



Irish Sport HQ
National Sports Campus
Blanchardstown
Dublin 15, Ireland

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

Ms. Jane Curley
Strategic Planning Division
Department for Infrastructure
Clarence Court,
10-18 Adelaide Street
Belfast,
BT2 8GB
Northern Ireland

22nd August 2017

Re: Your reference LA10/2015/0292/F - Doraville Windfarm, Sperrin Mountains

Dear Ms Curley

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

1. Introduction and context

As the representative body for walkers 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. Mountaineering Ireland therefore represents a community of interest in this application drawn from the Sperrins and also a much wider geographic area.

Mountaineering Ireland accepts that change is part of an evolving, living landscape, but such change needs to be planned and done in a well-considered and long-term way. 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 the Sperrins, Northern Ireland's largest mountain range. It is imperative that in the management of landscape, balance is achieved between individual interest and the common and long-term good. These key considerations informed 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. However, at a time of much change in factors affecting the energy sector, Mountaineering Ireland is concerned that there appears to be a singular drive to construct more onshore windfarms in Northern Ireland. Mountaineering Ireland believes that a national focus on reducing energy consumption, coupled with a diversity of renewable sources, particularly solar electricity, tidal energy, off-shore windfarms and supported, community-scale schemes that deliver power directly,

Directors: P. Barron; F. Hackett; N. Hore; P. Kellagher; U. MacPherson; M. Maunsell; R. Millar,
P. O'Sullivan, I. Sorohan, D. Stelfox; Seamus Walsh; Simon Walsh.

Mountaineering Ireland is a company limited by guarantee. Registered in Dublin, Ireland, number 199053.

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

provide a more effective approach to meeting future energy needs. Grid developments, improved electricity storage, electric vehicles and other technological developments will all allow greater benefit to be harvested from Ireland's existing windfarm infrastructure.

In this regard Mountaineering Ireland welcomes the Department for Infrastructure's current review of planning policy for renewable energy. In addition to considering planning policy, there is need for informed and objective debate about how Northern Ireland can best manage its natural resources – including undeveloped and semi-natural landscapes, soils, biodiversity and fresh water – all of which are being depleted at worrying rates.

The proposal in question is for a 33-turbine windfarm, to the south of the Glenelly Valley in the Sperrin Mountains, at the head of two river valleys, Coneyglen Burn and Glenlark River. The development site is centrally located within the Sperrin Area of Outstanding Natural Beauty (AONB). If approved and constructed this would become the largest windfarm in Northern Ireland.

2. Observations on the proposed windfarm

2.1 Landscape and visual impact

Relevant planning policy is set out in Planning Policy Statement 18 on Renewable Energy (PPS18; DoE 2009a), which is complemented by Best Practice Guidance (DoE, 2009b) and Supplementary Planning Guidance to accompany PPS18 (SPG 18; NIEA, 2010). Policy RE 1 of PPS18 provides for renewable energy developments that will not result in an unacceptable adverse impact on visual amenity and landscape character. To ensure consistency in development following the local government reforms of 2014, the Department of the Environment published a Strategic Planning Policy Statement on Planning for Sustainable Development (SPPS; DoE, 2015). A review of planning policies on renewable energy and countryside development is currently underway and expected to be completed in 2018.

The proposed windfarm site is within the South Sperrin Landscape Character Area (LCA 24), a landscape deemed to be *'extremely sensitive to changes which would affect its unspoilt character'*. The LCA also notes: *'This landscape would be sensitive to the expansion of commercial forestry and to any large scale development, particularly relating to mineral extraction, which would be prominent in views from the surrounding ridges.'*

The draft Supplementary Planning Guidance to accompany PPS 18 (EHS, 2008) contained description relating to the capacity for each LCA to accommodate wind energy development. Mountaineering Ireland understands the capacity assessments may have been removed from the final SPG 18 due to pressure from the wind industry. Mountaineering Ireland draws attention to the draft capacity statement for LCA 24 (below) and makes the case that this should be accorded significance in the consideration of this application:

