

An Bord Pleanála,
64, Marlborough Street,
Dublin 1,
D01 V902

By email to: bord@pleanala.ie

2nd August 2023

Re: Bord Pleanála Case Reference: PA93.317265

Dear Secretary,

I refer to the SID planning application reference number PA93.317265 which has been lodged with An Bord Pleanála for the proposed construction of Dyrick Hill Windfarm comprising 12 no. wind turbines and related works in County Waterford.

1.0 Introduction

As a prescribed body in the planning process, one of the main objectives of Fáilte Ireland is to advocate for the protection of key tourism assets and amenities. The Irish landscape is one of the primary assets for tourism in the country and has been the cornerstone of international tourism marketing campaigns for decades. International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore, as the Irish landscape is one of the primary reasons for visiting the country, it is essential that the quality, character and distinctiveness of this valuable resource is protected.

Equally Fáilte Ireland recognises the importance of developing the State's renewable energy sector. In this regard Fáilte Ireland has been supportive of and contributes to the preparation and adoption of the Wind & Renewable Energy Strategies for counties across the Country. These Strategies have provided invaluable guidance to Applicants, Shareholders and Planning Authorities alike in identifying potential sites and in assessing the potential for development of appropriately located renewable energy infrastructure. Within the hierarchy of plans, these Strategies have ensured that the development of renewable energy infrastructure, such as wind farms, is plan-led and can be located to avoid, or minimise disproportionate negative impacts on other land uses, including tourism-related uses and the receiving environment.

2.0 Visitor Attitudes

While supporting the development of wind energy infrastructure, subject to proper planning and environmental requirements being met, the position of the Fáilte Ireland is also informed by research on visitor attitudes.

In 2007 Fáilte Ireland commissioned an independent study looking at visitor attitudes to wind farm developments in the Republic of Ireland¹. The study was updated in 2012. A further study was undertaken in 2018 on Visitor Awareness and Perceptions of the Irish Landscape. This provides up to-date information on which we can base an informed assessment of the likely impact of a wind energy development on the tourism potential of an area. The key findings of the 2012 & 2018 studies are summarised as follows:

- Over half saw at least one wind farm in 2012 compared with under half in 2007 and more groups of wind turbines were detected as opposed to just one, as in 2007. Awareness of the existence of wind farms was higher among domestic visitors. As in 2007, in 2012 most wind farms were seen at a distance from the car. However, 2012 saw an increase in the number of farm sightings.
- More visitors saw turbines at closer proximity than on the horizon in 2012, versus 2007. Mountain moorland areas were the most prevalent sites where wind farms were seen. Sightings at coastal areas have reduced significantly. Impacts on sight-seeing were less positive in 2012, with a sharp rise in both negative and 'no impact' views compared with 2007. Those on countryside breaks, not on activity breaks and over 65s were most negative about wind farms being present when sight-seeing.
- The majority of participants favour small groups of large turbines over large groups of small turbines. When given a choice of groups of 5 or 25 turbines or 2 clusters of 10, the site with 5 turbines scored most positively or neutrally in 2012.
- In 2012, seventy-one per cent stated that wind farms have either a positive or 'no impact' on their likelihood to visit Ireland, while just 24% are averse, leaving 5% saying 'it depends'.
- In general, participants were most strongly averse to the construction of wind farms at coastal areas, followed by fertile farmland, in 2012.
- In 2018, the results from a major study by Fáilte Ireland on tourism and landscape found that the majority of visitors appeared not to notice the majority of developments – even very large and visually prominent structures such as wind turbines and powerlines. It appears that there are significant divergences between what can be seen and what is noticed. The majority of visitors expressed very limited desire to change developments that they do notice. The majority of visible development does not appear to have any adverse effects on the impression of the quality of the landscape.

3.0 Submission on Assessment of Tourism in the EIAR submitted with the Application.

An EIAR has been submitted with the proposed development. Tourism and impact on tourism is addressed in Chapter 5 Population and Human Health of the EIAR.

¹

https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/3_Research_Insights/4_Visitor_Insights/Visitor-Attitudes-on-the-Environment.pdf?ext=.pdf

The baseline or receiving tourism environment is described in Section 5.4.5, with reference to the Waterford City and County Development Plan 2022-2028, to tourist attractions and to studies on public perception of wind farms.

In discussing the Waterford City and County Development Plan 2022-2028, the description notes one of the strategic objectives in Chapter 4: Economy, Tourism, Education and Retail, however, there is no or limited discussion of other key objectives, including Tourism Policy Objectives ECON 22 to ECON 30 under Section 4.10 Sustainable Tourism.

Despite the location of the proposed development on the boundary with County Tipperary, tourist-related policies and objectives as set out in Chapter 9 of the Tipperary County Development Plan 2022-2028 are not referenced or discussed.

Likewise, there is a lack of detail on the location, nature and sensitivity of the tourist attractions/amenities potentially impacted by the proposed development and no mapping is provided of the tourist attractions/amenities or tourism characteristics in the area.

It is also noted that other tourism-related publications, including ‘The Waterford City and County Council Tourism Statement of Strategy and Work Plan 2017 – 2022’² or the ‘Rural Waterford Visitor Experience Development Plan 2021-2023’³ are not referenced.

The assessment of the impact of the proposed development on Tourism is addressed at Section 5.5 of Chapter 5 of the EIAR. However, the assessment appears to rely solely on the landscape and visual assessment presented in Chapter 11 of the EIAR, with no detailed assessment of the likely impact, if any, on the tourist attractions, their tourist resources and their sensitivities.

Therefore, we would ask that An Bord Pleanála in their assessment consider:

- the description of the baseline tourism environment,
- the tourist-related policies and objectives of the Waterford City and County Development Plan 2022-2028,
- the tourist-related policies and objectives as set out in Chapter 9 of the Tipperary County Development Plan 2022-2028,
- the objectives of other local and regional tourist development publications, and

²https://www.waterfordcouncil.ie/media/plans_strategies/tourism/WATERFORD%20Tourism%20Statement%20of%20Strategy.pdf

³ <https://www.waterfordcouncil.ie/media/economic-development/Rural%20Waterford%20Visitor%20Experience%20Development%20Plan.pdf>

- the likely impact of the proposed development on local tourist attractions in County Waterford and County Tipperary.

Yours Sincerely,



John Fallon
Officer – Environmental Engineering, Fáilte Ireland