

Fergal Kilmurray
Executive Officer
An Bord Pleanála
64 Marlborough Street
Dublin 1

12th July 2012

Re: PL 15.240502 – Gaelectric Developments Ltd., Rockmarshall, Jenkinstown, Dundalk, Co. Louth

Dear Fergal

Thank you for affording Mountaineering Ireland the opportunity to comment on the June 2012 submission by Gaelectric in response to the observations from Downey Hynes Partnership on behalf of the Protect Rockmarshall Mountain Group.

We have read Gaelectric's submission and believe that it doesn't include any substantial new information, nor does it adequately refute some of the objections, particularly regarding adverse visual impact and loss of recreational amenity.

As we continue to have significant concerns regarding this proposal, we have attached our submission from 16th May 2012 and respectfully request that the Board upholds Louth County Council's decision to refuse planning permission for this development.

Yours sincerely



Karl Boyle

Chief Executive Officer

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

16th May 2012

Re: PL 15.240502 – Gaelectric Developments Ltd., Rockmarshall, Jenkinstown, Dundalk, Co. Louth

Dear Sir / Madam

Mountaineering Ireland* welcomed Louth County Council's decision regarding P.A. Ref. 11/228 as it vindicated the points made in our submission of 3rd June 2011. Having read the first party appeal in this case, we are re-submitting our initial comments for the Board's consideration along with these further points:

- A. **Impact on road network** - The widening and straightening of roads, notwithstanding the permission of landowners, is a major issue in this application as it affects the visual amenity of the Rockmarshall area and is highly detrimental to the character of the road network. We do not believe the proposed ameliorations will in the short, or medium, term provide satisfactory restoration of the scenic value of the area. Biodiversity will also be affected.
- B. **Wide surfaced tracks** - We note the appellant's intention, in Item 13 of the Planners Report on Further Information, to leave a 5m wide surfaced track to each turbine. This is contrary to the proper planning and sustainable development of the area by reason of visual disamenity. Furthermore, the argument that leaving these tracks in place would be 'best practice' to avoid closing the Annaloughan Loop Walk is highly questionable. The amenity value of the Annaloughan Loop will be lost forever if this development proceeds. The lack of any formal designation for this trail is shared with very many locally significant walks; this does not diminish its value to the community and it should be protected.
- C. **Landscape change** – Mountaineering Ireland (MI) strongly disagrees with the appellant's argument in section 5.1. MI recognises and accepts that landscape is the product of human interaction, but to suggest that the imposition of five large wind turbines represents continued change of a cultural landscape is absurd. The sudden intrusion of this industrial use on the side of a mountain in a highly scenic area is an unacceptable rate of landscape

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change. The future sustainable development of the Rockmarshall 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.

Mountaineering Ireland's comments (3rd June 2011) on Planning Application Number 11/228 to Louth County Council:

Mountaineering Ireland submits these comments from the context of supporting the principle of sustainable, renewable energy developments within Ireland. We believe that a national policy of energy conservation, coupled with a diversity of renewable sources, particularly offshore stations and supported, community scale schemes that deliver power directly (e.g. Dundalk IT) is a more effective approach to meeting future energy needs.

1. **Landscape impact** – The proposed development would detract from the exceptional character of the Cooley Peninsula landscape and the quality of the natural environment on Rockmarshall Mountain. The site is within the only area identified as a landscape of 'international importance' in the 2002 Louth Landscape Character Assessment (Carlingford Lough and Mountains including West Feede Uplands). This conflicts with Policy CON 5 in the Louth County Development Plan 2009-2015, which commits to promote the protection of the landscape through the implementation of the Louth Landscape Character Assessment.
2. **Not a preferred area** – The location of this proposal is not within the 'preferred area' for wind energy development in Co. Louth, and MI argues that the proposal contravenes Policy EN 13 in the Louth County Development Plan 2009-2015 'to facilitate the development of wind energy sources where proposals are consistent with the landscape preservation objectives of the Plan, the protection of the natural and built environment and the visual and residential amenities of the area'.
3. **Visual impact** - The wind turbines would be very prominent in the landscape when viewed from the coastal area to the south and from around Dundalk, and from the M1. The scale of the proposed turbines in the compact landscape of the Cooley Peninsula would be incongruous. Section 6.5 of Louth County Development Plan 2009-2015 identifies a number of specific views and prospects that are reflective of Louth's unique scenic quality; many of these would be adversely affected by the proposed development, e.g. VPs 7, 9, 10, 11 which are close to the site, and VPs 17, 18, 19 and 20 which are views of the Cooley Mountains across Dundalk Bay.
4. **Impact on recreation** – The location of the proposed wind-farm is along the route of the Annaloughan National Loop Walk; this is a valuable amenity for local residents and visitors to the area. Aside from the fact that this route would be closed for over a year during construction, the quality of the route would be permanently impaired if the proposed development took place. The site is only 1.8km from the Táin Way, the principal long distance walking route in Co. Louth (famous for its sea views and its associations with the Táin Bó Cúailnge) and 5km from Slieve Foye, the main summit of the Cooley Mountains.

