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Central Planning Unit,
Donegal County Council,
County House,
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Co. Donegal
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By email: windenergycdpvariation@donegalcoco.ie

Date: 3rd June 2022

Re: Fáilte Ireland Submission on Proposed Variation to the County Donegal Development Plan 2018-2024 (As Varied) in respect of a Wind Energy Policy Framework (Variation No. 2).

To whom it may concern,

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to the invitation for submissions on the Proposed Variation to the County Donegal Development Plan 2018-2024 (As Varied) in respect of a Wind Energy Policy Framework (Variation No. 2) by Donegal County Council.

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.

Fáilte Ireland recognises the importance of developing the State's renewable energy sector. Fáilte Ireland has been supportive of the preparation and adoption of the Guidelines and has contributed to the preparation of County Wind Energy Strategies across the Country. These Strategies have provided invaluable guidance to Applicants and Planning Authorities alike in identifying potential sites and assessing the potential for developing wind energy infrastructure. Within the hierarchy of plans, these Strategies have ensured the development of wind energy infrastructure is plan-led and can be located to avoid – or minimise, disproportionate negative impacts on other land uses and the receiving environments.

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. 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 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.

Fáilte Ireland recommends that the above data on visitor attitudes in relation to wind energy development, are taken into consideration in preparing the mapping of areas 'Open to Consideration'

and ‘Acceptable in Principle’ for wind development. Perceptions in the landscape of wind energy are important to assess their wider impact on the landscape.

Reason for the Submission

Fáilte Ireland understands that the County Donegal Development Plan 2018-2024 is adopted, but a High Court Order made on the 5th day of November 2018 removed certain critical provisions of the Plan relating to Wind Energy from that adopted by a resolution of the Members in May 2018.

Fáilte Ireland has reviewed the Environmental Report of the Proposed Variation to the County Donegal Development Plan 2018-2024 (As Varied) in respect of a Wind Energy Policy Framework (Variation No. 2). As the Proposed Variation, once approved, will form part of the adopted County Development Plan, our comments take adopted Objectives and Policy relating to Tourism into consideration.

Tourism in the County Donegal Development Plan 2018-2024

The Core Strategy of the County Donegal Development Plan 2018-2024 identifies Tourism as one of the priority areas with Settlement Structure, Layer 3: Rural Towns and Open Countryside as a ‘*critical component of the social, community and cultural identity of the County*’ including ‘*to provide a natural tourism product*’.

Tourism and The Wild Atlantic Way is also identified as one of the six common themes of existing or potential special economic functions that cut across the ‘Strategic Towns.’ It is notable that the Strategic Towns are located on or close to the coastal edge of the county in the spatial distribution of Strategic Towns as shown on Figure 3.1 of the County Development Plan. Of the twenty-three ‘Strategic Towns’ performing ‘Special Economic Functions’ in Chapter 3.3, Table 3.2. Tourism is identified as a reason in nineteen of them.

Chapter 7: The Natural and Built Heritage of the County Development Plan states that ‘*The landscape of County Donegal is distinctive, unique and synonymous with the identity of County Donegal, and the extensive coastline and seascape is an integral and constituent element. The nature of the landscape is such that it is a contributory factor in the economic draw owing to its quality as a place to live and work, attracting Foreign Direct Investment and associated population growth, **of note is the growing tourism market**, evidenced by its recent accolades as a set location for the next ‘Star Wars’ movie and being voted ‘The Coolest Place on the Planet’ by National Geographic Traveller Magazine (Jan/Feb 2017)*’.

The following Objectives are noted with regard to the importance of landscape and built heritage to tourism:

NH-0-5: ‘*To protect, manage and conserve the character, quality and value of the landscape having regard to the proper planning and development of the area, including consideration of the scenic*

amenity designations of this plan, the preservation of views and prospects and the amenities of places and features of natural, cultural, social or historic interest’.

NH-0-7: *‘To protect the areas of Especially High Scenic Amenity from intrusive and/or unsympathetic developments’.*

Chapter 9 of the County Development Plan sets out the Aims and Objectives for Tourism. The stated aim for Tourism in the County Development Plan is:

‘To enable Donegal to compete as a world class tourism destination by protecting key tourism assets and supporting the sustainable development of new and existing tourism products and attractions.’

