

## Appendix 6

### FI LVIA Response





## DOCUMENT DETAILS

Client: **StatKraft**

Project Title: **FI LVIA Response**

Project Number: **200445-g**

Document Title: **Appendix 6**

Document File Name: **Appendix 6 - FI LVIA Response - 2022.10.26 - F -200445-g**

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Rev	Status	Date	Author(s)	Approved By
01	Draft	24/08/2022	SF	JS (internal MKO)
02	Draft	15/09/2022	SF & JS	SK
F	Final	26/10/2022		

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# 1. LANDSCAPE & VISUAL RESPONSES

This Appendix includes responses to two items of the Request for Further Information as they relate to the topic of Landscape and Visual Impact:

- Item 1 - Particulars and Documentation
- Item 6 - Submissions and Observations

## 2. ITEM 1.0 PARTICULARS AND DOCUMENTATION

Item 1 of the Request for Further Information requests clarification on the range of turbine envelope configurations sought for planning permission. As detailed in Section 2.1.2 of the main Further Information Response (FIR) document, the applicant is seeking planning permission for a range of turbine envelope configurations. The applicant has produced new photomontage visuals in order to present this range. For consistency and context, these new photomontage visuals are incorporated as additions to the Volume 2 Photomontage Booklet that was previously submitted as part of the EIAR (ABP Ref No. 309770-21). The new photomontage booklet is included as Appendix-7 of this FIR. The following text discusses the new additions to the photomontage booklet and how the range of turbine envelope configurations relate to potential landscape and visual impacts.

### 2.1 Turbine Envelope Range: Photomontage

The dimensions presented below are the range of hub height, rotor diameter and overall tip height which constitute a 'reasonably limited range' and are included in the Photomontage Booklet – *Appendix 7*:

- Turbine Tip Height – Maximum height 175m, Minimum height 175m
- Hub Height – Maximum height 100.5m, Minimum height 97.5m
- Rotor Diameter – Maximum length 155m, Minimum length 149m

A rotor diameter of 155m and a hub height of 97.5m was considered throughout the landscape and visual assessments included in the EIAR and is considered a good representative illustration of the Proposed Development. This turbine configuration (blade length of 77.5m and a hub height of 97.5m) of the reasonably limited range is termed as the 'Maximum Rotor Diameter and Minimum Hub':

- **Maximum Rotor Diameter and Minimum Hub Height** – Presented for All 22 No. Viewpoints in the Appendix 7 - Photomontage Booklet (and was presented in Volume 2 of the EIAR).
  - Maximum Tip Height – 175 metres
  - Minimum Hub Height – 97.5 metres
  - Maximum Rotor Diameter – 155 metres

It is emphasised that **irrespective of which turbine model (combination of hub height and rotor diameter) within the range outlined above is installed on site, the significance of residual landscape and visual effects will not be altered.** However, for the avoidance of doubt, 2 No. alternative turbine configurations (other than the configuration presented throughout the booklet) are presented for three selected viewpoints included in the Appendix 7 photomontage booklet accompanying this document under title pages 'Turbine Envelope Range'. These configurations include 'Minimum Rotor Diameter & Maximum Hub Height' and 'Median Rotor Diameter & Median Hub Height'. The 3 No. viewpoints selected are representative of short-range views (Viewpoint 07 - 1.26 km from the Proposed Development), medium-range views (Viewpoint 21 - 5.32 km from the Proposed Development) and

long-range views (Viewpoints 14 - 16.5 km from the Proposed Development). The following summarises the ‘Minimum Rotor Diameter & Maximum Hub Height’ and ‘Median Rotor Diameter & Median Hub Height’ that is presented:

- **Minimum Rotor Diameter & Maximum Hub Height** – 3 Photomontage Viewpoints (VP07, VP14 and VP21)
  - Maximum Tip Height – 175metres
  - Maximum Hub Height – 100.5 metres
  - Minimum Rotor Diameter – 149 metres
  
- **Median Rotor Diameter & Median Hub Height** – 3 Photomontage Viewpoints
  - Maximum Tip Height – 175metres
  - Median Hub Height – 100 metres
  - Median Rotor Diameter – 150 metres

As is shown by the ‘Turbine Envelope Range’ visuals within the Appendix 7 photomontage booklet, it is extremely difficult to determine any difference that would arise from the use of differing turbine configurations within the range of dimensions proposed. Any difference is only identifiable in the wireframe visuals accompanying the photomontages, and these differences are only really distinguishable with the use of magnification. Irrespective of which turbine model is utilised within the proposed range, the residual landscape and visual impacts reported in the EIAR will not be altered.

### 3. ITEM 6.0 SUBMISSIONS AND OBSERVATIONS

Item 6 of the RFI requests a response to “*matters pertaining raised in submissions and observations received by the Board from members of the public and prescribed bodies*”. All matters within these submissions pertaining to the topic of landscape and visual impacts of the Proposed Coole Wind Farm are addressed in the following text.

