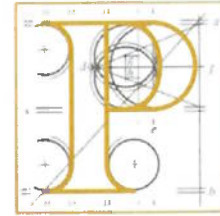


Our Case Number: ABP-319448-24



An
Bord
Pleanála

Fáilte Ireland
Environmental and Planning Unit
88 - 95 Amiens Street
Dublin 1
D01 WR86

Date: 28 May 2024

Re: Proposed Development of an 8 no turbine wind farm development and associated works on land within the townlands of Clonmellon, Kilrush Upper, Kilrush Lower, Newtown, Ballinlig, Carnybrogan, Cavestown and Rosmead, County Westmeath and Galboystown, Co. Meath. (www.knockanarraghwindfarmsid.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. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Raymond Muwaniri
Executive Officer
Direct Line: 01-8737125

PA09

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Glao Áitiúil	LoCall	1800 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

An Bord Pleanála.
Strategic Infrastructure Development (SID) Section,
64 Marlborough Street,
Dublin 1.

23rd May 2024

ABP Ref. **PA17.319448**
Project: Knockanarragh Wind Farm Development, Co. Westmeath and Co. Meath
Applicant: Knockanarragh Wind Farm Limited

Re: **Submission in relation to a Section 37E application for permission for:**

Proposed Development of an 8 no turbine wind farm development and associated works on land within the townlands of Clonmellon, Kilrush Upper, Kilrush Lower, Newtown, Ballinlig, Carnybrogan, Cavestown and Rosmead, County Westmeath and Galboystown, Co. Meath. The planning application area is approximately 115.81 ha in size.

The wind turbines will have an overall tip height of between 175 and 180m, a hub height of between 97.5 and 99mm, and a rotor diameter of between 155m and 162m. The Proposed Wind Farm will be connected to the national grid via 110kV underground cabling to a proposed 110kV substation located west of Clonmellon, Co Meath, and to the existing 110kV overhead line at Clonmellon, inclusive of 110kV interface masts.

The Proposed Wind Farm site is located on the Westmeath / Meath County boundary approximately 3km northeast of Delvin, 8km northwest of Athboy, 12km southwest of Kells, and 15km southeast of Oldcastle. The N52 National Road runs in a north-south direction to the east of the Proposed Wind Farm site.

An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (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 a proposed wind farm development at Clonmellon, Kilrush Upper, Kilrush Lower, Newtown, Ballinlig, Carnybrogan, Cavestown and Rosmead, County Westmeath and Galboystown, Co. Meath.

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 County Wind & Renewable Energy Strategies 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 environments.

Therefore, in making this submission, we would ask An Bord Pleanála to consider the potential impact of the proposed wind farm development on a range of cultural and tourism assets, including Fore Abbey and its surrounds, Lough Lene, Loughcrew Megalithic Cemetery, Rosmead, Killua Castle, Ballinalough Castle, and the Spire of Lloyd.

Given the quality and significance of the cultural landscape as a tourism asset, this review has focused on Chapter 04: Population and Human Health (Tourism); Chapter 10: Landscape and Visual, and Chapter 12: Cultural Heritage of the EIAR, together with a review of Westmeath and Meath County Development Plans (including associated Renewable Wind Energy Strategies and Landscape Character Assessments) and tourism development, information and promotion resources (including Discover Ireland, Midlands Ireland, and Visit Westmeath).

We note that planning permission was granted previously at Bracklyn c. 10km south of the subject site for a wind farm development comprising 9 turbines with a tip height of 185m, a rotor diameter of 162m and a hub height of 104m (ABP ref.: PA25M.311565). It is understood that pre-construction investigations are on-going, but construction has not commenced.

In addition, an application for a further wind farm development also spanning the Westmeath / Meath County boundary near Ballivor c.10km south of the subject application site and comprising 26

turbines with a tip height of 200m, a rotor diameter of 170m and a hub height of 115m, is also before An Bord Pleanála (ABP ref.: PA25M.316212).

