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Appendix A – Tourism Impact Assessment

1 INTRODUCTION

This Technical Report has been prepared by Michael Counahan, Managing Director of CHL. Additional research was conducted by Aidan Pender, former Associate Director at CHL Consulting Ltd.

Michael Counahan has some 40 years' professional consulting experience in tourism, cultural heritage and the arts. During this time, he has worked on tourism development projects throughout Europe, the Caribbean, Middle East and South-East Asia. He has led the majority of CHL's assignments over the past 25 years. He holds a B.A. (Mod.) in Economics & Politics, an M.A. and an LL.B (Bachelor of Laws). He is a Fellow of the Institute of Management Consultants and Advisers.

Michael has conducted numerous tourism planning and development studies throughout Ireland, North and South, over the past 30 years. These include tourism and economic impact assessments, project cost-benefit analyses, market and financial feasibility studies, market demand assessments and strategic tourism master planning.

Aidan Pender was with CHL Consulting for 10 years up to his retirement at the end of 2023. He joined CHL from Fáilte Ireland (National Tourism Development Authority of Ireland) where he had been Director of Strategic Development. In that position he was responsible for the development of a range of programmes designed to support the further development of the Irish tourism industry, with particular emphasis on the scope, content and quality of visitor experiences. He holds Masters Degrees in Economic Science and in Public Administration.

Aidan has conducted numerous studies on tourism impacts associated with both the renewable energy sector and the mineral extraction sector in Northern Ireland. He has also advised on the tourism and planning implications of a change of use to tourism accommodation. In recent years, he has carried out numerous projects in the tourism sector in Ireland and the UK - these include feasibility studies, tourism impact assessments, cost-benefit analysis projects, and strategic master-planning for new tourism developments.

This Technical Report should be read alongside the *Tourism Impact Assessment*, Appendix A of this report.

2 METHODOLOGY

The scope of the work which underpins this Technical Report on Tourism is detailed in the Tourism Impact Assessment of the proposed development prepared by CHL Consulting in August 2022 and updated in May 2024.

The Northern Ireland policy direction in relation to land-use planning and tourism impacts is set out in PPS 16¹ and presents a number of points relating to planning policy for tourism development and also for the safeguarding of tourism assets. Section TSM 8 (Safeguarding of Tourism Assets) of PPS 16 deals with the safeguarding of existing tourism assets in the particular context of a proposed and unrelated physical development in the immediate vicinity of those tourism assets. TSM 8 makes an important point in this regard when addressing the policy stance in relation to the avoidance of significant adverse tourism impacts. It states: *“Planning permission will not be granted for development that would in itself, or in combination with existing and approved development in the locality, have an adverse impact on a tourism asset (as defined in paragraph 7.39 of the J&A in Appendix 1 Glossary of Terms) such as to significantly compromise its tourism value”*. A tourism asset is defined *“as any feature associated with the built or natural environment which is of intrinsic interest to tourists”*.

It is noted that in Para 12.11 of its Draft Local Development Plan, Derry City & Strabane District Council (DCSDC) proposes to replace TSM 8 by TOU 1 – Safeguarding of Tourism Assets. The latter reiterates the text of TSM 8 including the definition of a tourism asset *“as any feature associated with the built or natural environment which is of intrinsic interest to tourists”*.²

Fermanagh & Omagh District Council have made slight variations to the wording of TSM 8 in their Local Development Plan where Policy TOU01 states that: *“The Council will not permit any form of development that would, in itself or in combination with existing or approved development, have an adverse impact on the intrinsic character or quality of a tourism asset or any part thereof, or diminish its tourism value, or part thereof”*.³ A tourism asset is defined as *“any feature associated with the built or natural environment which is of intrinsic interest to tourists”*.

Within Policy TSM 8, and the Local Development Plans of both DCSDC and FODC, there is effectively a two-part test that a proposed development must be assessed against in order to determine whether or not it is policy compliant. The first element is to establish the existence of a tourism asset that could potentially be adversely impacted. The second element is to establish whether or not a proposed development would have an adverse impact on the identified tourism asset such as to significantly compromise the asset's tourism value.