'Capacity Assessment - Turbine groupings and height

This LCA is unlikely to be able to accommodate commercial wind energy development. Any wind energy development should generally be limited to single domestic/community size turbines. Even such small scale

development would be inappropriate in the open, exposed and largely uninhabited landscapes of the upper slopes.’ (EHS, 2008)

Under the more recent Regional Landscape Character Assessment (RLCA) the proposed development site falls within RCLA 7 – Sperrins. The RLCA states that: *‘The potentially significant impacts of large scale wind energy development in the uplands, on the scale, openness and tranquillity of the area, must be a prime consideration’.*

Mountaineering Ireland notes the developer’s argument that the *‘wildness’, ‘tranquillity’* and *‘remoteness’* of the landscape may be overstated for some areas of the RLCA due to the presence of new wind farm development. It is Mountaineering Ireland’s strong assertion that the extensive windfarm development on the periphery of the Sperrins makes it all the important to protect the qualities of wildness, remoteness and tranquillity in those areas in which they remain.

Mountaineering Ireland is concerned that the inclusion of just one viewpoint along the main ridge of the Sperrins, the high mountain ridge running west to east from Mullaghcarbathagh (517m) to Spelhoagh (568m), masks the impact that this proposed windfarm would have on the mountain landscape that is the centrepiece of the Sperrins. This ridge, which extends for a distance of more than 30km, along with its slopes, valleys and subsidiary peaks, make up what is inarguably the most extensive area of wild, remote and tranquil mountain land in Northern Ireland.

The assessment of visual impact from Mullaghclogha summit (Viewpoint 19) and the other relatively high viewpoints such as the Sperrin Road near County Rock (Viewpoint 10); Crockbrack (Viewpoint 11); Crocknamoghil (viewpoint 12); Park Road (Viewpoint 14) and the Crockandun Hills (Viewpoint 20) indicate the extent to which the proposed windfarm would be a significant feature in views throughout the central Sperrins and therefore would diminish the special qualities of this designated landscape.

Mountaineering Ireland is similarly concerned that no viewpoint has been included along the ridge to the southern side of the Glenelly Valley (between Mullaghbolig, 442m and Corratary Hill, 383m). As it is closer to the site of the proposed windfarm the impact along this ridgeline would undoubtedly be overwhelming.

The developer claims (7.2.14, paragraph 42) that the development will affect a very limited and localised part of the Sperrin RLCA. This is disingenuous; the ZTV maps in Figure 7.2.6 show that the core of the Sperrin AONB would be significantly affected were this windfarm to proceed.

Mountaineering Ireland strongly refutes the developer’s claim that the RLCA *‘overstates the wildness, tranquillity and remoteness of the landscape character on and around the site area’.* In the context of Ireland’s landscape, the site proposed for this windfarm is undoubtedly wild – as desolate as the Bluestacks or the Nephins (see Figures 1 and 2 below), with generally wide visibility, over long distances, to and from all the surrounding uplands. A recent site visit showed that on a north to south axis from the proposed windfarm there are no man-made structures for 7.5km, and on the east to west axis, with the exception of the minor road (Coneyglen through to Glenelly - one dwelling house), there are no other man-made structures for 16km. The glen between Carnanelly and Mullaghturk is very remote and likewise the Glenlark valley to the west of the minor road. Standing in these glens, it is likely one would see only the natural landscape.

In support of this argument, attention is also drawn to the Planning Appeals Commission decision against the nearby Mullaghturk windfarm application (reference: 2007/A1313) in which the Commissioner stated: *‘I*

observed that the landscape is very largely unspoiled, uncommonly free from built or other development, and exhibits a wild, remote and tranquil character.'

Mountaineering Ireland has called for the mapping of Ireland's undeveloped landscapes as a spatial planning tool and the development of guidance for assessing impacts on these areas as part of the planning process (MI, 2017). The work of the Scottish government in mapping and describing their wild land areas provides a relevant model. Scotland's third National Planning Framework recognises wild land as a '*nationally important asset*' requiring strong protection and Scottish planning policy ensures that developments which have the potential to impact on wild lands are subject to extra scrutiny (SNH, 2017a).