#### 3.1 Landscape and Visual Effects: Photomontages

Several 3<sup>rd</sup> party submissions relate to the technical production of the photomontages and selection of viewpoints used in the Landscape and Visual Impact Assessment (LVIA) in Chapter 12 of the EIAR. The following section comprises a comprehensive response to these 3<sup>rd</sup> party critiques, demonstrating that the photomontages have been produced correctly, selection of viewpoints was appropriate and that the LVIA included in the EIAR was both rigorous and robust. However, it is noted that all of the points made below and any critiques made are in the first instance, immaterial to the determination of residual visual effects. It is submitted that even if all of the submissions were valid then this would not have any material impact on the determination of the significance of visual effects conducted. An important point to be emphasised, prior to any discussion of the submissions made and before any consideration is given to this discussion, is that the specific critiques made do not, in the professional judgement of the Landscape and Visual Team at MKO, constitute any meaningful or fundamental critique such that a determination of significance in the visual impact assessment would be altered as a result. It is important to state that no submissions from the Council or 3<sup>rd</sup> party individuals disagree with the significance ratings of visual effects in the EIAR. Submissions made by 3<sup>rd</sup> party individuals are solely based on the technical elements of the photomontages.

## Scale of The Proposed Turbines in the Photomontages

Several submissions address the scale of the proposed turbines within the photomontages in relation to local landscape features: One such submission states:

*“In photomontage no 5 the image comes from the townland of Ballywillan which overlooks the bogland and the beautiful Hill of Mael and Rock of Curry, two local landmark and some of the highest landmasses in the area. In this photoshopped Image the turbine are clearly visible in the landscape. They look to be almost the height of the local landmarks, tower above the bogland and break the otherwise unbroken skyline dramatically. This is bad enough. But this image is not at all accurate. Firstly the turbines themselves are 175m high situated on bogland 75m above sea level, making a combined total of 250m above sea level. The Hill of Mael is 240m above sea level. The turbines are to the fore of the Hill, therefore should appear larger than the hill. They do not Secondly the turbines are a light white–grey colour not a dull light brown as portrayed in these photomontage images. This makes them appear less distinct against the winter landscape in the background.”*

Several similar submissions were made in relation to the height of the turbines relative to surrounding topography or similar height. The photomontages presented in the EIAR are verified photomontages. They have been modelled and scaled and presented correctly. As stated in Appendix 12-1 of the EIAR, “the visibility of the turbines will decrease with the distance from which they are viewed.” In Figure 3-1 (also presented in Appendix 12-1 of the EIAR) below all turbines are modelled to the same size specification, but with distance they appear smaller. The verified photomontages and wireframes are accurately scaled in each viewpoint.



Figure 3-1 The effect of distance on visibility of wind turbines (Illustrative Purposes Only)

Figure 3-2 below shows the base elevation of the landscape of the Proposed Development site and the elevation of several topographical features surrounding the site to the east and north-east; the Hill of Mael, Rock of Curry and Mullaghmeen. Chapter 4 of the EIAR states each turbines foundation elevation, the table of elevations is replicated in

Table 3-1 below. The foundation elevation for Turbine 12 is the highest at 69m above sea level, combined with the turbine tip height this would give the turbine a height of 244m above sea level, 4 meters higher than the Hill of Mael.