The approach adopted in the Tourism Impact Assessment has been to identify the extent to which the area of the Proposed Development route corridor constitutes a tourism asset as evidenced by the level of tourism activity in the area, and then to consider the extent to which the asset may be significantly compromised by the proposed development.

In order to bring clarity to the assessment of the tourism impact of a proposed development, it is necessary to be clear about the terminology used in tourism. The following definitions apply in this report:

- **Tourism:** *a social, cultural and economic phenomenon which entails the movement of people to countries or places outside their usual environment for personal or business/professional purposes. These people are called visitors (which may be either tourists or excursionists; residents or non-residents) and tourism has to do with their activities, some of which involve tourism expenditure. (UN World Tourism Organisation – UNWTO)⁴*
- **Tourist:** *a visitor is a traveller taking a trip to a main destination outside his/her usual environment, for less than a year, for any main purpose (business, leisure or other personal*

¹ Planning Policy Statement 16: Tourism (June 2013)

² Derry City & Strabane District Council: *Local Development Plan 2032, Draft Plan Strategy*,

³ Fermanagh & Omagh District Council: *Local Development Plan 2030, Plan Strategy*

⁴ <https://www.unwto.org/glossary-tourism-terms>

purpose) other than to be employed by a resident entity in the country or place visited. A visitor (domestic, inbound or outbound) is classified as a tourist (or overnight visitor), if his/her trip includes an overnight stay, or as a same-day visitor (or excursionist) otherwise. (UNWTO op. cit.) **Note that this definition excludes local residents making use of recreational amenities and visitor services that may also be enjoyed by tourists.**

- **Tourism asset:** *Any feature associated with the built or natural environment which is of intrinsic interest to tourists. (PPS 16) These are features that “are important in attracting tourists and sustaining the tourism industry”.⁵*

The approach adopted in this assessment of tourism impact is to

- establish whether a particular feature is a tourism asset
- to determine whether the proposed development impacts on the asset
- to assess whether the impact significantly compromises the asset’s tourism value

In assessing tourism impact, the importance of a tourism asset in attracting tourists and sustaining the tourism industry can best be gauged by considering the following factors:

- the extent of tourism infrastructure in the area (accommodation, attractions, activities etc.)
- its existing performance in terms of attracting visitors (as measured by visitor numbers), and
- its visibility and profile for consumers

The work undertaken by the consultants has included:

- A visit to the Proposed Development route corridor to identify any tourism-related infrastructure, products and services located along or close to it.
- A review of Northern Ireland policy direction in relation to land-use planning and tourism impacts
- A review of national and regional tourism statistics
- A review of the tourism strategies and the Draft Local Development Plans and tourism evidence papers published by Derry City and Strabane District Council and Fermanagh & Omagh District Council.
- Extensive online searches for any tourism products in the Proposed Development route corridor area
- Extensive documentary searches for any tourism products in the Proposed Development route corridor area, including the reports on Landscape & Visual and Cultural Heritage that form part of the Environmental Statement for the proposed development.
- Desk research (online and documentary) into the extent to which tourism activity may be affected by power lines and other infrastructural developments such as windfarms.
- Consideration of the points raised by objectors to the proposed development on tourism grounds.

⁵ Derry City & Strabane District Council: *Local Development Plan 2032 - Draft Plan Strategy*

3 SUMMARY OF ASSESSMENT

3.1 Tourism Activity in the Proposed Development Route Corridor Area

There is no reference in the annual visitor attraction surveys conducted by the Northern Ireland Statistics & Research Agency to the land area within the Sperrins AONB that the proposed Proposed Development route corridor might occupy along its projected route, nor is there any suggestion that this particular land area is tourism centric or that it could represent a tourism resource.

There are no built visitor attractions in the Proposed Development route corridor. The Cultural Heritage chapter in the Environmental Statement states that *“There are no Listed Buildings or Historic Parks, Gardens and Demesnes located within the 200m Proposed Development assessment corridor”*. There are two Historic Parks, Gardens & Demesnes properties near the Proposed Development route corridor – Holy Hill House at Strabane, located some 600m north of the Proposed Development route corridor, and Beltrim Castle near Newtownstewart, located some 2.3 km south of the Proposed Development route corridor. However, there are no data available on the level of tourist activity at these sites and they are not featured in their respective District Council Tourism Strategies

The route followed by the 37.9km Proposed Development route corridor traverses 32 townlands between Ballymagorry (at the northern inception point of the route) and Greencastle (at the southern termination point of the route). An exhaustive online search for references to these townlands found no evidence of any tourism products or activities in 28 of these townlands and very minor references in the remaining four: a one mile walk on the outskirts of a village, a small self-catering cottage, a Forest Park some distance away from the townland itself, and a reference to a 17th century demesne and associated ornamental garden.