2.0 Westmeath County Development Plan 2021-2027 (WCDP)

The WCDP includes Tourism as one of its Strategic Aims:

“Tourism: To provide for the continued expansion of the tourism sector, with a focus on creating strong visitor destination towns and sufficient high-quality visitor services and the continued development and enhancement of visitor attractions and activities to provide memorable, immersive visitor experiences, capitalising on our natural and cultural heritage assets, whilst safeguarding these resources for future generations.” (section 1.8)

The WCDP also notes that “A strong emphasis will be placed on securing sustainable tourism growth, whereby the quality of our landscapes, natural environment and cultural heritage is protected and safeguarded for the long-term enjoyment of assets.” (page 140). Tourism is addressed in detail in Chapter 6 of the WCDP. Westmeath (and Meath) are located within ‘Ireland’s Hidden Heartlands’ regional tourism brand. It promises visitors a slow-paced experience, immersed in the natural environment and culture of the region. Activities such as walking, cycling, boat tours on the iconic River Shannon, bird-watching, fishing, and watersports are central to this theme, along with the chance for visitors to engage with local communities, their culture, crafts and local food.

The WCDP notes under ‘Guidance on Sustainable Tourism’, that Fáilte Ireland has developed five key principles that ensure developments achieve a balance between appropriate tourism development and economic, environmental and social sustainability. Two of these principles reference the importance of the natural landscape, its heritage and its communities and the safeguarding of same:

“Principle 2: Our landscapes, our cultural heritage, our environment and our linguistic heritage all have an intrinsic value which outweighs their value simply as a tourism asset. However, sustainable tourism planning makes sure that they can continue to be enjoyed and cherished by future generations and not prejudiced simply by short term considerations.”

“Principle 4: Strategic tourism assets – including special landscapes, important views, the setting of historic buildings and monuments, areas of cultural significance and access points to the open countryside, should be safeguarded from encroachment by inappropriate development.”

Chapter 6 of the WCDP includes 72 Policy Objectives in relation to aspects of Tourism including, General Tourism Development; Destination Towns; Tourism Infrastructure and Visitor Services; History, Heritage and Ancient Sites; Lakes and Waterways; Greenways, Cycling and Walking; and Arts, Culture and Festivals. Amongst others, Policy Objective 6.7 seeks to:



“Protect and conserve the natural, built and cultural heritage features which add value to the visitor experience in Westmeath and seek to restrict developments which would damage or detract from the quality of scenic areas and identified natural and cultural heritage assets.”

Lough Lene is identified as a High Amenity Area (Map 64, WCDP)

“Lough Lene is located in the highly scenic northern section of the County in an undulating hilly landscape that typifies this area and is designated as a Special Area of Conservation. Its associations with the nearby historic monastic settlement of Fore and location on an existing tourist trail require its future development to be considered sensitively. The lake is an important stop off point on the Táin Trail (tourist cycling/driving route). Lough Lene is also an important public water supply source for the County.

Recreation in the form of angling is well renowned on Lough Lene. The lake is particularly known for its clear waters. There is a bathing area and combined boat access slip way at ‘The Cut’ on the eastern shore of the lake, which may offer further potential for appropriate recreational development. Lough Lene can be considered to be located in a sensitive tourist landscape with the Fore Special Heritage Area located within close proximity to the vicinity of the lake.” (page 429, WCDP)

Protected Views 30 & 31 (County Status) (Map 67, WCDP)

CPO 13.81: Protect and sustain the established appearance and character of views listed in Appendix 5 of this plan that contribute to the distinctive quality of the landscape from inappropriate development. (page 431, WCDP)

The WCDP also notes that *“a policy has been added to protect views from the existing looped walking route at Fore Abbey.”* (page 430, WCDP)

Landscape Character Area 3: ‘River Deel Lowlands’ (Map 68, WCDP) *“This part of the county has a strong historic landscape component with several demesne landscapes occurring within the area.”* (page 414/415, WCDP).

