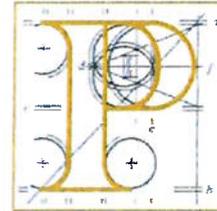


Our Case Number: ABP-318701-23



**An
Bord
Pleanála**

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

Date: 26 February 2024

Re: 10 year planning permission for the proposed wind energy development consisting of 22 wind turbines and all associated infrastructure located in the townlands of Glenora, Altderg, Keerglen, Ballykinlettragh, Ballycastle, Ballyglass, Killeena, Glencullin and Lugnalettin, Co. Mayo. (www.glenorawfplanning.com)

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. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Lauren Murphy
Executive Officer
Direct Line: 01-8737275

PA09

Tel (01) 858 8100
Glaó Áitiúil LoCall 1800 275 175
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Láithreán Gréasáin Website www.pleanala.ie
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64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902

Lauren Murphy

From: Marine
Sent: Wednesday, February 21, 2024 1:05 PM
To: SIDS
Subject: FW: PA16.318701 Glenora Wind Farm, Mayo Submission-Fáilte Ireland
Attachments: Fáilte Ireland Submission-PA16.318701 Glenora Wind Farm, Mayo.pdf
Categories: Lauren

From: Bord <bord@pleanala.ie>
Sent: Tuesday, February 20, 2024 3:37 PM
To: Marine <marine@pleanala.ie>
Subject: FW: PA16.318701 Glenora Wind Farm, Mayo Submission-Fáilte Ireland

From: Yvonne Jackson <Yvonne.Jackson@failteireland.ie>
Sent: Tuesday, February 20, 2024 3:34 PM
To: Bord <bord@pleanala.ie>
Subject: PA16.318701 Glenora Wind Farm, Mayo Submission-Fáilte Ireland

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To Whom It May Concern,

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: PA16.318701. Re: Submission in relation to Section 37E application for: A 10-year planning permission for the proposed wind energy development consisting of 22 wind turbines and all associated infrastructure in the townlands of Glenora, Altderg, Keerglen, Ballykinlettragh, Ballycastle, Ballyglass, Killeena, Glencullin and Lugnalettin, Co. Mayo.

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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An Bord Pleanála
64 Marlborough Street,
Dublin 1.

Sent by email: bord@pleanala.ie

20 February 2024

ABP. Ref.: PA16.318701

Applicant: Glenora Wind Farm DAC

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

A 10-year planning permission for the proposed wind energy development consisting of 22 wind turbines and all associated infrastructure in the townlands of Glenora, Altderg, Keerglen, Ballykinlettragh, Ballycastle, Ballyglass, Killeena, Glencullin and Lugnalettin, Co. Mayo.

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 22 wind turbines with an overall ground to tip height of 180m and associated wind farm infrastructure development in the vicinity of Glenora and adjoining townlands on the southern upland slopes of Maumakeogh Mountain, circa 6km southwest of Ballycastle in northwest Mayo.

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 Ireland. The study was updated in 2012. Having regard to the intervening period with newer and larger turbines being constructed, it is considered that the findings of this research may be outdated.

A further study was undertaken in 2018 on Visitor Awareness and Perceptions of the Irish Landscape which we feel is more appropriate to reference. 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 2018 studies are summarised as follows:

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.

3.0 Context of the Proposed Development

The landscape comprises a remote and somewhat isolated upland valley with coniferous plantation on lower slopes giving way to open exposed peatland and moorland on upper slopes. The land rises northwards to the peak of Maumakeogh (379m), westwards to Benmore (343m) and gradually to a local peak (239m) at Altderg to the south. Westwards the land falls gradually towards the valley of the Ballinglen River.

The Céide Fields Visitors Centre, a significant tourist destination which received in excess of 22,000 visitors in 2022, lies c.5.5km north of the wind farm site. While the land slopes north towards the



spectacular coast, the 6,000 year old Neolithic stone-wall field system, dwelling areas and megalithic tombs, extend southwards over hundreds of acres of the uplands, which today are covered by a natural blanket bog with its own unique vegetation and wildlife.