Despite the possible shortcomings in the selection of viewpoints mentioned above, the fact that the development was assessed to have a significant visual impact on 22 of the 25 viewpoints shows how prominent this proposal would be in this sensitive upland landscape. Mountaineering Ireland contends that the proposed development would be unacceptably damaging to the visual amenity and landscape character of this area and thus in conflict with Policy RE 1 of PPS18.



Fig. 1 View south west from Carnanelly top showing windfarm location



Fig. 2 View south from Carnanelly Slievevaddy ridge

2.2 Impact on Area of Outstanding Natural Beauty (AONB)

Mountaineering Ireland finds it unusual that there is not a single reference to the Sperrin Area of Outstanding Natural Beauty (AONB) in the non-technical summary submitted with this application (published 26/5/2017). It cannot be ignored that the site proposed for what would be the largest onshore windfarm in Northern Ireland is at the heart of the Sperrin AONB. According to the UK's National Association for Areas of Outstanding Natural Beauty, an AONB is *'an outstanding landscape whose distinctive character and natural beauty are so precious that it is in the nation's interest to safeguard them.'*

The Sperrin AONB is already considerably disadvantaged when compared with other AONBs. The Sperrins Outdoor Recreation Action Plan (ORNI, 2013) identified the most significant issue constraining future recreational development in the Sperrins as the absence of one co-ordinating management body with responsibility for the development, management and promotion of the Sperrins region. The report also noted the lack of a dedicated AONB Officer and an AONB Management Plan as constraints. Given these weaknesses, it is incumbent on the Strategic Planning Division to ensure protection of this important scenic landscape for the future.

Mountaineering Ireland recognises that there is not an embargo on windfarm development in AONBs, however, the Strategic Planning Policy Statement on Renewable Energy states that: *'Development proposals within AONBs must be sensitive to the distinctive special character of the area and the quality of their landscape, heritage and wildlife'* (DoE, 2015, paragraph 6.187).

The SPPS goes on to say that: *'A cautious approach for renewable energy development proposals will apply within designated landscapes which are of significant value, such as Areas of Outstanding Natural Beauty, and the Giant's Causeway and Causeway Coast World Heritage Site, and their wider settings. In such sensitive landscapes it may be difficult to accommodate renewable energy proposals, including wind turbines, without detriment to the region's cultural and natural heritage assets'* (paragraph 6.223). Both these statements originate from the Best Practice Guidance to accompany PPS18, published in 2009 (DoE, 2009b).

Table 17 of the Landscape and Visual Impact Assessment submitted by the developers in December 2015 shows that the proposed windfarm would have a *'significant effect'* on landscape character in many parts of the AONB. Design changes in the interim include a reduction in the number of turbines from 36 to 33 and the re-location of seven turbines, however all turbines in the proposal are now approximately 10 metres higher than previously. The addendum to the Environmental Statement completed in April 2017 notes (in Table 9.1) there is no material change to the findings of the 2015 landscape and visual assessment and that the significance of effects remain unchanged.

Mountaineering Ireland draws attention to the fact the scale of renewable energy development which is the subject of this application, comprising 33 wind turbines of up to 149 metres in height, would not have been envisaged when that *'cautious approach'* was first advocated over eight years ago.

Power generation on the scale proposed at Doraville is clearly an industrial use of land. Wind turbines are the largest manmade structures being imposed on Ireland's upland landscape, each one with a substantial concrete foundation and a service road of a scale unprecedented in such settings. 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 or brownfield sites on the outskirts of cities and towns, with easier grid access and closer to demand centres?

It is the position of Mountaineering Ireland, that given its scale, and its central location within the AONB, that this industrial development would be severely injurious to the integrity of the Sperrin AONB, and therefore not compatible with the SPPS on Renewable Energy.

2.3 Cumulative impact

Northern Ireland's over-reliance on onshore wind for electricity generation has been briefly referred to in Section 1. In the context of this application it must also be considered that almost half of Northern Ireland's wind turbines are located in west Tyrone, some of these within the Sperrin AONB. The landscape of south Derry/Londonderry has also taken more than its share of this type of development. In an Environment Committee debate in March 2015 on the report of the Wind Energy Inquiry, the then Chair of the Committee Anna Lo MLA stated that some areas, notably west Tyrone, had already reached saturation point in the number of wind developments, either operational or planned, for the region (NI Assembly, March 2015).