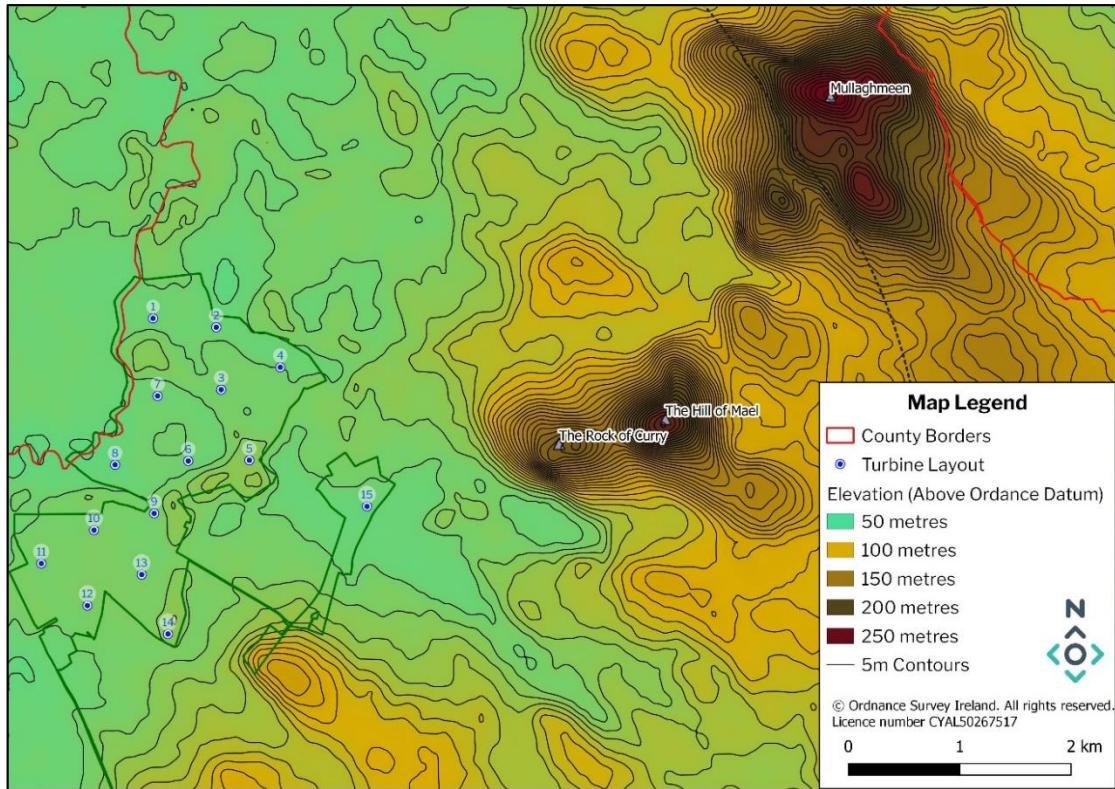


Figure 3-2 Map displaying the elevation of the Coole Wind Farm site and surrounding Topography features

Table 3-1 Proposed Wind Turbine Locations and Elevations

Turbine	ITM Coordinates		Top of Foundation Elevation (m OD)
	Easting	Northing	
1	640852	777346	64
2	641419	777267	64
3	641463	776708	66
4	641994	776908	65
5	641716	776074	63
6	641168	776069	65
7	640893	776651	65
8	640511	776034	62
9	640862	775599	66
10	640322	775448	68
11	639849	775149	67
12	640263	774772	69



13	640750	775050	68
14	640986	774517	67
15	642772	775661	62

Figure 3-3 below shows the wireframe image extracted from Photomontage 05 of the Photomontage Booklet. The Hill of Mael and Rock of Curry are clearly visible as two topographical features to the left of the Proposed Development. From the perspective of Photomontage 05, the Proposed Development is located in closer proximity to the viewpoint than the Hill of Mael and the Rock of Curry, and therefore the proposed turbines are seen to be of larger scale. The red line indicates that the turbines full tip height does appear taller than the Hill of Mael. As stated previously the visibility of the turbines will decrease with the distance from which they are viewed. The closest turbine (T1) is approximately 5.65km from this viewpoint location, below in Figure 3-3 it appears relatively larger than T15 which is 8.1km away from the viewpoint. The Hill of Mael and Rock of Curry are over 8.5km away from this viewpoint and are both seen as smaller than the turbines.

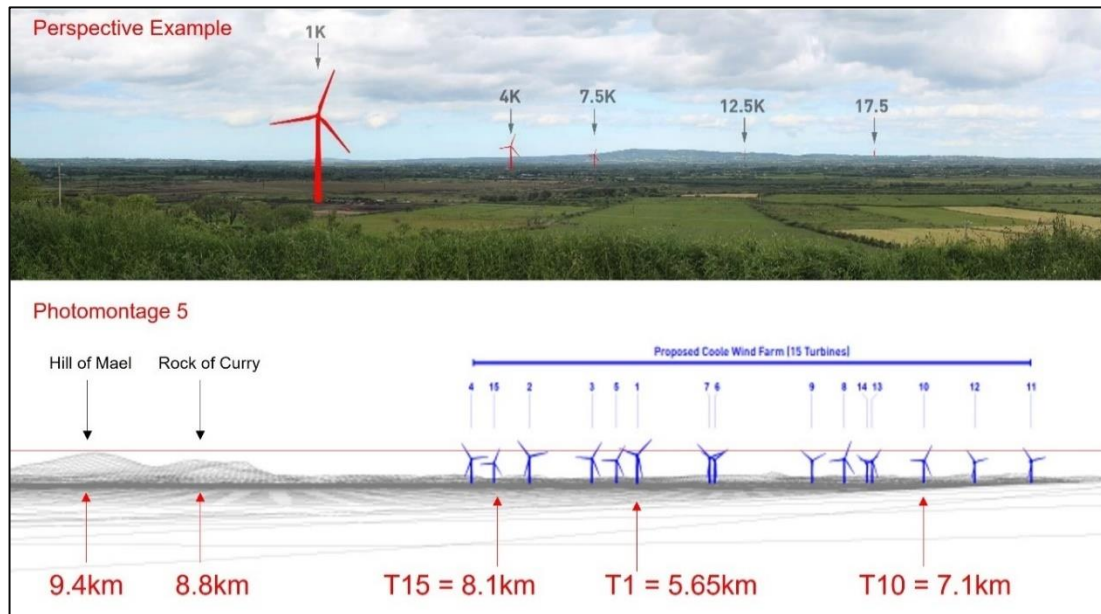


Figure 3-3 Photomontage and Wireframe for VP05

A similar submission made by a 3<sup>rd</sup> party individual states:

