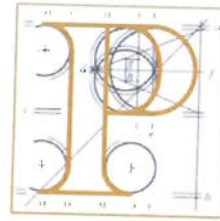


Our Case Number: ABP-319866-24
Planning Authority Reference Number:



An
Bord
Pleanála

Faillte Ireland
88-95 Amiens Street
Dublin 1
D01 WR86

Date: 19 August 2024

Re: Proposed development known as North Irish Sea Array ("NISA") Offshore Wind Farm
Located off the coast of Counties Dublin, Meath and Louth (www.northirishsearraysid.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 coastal planning authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to marine 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 marine@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,


Ellen Moss
Executive Officer
Direct Line: 01-8737285

OA15

Teil	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1890 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

Ellen Moss

From: Bord
Sent: 09 August 2024 09:39
To: Marine
Subject: FW: ABP-OA29N.319866-Arklow Bank Wind Farm Phase 2-Submission Fáilte Ireland
Attachments: OA29N.319866 Submission-Fáilte Ireland.pdf

Categories: Ellen Case

From: Yvonne Jackson <Yvonne.Jackson@failteireland.ie>
Sent: Friday, August 9, 2024 9:10 AM
To: Bord <bord@pleanala.ie>
Subject: ABP-OA29N.319866-Arklow Bank Wind Farm Phase 2-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: OA29N.319866. Planning Permission for proposed development known as North Irish Sea Array ("NISA") Offshore Wind Farm off the coast of counties Dublin, Meath and Louth and onshore infrastructure within County Dublin (Fingal and Dublin City Council administrative areas).

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
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National Tourism
Development Authority

An Bord Pleanála

64 Marlborough Street,

Dublin 1.

9th August 2024

ABP Ref.: OA29N.319866

Applicant: North Irish Sea Array Windfarm Ltd

Re: Submission in relation to a Marine Development - Application under Section 291 of the Planning and Development Act 2000, as amended, for:

Proposed development known as North Irish Sea Array ("NISA") Offshore Wind Farm off the coast of counties Dublin, Meath and Louth and onshore infrastructure within County Dublin (Fingal and Dublin City Council administrative areas)

An EIAR and NIS have 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 offshore renewable energy infrastructure in the outer maritime area located between approximately 12 and 17 km off the Irish Sea coast of north Dublin and Meath and approximately 30km south of Cooley Point. The offshore wind farm has an area of approximately 88.5 km²

The proposed development provides for two alternative options: first the erection of 49no. offshore wind turbines with a maximum tip height of 290m above the Lowest Astronomical Tide (LAT) or second, the erection of 35no. offshore wind turbines with a maximum tip height of 316m above the LAT. The turbines will be attached to the seabed by monopile foundations with associated scour protection and the wind farm would have a combined Maximum Export Capacity of c.700 MW. The application includes for 1no. offshore substation, subsea inter-array cables, subsea export cables, onshore export cables, 1no. onshore grid facility, and associated works.

Planning permission is being sought for an operational life period of 35 years.

1.0 Introduction

Fáilte Ireland's role as the National Tourism Development Authority, is to support the long-term sustainable growth in the economic, social, cultural and environmental contribution of tourism to Ireland.

Fáilte Ireland recognises the importance of developing the State's renewable energy sector and supports the government's ambitious Climate Action Plan targets and to position Ireland to take advantage of the economic opportunity created by the roll out of both fixed and floating offshore wind in Irish waters. However, the challenge lies in striking a balance between the maintenance of landscape and seascape character and scenery as a tourism asset and facilitating the development of renewable energy.

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, including its seascape, 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.

2.0 The Value of Tourism

Tourism is one of Ireland's most important industries, contributing to the economic and social fabric of the island. It is a leading creator of jobs and revenue, and one of the few sectors that has the potential to significantly benefit remote rural areas. While traditional tourism statistics focus primarily on 'flows' (i.e., the number of visitors, the number of overnight stays, etc.), Gross Value Added (GVA) measures the overall contribution of a particular sector to national income. Tourism activity in Ireland is associated with over 4% of direct GVA.¹ Because tourism is characterised by the fact that consumption takes place where the service is available, and tourism activity is frequently concentrated in areas which lack an intensive industry base, it is credited with having a significant regional distributive effect.