Table 7.2.8 in the addendum to the Environmental Statement (April 2017) shows the revised assessment of cumulative landscape and visual effects on the 25 selected viewpoints. The intention was to establish whether or not the addition of the proposed development, in combination with other relevant existing and proposed windfarms, would lead to a landscape character or view that is characterised primarily by windfarms. It is striking that the assessment shows for all the hill or mountain viewpoints (Crocknamoghil - Viewpoint 12; Mullaghclogha - Viewpoint 19; Crockandun Hills - Viewpoint 20; and Slieve Gallion - Viewpoint 25) that the assessment remains the same – *'significant in any scenario'*.

Taking the Mullaghclogha viewpoint as an example (frequently visited by hillwalkers), examination of the photomontages and wireline drawings (7.2.83a-f) shows what Mountaineering Ireland considers to be an unacceptable degree of cumulative impact, notably in the 30° and 300° views, but particularly the 120° view which would be dominated by the proposed Doraville windfarm. Due to the central location of this site within the AONB, its visibility from so many locations and the extent of the proposed development, were the Doraville windfarm to be permitted the central part of the Sperrin AONB would undoubtedly become a landscape characterised primarily by windfarms. It is Mountaineering Ireland's assertion that this would be clearly contrary to the proper planning and sustainable development of a designated landscape.

2.4 Damage to recreational experiences and tourism

Mountaineering Ireland welcomes the acknowledgment within the Landscape and Visual Impact Assessment (Appendix 6.3) that walkers and others engaged in outdoor recreation have a high sensitivity to changes in the landscape because their purpose is often to enjoy their surroundings. This is in keeping with guidance from the Landscape Institute and Scottish Natural Heritage (SNH, 2017b).

It also corroborates with Mountaineering Ireland's own findings. Consultation with members in 2016 identified *'peace and quiet'*, *'natural beauty'*, *'wildness'* and *'escape'* as the main attributes which make mountain experiences special (Mountaineering Ireland, 2017). The quality of the environment and the

quality of the recreational user's experience are inextricably linked, with undeveloped natural landscapes providing the highest quality experiences. The relative lack of built artefacts in the wild landscape is a crucial part of the mountain experience.

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 by renewable energy developments, afforestation, extractive industry, the erection of new fences and communications masts, the construction of new roads and tracks, and other built development including inappropriately sited housing. Wildness, remoteness, tranquillity and scenic quality are landscape values strongly associated with the Sperrins; it is vital that these qualities are protected for the enjoyment of future generations.

Long before his untimely death in 1976, Joey Glover, the founder of the North West Mountaineering Club, named a 30km+ route along the main ridge of the Sperrins as the Sperrin Skyway. The route incorporates 11 summits over 500m. In his guide to Ireland's mountains, *From High Places*, author Adrian Hendroff described the view along that ridge as *'fold after fold of unassuming hills stretched out before me, rolling gently like brown waves above a carpet of green'* (Hendroff, 2010).

The Visual Impact Assessment assesses the impact of the proposed developed through a series of static views from selected viewpoints. Its results very clearly indicate significant impact, and as noted in Section 2.1 significant impact would be experienced along most of the main Sperrin ridge and other high ground across the AONB, including stretches of the Ulster Way. The effect of windfarms on people's experience of upland landscapes is exacerbated by the movement of turbine blades, which bring large scale mechanised movement to a naturally still environment. As walkers move through the landscape different views are experienced in succession, consequently the cumulative impact of windfarm development detracts markedly from the quality of the experience enjoyed. It is not just the turbines that present an issue, many Mountaineering Ireland members have also commented on how windfarm access roadways detract from the quality of the landscape, due to their large scale and visibility.

As the representative body for Ireland's largest recreation user group, walkers, Mountaineering Ireland can say with certainty that the industrialisation of the Sperrin landscape through the imposition of a highly visible windfarm will detract from the quality of the recreation experience currently enjoyed by walkers in the Sperrins. 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).