*“The photomontage 10 in Volume 2 Photomontage Booklet depicts the wind turbines in the same picture as the Hill of Mael on the left at 240m and Mullaghmeen on the right at 258m above sea level. The ground where Coole Wind Farm Ltd is applying to build the turbines is 75m above sea level so the tip of the blades will reach 250m above sea level. Thus they will be higher than the Hill of Mael and only 8m below the top Mullaghmeen which is not at all how the turbines are depicted as they are all lower than the Hill of Mael, Photomontage 10 is very misleading. This wind farm will dominate these two landmarks of North Westmeath.”*

Contrary to Photomontage 5, Photomontage 10 was taken from the east and so the Hill of Mael is located in closer proximity to the viewpoint location (6.68km) than the Proposed Development. The turbines are located further away from the viewpoint and so the Hill of Mael appears to be larger than the turbines. The closest turbine (T15) is approximately 8.13km from this viewpoint location and appears to be the largest turbine in Figure 3-4. It appears relatively larger than T1 and T10 which are over 10km away from the viewpoint.



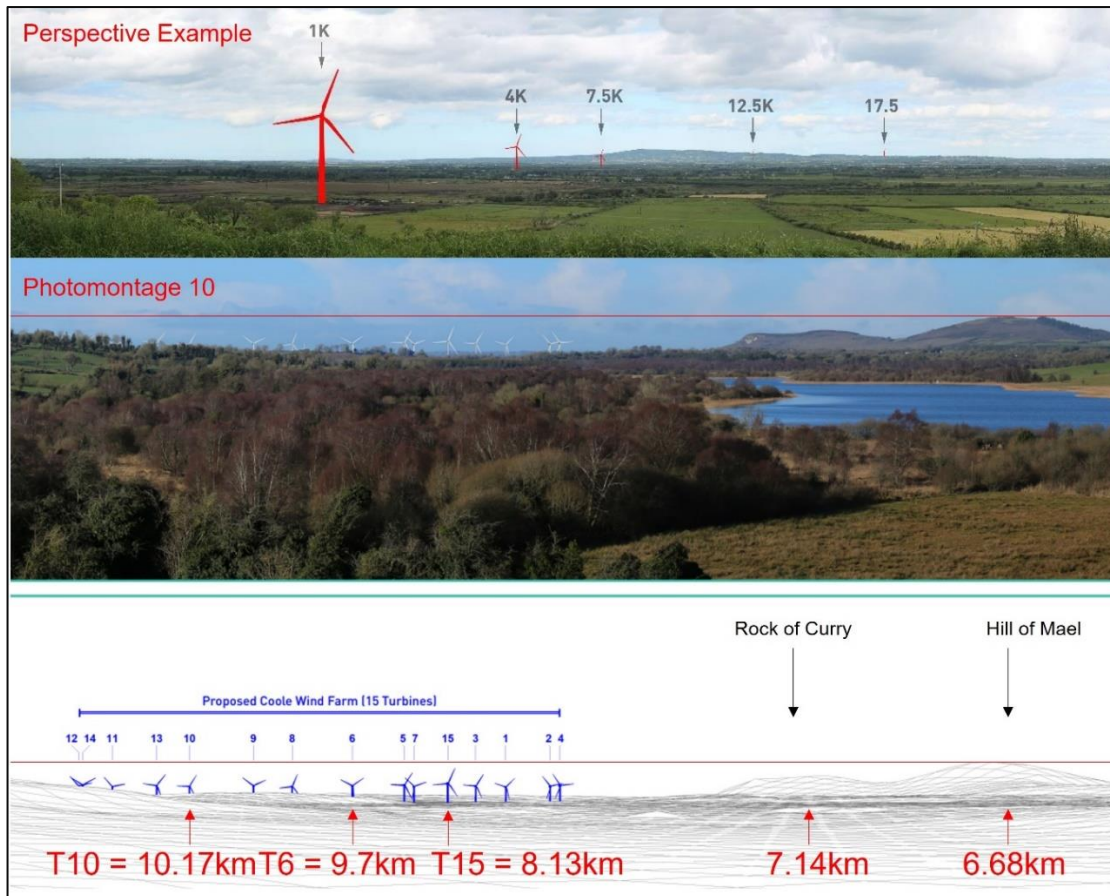


Figure 3-4 Photomontage and Wireframe for VP10

The same style of submission has been made about Photomontage 21:

*“Photomontage 21 shows how the proposed Wind Farm will dominate the view from Mullaghmean and that is looking down on the turbines whereas they will actually be much higher. Mullaghmean is the largest beech forest in Ireland, a major tourist attraction with many walks all kept in very good condition. It is a very important community asset and so building adjacent to this is outrageous.”*

The location of VP21 is located 3.2km from the Hill of Mael and 5.32km from closest turbine (T4). Figure 3-5 below shows the photomontage and wireframe for Photomontage 21, the red line displayed in the Photomontage and wireframe show that, at full tip height, the turbines are taller than the Hill of Mael. The closest turbine (T4) appears largest as it is located 5.32k away from VP21, however T12, that is located 7.92km from VP21, appears shorter than T4.