There are three scheduled monuments within the Proposed Development route corridor – Ballykeery Killeen (burial ground) and two sites in Culvacullion townland – a stone circle and a group of 4 stone circles and a stone row alignment. These sites have not been made accessible for tourists and there is no evidence of any tourism activity.

There are a number of walking and cycling routes that the Proposed Development route corridor will pass close to or across. The extent to which these routes are used by tourists is unknown but they are included in tourist-oriented brochures and websites. The Landscape & Visual Impact Assessment has concluded that the impact of the Proposed Development route corridor on these routes will be localised, minor and not significant.

There are no references to the specific Proposed Development route corridor area in the current tourism strategies for Derry City and Strabane District and Fermanagh & Omagh District. The cluster maps prepared for tourism activity in both Derry City and Strabane District Council, and Fermanagh and Omagh District Council demonstrate that tourism activity in both Districts takes place at a considerable remove from the Proposed Development route corridor line.

The conclusion drawn from this analysis is that the land area of the Proposed Development route corridor route is not a tourism-centric resource. There is little if any tourism activity taking place in this land area, there is little if any visitor activity or expenditure, and there is little if any tourism employment associated with the area.

3.2 Tourism Impact on the Proposed Development Route Corridor in Construction and Operational Phases

On the basis of our conclusion that there is no significant level of tourism activity taking place in the area of the Proposed Development route corridor route, it is our opinion that this specific area is not a significant tourism asset. There is no evidence to suggest that this land area and its hinterland exercise a significant ‘drawing-power’ attracting tourists to this location. Therefore, there will be no significant adverse impact on tourism as a result of the proposed development.

3.3 Tourism Impact on the Sperrin AONB

The Sperrin AONB is the largest AONB in Northern Ireland, extending to more than 118,000 hectares, or almost 1,200 square kilometres. As with the other AONBs, Sperrin is a tourism asset but, compared to some of the other AONBs, such as Mourne or Causeway Coast, it is at a relatively early stage of development in tourism terms. There is little tourism infrastructure in or in the immediate surrounds of the AONB. It has a growing reputation as a place for outdoor activity, and there are numerous way-marked walks, cycle routes and scenic drives. There are also a number of tourism-related developments including the Sperrins Sculpture Trail and Sperrins Scenic Drive. However, there is very little by way of data on visitor numbers that can show the extent of tourist activity in the AONB.

Given the location of the Proposed Development route corridor, in the foothills of the Sperrins towards the western boundary of the AONB, and given the low level of tourist activity in this area, the Proposed Development route corridor will not give rise to any significant adverse impact on the tourism value of the AONB. The principal tourist attractions in the Sperrins are remote from the Proposed Development route corridor and will not be affected by it.

The consultation response from the Planning Department of Derry City and Strabane District Council (DCSDC) – see Para 19.66 – identified three tourism projects that they thought would be adversely affected by the Proposed Development route corridor: the Sperrins Scenic Drive, the International Appalachian Trail (IAT), and the Sperrins Sculpture Trail. Our assessment is as follows:

- **The Sperrins Scenic Drive** comprises four separate Drives – North, Central, East and South. The Proposed Development route corridor crosses the Central Drive at a point on the B47 road a short distance east of Plumbridge. Overhead lines already exist along the B47 and are not identified as barriers to enjoyment of the Drive by prospective tourists. The Proposed Development route corridor does not cross or come close to the other three Drives and has no impact on them.
- **The IAT**, which follows the same route through the Sperrins as the Ulster Way, mainly follows the path of hillside public roads between Gortin and Moneyneany. The Proposed Development route corridor crosses the trail at the Meenadoo Road between Glenrina Bridge and Glenforan and any encounters prospective walkers would have with the line would be brief and unlikely to inhibit use of the IAT. (See also the observation on visual impact in Para 19.34 above.)
- The Proposed Development route corridor does not make contact with the key features of the **Sperrins Sculpture Trail** – the Giants of the Sperrins – the nearest of which is at the location of the former Sperrins Heritage Centre in the Glenelly Valley, some 7 or more miles from the Proposed Development route corridor.