The introduction to Chapter 9 elaborates *‘With its; rugged coastal landscapes, windswept mountains, offshore islands, varied natural habitats, vibrant cultural life and Gaeltacht areas, and rich built heritage, Donegal possesses a wealth of world class tourism assets (Map 9.1: Tourism refers). Furthermore, iconic attractions such as Glenveagh National Park, Sliabh Liag, Fanad Lighthouse Malin Head, and Grianan Na Aileach are capable of attracting significant visitor numbers in their own right.’*

The intrinsic link between the landscape, settlements and natural heritage of the County to the existing and future value of tourism is well established in the County Development Plan. It is through this interrelationship that Fáilte Ireland makes observations and recommendations on the Proposed Variation to the County Donegal Development Plan 2018-2024 (As Varied) in respect of a Wind Energy Policy Framework.

Proposed Variation to the County Donegal Development Plan 2018-2024 (As Varied) in respect of a Wind Energy Policy Framework (Variation No. 2).

Fáilte Ireland wishes to make the following comments on the Environmental Report on the Proposed Variation to the County Donegal Development Plan 2018-2024 (As Varied) in respect of a Wind Energy Policy Framework (Variation No. 2).

Regarding Section 1.2.3: Step 3 Preparation of Environmental Report:

Fáilte Ireland welcomes the statement that *‘it is considered beyond reasonable doubt that windfarm applications will require an Environmental Impact Assessment Report (“EIAR”) and Appropriate Assessment (“AA”) at the development consent stage.’*

Fáilte Ireland agrees that *‘at this time the likely significant effects of the Proposed Variation on the environment at a strategic level only and to leave over for detailed project level assessment matters connected with the exact location and detailed design of the windfarm(s).’*

Section 1.2.3 of the Environmental Report on the Proposed Variation goes on to state that the report *‘identifies possible overall measures which may prevent, reduce, or as fully as possible offset such adverse environmental impacts (i.e. mitigation measures)’* and includes Table 1.2: Checklist of



Contents of Environmental Report. Table 1.2 identifies Contents of Environmental Report under (f) *'The likely significant effects on the environment.'* A number of issues to be considered are listed to be addressed under Section 7 *'Assessment of the Likely Significant Effects on the Environment of Implementing the Proposed Variation'*, many of which would be of interest and importance to tourism. However, impact on tourism specifically is not stated in the description of contents. Given the significance of tourism to the economy of County Donegal and the role of landscape and environment, we recommend that impact on tourism is considered specifically and included in the Contents of Environmental Report. This is in line with the *'EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports,'* (May 2022). Table 3.1 of the Guidelines¹ identifies *'Amenity'* as a typical heading under *'Landscape'* as a Prescribed Environmental Factor. Typical Topics under *'Amenity'* include *'Public Access, Public amenities, Recreation and Tourism.'* The consideration of Tourism as an issue in its own right will ensure that measures necessary to mitigate potential adverse effects are incorporated from the outset of the planning and design of wind energy development.

Regarding Section 3 *'The Relevant Aspects Of The Current State Of The Environment And The Likely Evolution Thereof Without Implementation Of The Plan Or Programme'*:

This section sets out the current state of the environment under environmental headings as outlined under the SEA Directive. A separate table is provided for each environmental heading with a referencing system to baseline topics with associated environmental protection objectives as discussed in Chapter 6 of the Environmental Report of the Proposed Variation. The tables include mapping of the assets under headings including Biodiversity, Flora and Fauna, Water, Cultural Heritage and Landscape. Fáilte Ireland believes that each of these baseline reference items contribute to the tourism value of County Donegal.

Under 3.9 Landscape the baseline reference is identified as Figure 3.14 County Donegal Development Plan 2018-2024 (As Varied) 7.1.1 Scenic Amenity Map. The map identifies the extents of areas of landscape that correspond with the categorisation of the scenic amenity value of the County into three layers as described in Chapter 7 *'Natural and Built Heritage'* of the County Development Plan. These are as follows:

'Areas of Especially High Scenic Amenity (EHSA): *Sublime natural landscapes of the highest quality synonymous with the identity of County Donegal. These areas have extremely limited capacity to assimilate additional development.*

'Areas of High Scenic Amenity (HSA): *Landscapes of significant aesthetic, cultural, heritage and environmental quality that are unique to their locality and are a fundamental element of the landscape and identity of County Donegal. These areas have the capacity to absorb sensitively located development of scale, design and use that will enable assimilation into the receiving landscape and*

¹*'Guidelines on the information to be contained in Environmental Impact Assessment Reports,' EPA, (May 2022), Table 3.1 'Sample organisation of headings and topics to address issues arising for each prescribed environmental factor'.*

which does not detract from the quality of the landscape, subject to compliance with all other objectives and policies of the plan.