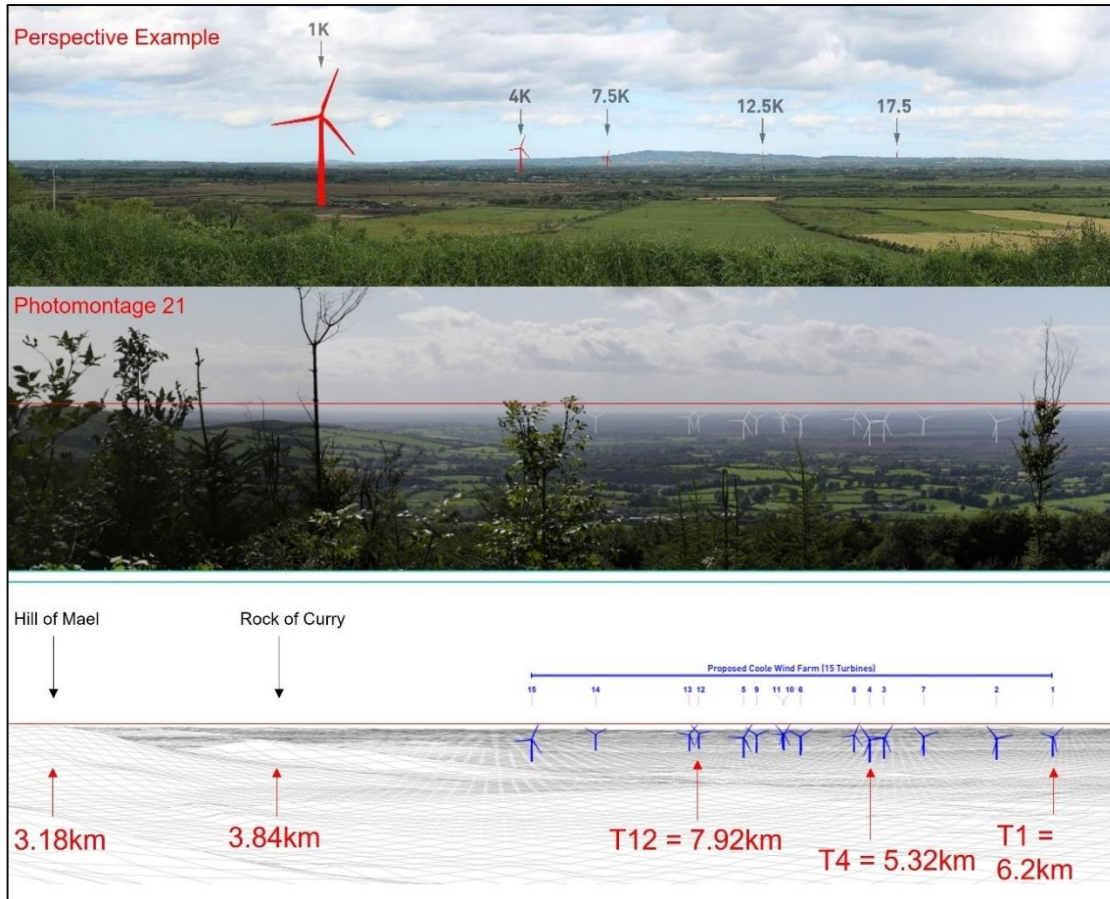


Figure 3-5 Photomontage and Wireframe for VP21

*“The photomontages are wrong and based on the narrower blade width turbines planned to be used for the non SID Coole Wind Farm. In the turbines planned for Coole Wind Farm SID 88.5% of the full turbine height consists of the diameter of the blade. The blade size in these images is based on the narrower turbine where 80% of the full height of the turbine consisted of the diameter of the blade. All of the photomontages are Inaccurate and do not show the full Impact of the turbines as the width of the turbines has increased by over 11 % from 140m to 155m in diameter. To prove my point take a look at any of the wire frame images. The 13 turbine Coole Wind Farm Images are drawn in green and the 15 turbine Coole Wind Farm images are drawn in blue. The proportions of the blades should have increased by over 11 % from the green to the blue wireframe images. They have not.”*

In relation to this critique, Figure 3-6 below shows a comparison of the wireframes of both turbine layouts for Photomontage 7. Both layouts have a turbine tip height of 175m. The hub height presented in the photomontages for the original 13 turbine layout for Coole Wind farm was 105m with a turbine blade diameter of 140m. For the new 15 turbine layout, the hub height presented in the photomontages was shorter at 97.5m but with a larger rotor diameter of 155m. As shown below in Figure 3-6, the turbines of the 13 turbine layout (represented in green) have taller hub heights than those of the 15 turbine layout (represented in blue). The blade length of the 15 turbine layout (blue) are longer than those of the 13 turbine layout (green) giving both turbine layouts the same full tip height of 175m.