An essential element of the economic impact of tourism in a public policy context is the sector's contribution to Exchequer revenue. Total combined annual tax take from tourism activity was estimated at close to €3bn pre-pandemic, with VAT being the single most important source, followed by taxes on income. This estimate is based on the direct, indirect and induced impacts. This arguably represents a conservative estimate of the total Exchequer impact as the absence of such activity would, for example, result in a notable increase in the cost of unemployment benefit.



3.0 Importance of Landscape and Seascape as a Tourism Asset

The environmental and scenic quality of the Irish rural landscape is a key and distinctive determinant in the Irish tourism product and given that Ireland's tourism offering is largely based on our natural and built heritage, it is crucial that the quality, character and distinctiveness of these assets are protected. These assets are sensitive, vulnerable and interlinked and dependent on the quality of all aspects of the environment including the quality in terms of biodiversity, water, air, lands and soils as well as the interaction with visual appearance, cultural heritage, people and communities. As such any developments which may impact these features have the potential to impact the tourism product and its economic value.

We know from our research that amongst the most important reasons for visitors choosing Ireland as their holiday destination is because of our beautiful scenery, natural attractions, and natural environment. We also know that our visitors are broadly satisfied with their experience of Ireland in relation to these factors.



(Source: Fáilte Ireland Key Tourism Facts 2019)

4.0 Ireland's Ancient East – Louth, Meath Tourism

Ireland's Ancient East was launched in 2015 as a mechanism to unify the region as an internationally marketable tourism destination. By 2019, tourism in Ireland's Ancient East was worth €1.7bn to the



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regional economy supporting approximately 55,200 jobs. Over half (55%) of this revenue was generated by international visitors with the remaining 45% from Island of Ireland visitors.

The Ireland's Ancient East Regional Tourism Development Strategy 2023 – 2027 is a roadmap for the tourism industry and all stakeholders involved in the region to navigate the current challenges and steer a course towards recovery and future success. It sets out a strategic approach to unlock the commercial potential of Ireland's Ancient East while ensuring development is sustainable and the benefits accrue to local communities and protect our natural environment. The Strategy is also informed by planning policy, the National Planning Framework, the Regional Spatial and Economic Strategies and lower tier plans. It is a key strategic objective of the strategy to motivate the domestic and international consumer to visit Ireland's Ancient East.

The Ancient Destination Experience Development Plan (ADEDP) is the current active DEDP for Meath and Louth with the purpose to co-ordinate all tourism development activity in the destination around a single five-year vision which is prepared and owned by both public and private sector stakeholders.

The target outputs from the ADEDP will include a reduction in seasonality, increase visitor spend, grow visitor bednights, employment and visitor dispersion. In addition to the core economic performance measurements, the DEDP is designed to address a number of objectives including but not limited to;

- Realise the value of the core assets within Ancient, including Destination Towns, natural assets and visitor attractions to deliver sustained growth.
- Engage the visitor with fascinating stories of Ancient in a UNESCO World Heritage area, delivered through best-in-class immersive experiences and activities.
- Protect, sustain and enhance the natural environment of the Plan area.



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5.0 Dublin

Dublin is the key access point for the island of Ireland and is often the first and/or last experience visitors have of the country. Its traditionally strong air access has also made it the key city break destination in Ireland. For many overseas consumers, it is their only experience of Ireland. This strong access, combined with good conference facilities, has also seen Dublin enjoy sustained growth in the high value Meetings, Incentive, Conference and Events (MICE) business. Equally, the city's sporting and events infrastructure enables it to attract many domestic visitors.