Map 69 (WCDP) indicates that the whole county other than the Hill of Uisneach, which has no capacity, has low potential for Wind Energy development.

Map 74 (WCDP) Green Infrastructure Network, ‘The Fore Trail’ ‘The Táin Trail’.

Section 14.4 of the WCDP: **Fore Special Heritage Area** notes:

“In recognition of its exceptional archaeological and historical importance and the significant contribution which it can make to the tourist offering in North Westmeath, a Special Heritage Management Study has been prepared for Fore. The wealth of the archaeological and historical remains in Fore Village, together with the attractive landscape in which they are set

mark this area out as one of national importance. Fore is one of the main tourist attractions promoted in Westmeath under the Ireland's Ancient East brand.” (page 436, WCDP).

And the following related policies:

CPO 14.19 Ensure that development proposals that would detrimentally impact upon the setting and interpretation of archaeological monuments, historic landscape or buildings of architectural value at Fore will not be permitted.

CPO 14.20 Protect and sustain the established appearance and character of views over the surrounding countryside at Fore, while facilitating the continued development of uses that sustain the activities that give rise to the appearance and character of the landscape.

Section 8.5.1.8 of the WCDP: **Heritage** notes in relation to Clonmellon and its surrounds that:

“The designation of much of the settlement core as an Architectural Conservation Area owes much to the quantity and quality of architectural heritage on offer in Clonmellon. Approximately 1.2km east of the village centre is Killua Castle, the ancestral home of the Chapman Family built c.1780 in a gothic revival fashion. In addition to the Castle, the site hosts a number of demesne-related structures and follies of significant architectural heritage. It is further noted that Ballinlough Castle is located approximately 5km south of Clonmellon.”

3.0 Meath County Development Plan 2021-2027 (MCDP)

The Plan notes (Section 4.3.6) that:

“Tourism and recreation are noted as key sectors in both the economic and social development of the County, providing opportunities for employment and wealth generation, and also facilities and infrastructure that enhance the quality of life for residents.”

Section 4.24 of the Plan goes on to set out policies and objectives in relation to Tourism under Policy Context, Development Plan Vision for Tourism, Tourist Infrastructure, Tourism Sectors, and Accommodation.

Chapter 8 of the development plan relates to cultural and natural heritage. Section 8.17 relates to landscape. Section 8.1 of the Plan notes that:

“The County’s wealth of built heritage makes it exceptional in Ireland. It includes the UNESCO World Heritage Site of Brú na Bóinne, the seat of the High Kings of Ireland at Tara, the passage tombs of Loughcrew, the largest Anglo-Norman castle in Europe at Trim, the historic towns of Navan, Trim and Kells, great country houses, demesne landscapes and a significant industrial heritage of canals and mills.”



And...

"The identity of the County is linked to its heritage, and is central to how we see ourselves as individuals, communities and as a County. Our unique heritage is an intrinsic part of the character and attractiveness of the County and is a catalyst in attracting tourism and investment."

Section 8.6 of the Plan notes that:

"The archaeological heritage of an area includes monuments, sites, and objects whether situated on land or under water. In this respect, the County has a significant archaeological heritage, and provides a valuable cultural, educational and tourism resource."

HER POL 1 states it the policy of the Council to:

"To protect archaeological sites, monuments, underwater archaeology and archaeological objects in their setting, which are listed on the Record of Monuments and Places for Meath."

HER OBJ 3 states it an objective of the Council to:

"To seek to protect important archaeological landscapes from inappropriate development."

HER OBJ 52 states it an objective of the Council to:

"To explore over the lifetime of the Plan, the designation of Landscape Conservation Area, pursuant to Section 204 of the Planning and Development Act 2000, as amended, in respect of the Loughcrew and Slieve na Calliagh Hills."

3.1 Meath Landscape Character Assessment (MLCA)

The site of the proposed development is within and adjoins Landscape Character Assessment (LCA) No. 17: *South West Kells Lowlands*, an area of 'Moderate Value' and 'Moderate Sensitivity'. LCA No. 19 *Loughcrew & Slieve na Calliagh Hills* to the northwest of the site is an area of 'Exceptional Value' and 'High Sensitivity'. (refer to Maps 02 & 03 of the Meath Landscape Character Assessment, Appendix A.05, MCDP).