It is an objective of the Mayo County Development Plan 2022-2028 (BEO 2): *To protect the tentative World Heritage Site in Mayo on the UNESCO Tentative List - Ireland 2010, The Céide Fields, from inappropriate development and support its nomination to World Heritage Status.*

A 32km section of The Western Way runs from Bellacorrick to Ballycastle. Approximately 12km of this amenity, recreational and tourist route is dominated by the presence existing / permitted wind farms / turbines at Bellacorrick / Oweninny / Sheskin. The remaining c.20km of the Way passes through a rural and isolated landscape, including the site where, with the exception of coniferous plantations, upland peatland landscapes drained by streams and lakes and natural processes prevail. Tourism and Recreation Policy TR11 of the Mayo County Development Plan 2022-2028 also sets out:

“To promote Mayo as a premier walking / cycling destination in the Country and support the further development of walking routes and trails within the county and the integration and linkage of these with other existing / proposed routes and trails both within and outside of County Mayo, in accordance with national walking strategy guidance and in conjunction with the Tourism Section of Mayo County Council, Fáilte Ireland and other relevant stakeholders. Opportunities to enhance ecological connectivity should be integrated as part of any linking of routes to strengthen and support green infrastructure.”

The *Landscape Appraisal for County Mayo* (in Volume 4 of Mayo County Development Plan 2022-2028), indicates that the proposed wind turbines are located in ‘Landscape Character Area E: North Mayo Mountain Moorland’. The ridgelines / skylines, including Maumakeogh, surrounding the site are highlighted as being ‘Vulnerable Features’, as are the river / stream corridors (e.g. Bellananaminnan, Sralagagh, Keerglen, Glenulra and Oweninny) surrounding the site (refer to section 3.1(a) and associated mapping in the *Landscape Appraisal for County Mayo*).

The stated policy with regard to areas designated as vulnerable (section 3.1(b) of the *Landscape Appraisal for County Mayo*) is that:

“These areas or features designated as vulnerable represent the principal features which create and sustain the character and distinctiveness of the surrounding landscape. To be considered for permission, development in the environs of these vulnerable areas must be shown not to impinge in any significant way upon its character, integrity or uniformity when viewed from the surroundings. Particular attention should be given to the preservation of the character and distinctiveness of these areas as viewed from scenic routes and the environs of archaeological and historic sites.”



The site is also located within the 'Slopes >10%' landscape, which are 'Areas Designated as Sensitive' (refer to section 3.2(d) and associated mapping in the *Landscape Appraisal for County Mayo*).

In terms of landscape policy, the proposed wind farm is located in 'Policy Area 3 - Uplands, moors, heath or bogs', where it is noted that wind farms have:

"High potential to create adverse impacts on the existing landscape character. Having regard to the intrinsic physical and visual characteristics of the landscape area, it is unlikely that such impacts can be reduced to a widely acceptable level."

The *Renewable Energy Strategy for County Mayo* (in Volume 4 of the Mayo County Development Plan 2022-2028), identifies Priority Areas, Tier 1 Areas (large and clustered wind farms) and Tier 2 Areas, where wind farm developments are preferred (Priority & Tier 1), or are open for consideration (Tier 2). The proposed Glenora Wind Farm is not located within or adjacent to a Priority Area. Reviewing Figure 14-6 of Chapter 14 of the EIA it is clear that 3 turbines are within a Tier 1 area and a further 4 or 5 are within a Tier 2 – open for consideration area. However, the remaining 14 or 15 turbines are outside of areas where wind farm developments are open for consideration. These excluded areas coincide with the sensitive 'Slopes >10%' and the Vulnerable Features (stream / river corridors) identified in the landscape appraisal as noted above.

4.0 Review of Assessment of Tourism in the EIA submitted with the Application

An EIA has been submitted with the proposed development. Tourism, and impact on tourism, is addressed in Chapter 5: Population and Human Health and also referenced in Chapter 14: Landscape and Visual Impact, of the EIA.

It is considered that the existing tourism context is appropriately addressed at Section 5.4 of the EIA. However, we would note that while the Céide Fields Visitors Centre is listed as one of the key tourist attractions under section 5.4.1.1, here as elsewhere in the EIA, greater consideration, beyond the visitor's centre and looped walk, should be afforded to the wider landscape context of the Céide Fields as a nationally and internationally significant heritage and tourism asset and experience.

The impact of the proposed development on tourism and amenity during the construction phase and operation phase is set out at Sections 5.10.2.5 and 5.10.3.5 respectively. However, while noting the inclusion of a Recreational and Amenity Plan (under construction stage impacts?), it is considered that the assessment of the 18-to-24-month construction phase is basic and high level and fails to adequately address the major landscape and visual disturbance that the proposed development will introduce into this remote and secluded landscape. The assessment also fails to adequately address the nature of direct and indirect – and potentially secondary – impacts that the Proposed Development will have on the landscape and tourism, including The Western Way, the Wild Atlantic Way, and the wider context of the Céide Fields.