Areas of Moderate Scenic Amenity (MSA): *Primarily landscapes outside Local Area Plan Boundaries and Settlement Framework boundaries, that have a unique, rural and generally agricultural quality. These areas have the capacity to absorb additional development that is suitably located, sited and designed subject to compliance with all other objectives and policies of the Plan.'*

The map also includes National Roads, Regional Roads and locations of Views. It is noted that *'None of the landscapes have been classified as Low Value.'* However, Fáilte Ireland recommends that the baseline information that is relevant should also include Tourism related assets. Relevant information is shown on Map 9.1 Tourism of the County Donegal Development Plan 2018-2024 and referred to in Chapter 9 Tourism of Part B of the County Development Plan. Tourism assets on Map 9.1 include The Wild Atlantic Way, Blue Flag Beaches, Heritage Places and Buildings, walking and cycling routes, Glenveagh National Park and the Indicative Letterkenny to Burtonport Greenway.

Regarding Section 4: 'Environmental Characteristics of the Areas Likely to be Significantly Affected by the Proposed Variation'.

Fáilte Ireland notes the extents of Areas Unlikely to be Significantly Affected in Fig. 4.1, which covers areas of the County where minimal capacity for windfarm development is proposed from overlaying the spatial layers of the assessment leading to areas *'Not Normally Permissible.'* The Geographical Extent of Areas Likely to be Significantly Affected by the Proposed Variation in Fig. 4.2. is also noted, which shows areas that are considered *'Open to Consideration'* and includes *'a very small'* but undefined area considered *'Acceptable in Principle'*.

The results of the 'sieve-mapping-analysis' following the overlay of the spatial layers shown in Fig. 4.2 indicates areas *'Open to Consideration'* which predominantly extend around the coastline of County Donegal.

Fáilte Ireland agrees that areas *'Open to Consideration'* may be constrained by one or more environmental considerations that require detailed investigation at project level and such detailed investigations may or may not have a positive outcome. However, we believe that the omission of Tourism assets as part of the sieve mapping analysis in the own right may lead to areas being included in *'Open to Consideration'* which should not be included. Map 9.1 includes the Wild Atlantic Way, which is a tourism asset of National significance. 21% of The Wild Atlantic Way is in County Donegal with 3 Signature Points and 37 Discovery Points along the route. The Wild Atlantic Way runs around the Donegal coastline linking with other existing and potential tourism assets identified in Chapter 9 of the County Development Plan. Fáilte Ireland believes that a significant proportion of the areas shown on Fig. 4.2 overlay The Wild Atlantic Way. Fáilte Ireland recommends that the:

- Tourism assets shown on the Map 9.1 of the County Development Plan 2018-2024 are included in the Environmental Characteristics of Areas likely to be Significantly Affected by the Proposed Variation and the sieve mapping analysis reviewed in light of this.

- Analysis of tourism assets considers potential effects that are relevant to the assets and their value. For example, the hierarchy of Signature Points and Discovery Points on The Wild Atlantic Way and the viewing distance of wind turbines from tourism assets.

The concentration of areas ‘*Open to Consideration*’ around the Donegal coastline also has potential to affect the perception of the landscape from the sea and the marine environment as a tourism asset. Fáilte Ireland would draw attention to the Regional Seascape Character Assessment for Ireland, 2020, published and available through the Marine Institute². The Donegal coast falls under four Regional Seascape Areas:

- SCA1 - Border SCA Lough Foyle
- SCA2 - North Donegal Atlantic Headlands, Bays and Beaches
- SCA3 - North Atlantic Islands, Headlands and Beaches
- SCA4 - Sligo Bay (partially)

The Regional Seascape Character Assessment for Ireland sets out Key Characteristics, Natural Influences, Cultural and Social Influences, Contemporary (current characteristics), Art and Folklore, Perceptual Influences, Sense of Place and Sounds and Smells for each area. The document is a valuable source supporting a greater understanding of the qualities and characteristics that underpin the value of Donegal coast as a tourism asset. Fáilte Ireland recommends that the environmental assessment for the Proposed Variation takes this Regional Seascape Character Assessment into consideration as part of the sieve mapping process and also includes the document for reference by potential development applicants.