The tourism economy and associated visitor numbers for Dublin were impressive prior to COVID-19. Nationally, Dublin accounts for over two thirds of all overseas tourists to Ireland. Tourism revenue pre pandemic was €2.6bn, 85% of this revenue coming from overseas tourists. Tourism is also important in terms of employment, with the industry supporting just under 70,000 jobs in 2019.

The Dublin Regional Tourism Development Strategy 2023-27 is a roadmap for the tourism industry and all stakeholders involved in tourism in the region to navigate the current challenges and steer a course towards a sustainable recovery and continued success. The plan sets out a strategic approach



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to unlocking the commercial potential of Dublin. It will ensure focus on tourism development is sustainable and regenerative and that the benefits accrue to local communities and to nature. The Strategy is also informed by planning policy, the National Planning Framework, the Regional Spatial and Economic Strategies and lower tier plans. It is a key strategic objective of the strategy to develop differentiating experiences, providing domestic and international tourists with reasons to visit and to stay longer.

The Dublin Coastal Trail was developed and launched in 2022 by Fáilte Ireland in partnership with Iarnród Éireann and the three Dublin local authorities. The new trail encourages domestic and international tourists to explore Dublin's beautiful coastal region. Stretching from Skerries in North Dublin to Killiney in South Dublin, the trail is easily accessible by rail and encourages visitors to journey out of the city, bringing new life to Dublin's coastline.





6.0 Visitor Awareness and Perceptions of the Irish Landscape (Fáilte Ireland, 2018)

In 2017 Fáilte Ireland commissioned a study into visitor awareness and perception of the Irish landscape. The findings were that very few negative comments were made and often large-scale developments – including the existing offshore wind farm at Brittas Bay (Arklow Bank Phase 1 Wind Farm) – were not specifically noticed or reported.

While not specifically referenced in this application, it must be noted that the Brittas Bay Wind Farm is not only the only such project in existence in Ireland – with associated innovative and novelty qualities – but comprises only seven turbines of a maximum 124m in height located at 10 to 12 km offshore. However, the turbines proposed at 'NISA' are more than twice the height of the existing turbines at Brittas, and at a similar distance from the shore. Therefore, the existing offshore Wind Farm is not an appropriate basis for comparison or precedent for offshore wind farm projects as now proposed.

This consideration is supported in the study *'Impacts of offshore wind farms on local tourism and recreation: a research study'*, (Glasson et al., 2022) which notes that currently the balance of the research finds that the impact on tourism of offshore windfarms is largely benign and of low significance. However, this may change in the future: *"Visitor perceptions of the impacts of OWFs, both generally and for particular locations, may change overtime with perhaps the waning of the innovative attraction of OWFs. There may be potential for future enhancement initiatives which link OWF promotions with other activities, including for example nature-based tourism and supply chain businesses."*

Therefore, given the scale and proximity of the Proposed Development, and other similar developments, both proposed and planned along the east coast, we would query if sufficient consideration and assessment of potential **alternatives** and the full extent of environment impacts has been given to locating such development at greater distance from the highly sensitivity coast / near-coast area.

7.0 Community Benefit Fund

It is noted that coastal and marine communities will benefit from offshore renewable electricity projects through the community benefit fund process that will be established for each project. Fáilte Ireland are supportive of this framework and the opportunity it provides for investment in the sustainable development of the area including tourism as a key sector and economic driver.

8.0 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 33 Socio-Economic, Tourism and Recreation.



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We would make the following observations / comments on the assessment of **tourism-related aspects**:

