



FRIENDS OF KNOCK IVEAGH

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24th February 2021

Dear Committee,

**Re. The Public Accounts Committee Investigation into Renewables Incentives**

We are a community group which has been campaigning against unlawful development at the important heritage site at Knock Iveagh, County Down since September 2017.

Knock Iveagh is the site of a regionally important Neolithic burial cairn built on top of a distinctive and unusual layer of bone, ash and ritual deposits dating back to 3,600BC. It is thought to have been the inauguration complex for early Irish Kings belonging to the Ulaid tribe, the Ui Echach Coba. It was later re-purposed as part of the inauguration complex for the Magennis Chieftains of Iveagh. After the fall of the Magennis it continued to be a place regularly visited by interested people, walkers and members of the community. In all, Knock Iveagh summit has been valued as a sacred place within the landscape here for at least 6,000 years.

Due to a series of systemic failures involving the (old) Department for the Environment (DOE), the Department for Communities (DFC), the Department for Infrastructure (DFI) and Armagh City, Banbridge and Craigavon Borough Council (ABC Council) **an incorrectly streamlined application for a wind turbine was granted planning permission in 2013 with the turbine subsequently built, in 2017, adjacent to the summit of Knock Iveagh. This took place without the necessary Environmental Impact Assessment being undertaken, the nearest neighbours were not consulted, and (also unlawfully) government archaeologists were not consulted about the development despite its proximity to a protected (Scheduled) ancient monument. Furthermore, the decision was contrary to published Planning Policies including PPS 6 Archaeology and Built Heritage and PPS18 Renewable Energy.**

It is on record, that in 2015, before the turbine was erected, at a Planning Appeal Commission hearing relating to a second turbine proposed for the hill, ABC Council 'distanced themselves' from the decision to grant the first turbine planning permission. This removes any doubt that they were aware of the damage the approved wind turbine would do to Knock Iveagh; however they did not take any steps to prevent that development going ahead.

In 2017, when the flaws in the process came to light and it became apparent that additional, unlawful development associated with the turbine (but not shown on any planning application) would also be taking place, this campaign group wrote to both ABC Council and the Department for Infrastructure to make them aware of the demonstrable and catastrophic errors which had led to the granting of the planning permission, and to ask them to prevent the development from completing before further damage was done to Knock Iveagh.

We were not alone in doing so. **The Historic Monuments Councils - as advisor to the Department of Communities (under the Historic Monuments and Archaeological Objects Order 1995) - also wrote to both ABC Council and the DFI, advising them of the importance of the site and asking them to revoke the planning permission.**

Nonetheless, for reasons for which we can only speculate, the development was allowed to proceed. **In addition to the wind turbine, developers also erected unlawful electrical buildings, an access road, and dug approximately 2km of earthing trenching, none of which had been in the original application. At no point was there any archaeological consultation, investigation, or mitigation for any part of the development. The Historic Monuments Council have indicated that “the turbine has created a serious visual impact upon the integrity of the monument’s setting and the landscape”.** An important heritage site, one of the earliest on record in the British Isles and a precursor to many other famous megalithic ritual centres, was, quite simply, and colloquially, trashed. The cairn which had been deliberately placed at Knock Iveagh’s summit in order to dominate an important ritual landscape, is itself now dominated by an imposing wind turbine ≈41.5m high. The turbine erected is a reconditioned (second-hand) model and it is therefore highly questionable whether even this part of the development is even in line with the original planning permission. Neighbours, who were also not consulted, have been living with excess noise, concerns about health, and the loss of the amenity of their homes & gardens.

As if that wasn’t enough, with the development complete, the company responsible was able to go ahead and apply for ROCS - which of course they did. **The unlawful development at Knock Iveagh has been in receipt of ROCS since 26th February 2018, and at the time of writing it has received approximately 5,985 ROCS certificates, worth (at the most conservative of estimates) at least £299,250.** It is highly likely, in our view, to have received a great deal more than this<sup>1</sup>.

In December 2020, ABC Council agreed that the development was causing ‘an adverse environmental impact on the integrity of the setting of the scheduled monument and the visual amenity and landscape character of the site’. They subsequently wrote to the Department for Infrastructure asking them to take action. DFI declined to take any action and **the Minister has repeatedly refused to meet with this group despite her meeting with representatives of the industry.**

The planning failures listed above, and the damage to our shared heritage is important not only in and of itself, but also because:

- i) we, the public, have witnessed unlawful destruction and damage being done to a much-loved heritage site while the authorities (whom we fund through our taxes) to protect these places have appeared to turn a blind eye.
- ii) the development is in receipt of ROCS (which we fund via surcharges on our electricity bills) despite the original planning permission being flawed and most of the development having no planning permission at all, and
- iii) we are being told that ratepayers from ABC Council could be asked to pay a huge amount of compensation to the developer in the event that planning permission is discontinued. Why, in addition to the above, should we, the public, pay AGAIN for failures which we didn’t make, which have profited an off-shore company and damaged our shared heritage?

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<sup>1</sup> the value of certificates varies and this number may well be considerably higher

The whole thing beggars belief, and it appears that it has all arisen due to a Stormont ROCS scheme which actively incentivised (and streamlined) wind development without ensuring the correct checks and balances were in place. Those checks and balances include (but are not limited to):

- i) a lawful planning and consultation process,
- ii) lawful Environmental Impact Assessments on single industrial turbines over 15m in height, as per Schedule 2, 3.(j) (ii), and
- iii) a requirement for lawful planning permission to be in place for the whole development before ROCS are paid.

**Because of systemic failures at Stormont we, the public, are now in a position where we are literally paying a developer to shamelessly and unlawfully damage a priceless historic environment; in the event that they are required to stop damaging it, we will be asked to pay for that too! To date there has been a complete lack of accountability shown by the Stormont Executive for any part of this fiasco. Does the Public Accounts Committee believe this is reasonable?**

Should members of the public such as ourselves have to spend countless hours - years in fact - attempting **to act in the public interest, to ensure due process and to protect a place which should already have been protected** by those being paid to do so? A conservative estimate for four people, working approximately 10 hours per week for 3.5 years at £30 per hour (minimum consultancy rate) works out at approximately £218,400, not counting equipment or consumables. This being the case, we would like to ask, to whom should we send our bill?

With Best Regards,

Anne Harper

Veronica Williams

Arlene Copeland

Emma Grossmith