Regarding Section 7: Assessment of Likely Significant Effects on the Environment of Implementing the Proposed Variation

7.1.2 Guidance in Relation to the Assessment of Likely Significant Effects on the Environment in the Environmental Report refers to the EPA publication ‘*Strategic Environmental Assessment Resource Manual for Planning Authorities.*’ Fáilte Ireland suggest that ‘*EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports,*’ (May 2022) is also relevant here, particularly in respect of the content and issues, including tourism, as a typical topic for assessment.

Table 7.1 Consolidated Environmental Protection Objectives sets out the Environmental Component, Reference Code and the Consolidated Environmental Protection Objectives. Fáilte Ireland recommends that this table is updated to reflect the inclusion of Tourism Assets as an Environmental Component and the relevant Protection Objectives.

² ‘Regional Seascape Character Assessment for Ireland 2020 Final Report’, The Marine Institute. 2020. Definition and Classification of Ireland’s Seascapes. Minogue, R, Foley, K, Collins, T, Hennessy, R, Doherty, P, Vaughan, E and Black, D (Web: [final_seascape_character_assessment_report_with_annexes.pdf \(marine.ie\)](https://www.marine.ie/~/media/12/6/8/1/2020-06-23-final-seascape-character-assessment-report-with-annexes.pdf))

Table 7.2: Summary Assessment Matrix of the Likely Significant Effects of Specific Objectives, Policies, and Land Use Zonings of the Proposed Variation sets out the Objective, Policy or Land Use Zoning Reference, Summary Text of the Proposed Variation and a colour coded assessment of effect. Fáilte Ireland recommends that this summary matrix is updated to include Chapter 9 Tourism in the County Development Plan with appropriate wording following the assessment process that ensures the protection of identified Tourism Assets (County Donegal Development Plan 2018-2024, Map 9.1).

Fáilte Ireland welcomes the proposed inclusion of new policy E-P-23 (Ref# 13) regarding protection of specific assets. However, the assessment of the potential impact on Tourism Assets may require specific policy wording to be inserted that ensures the protection of identified Tourism Assets beyond those included currently. The proposed policy wording states requirements for set back of proposed turbines from the nearest part of the curtilage of residential properties and other centres of human habitation. Fáilte Ireland believes that this policy wording may not be adequate to protect Tourism Assets from potential adverse effects from wind development. Specific wording should be included to set parameters for wind turbines in respect of Tourism Assets, this may be defined as Visibility Level to guide what may/may not be acceptable³.

Ref# 20 in the Matrix Table includes a proposed Insert Map 8.2.1 entitled ‘Wind Energy’. Fáilte Ireland anticipates that the proposed Insert Map 8.2.1 will be updated following the assessment of Tourism Assets through the sieve mapping process.

Regarding 7.3 Overall Assessment of Likely Significant Effects on Key Environmental Aspects:

7.3.9 Landscape and Visual states *‘In relation to the visual baseline the following provisions of the above Development Plan are deemed significant:*

- *Map 7.1.1 of the plan which identifies a range of views within the county (see above).*
- *Objective NH-O-5: To protect, manage and conserve the character, quality and value of the landscape having regard to the proper planning and development of the area, including consideration of the scenic amenity designations of this plan, the preservation of views and prospects and the amenities of places and features of natural, cultural, social or historic interest.*
- *Policy NH-P-17: It is a policy of the Council to seek to preserve the views and prospects of special amenity value and interest, in particular, views between public roads and the sea, lakes and rivers.*
- *Policy TOU-P-5: It is a policy of the Council not to permit development which would materially detract from visual and scenic amenities along the route of the Wild Atlantic Way’.*

Fáilte Ireland agrees with the significance of these provisions. However, this section of the assessment report should also include County Donegal Development Plan 2018-2024, Map 9.1:

³ See ‘The Renewable Energy Landscape, Preserving scenic values in our sustainable future,’ (2017), Apostol D., Palmer J., Pasqualetti M., Smardon R., Sullivan R. – Chapter 5: Social Acceptance of Renewable Energy Landscapes

Tourism, which shows the route of The Wild Atlantic Way and the other key Tourism assets. The policy references relating to the identified Tourism assets should also be included.