It isn't just walkers and local residents who would be affected; cyclists and runners enjoy the hills and the quiet country roads through the Sperrins. The very minor road from Coneyglen Bridge past Doraville Lodge to the Glenelly Valley at Sperrin Lodge is a delight, with a real sense of remoteness; as the road goes through the centre of the proposed windfarm experiences there could change immeasurably.

The Doraville wind turbines would be visible from many of the roads through the Sperrins. The scenic driving routes through the Sperrin Mountains have been named in National Geographic's prestigious list of Top 101 Drives in the World, alongside such places as the Ring of Kerry, with the wild, unspoilt beauty, ideal trails and dreamy villages of the Sperrins ensuring that any visitor or recreational user can be submerged in its natural and undeveloped landscape (BBC, 2012).

Looking beyond current experiences, this development would also undermine the attraction of the area for future visitors seeking those qualities of wildness, remoteness and tranquillity.

In addition to the MCoS research referenced above, further evidence emerged from Scotland during July 2017. A survey conducted by YouGov on behalf of the John Muir Trust found that an overwhelming 80% of Scottish people believe that Scotland's iconic '*Wild Land Areas*' should continue to be protected in the future from large-scale infrastructure, whilst the majority (55%) are '*less likely*' to visit scenic areas if they contain developments such as commercial windfarms, electricity transmission lines and super-quarries.

The beautiful scenery and the relatively unspoilt environment found in Ireland's mountain areas are irreplaceable. These areas are significant natural assets which should be wisely managed for societal benefit through appropriate planning. In addition to its adverse impact on the experience of recreational users and local residents, Mountaineering Ireland believes that the proposed development would be in contravention of Planning Policy Statement 16: Tourism, specifically TSM8, the objective of which is to safeguard tourism assets.

2.3 Archaeology

The LVIA (Appendix 6.3; 1.8.3.9) shows that the proposed development would have a significant impact on views from the Beaghmore Stone Circles. This site has been dated to the Bronze Age but also contains some earlier features, thought to be from the Neolithic period. As one of only two major clusters of stone circles on the island of Ireland, the Beaghmore complex is widely recognised as being an important national monument, and may have been the focal point of a sacred landscape in the Neolithic period. The proposed windfarm would adversely impact on the enjoyment and appreciation of this important site, which is an important tourism asset in the Sperrin area.

2.4 Ecology

Based on Northern Ireland Environment Agency's mapping and datasets, the windfarm site is characterised by extensive peatland, a priority habitat. A 2013 survey found breeding waders in four kilometre squares at the centre of the proposed windfarm, and breeding raptors have been recorded in more than a dozen squares in the immediate vicinity of the site (DAERA, 2017). The site includes active peatland and the flora is typical of upland heath with a good range of typical heath/peatland species. The entire site has very suitable habitat for hen harriers, merlin, buzzards and any vagrant goshawks.

2.5 Grid connection

It appears that the developers have not included an application for the proposed grid connection route. Mountaineering Ireland draws attention to the Republic of Ireland High Court judgment in the case of *O Grianna v An Bord Pleanála* (December 2014). The Court quashed planning permission for a windfarm as planning permission for the grid connection was not in place, on the basis that 'project splitting' was in breach of the EIA Directive (Arthur Cox, 2015).

3. Conclusions

As an AONB, the Sperrin landscape is deemed to be so precious that it is the nation's interest to safeguard it. The outstanding qualities of wildness, tranquillity and remoteness associated with the Sperrin Mountains are attributes that are increasingly sought after.

It has been shown in this submission that the proposed Doraville windfarm would adversely impact on both the visual amenity and landscape character of the Sperrin area, and thereby impact negatively on the experience of recreational users. It would also affect the residential amenity enjoyed by local communities. It is simply impossible to hide a windfarm of this scale in a relatively undeveloped landscape.

It is Mountaineering Ireland's assertion that approval of this proposal would unacceptably undermine the integrity of the AONB designation in the Sperrins, with long-term consequences for this important scenic landscape. With any such application in an AONB a cautious approach is required; this is very pertinent given the scale of this proposal and its central location within the AONB. The need for a cautious approach is all the greater in the absence of any mechanism to measure the capacity of the Sperrin landscape to absorb a large windfarm, and because a review of planning policy for renewable energy developments in Northern Ireland is currently underway.

