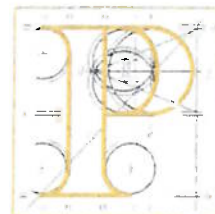


Our Case Number: ABP-320705-24



An
Bord
Pleanála

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

Date: 06 November 2024

Re: Proposed development of 9 no. wind turbines, 110kV substation and ancillary development located in the townlands of Snatty, Hurdlestown, Oatfield, Drumsillagh, Sallybank, Gortacullin, Aharinaghbeg, Knockshanvo, Cloontra, Cloghoolia, Ballycullen and others, County Clare. And located in the townland of Court, County Limerick. (<https://knockshanvoplanning.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,

PP DC
Lauren Murphy
Executive Officer
Direct Line: 01-8737275

PA09

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Glao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
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



**Fáilte
Ireland**

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

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

Issued by email: bord@pleanala.ie

31st October 2024

Re: Case reference: PA03.320705

Proposed development of 9 no. wind turbines, 110kV substation and ancillary development located in the townlands of Snatty, Hurdlestown, Oatfield, Drumsillagh, Sallybank, Gortacullin, Aharinaghbeg, Knockshanvo, Cloontra, Cloghoolia, Ballycullen and others, County Clare and located in the townland of Court, County Limerick.

Dear Secretary,

I refer to the above application which is currently registered with An Bord Pleanála.

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. This is highlighted in the most recent 'Overseas Holidaymakers Attitudes' survey, that 91% of our overseas visitors want to experience Ireland's unique scenery. 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.

It is the policy of Fáilte Ireland to support sustainable development and we acknowledge that there is a requirement to provide for and develop renewable energy, at appropriate locations and in accordance with proper planning and sustainable development. In considering the proposed wind farm development Fáilte Ireland acknowledges the requirement at a national level to reduce dependence on fossil fuels and to increase support from renewable sources, including wind. Notwithstanding, Fáilte Ireland is also aware of the significant effect that wind farms can have on the local and wider landscape, including the landscape as a major asset in support of national and international tourism.

Commentary on Proposed Development

From a tourism perspective the key impacts arising from the proposed development are likely to arise due to:

- Construction related impacts
- Impacts arising from the operational stage of the development

Construction Related Impacts

These impacts are temporary impacts arising directly from the construction of the windfarm. They include increased traffic movements by heavy goods vehicles in the locality and 'on-the ground' impacts arising from construction and ground works. These impacts may have a short-term negative impact on tourists and other users of the local area. These impacts can be mitigated by the implementation of appropriate construction management strategies which will reduce the nuisance associated with the construction phase. During construction of each of the major infrastructure elements and the installation of the wind turbines there is potential for impacts on the biodiversity and ecology of the area.

Impacts Arising from the Operational Stage of the Development

Arising from the operational stage of the development the key impacts that may affect tourism in the receiving environment are visual impacts, and those impacts arising from the operation of the facility.

The Landscape Character Assessment of County Clare (2004) describes 26 Landscape Types (LCTs) and divides the county into 21 Landscape Character Areas (LCAs). The proposed windfarm development is located within LCA 8, Slieve (sic) Bernagh Uplands.

LCA 8 – Slieve Bernagh uplands notes the prominence of Slieve Bernagh to the south (and west) of Lough Derg. The upper slopes of the uplands are described generally remote, and rarely enclosed, with sparse communications and the access roads around Slieve Bernagh consisting of forestry roads. Its isolation with long views afforded across surrounding landscape to Broadford Hills, Lough Derg and lower drumlin landscapes is also noted as a key characteristic. The LCA assessment of landscape and sensitivity states the lower slopes are sometimes affected by commercial forestry and inappropriate housing styles. However, the extensive hedgerow boundaries, and some fine examples of vernacular housing, ensure that many parts of this LCA remain intact and very attractive.

The higher slopes would be sensitive to very visible development and the skylines of Slieve Bernagh and Woodcock Hill to Ballycar are also designated as high amenity. The

recommendations for future management of the area include proactive management of wind farms. Whilst this landscape is not designated Heritage Landscape, Fáilte Ireland would consider it important to ensure its qualities as an attractive area to visitors should be taken into consideration.

In addition to the existing amenity and landscape character value of the area, it is important to consider the significance of the visual impacts on the potential amenity value. From a recreational perspective, it is noted the proximity of the proposed development to the 12 O’Clock Hills project which comprises of 3 main trails. The proposed development includes the provision of a section of a new recreational walking trail, as well as new viewpoints and amenity resources at the western extent of the Wind Farm site which link with existing trails and amenities.

The EIAR states *“Whilst the proposed turbines will cause a ‘Significant’ impact on the existing views at the 12 O’Clock Hills viewpoint (photomontage VP12; assessed in full below in Section 14.7), the proposed design and construction of a new section of recreational walking trail and new viewing areas included as part of the Proposed Development will enable the continued experience, enjoyment and appreciation of landscapes and scenic amenity of equivalent quality in that area.”*

Having regard to the continued and increased use of the upland landscape for leisure and recreational use, potential changes in landscape character perceived from views of the proposed development should be considered. The profile of recreational activities in the area is undoubtedly ‘landscape based’ – walking, cycling, and outdoor pursuits. Therefore, the protection and management of the landscape character becomes as much about protecting an economic and cultural asset, as it is about the physical context of those landscape features.

Cumulative Impacts

We note that the EIAR has included the projects and proposals for other wind farms that are either at pre-planning stage, planning stage and consented. We request that the Board considers, assesses and satisfies itself that the proposed Wind Farm development will not result in significant effects, either on its own or cumulatively, on the landscape or visual environment.

Conclusion

It is the policy of Fáilte Ireland to support the sustainable development of electricity generation by sustainable and renewable sources and support its contribution towards a sustainable energy supply in the region at appropriate locations and in accordance with proper planning and sustainable development.

We therefore ask that the planning authority take our observations into consideration when deciding on this application including the likely impact of the proposed development on the tourism and amenity receptors within the area.

Yours Sincerely,



Shane Dineen

Environment & Planning Manager, Fáilte Ireland