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Although the Cooley Mountains are relatively small when compared with some of the mountain ranges on Ireland's west coast, this area is heavily used by walkers and other recreational users. It is the largest area of relatively wild land available to residents in the densely populated north east and as such must be protected.

5. **Impact on heritage** - The Cooley Mountains, particularly the area of the proposed development, constitute Ireland's most significant 'epic' landscape. The locations described in *Táin Bó Cuailnge*, a masterpiece of epic literature, are clearly identifiable in the immediate area today, revealing an unbroken connection with the landscape of the Iron Age and the early Christian era. Rich in archaeology, mythic reference and folklore, the area is a repository of the past and its heritage, and should not, therefore, be subject to modern industrial development on the scale proposed.
6. **Impact on wildlife** – The proposed development is located very close to Dundalk Bay, one of the most important wintering waterfowl sites in the country, which is designated under the EU Habitats Directive as both an SPA and an SAC. As this site regularly supports more than 20,000 waterfowl, the potential for birds colliding with the turbines must be significant.
7. **Impact on local roads** - The development would have a major impact on the quiet, rural roads approaching the site, which might need to be widened or straightened to facilitate access by large and heavy vehicles. As these roads are designated as 'scenic routes' in section 6.5 of Louth County Development Plan 2009-2015, this development would contravene Policy RA10 which prohibits development that would interfere with or adversely affect scenic routes.
8. **Little benefit to the local area** – The local economic benefits of this proposal and any related development are likely to be extremely limited, and the local employment prospects short-lived. The Cooley Peninsula derives significant income from tourism, particularly tourism associated with recreation and the natural environment. Industrial development in this area could have a disproportionately negative effect on that income. Conversely, hillwalking and sustainable tourism have greater employment potential than jobs in the wind energy sector. Offshore development for wind does not present this economic loss.
9. **Inappropriate development** – As approval of this application would introduce large-scale industrial use into a rural landscape, it is MI's assertion that this proposal represents inappropriate development in an area which the Council itself has designated as an area of 'outstanding natural beauty'. Power lines to service the site result in visual intrusion. The construction, operation and decommissioning of the windfarm could cause pollution and disturbance to the local community, wildlife, the physical landscape, hydrology and an irreversible change to the local landscape. The turbines would also bring large scale mechanised movement to a naturally still environment. Development in this area would mean further diminution of Ireland's scarce national stock of relatively wild and undeveloped natural landscapes. MI does not oppose all renewable energy development in upland areas, rather we argue that development should be located where it does not destroy the essential character of the undeveloped landscape and coast.

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We have enclosed a cheque for the necessary €50 fee and we trust the Board will take our views into consideration when deciding on this appeal.

Yours sincerely

Karl Boyle
Chief Officer

* **Mountaineering Ireland** is the representative body for hillwalkers and climbers on the island of Ireland. MI 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 summer and winter hillwalking, rock and ice-climbing, rambling, bouldering and alpinism. Mountaineering Ireland (December 2011) has 10,500 members comprising 153 clubs and over 1300 individual members.

The work of Mountaineering Ireland includes: promoting mountaineering activities in Ireland; providing a range of services to members; promoting safety and training to hillwalkers and climbers and encouraging responsible use of the mountain environment.

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