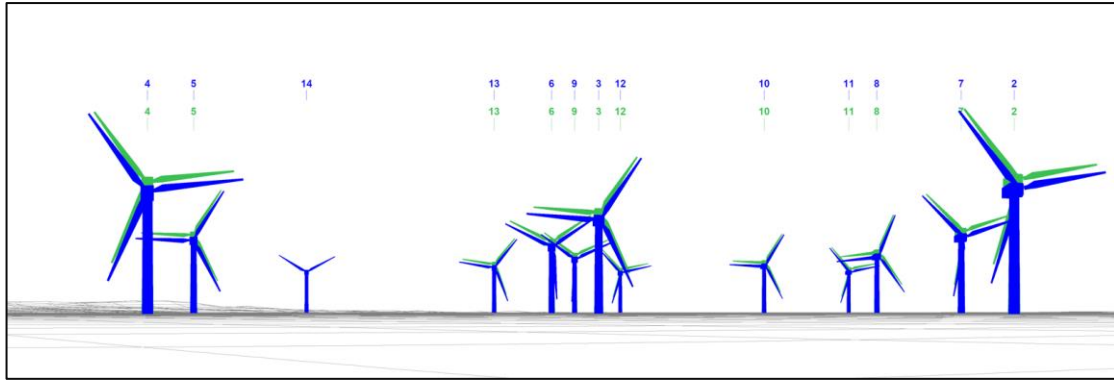


Figure 3-6 Comparative wireframe for photomontage 7

Another submission states:

*“The photoshopped images of turbines on the photomontage are not in keeping with the genuine width of the turbine blades and towers. For example in Photomontage 7, images 39-44 the image of the turbines in the photoshopped images are noticeably narrower than in the wire framed images. This is a deliberate attempt to fool people into thinking the turbines will have less of a visual impact on the landscape”.*

In relation to this critique, the wireframes used to accompany the rendered images for the photomontages are only used for model purposes. The thicker turbine is sometimes used within the wireframe to make the location of each individual turbine clearer. The rendered image (displaying the photoshopped turbines) represents the actual view of the turbines. Figure 3-7 below shows the photomontage and wireframe for Photomontage 7. The **rendered images** in the photomontage give the **most accurate representation** of the view and the turbines. As shown in Figure 3-8 below, the view in Photomontage 2 towards the Proposed Development is heavily screened so the rendered turbines are not fully visible, the wireframe below gives an indication of the turbine layout behind the screening.



Figure 3-7 Photomontage 7 with accompanying wireframe





Figure 3-8 Photomontage 2 and accompanying wireframe

In relation to submissions regarding the visibility of the Proposed Development outside of 20km, one submission states:

*“The proposed wind farm will be visible from beyond the 20km radius assessed through ZTV and some photomontages.”*

As stated in Appendix 12-1 of the original EIAR, the LVIA Study Area is set at 20km: *“Effects on visual receptors beyond a 20 km radius from the proposed development, where it is judged that potential significant effects are unlikely to occur”*. It is noted in this regard that views of the proposed turbines from locations outside of 20km from the Proposed Development are unlikely to be substantial in terms of the scale of the proposed turbines. The turbines appear smaller the further from the Proposed Development that they are viewed and are highly unlikely to result in significant landscape and visual effects at this distance. As a result, and in conjunction with other factors including the increased likelihood of complete screening of the proposed turbines with increased distance, significant landscape and visual effects are deemed unlikely to arise in this area beyond 20km from the Proposed Development. The Draft Revised Wind Energy Guidelines (2019, DoHPLG) also state that *“For blade tips in excess of 100m, a Zone of Theoretical Visibility radius of 20km would be adequate”*. In consideration of the above discussion, it is submitted that the 20km radius for the LVIA study area was appropriate and sufficient in the assessment of any likely significant landscape and visual effects.

## 3.2 Scenic Views

One 3<sup>rd</sup> party submission states:

*“The first photomontage in the EIAR shows photoshopped images, wireframe images and a map of the location of the Protected View from Coole, taken from Burkes bar, Coole. Coole is the village most adversely affected by this proposed Windfarm. The image should show the Protected View from this site but it looks north, away from the view. The real visual impact on the landscape in this part of Coole should show the view from Mayne Bog towards the turbines. The montage is misleading. As discussed below, Mayne Bog and the Bronze Age wooden road in Mayne Bog, with much potential for tourism and heritage, will be adversely impacted.”*

Westmeath County Council state that ‘*Mayne bog is not accessible to visitors and the surviving stretch of the trackway cannot be seen because it lies between 1.5m to 2m below the surface of the uncut ‘high bog’*’ (Source: <http://whahs.ie/mayne-bog-trackway/>). Photomontage 01 was taken from Protected View 49. The Westmeath County Development Plan (WCDP) 2014-2020 describe Protected View 49 as a ‘*Panoramic view of countryside from top of hill on Regional Road R-395 at Coole*’. In the new Westmeath County Development Plan 2021-27, the numbering of the protected views has changed. In the New WCDP Protected View 49 (now numbered as Protected View 27) states “*This is a panoramic view of the landscape to the west of Coole, much of which is bogland.*” The Proposed Coole wind farm is located north of this Protected View and will not impact on the focus of the Protected View of the boglands to the west. The Protected View is directed towards the bog, not originating from the bog itself. Due to the lack of access and consequently the lack of visual receptors likely to experience views from the bog, it is not deemed that the Proposed Development will have a significant visual impact on the area. The focus of this designated Protected View is towards Mayne Bog, in the opposite direction of the Proposed Development. In Plate 3-1 below a 180-degree field of view can be seen towards the Mayne Bog. The proposed Coole Wind Farm turbines will not be visible within this view.