Apart from the fact that the three projects identified have very little contact with the Proposed Development route corridor, there are no data on the extent to which there is any tourism activity associated with them. With regard to the Sculpture Trail, the LVIA concludes that *“the significance of effect of the Proposed Development during the operational phase is negligible as additional timber poles are readily absorbed within views, and within the wider landscape contained within the available views. Therefore, the impact of the Proposed Development is predicted to be negligible to minor and not significant.”*

Overall, given the location of the Proposed Development route corridor, in the foothills of the Sperrins towards the western boundary of the AONB, and given the low level of tourist activity in this area, it will not give rise to any significant adverse impact on the tourism value of the AONB. The principal tourist attractions in the Sperrins are remote from the Proposed Development route corridor and will not be affected by it. Moreover, it may be noted that the simple fact that a certain land area is within an AONB does not of itself make that particular land area a tourism asset. It may be considered to be a “local amenity” resource and valued as such by local users of the AONB, but this does not necessarily mean that those local users are “tourists” and it does not make that particular land area a tourism asset.

3.4 Cumulative and Transboundary Impacts

Drawing on the Landscape & Visual Impact Assessment and the Cultural Heritage report we conclude that there will be no significant cumulative landscape, visual or other impacts on tourism assets along or adjacent to the Proposed Development route corridor.

Although a portion of the proposed development near Strabane will be close to the international boundary with the Republic of Ireland, it will not give rise to any significant transboundary impacts. The closest point of the Proposed Development route corridor will be 3.8km from the international border and the LVIA has determined that it will not be apparent or readily perceived within eastern views from County Donegal due to distance and screening effects provided by intervening topographical changes and vegetation.

4 CONSULTATION RESPONSES AND SUBMISSIONS

4.1 Relevant Statutory Body Consultation Responses

A consultation response on the Proposed Development route corridor was submitted in October 2021 by the Planning Department of Derry City and Strabane District Council (DCSDC). In the fifth paragraph of that correspondence, it is stated that:

“SPPS Paragraph 6.2.62 in relation to safeguarding of tourism assets and again, as the overhead line is proposed to be located in the Sperrins AONB, it is considered this development will damage the intrinsic character and quality of this asset and diminish its effectiveness in attracting tourists. There are a number of specific tourism projects associated with the Sperrins AONB including the Sperrins Scenic Drive and Appalachian Trail, and the Sperrins Sculpture Trail which will be adversely impacted by the proposed development and there is no justification for this.”

There are two considerations arising from this paragraph. The first is the potential impact of the power line on the Sperrins AONB and whether this would significantly compromise its tourism value. The second is the potential impact on specific tourism projects. As is clearly set out in the analysis in the Tourism Impact Assessment in the Environmental Statement, which is summarised in Section 3.1 above, the Proposed Development route corridor will not give rise to adverse impacts such as would compromise the tourism value of the Sperrins AONB.

The second issue to arise from the paragraph concerns the observation *that there are a number of specific tourism projects associated with the Sperrins AONBwhich will be adversely impacted by the proposed development and there is no justification for this*. Specifically, these are the Sperrins Scenic Drive, the International Appalachian Trail (IAT) and the Sperrins Sculpture Trail. The position with regard to these tourism projects was set out in Para. 27 above and the tourism value of these projects will not be compromised by the Proposed Development route corridor.

No reference to tourism is apparent in responses from statutory bodies in Fermanagh & Omagh District.

4.2 Relevant Third-Party Representations

A total of 196 objections were received as Form Letters (standardised generic letters). The Form Letter contains within it (3rd bullet) the following statement:

“Overhead lines cause a visual deterioration of the skyline, reducing its aesthetic appeal in less populated areas, with a scenic, cultural or natural heritage importance, such as the Sperrins. This negatively affects the tourism potential of the area.”