The proposed Glenora Wind Farm would directly straddle or adjoin c.6.2km of the most isolated section of The Western Way, and proposed road ‘upgrades’ would directly impact and alter the character of a further 5km of the Way from Glenora to Sralagagh East, which follows a scenic rural track. This impact on the 32km section of The Western Way from Bellacorrick to Ballycastle is on top of the c.12km of the route, which already passes alongside the existing and permitted wind farms developments at Ballacorrock / Oweninny / Sheskin to the southeast.

The assessment of the construction phase of the proposed development impacts on tourism stated as *“there will be no significant effects.”* We would ask that An Bord Pleanála in their assessment give full and adequate consideration to the impact of the construction phase of the proposed development on tourism.

Likewise, the assessment of operational phase impacts is basic and high level and fails to address the major change that the Proposed Development will bring to the character of this secluded landscape and its tourist assets, including The Western Way, the wider context of the Céide Fields, the Wild Atlantic Way and the coast, including Downpatrick Head – from where the proposed turbines will be visible and visually discordant.

The sole finding of the impact of the operation phase of the proposed development on tourism is that *“The addition of dedicated recreational and amenity routes for locals and tourists will have a moderate positive effect on amenity in the local area.”* We would ask that An Bord Pleanála in their assessment give full and adequate consideration to the impact of the operation phase of the proposed development on tourism.

Chapter 14: Landscape and Visual is similarly structured, with the baseline well described but with the assessment of landscape and visual impacts (including on tourist assets) being basic and high-level. This leads to an inadequate assessment of impacts and an underrepresenting of major changes and significant effects for the landscape and the tourism resource.

The impact on the landscape finding of the 18-to-24-month construction phase of the Proposed Development is *“Short-term, Slight, Negative effect in terms of landscape effects, although these will be localised to the landscape of the site itself and the development footprint”*, or that the visual impact of the construction phase of the Proposed Development is *“Short-Term, Slight, Negative visual effects.”* Again, we would ask that An Bord Pleanála in their assessment give full and adequate consideration to the impact of the construction phase of the proposed development on tourism.

While there is good discussion on operation phase landscape and visual impacts, for the most part the assessment underestimates the effects arising from the introduction of a wind farm development into the landscape, the direct and indirect change in the character of the landscape and the change in the viewer – including tourist – experience.

It is noted that the proposed turbines are set between 153.5m (T10) to 231.5m (T22) above ordnance datum (AOD). However, eleven of the turbines are set above the 200m contour and eight of these are above the 220m contour. With an overall height of 180m, these eleven turbines rise to over 380m AOD (with eight to over 400m AOD), which is higher than the surrounding topography.

The application includes a Photomontage (wirescape) of the proposed development taken from the Céide Fields Visitors Centre. The image shows that the proposed turbines will not be visible from the visitor's centre as the development is screened by the intervening rising topography. However, the assessment does not address visibility from the wider context of the Céide Fields.

5.0 Conclusion

Fáilte Ireland would have some concerns in relation to the potential impact of the Proposed Glenora Wind Farm on the local and wider tourism resource. This is highlighted in the number of landscape sensitivities identified in the *Landscape Appraisal for County Mayo* and general unsuitability of the land for wind farms as identified in the *Renewable Energy Strategy for County Mayo*.

At a plan level this can be appreciated with reference to Figure 14-16 of Chapter 14 of the EIAR. The figure clearly shows the clustering nature of existing, permitted and proposed wind farm developments around Bellacorrick c.7km south of the Glenora site. These clustered developments are located in an adjoining 'Landscape Character Area F: North Mayo Inland Bog Basin', which contains significantly less 'Vulnerable Features', and which has a long-standing history of power production and more recently – but nevertheless established – of wind farm development. By contrast the location of the proposed Glenora Wind Farm is a clear break from the established pattern of such development in North Mayo.

The proposed wind farm development maybe in contrary to landscape-related policies and objectives NEP 14, NEO 25, NEO26, NEO 27 and NEO 28 (as listed in Chapter 14 of the EIAR). These provisions aim "to protect, enhance and contribute to the physical, visual and scenic character of County Mayo and to preserve its unique landscape character", including along scenic routes and in Mayo's coastal areas and lakeshores.

Therefore, we would ask that An Bord Pleanála in their assessment gives full and adequate consideration to the likely significant impact that the Glenora Wind Farm would have on the high quality landscape environment, which is a critical tourism asset and resource underpinning the value and quality of the Wild Atlantic Way, the Céide Fields and the north Mayo coast, The Western Way and local tourism initiatives.

Yours sincerely,



Manager of Environment and Planning, Fáilte Ireland