LCA No. 17 is described (pages 79-81, MLCA) as:

"A large rural area characterized by rolling lowland farmland with remnants of parkland landscapes. This LCA forms the setting for the southern side of the Loughcrew Hills and is quite unspoilt by modern development."

"People's Park at the edge of Kells provides an elevated viewpoint and landmark (lighthouse) that is visible from the surrounding area." (i.e. The Spire of Lloyd)



The following landscape elements are included under 'History and Culture':

- *Setting for southern side of Loughcrew Hills*
- *Remnants of 18th Century demesnes and estate farms*
- *C18th and C19th farmhouses.*

The following are included under 'Tourism':

- *Kells is an Irish heritage town and home of the 'Book of Kells'.*
- *Kells heritage centre provides information on the history of Kells and the surrounding area.*
- *Peoples Park complete with Spire of Lloyd erected by the first earl of Bective provides panoramic views over the surrounding landscape*
- *Grove Gardens outside Kells has a rich variety of flowering hybrids and exotic wild birds.*
- *Kells Golf Course*
- *River Blackwater is popular for angling.*
- *Kells equestrian centre*

The following is included under 'Key Settlements':

- *People's Park is a public open space located on a hill above the town and has a lighthouse which is a landmark within the wider area. Panoramic views in all directions across Counties Meath, Cavan and Westmeath can be obtained from here."*

4.0 Consideration of Tourism-related Aspects in the EIAR

4.1 Chapter 4 Population and Human Health

The baseline Tourism environment is described from paragraph 4.160 of Chapter 4 with the distance of main tourism sites to the Proposed Development listed in Table 4-11.

Sites as far away as 82km are included in the table, however, important sites much closer to the development are not included, etc., UNESCO Bru na Boinne (35km), Boyne Valley (21km), Loughcrew Megalithic Landscape / House and Gardens (10km). The Hill of Tara is included at 42km – however, the hill is actually within 30km of the site.

Surprisingly the significant heritage and tourism asset of Loughcrew, which is c.10km to the northwest is only noted in the chapter by means of extracted references and there is no assessment of the impact of the proposed development on the site as a tourism asset.



There is also no assessment of the impact on local attractions / sites such as Killua Castle, Ballinlough and in general sites of local tourism and recreational value are not adequately acknowledged or addressed.

Residual effects on tourism are addressed in paragraph's 4.201 and 4.202, summarising that:

"While there is potential for a slight, short term impact to recreation, amenity and tourism due to the intermittent closure of existing forestry tracks during the construction and decommissioning phases of the Proposed Development, the significance of impacts to recreation, amenity and tourism in the surrounding area as a result of the Proposed Development are assessed as imperceptible."

"The cultural heritage and landscape and visual assessments found that the development of the wind farm would have a slight impact on setting of heritage assets Ballinlough Castle (15400906) within Ballinlough Estate or Rosmead Country House (15400921), the Triumphant Arch (15400904) and the Rosemead estate curtilage buildings, and the series of Ringforts across the landscape. The potential impact to recreation, amenity and tourism are considered to be imperceptible."

It is considered that having regard to the photomontages submitted with the application that the proposed development has the potential to alter the character and experience of sites such as Rosmead Country House & Triumphant Arch, Ballinlough Castle, Killua Castle and the surrounding baseline environment (Photomontage Nos. VP18 to VP 25).

Likewise, it is considered that the proposed development will introduce views of development into the view of the landscape associated with Loughcrew Megalithic site (Photomontage No. VP1). While the proposed development is not visible in the photomontage from Fore Abbey (Photomontage No. VP5), it should be noted that this is a site-specific view and that the proposed development will be visible from much of the associated heritage landscape surrounding the Abbey.

