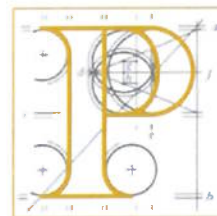


Our Case Number: ABP-318446-23



An
Bord
Pleanála

Failte Ireland
Environment & Planning Unit
88-95 Amien Street
Dublin 1
D01 WR86

Date: 31 January 2024

Re: Proposed construction of Coumnagappul Wind Farm consisting of 10 no. turbines and associated infrastructure.
In the townlands of Coumnagappul, Carrigbrack, Knockavanniamountain, Barricreemountain Upper and Glennaneanemountain, Skeehans, Lagg, Co. Waterford. (www.coumnagappulwindfarmSID.ie)

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.


The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email sids@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,


Niamh Hickey
Executive Officer
Direct Line: 01-8737145

PA09

Tell	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Niamh Hickey

From: Marine
Sent: Monday 29 January 2024 15:53
To: SIDS
Subject: FW: PA93.318446 Coumnagappul Wind Farm Submission-Fáilte Ireland
Attachments: PA93.318446_Submission_Fáilte Ireland.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

From: Bord <bord@pleanala.ie>
Sent: Monday, January 29, 2024 3:50 PM
To: Marine <marine@pleanala.ie>
Subject: FW: PA93.318446 Coumnagappul Wind Farm Submission-Fáilte Ireland

From: Yvonne Jackson <Yvonne.Jackson@failteireland.ie>
Sent: Monday, January 29, 2024 3:35 PM
To: Bord <bord@pleanala.ie>
Subject: PA93.318446 Coumnagappul Wind Farm Submission-Fáilte Ireland

Dear Secretary,

Fáilte Ireland would like to take the opportunity to make a submission to a planning application which is currently lodged with An Bord Pleanála Ref: PA93.318446- Permission is sought for a 10 year permission for the proposed construction of Coumnagappul Wind Farm consisting of 10 no. turbines and associated infrastructure (and all associated works) in the townlands of Bleantasourmountain, Carrigbrack, Clooncogaile, Coumnagappul, Glennaneanemountain, Kilkeany, Kilkeany Mountain, Knocavanniamountain and Reanadampaun Commons, Ballymacmague North, Ballymacmague South, Colligan More, Colliganwood, Eaglehill, Garryclone, Garryduff, Kilcooney, Killadangan, Knockacaharna, Knockboy, Lackandarra Upper and Tinalira Co. Waterford.

The attached submission has been prepared by Fáilte Ireland, the National Tourism Development Authority.

I would be grateful if you could send a reply email acknowledging receipt of submission.

Regards,

Yvonne

Yvonne Jackson
Product Development-Environment & Planning Support | Fáilte Ireland

88-95 Amiens Street, Dublin 1, D01 WR86
M +353 (0)86 0357590



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**Fáilte
Ireland**

**Turasóireacht Náisiúnta
An tÚdara Eorbartha**
National Tourism
Development Authority

An Bord Pleanála,
64 Marlborough Street,
Dublin 1

Issued by Email: bord@pleanala.ie

29th January 2024

ABP. Ref.: PA93.318446

Applicant: Coumnagappul Wind Farm Limited

Re: Submission in relation to Section 37E application for:

a 10 year permission for the proposed construction of Coumnagappul Wind Farm consisting of 10 no. turbines and associated infrastructure (and all associated works) in the townlands of Bleantasourmountain, Carrigbrack, Clooncogaile, Coumnagappul, Glennaneanemountain, Kilkeany, Kilkeany Mountain, Knocavanniamountain and Reanadampaun Commons, Ballymacmague North, Ballymacmague South, Colligan More, Colliganwood, Eaglehill, Garryclone, Garryduff, Kilcooney, Killadangan, Knockacaharna, Knockboy, Lackandarra Upper and Tinalira Co. Waterford.

An EIAR and NIS has been submitted with the application.

To whom it may concern,

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to an application for the erection of 10no. Wind Turbines with an overall ground to tip height of 185m and associated wind farm infrastructure development in the vicinity of Coumnagappul and adjoining townlands on the western upland slopes, circa 15km north of Dungarvan 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

¹

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



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 Context to Tourism in the Vicinity of the site and wider Region

The proposed windfarm site is located on the western uplands of the Comeragh Mountains. The Comeragh Mountains are a varied and often remote and secluded range which stretches through the centre of County Waterford from north of Dungarvan to near Clonmel on the county boundary with Tipperary.