1. **Pre-application consultation** with Fáilte Ireland is noted in this chapter of the EIAR, as is the reference to Fáilte Ireland guidelines and use of Fáilte Ireland data.
2. It is noted that the **baseline tourism description** (Section 33.3.9) addresses Tourism in Fingal, Dublin City, Meath and Louth, referencing relevant tourism strategies and key attractions etc., however, the description is of high level and relatively generic manner. The baseline does not provide a detailed list or any mapping of existing tourism facilities / products within the study area.
3. The description of the **baseline tourism environment** is lacking in terms of a significance or sensitivity analysis, which could have brought focus to the assessment.
4. The **assessment** of both the construction phase and operation phase impacts on tourism is high level, summary and generic in nature, relying, overly, on the Seascape, Landscape and Visual Assessment (see comments on this assessment below also).
5. The **assessment** does not describe the potential changes, the degree of change, and as no baseline sensitivity has been applied, the assessment of likely impacts, i.e. as presented in Tables 33.12, 33.16, is unsupported.
6. The assessment of potential **cumulative impacts** on tourism is also considered high level, summary and dismissive in nature, relying on the presence of a Community Benefit Fund and employment, without appropriate consideration of the likely impact on the character, nature and type of existing tourism product in the study area.
7. We have some concern in relation to assessment of **visual impacts** as set out in Chapter 29 Seascape, Landscape and Visual of the EIAR. This is reinforced by a review of similar assessments for other offshore wind farm developments currently before An Bord Pleanála, and specifically the Oriel Offshore Wind Farm (ABP Ref.: OA15.319799), where there is considerable overlap in the zone of visibility and in terms of specific viewpoints selected for assessment and preparation of Photomontages.

From this review it would appear that the assessment of visual impacts for the proposed NISA project notes markedly lower impacts and lower significance of impacts from locations of similar distance – even in the case of Clogherhead which is common in both (VP 13 in NISA assessment and VP 14 in Oriel assessment). Table 29.39 of the NISA Chapter notes that visual impact of the operational phase of the proposed development as follows:

Array Viewpoint	Area	Visual Receptor Sensitivity	Magnitude of Impact (Pre-Mitigation)	Significance / Quality / Duration of Visual Effect
VP13 Clogherhead Beach		High	Medium – Low	Moderate/Negative / Long-term

For a similar development at a similar distance the Oriel Wind Farm Assessment assesses the impact of the Oriel Wind Farm development as “**Moderate to Major Significance, Adverse**” (Table 27-81 of chapter 27 of the EAIR submitted with the Oriel Wind Farm Project).

8. We also have some concern in relation to of **cumulative assessment of visual impacts** as set out in at Section 29.9 of Chapter 29 Seascape, Landscape and Visual of the EIAR. The cumulative assessment is focused on the subject development together with Oriel Array to the north and Dublin Array and Codling Wind Park to the south. However, the assessment does not consider other potential projects (which are assessed in the Oriel application), including Mainstream Dublin which is located between NISA and Oriel, or MaresConnect, which is located south of the NISA project.
9. Notwithstanding this weakness the cumulative assessment, which is presented in the EIAR for the NISA project, fails to appreciate the cumulative visual relationship between the proposed developments. As an example, the cumulative impact assessment from VP 13 Clogherhead is described in Table 29.40 of the EIAR, as follows:

VP No.	Sensitivity of VP receptor (from Table 29.39)	Magnitude of Cumulative Impact	Significance of Cumulative Effect
VP13 Clogherhead Beach	High	Negligible	Imperceptible

This assessment fails to appreciate that turbines both at the proposed NISA project and at the proposed Oriel project to the north will be similarly visible from this sensitive vantage – in effect considerably extending the extent of offshore turbines visible across the full panorama from Clogherhead. This lack of appropriate consideration to the cumulative assessment ignores the potential for ‘near shore’ turbines to be visible along entire coast from Strangford Lough (NI) to Dublin City and to Wexford if taken with other proposed projects (e.g. Oriel and Arklow Bank Phase 2).

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

- the adequacy of the detail provided in the description of the baseline tourism environment, particularly in terms of the absence of characterisation or sensitivity applied to the tourism environment,
- the lack of a sufficiently detailed consideration of the potential construction and specifically the operation phase impacts on tourism,
- the absence of a sufficiently considered assessment of potential cumulative impacts on tourism, potentially along the full extent of the east coast of Ireland, and
- the appropriateness of the proximity and scale of the proposed development given its specific location along east coast.

Yours sincerely,



Shane Dineen
Manager-Environment and Planning, Fáilte Ireland