Approval of this application would also undermine the significant public and community investment already made in tourism development in the Sperrins, 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

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 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 12,000 members, comprising 185 clubs and approximately 1400 individual members (July 2017).

4. References

Arthur Cox (2015) *Legal Update: Environmental and Planning Challenges for the Wind Energy Sector*, available online: <http://www.arthurcox.com/wp-content/uploads/2015/03/Legal-Update-Environmental-and-Planning-Challenges-for-the-Wind-Energy-Sector.pdf>.

BBC (2012) *Sperrin Mountains in National Geographic's top 101 list*, see: <http://www.bbc.com/news/uk-northern-ireland-19205729>

DoE (2009a) *Planning Policy Statement 18: Renewable Energy*, published by Department of the Environment: https://www.planningni.gov.uk/index/policy/planning_statements/planning_policy_statement_18_renewable_energy.pdf.

DoE (2009b) *Best Practice Guidance to Planning Policy Statement 18 'Renewable Energy'*, published by Department of the Environment, available online: https://www.planningni.gov.uk/index/policy/planning_statements/planning_policy_statement_18_renewable_energy_best_practice_guidance.pdf

DoE (2013) *Planning Policy Statement 16 'Tourism'* published by Department of the Environment, online at: https://www.planningni.gov.uk/index/policy/planning_statements/pps_16_tourism.htm

DoE (2015) *Strategic Planning Policy Statement for Northern Ireland (SPPS) Planning for Sustainable Development*, published by Department of the Environment, available online: <https://www.planningni.gov.uk/spps>

EHS (2008) *Wind Energy Development in Northern Ireland's Landscapes Draft Supplementary Planning Guidance to accompany Planning Policy Statement 18 'Renewable Energy'*, published by the Environment & Heritage Service: www.planningni.gov.uk/index/news/dfi_planning_news/news_policy/pps18-supplementary-guidance16032009.pdf

Hendroff, A. (2010) *From High Places – A Journey through Ireland's Great Mountains*, published by The History Press Ireland

JMT (July, 2017) *Poll reveals the call of wild places to visitors*, published by the John Muir Trust, available online: <https://www.johnmuirtrust.org/latest/news/1205-poll-reveals-the-call-of-wild-places-to-visitors>

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.

Mountaineering Ireland (2017) *Mountaineering Ireland's Vision for the Future of Ireland's Mountains and Upland Areas*, available online: <http://www.mountaineering.ie/aboutus/news/2017/?id=102>

NI Assembly (March 2015), Environment Committee debate on the report of the Wind Energy Inquiry, contribution from Anna Lo MLA, available online: <http://www.theyworkforyou.com/ni/?id=2015-03-03.2.1>

NIEA (2010) *Wind Energy Development in Northern Ireland's Landscapes - Supplementary Planning Guidance to Accompany Planning Policy Statement 18 'Renewable Energy'*, published by Northern Ireland Environment Agency, available online:



https://www.planningni.gov.uk/index/policy/planning_statements_and_supplementary_planning_guidance/spg_other/supplementary_guidance_wind_energy_development_in_ni_landscapes-2.htm

DAERA (2017) *Natural Environment Map Viewer*, accessed 22nd August 2017 at: www.daera-ni.gov.uk/services/natural-environment-map-viewer

ORNI (2013) *An Outdoor Recreation Action Plan for The Sperrins – Executive Summary*, published by Outdoor Recreation NI, available online: <http://www.outdoorrecreationni.com/publications/outdoor-recreation-ni/>

SNH (2017a) Wild Land section of Scottish Natural Heritage website, see <http://www.snh.gov.uk/protecting-scotlands-nature/looking-after-landscapes/landscape-policy-and-guidance/wild-land/>

SNH (2017b) *Siting and Designing Wind Farms in the Landscape*, published by Scottish Natural Heritage, available online: <http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/landscape-impacts-guidance/>