This is a general statement of opinion rather than a statement of fact. It also refers to the Sperrins in general, which is close to 1,200 square kilometres in area, rather than the narrow Proposed Development route corridor which lies towards the western boundary of the AONB in the foothills of the Sperrins. As discussed in Paras 19.25 – 19.35, there is no evidence of significant tourism activity along the Proposed Development route corridor and the Form Letter offers no such evidence. The question of potential depends on the appeal of the landscape and the Landscape and Visual Impact Assessment (LVIA) report concludes that there will no significant impact arising from the proposed power line.

Correspondence from the Save our Sperrins group also raised some issues relating to tourism. In paragraph (i) reference is made to the importance of landscape and scenery for the tourism and farming industries, and that “landscape is in effect the primary asset for tourism in this country”. Whilst perhaps having some reservations about the use of the term “the primary asset”, CHL Consulting would have no difficulty with the point made thus far. The writer then goes on to say that “obtrusive cables and poles would critically cut across the nascent tourism industry for the Sperrins AONB”. This is presented as a statement of fact although, in reality, it is an opinion asserted without any evidence. Moreover, it appears to conflate the relatively narrow route corridor with the entire Sperrins AONB.

In Paragraph (iv) the writer draws upon a quote from the FODC Landscape Character Assessment to underline the importance of scenery and landscape.

In paragraph (v), the writer repeats the previously made assertion that overhead lines cause a visual deterioration of the skyline, and that this negatively affects the tourism potential of the area. Again, no evidence is presented to support this contention nor is the supposedly affected “area” defined in terms of its size and scale. Moreover, the presence of existing overhead power line networks in the area is not identified as a barrier to tourism.

In paragraph (xi) it is stated that “overhead lines passing through areas of tourism and amenity potentially cause a permanent noise disturbance that has a negative impact undermining the amenity and tourism value of these assets”. This matter is dealt with in Chapter 14 (Noise and Vibration) presented in the Environmental Statement.

In paragraph (xv) the writer states that “it is important to integrate these negative environmental, tourism, and health impacts into the cost benefit evaluation of overhead electricity lines in order to avoid decisions that may be biased towards less environmentally friendly solutions.” The point is noted, although the lack of evidence of tourism activity in the area would be an issue and, as mentioned already, the LVIA has concluded the power line will not cause any significant impact on the AONB.

5 CONCLUSIONS

The conclusion drawn from this analysis is that the Proposed Development route corridor is not a tourism-centric resource. There is no evidence to suggest that this land area and its hinterland exercise a significant 'drawing-power' attracting tourists to this location. There is little if any tourism activity taking place in this area, there is little if any visitor activity or expenditure, and there is little if any tourism employment associated with the area. In the event of a tourist passing close to the Proposed Development route corridor, this will most likely be a brief encounter for a person travelling by in a car, a walker or cyclist none of whom will experience any significant visual impact from the power line.

Given the location of the Proposed Development route corridor, in the foothills of the Sperrins towards the western boundary of the AONB and given the low level of tourist activity in this area, it will not give rise to any significant adverse impact on the tourism value of the AONB. The Landscape & Visual Impact Assessment of the Proposed Development route corridor has concluded that any impact on walking or cycling routes that might pass or come close to the Proposed Development route corridor will be localized and not significant.

Cluster maps prepared for tourism activity in both Derry City and Strabane District Council, and Fermanagh and Omagh District Council demonstrate that tourism activity in both Districts takes place at a considerable remove from the Proposed Development route corridor. Once again, damage cannot be done to tourism in an area where tourism does not occur.

Policy TSM8 of PPS 16, and the corresponding policies in the Local Development Plans (TOU01 in FODC LDP and TOU 1 in the DCSDC Draft LDP), present a two-part test to guide the determination of an outcome to a planning application. The first element is to identify what the potentially impacted tourism asset is. The second element is whether the proposed development would have an adverse impact on the identified tourism asset such as to significantly compromise its tourism value. In view of the absence of tourism activity in the area of the proposed development, we can find no evidence for, and no likelihood of, an outcome that might significantly compromise tourism value in the area.

On the basis of the foregoing assessment, therefore, it is considered that the proposed development does not give rise to any significant adverse tourism impact along its proposed route.

APPENDIX A – TOURISM IMPACT ASSESSMENT