Plate 3-1 View towards Mayne Bog from VP01 (Protected View 49, WCDP 2014-2020, now numbered Protected View 27, WCDP 2021-2027)

In relation to a concern highlighted in a 3<sup>rd</sup> Party Submission that “*Photomontage no 8 is not taken in the actual location of Protected View no 51, but in the vicinity of the view, this is highly inaccurate and deliberately misleading.*” The WCDP 2014-2020 describes Protected View 51 as ‘*Sporadic views (both sides of roadway) of “Hill of Mael” to the west and “Mullaghmeen” to the north-east from Local Road L-1759 which runs through the intervening valley.*’ Figure 3-9 below shows a map of Protected View 51 and the photomontage location with zones of theoretical visibility. The ZTV indicated that there was no visibility along a large portion of the section of the L1759 Local Road designated as part of the Protected View. VP08 is the closest point to this Protected View where there is theoretical visibility. Protected View 51 is directed towards the Hill of Mael and Mullaghmeen (as stated in the description from the WCDP) and not in the direction of the proposed turbines. Further south along the view from VP08, the Hill of Mael screens the turbines from view.

The new county development plan WCDP 2021-27 acknowledges that there are limited views from this scenic view due to vegetation. The WCDP 2021-27 describes Protected View 51 (re numbered to Protected View 32 in the new WCDP) as ‘*The focus of this view is the Hill of Mael and Mullaghmeen on either side of the road. It should be noted that there are stretches of the road which have no clear line of sight due to tall road-side vegetation.*’

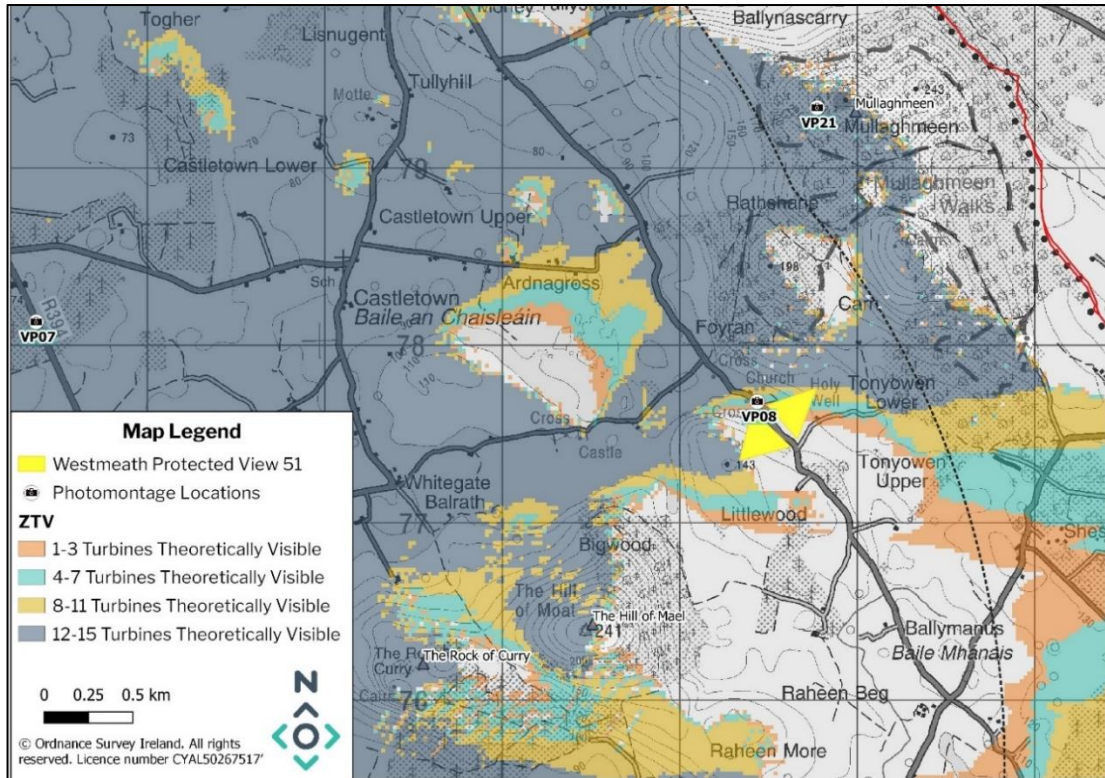


Figure 3-9 ZTV of area surrounding VP08.