Waterford City and County Development Plan 2022-2028 acknowledges that Tourism in Waterford has undergone a considerable transformation over the past ten years with significant investment in flagship tourism attractions, activity tourism and the establishment and support of high-quality festivals and events. The transformation came about as the result of positive policy decisions and from the effort by key organizations including Waterford City & County Council, Fáilte Ireland and key industry stakeholders who together initiated and/or supported tourism related developments. These initiatives include investment in recreational walking and cycling trails, outdoor activity-based opportunities and in flagship festivals, including the annual Nire Valley Comeragh Mountains Walking Festival and Comeragh's Wild Festival.

The Development Plan notes that *"tourism development must be balanced with the protection of the natural environment, a key attractor itself, and the people who live in these areas. Ongoing environmental management of amenities and managing visitor expectation is crucial to the promotion of sustainable tourism in the County."* The plan notes that Waterford has a broad range of tourist amenities and attractions which include, the Comeragh Mountains and the countywide accredited recreational walking and cycling trails, woodlands and parks.



The Plan also notes that while in recent years tourism development has focused on Waterford City, and the coastal destination towns, there are many other areas in County Waterford that have significant sustainable tourism potential such as the West and North of the County including the Comeragh Mountains.

The Plan includes 9 specific objectives (ECON 22 to ECON 30) focused on the development, enhancement and protection of the tourism product in Waterford. Given the high-quality rural upland environment of the site of the proposed windfarm, objective **ECON 26: Tourism Product and Infrastructure** is noted where the Council,

"will promote, facilitate, encourage investment, and deliver improvements to our tourism product, infrastructure and facilities" ...

"In particular we will continue to advance initiatives such as the INTERREG 'Local Flavours' programme aimed at encouraging, strengthening and delivering investment and improvement to rural economic development and tourism and heritage assets in the following principle (rural cluster) areas and tourism-related initiatives:

- ...
- Comeragh Mountains
- ..."

4.0 Review of 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 6 Population and Human Health of the EIAR.

Section 6.6.4 of the EIAR describes the receiving 'Recreational, Amenity and Tourism' baseline, with details of the national and regional value of tourism and noting the most popular recreation activities – which includes 'hiking and cross country walking'.

A list of the recreation and tourism amenities located within 15 km of the site is provided (pg. 15 of 55). 23 of these are within 10km of the site, while 7 are within 5km. A number of additional amenities / facilities (detailed below in this submission) are not included and no mapping of the facilities relative to the proposed wind farm is provided. Such mapping would be helpful in understanding proximity and wider relationship.

The list in the EIAR does include the 'Comeragh Mountains' which is described as being c. 5km from the site. However, this is somewhat misleading, as being located on the upper western slopes of the Comeragh Mountains, the site should actually be considered as being within the Comeragh Mountains. It is noted that the site is referenced as being within the Comeragh Mountains elsewhere in the chapter (e.g. pg. 29 of 55) and the EIAR.



In addition, and while referencing other walks, including those from the Nire Valley, the list of amenities (pg. 15 of 55) does not include the Seefin Top Walk or the Seefin and Coumaraglin Mountain Loop Walk – both of which are located in very close proximity (c.1km south / southeast) to the proposed windfarm or the five promoted walks in Nire Valley – all of which come within c.4km east of the windfarm. These additional amenities are underlined and annotated (*) in the list below.

The unspoilt natural quality and visual appearance of the upland landscape is considered critical to the sustainable development and protection of the following recreation and tourism assets, all of which are located within 10km of the wind farm site:

- The Comeragh Mountains
- Seefin and Coumaraglin Mountain Walk c.1km*
- Seefin Top Walk c. 1km*
- The Magic Road c. 3.3 km
- Nire Valley Glamping c. 3.5 km
- Coumalocha Loop Walk. <4km*
- Nire Valley to Sgilloge Loughs Walk <4km*
- Nire Valley and Knockanaffrin South Top Walk <4km*
- Nire Valley Trails – Coumduala Loop Walk <4km*
- Coumlra and carrageen Circular Walk <4km*
- Standing Stone c. 4 km
- Nire valley Eco Camp c. 4.3 km
- Mahon Falls c. 4.5 km
- Crough Wood c. 5km
- Coumshingaun Lake c. 5.8 km
- Coumshingaun Lough Trailhead c. 6.0 km
- Ned Curran's Cottage, c. 6 km.
- Crotty's Lake c. 6.6 km
- The Boolas National Looped Walk c. 8.4 km
- Lough Mohra & Rath Beag Loop Walk c. 8.8 km
- Carey's Castle c. 9.1 km
- Carey's Castle Forest Recreational Area c. 9.2 km
- Colligan Wood Walks c. 9.5 km

The description of the baseline in Chapter 6 of the EIAR does acknowledge that these outdoor facilities “act as a major attraction for recreation and amenity”, and that “all are located within close proximity to the site.” (pg. 15 of 55). The baseline also acknowledges the presence of a number of walking clubs, such as the Comeragh Mountaineering Club, that use the mountaineering and hiking facilities.