4.2 Chapter 10 Landscape and Visual

A detailed description of the baseline environment, including of heritage, amenity and tourism sites is provided in Chapter 10. Despite the detailed assessment we consider that the description of impacts tends to underrepresent the visual effects of the proposed development and the actual impact on landscape character.

Photomontage View VP25 is an example. Table 10-18 notes the Visual Receptor Sensitivity as *Medium*, the Magnitude of Visual Change as *High-Medium* and consequently the Visual Impact Significance as *Moderate, Negative Long-term*. However, should the Magnitude of Visual Change be described as *High*, the consequent Visual Impact Significance would be assessed as *Substantial*,

Negative Long-term. In this context it is worthwhile considering the ‘existing baseline view’ and the ‘proposed view’ for VP25 (See extracts below) – and the description of a ‘High’ and ‘Very High’ Magnitude of Impact as defined in Table 10-4 of chapter.

<i>High</i>	<i>The proposal obstructs or intrudes into a significant proportion or important part of the available vista and is one of the most noticeable elements. A considerable degree of visual change will occur within the scene substantially altering its character, composition and associated visual amenity.</i>
<i>Very High</i>	<i>The proposal obstructs or intrudes into a significant proportion or important part of the available vista and is one of the most noticeable elements. A considerable degree of visual change will occur within the scene substantially altering its character, composition and associated visual amenity.</i>

It is considered that either of these definitions are more appropriate to the assessment of the visual impact from this viewpoint, and this is a consideration that can be applied to the assessment of impacts on landscape character and visual impacts throughout the chapter.

Consideration of cumulative impacts is addressed from paragraph 10.148 to paragraph 10.155 of Chapter 10. While the assessment is acknowledged, it is worthwhile noting that all other permitted / planned wind farm developments are located over 10km to the south of the proposed development. Therefore, as can be appreciated from Figure 10-5, the proposed development is located in an area where similar development is not a feature of the existing environment.

4.3 Chapter 12 Cultural Heritage

Local sites of heritage value are discussed in detail, however, we note that the significant heritage landscapes of Loughcrew and Fore Abbey are not mentioned even in the baseline context.

Often the environmental, landscape and visual setting of tourism sites is as important to appreciation and experience of visiting such attractions themselves. This is especially the case for features of cultural heritage significance where there is a relationship to the surrounding landscape. In this regard it is considered that the assessment in Chapter 12 should have addressed the character, nature and significance of the landscape as a setting for Loughcrew and Fore Abbey.

We would also consider that the assessment of the impact of the proposed development on local sites of heritage value – e.g. Rosmead House and Triumphant Arch (*‘Smiling Bess’*), Ballinlough Castle and other local heritage sites – underrepresents the actual significance of effects that are likely to be experienced.



5.0 Conclusion

In conclusion we would ask An Bord Pleanála to consider the potential impact of the proposed wind farm development on local heritage and tourism sites, including Rosmead House, grounds and Triumphant Arch (Smiling Bess), Ballinlough Castle, Killua Castle and other surrounding features / sites, together with the potential impact on wider tourism assets, including on Loughcrew Megalithic Landscape / House and Gardens, Fore Abbey Landscape and their associated surrounding landscapes.

These sites are a significant feature of local and wider cultural heritage and are important and promoted tourism and recreation assets. We have the following concerns in relation to how the impact on tourism is addressed in the EIAR, which accompanies the application:

- The lack of detail and considered assessment of the impact of the proposed development on tourism, including on local and wider tourism sites;
- The visually open, exposed and unspoilt character of this natural landscape, where wind farm development is unfamiliar and where negative impacts would be intensified;
- The siting of the proposed development in the plain overlooked from the Loughcrew Megalithic Site, a place of significant cultural heritage, landscape and tourism value; and
- The underrepresentation of likely significant impacts on cultural heritage and on the landscape and visual environment, which are important to developing and supporting the local and wider tourism product.

Yours Sincerely,

Shane Dineen

Shane Dineen

Environment & Planning Manager, Fáilte