Table 7.3: Overall Assessment of Landscape Effects on Scenic Landscape Category Areas (Map 7.1.1 of the CDP 2018-2024 (As Varied) refers) sets out the Landscape Receptor, Sensitivity, Magnitude of Effect, Overall Landscape Effect and Comment. Fáilte Ireland notes that the report finds that ‘A significant portion of the HAS (High Scenic Amenity) landscapes are contained within the ‘Open to Consideration’ wind energy zoning in the variation. Furthermore, Donegal is likely to experience development pressures for further wind energy development in the coming years as a result of the government’s Climate and Renewable energy targets. Fáilte Ireland agrees that it is likely that there will be development pressures from further wind development. Considering that the significant proportion of the areas currently mapped as ‘Open to Consideration’ are located around the Donegal coast and overlap with the greatest proportion of the County’s most significant Tourism assets, the comment under ‘Size/Scale’ reinforces the importance of assessing the potential impact on Tourism in its own right. Whilst Map 7.1.1 covers aspects that overlap with Tourism, it does not identify Tourism assets specifically and Fáilte Ireland believes that, on its own, it is not an adequate basis for assessing potential effects on Tourism. We would recommend that a similar mapping and assessment process is carried out with regard to Map 9.1 Tourism to consider potential effects more accurately for Tourism assets.

Furthermore, pressures to develop wind in Donegal will not only relate to onshore wind development. A programme of development of significant offshore wind is also likely. Consideration should be given to ensuring policy is written to ensure that the potential effects of onshore infrastructure and support services for the construction, operation, and maintenance of offshore wind is addressed to safeguard the value of Tourism assets and other key environmental characteristics.

With regard to 7.4 ‘In combination and Cumulative Impacts,’ Fáilte Ireland anticipates that the inclusion of Tourism assets as identified in the County Development Plan, Map 9.1 as part of the assessment process will lead to an update of Table 7.4 Key Environmental Receptors.

Regarding 8.2, Measures to prevent, reduce and as fully as possible offset any significant adverse environmental effects related to the Proposed Variation:

Under ‘Avoidance and Reduction of Significant Adverse Environmental Effects through Sustainable Spatial Frameworks’ the report states ‘Environmental issues (biodiversity, impacts on human health, landslide susceptibility/water quality, landscape and visual impacts) were fully integrated into the Proposed Variation making process from the outset to ensure that the variation minimises impacts on key environmental receptors/has due regard to environmental constraints and otherwise promotes sustainable development’. Fáilte Ireland anticipates that the of Tourism assets as identified on Map 9.1 Tourism will be included to ensure full integration of environmental issues into the Proposed Variation.

Under ‘*Avoidance and Reduction of Significant Adverse Environmental Effects through Planning Policies,*’ Fáilte Ireland anticipates that the Tourism assets as environmental receptors will be included and highlight key existing relevant Tourism policy and any new policy wording that stipulates parameters for the assessment of potential wind development on Tourism assets.

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.

The Environmental Report of the Proposed Variation to the County Donegal Development Plan 2018-2024 (As Varied) in respect of a Wind Energy Policy Framework (Variation No. 2) sets out a clear sequence of the approach, assessment and conclusions reached in setting wind policy framework for inclusion in the County Development Plan. Fáilte Ireland is supportive of this process.

The environmental issues considered in the assessment process include aspects that are of importance to tourism in Co. Donegal. However, the omission of Tourism and identified Tourism assets as identified in the County Development Plan 2018-2024 specifically, may lead to a perception that wind development proposals are ‘Open for Consideration’ in areas where they will have an adverse effect on key tourism assets. Fáilte Ireland observes that the areas ‘Open for Consideration’ overlap locations of highly important Tourism assets and attractions, particularly around the coast. The environmental report does state that areas ‘Open for Consideration’ are subject to detailed environmental assessment and potentially sensitive receptors affecting the acceptability of wind farm proposals. However, Fáilte Ireland recommends that Tourism assets are identified and incorporated in the sieve mapping and assessment process in their own right to ensure Tourism is protected as an essential part of the County economy.

We therefore ask that Donegal County Council take our observations into consideration when concluding the Variation to the Wind Energy Policy Framework.

Yours Sincerely,



Environment & Planning Manager, Fáilte Ireland