The baseline description also references Chapter 16: Landscape and Visual Impact, of the EIAR.



Section 6.7.10 of the EIAR sets out the Potential Effects - Recreation, Amenity and Tourism – Construction. This section notes ‘significant short term impact’ on the physical landscape, and ‘high-medium impact on the landscape character’ from construction. It is noted that there are no expected direct impacts on recreation and amenity features and “the Project will not impede tourist use of the Mountains”.

Section 6.7.11 of the EIAR sets out the Potential Effects - Recreation, Amenity and Tourism – Operation. This section notes the *Wind Energy Guidelines for Planning Authorities* (2006), the *Draft Revised Wind Energy Development Guidelines* (2019); *Attitudes towards the Development of Wind Farms in Ireland* (SEI, 2003); *Wind Farms and Tourism Trends in Scotland* (BiGGAR, 2016), as well as Fáilte Ireland’s *Visitor Attitudes on the Environment* (2008, updated 2012) and *EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects* (2019) and the *Public Attitudes Monitor* (Wind Energy Ireland, 2022). The EIAR relies on these publications to conclude “that the majority of tourists surveyed had a generally positive view on wind energy development in the landscape.”

It is noted that the “most proximate major tourist attraction to the Coumnagappul Wind Farm Site located to the east is the numerous hiking, amenity and walking trails associated with the Comeragh Mountains.” In considering impacts on these amenities, Section 6.7.11 refers to Chapter 16 – Landscape and Visual of the EIAR, stating that “the largest area of comprehensive visibility is situated to the western and southern extents of the study area,” with “limited potential for turbine visibility to the eastern half of the site [sic...study area?] with potential visibility of up to 6 turbines.”

It is stated that:

“Visual impact as outlined in Chapter 16 therefore ranges from substantial-moderate’ to ‘Imperceptible especially to the south of the site. However, beyond this, visual impacts reduce rapidly throughout the central and wider study area, and in over 66% of the 20km study area, there will be no visibility of the proposed turbines. Thus, it is not considered that the proposed Coumnagappul Wind Farm will result in significant visual impacts at surrounding receptors.”

This section goes on to state that:

“Thus, it is considered that whilst the proposed wind farm would represent an intensification of development in the local landscape context within up to 5km. However, it is considered that the scale of the proposed development will be well assimilated within its landscape context without undue conflicts of scale with underlying land form and land use patterns. Thus, the magnitude of the landscape impact is deemed to be High-Medium within the site and its immediate environs (c.1km) reducing to Medium for the remainder of the central Study Area. The quality of the landscape effects is deemed Negative. Beyond 5km from the site, the magnitude of landscape impact is deemed to reduce to Low and



Negligible at increasing distances as the wind farm becomes a proportionately smaller and integrated component of the overall landscape fabric.

Overall, it is expected that the operational phase of the Project will have a non-significant neutral impact on recreation and tourism in the area due to the distance of the proposed turbines from significant features. The provision of the community benefit fund will likely have a moderate positive long-term impact on the amenities of the nearby residents. Thus, in summary, it is not considered that the proposed Coumnaagappul Wind Farm will result in significant visual impacts at surrounding receptors."

Section 6.8.4 of the EIAR sets out Mitigation Measures – Recreation, Amenity and Tourism noting that such measures are primarily related to the design stage of the wind farm which allowed for prevention of unnecessary or inappropriate development to occur that would significantly affect any recreational or tourist amenity.

"Mitigation measures to avoid impacts to recreational facilities such as trails and scenic drives includes the distribution of signage and maps of alternative routes to reduce the effect on tourists and local users of the Comeragh Trails."

Section 6.9.4 of the EIAR sets out Residual Impacts – Recreation, Amenity and Tourism noting that:

"Due to the proximity of a number of tourist and amenity sites associated with the Comeragh Mountains being in close proximity to the site, the significance of visual impacts for receptor types ranges between 'Substantial-moderate' to 'Imperceptible' with a negative short term context. The most notable visual impacts will occur within the immediate surrounds of the turbines at local residential receptors to the south of the horseshoe ridge that contains the site. Impacts beyond this will reduce quickly to 'Moderate' and 'Moderate-slight', as the horseshoe ridge and surrounding upland landscape context tends to screen and partially contain the overall perceived scale of the proposed development from surrounding receptors. Furthermore, even when clearly visible from surrounding receptors outside of the immediate site context, the proposed turbines generally present in a compressible manner and are well accommodated in this broad landscape context that comprises large-scale landscape features and broad transitional land uses.

The community benefits gained during the operational phase due to the capital investment in the area are expected to last beyond the decommissioning phase resulting in a residual permanent significant, positive impact on the amenities of the area."

Chapter 16 Landscape and Visual Impact, of the EIAR references the *Waterford Landscape and Seascape Assessment 2020*, which is included in Appendix 8 of the *Waterford City and County Development Plan 2022-2028*). The windfarm site is wholly located in the 'Upland' landscape



type and Unit 6A 'Comeragh Uplands', areas described as being 'Most Sensitive' in terms of vulnerability to change in its character. This reflects the capacity of the area to absorb new development as well as the potential to create disproportionate visual impacts. 'Most Sensitive' landscapes are described as:

"Very distinctive features with a very low capacity to absorb new development without significant alterations of existing character over an extended area."

Chapter 16 Landscape and Visual Impact, of the EIAR also references the *Renewable Energy Strategy 2016-2030*, which has been in place since 2016 and is included in Appendix 7 of the current *Waterford City and County Development Plan 2022-2028*).

At Section 13.2, the Renewable Energy Strategy (RES) states that:

"The Scenic Landscape Evaluation map as set out in the Waterford County Development Plan classifies the landscape and features of Waterford and seeks to protect the landscape from inappropriate and unsustainable forms of development whilst also recognising that changes in the landscape brought about by development are inevitable."

The preparation of the RES has had regard to Policy / Legislative Considerations; to Environmental Considerations; to Infrastructure Considerations; and to Socio-Economic Considerations, including balancing other land uses such as Tourism and Leisure, etc, and impact on sensitive receptors, including local residents, areas of tourism and landscape amenity value, etc.

Having had regard to these considerations, the RES developed a Wind Energy Strategy for the county, which classifies areas for wind farm projects as either 'Open for Consideration', 'Preferred' or 'No Go Areas' (Exclusion). The proposed Coumnagappul Wind Farm is wholly located within a 'No Go Area' (mapped as Exclusion in the RES).

As noted, the assessment of the impact of the proposed development on the landscape and visual environment is provided in Chapter 16: Landscape and Visual of the EIAR. However, having regard to the sensitivity and unspoilt remoteness of the Comeragh Mountains and to the existing spatial planning and sustainable development environment, which pertains to the area and to wind farm projects, it is therefore considered that the landscape and visual impact assessment has noticeably underestimated the likelihood of significant negative impacts that the proposed wind farm would have on the landscape and visual character of an extensive area of the Comeragh Mountains. This impact extends to lands to the south and to the west, including to the eastern and southern ranges of the Knockmealdown Mountains on the Waterford Tipperary boundary. It is likely that such impacts would have significant adverse impacts on the very high-quality landscape value proposition of the numerous recreation, amenity and tourism facilities and industries that operate across a wide area of the Comeragh Uplands.



5.0 Conclusion

The proposed windfarm site is located on the western slopes of the Comeragh Mountains, a varied often remote and secluded range of unspoilt uplands, which stretch through the centre of County Waterford from north of Dungarvan to near Clonmel on the county boundary with Tipperary. This is an area of active, diverse and economically valuable outdoor recreation, amenity and tourism facilities and industries, which directly depend on the high-quality unspoilt landscape and visual characteristics of the area. The quality and sensitivity of the area and the need to protect and sustain the features and industries which rely on the area is reinforced in planning policy and guidance.

Therefore, we would ask that An Bord Pleanála in their assessment gives full and adequate consideration to:

- The high quality and sensitive nature of the landscape and visual character of the area and to the numerous recreation, amenity and tourism opportunities and facilities that value, promote and rely on this environment;
- The tourism-related policies and objectives of the *Waterford City and County Development Plan 2022-2028*;
- To the No Go Area (Exclusion) characterisation of the site and the Comeragh Mountains as a location for wind farm developments as set out in the *renewable Energy Strategy*, in Appendix 7 of the *Waterford City and County Development Plan 2022-2028*;
- The high sensitivity and vulnerability of the landscape character of the site and surrounds in the Comeragh Mountains as set out in the *Landscape and Seascape Character Assessment*, in Appendix 8 of the *Waterford City and County Development Plan 2022-2028*; and
- The consideration that the landscape and visual impact assessment has noticeably underestimated the likelihood of significant negative impacts that the proposed wind farm would have on the landscape and visual character of an extensive area of the Comeragh Mountains and by association on the numerous recreation, amenity and tourism facilities and industries dependent on a wide area of the Comeragh Uplands.

Sincerely,

John Fallon
Officer – Environmental Engineering, Fáilte Ireland