*“CWF acknowledge that the views from Lough Crew, Frewin Hill and Mullaghmeen and views of the lakelands have high aesthetic quality and are designated scenic amenity in the relevant County development plans. Coole Wind Farm if built will have a permanent detrimental effect on those and other science view in our landscape and will hugely damage the potential of North Westmeath as a tourism industry.”*

The original EIAR provides a comprehensive assessment in relation to landscape and visual effects on the scenic amenity discussed in the above quote from a 3<sup>rd</sup> party submission. It is noted that Appendix 12-3 from the EIAR contains detailed viewpoint assessment tables for each of the viewpoints. VP11, VP14 and VP21 show views from Lough Crew, Frewin Hill, and Mullaghmeen, each of these viewpoints were discussed in detail and assessed. In terms of the effect the wind farm will have on each of these views, Lough Crew (VP11) and Frewin Hill (VP14) were deemed to have a Slight residual effect on the view. The residual effect from Mullaghmeen (VP21) was deemed to be Moderate. No significant visual effects were deemed to arise as a result of the Proposed Development at these locations.



3.3

## Receptors in Close Proximity

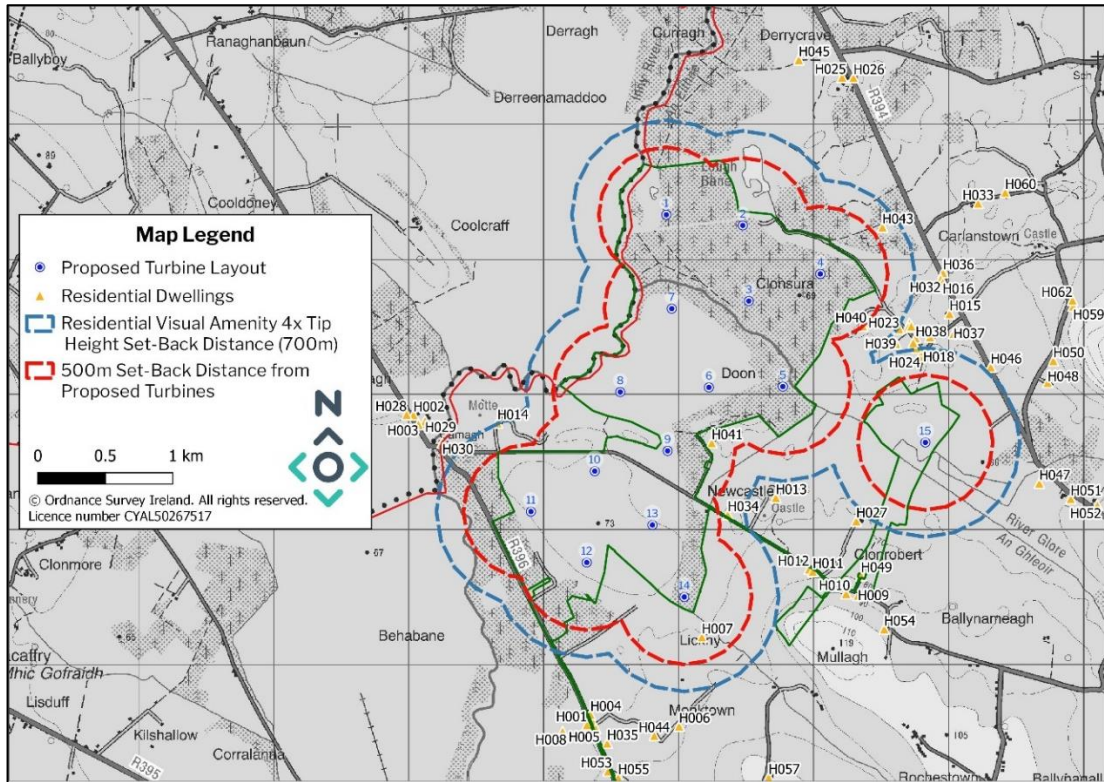


Figure 3-10 Residential Receptors within 1.55km of a proposed turbine

A number of 3<sup>rd</sup> party submissions raise concerns relating to the residential dwellings in close proximity to the site. These concerns highlight the setback distance set out by the Draft Revised Wind Energy Development Guidelines (2019, DoHPLG) for visual amenity. Potential for impacts on sensitive residential receptors has been kept to the fore throughout the iterative design process adopted for the Proposed Development and has been considered in full within the EIAR. The Draft Revised Wind Energy Development Guidelines (2019, DoHPLG) contain Specific Planning Policy Requirements (SPPRs). Of specific relevance here in relation to appropriate setback distances is SPPR 2 which states:

**SPPR2**

*“With the exception of applications where reduced setback requirements have been agreed with relevant owner(s) as outlined at 6.18.2 below, planning authorities and An Bord Pleanála (where relevant), shall, in undertaking their development planning and development management functions, ensure that a setback distance for visual amenity purposes of 4 times the tip height of the relevant wind turbine shall apply between each wind turbine and the nearest point of the curtilage of any residential property in the vicinity of the proposed development, subject to a mandatory minimum setback of 500 metres from that residential property. Some discretion applies to planning authorities when agreeing separation distances for small scale wind energy developments generating energy primarily for onsite usage.”*

In December 2019, the Draft Revised Wind Energy Development Guidelines were published for consultation and have yet to be finalised. As illustrated in Figure 1-11 above, the Proposed Development has a 700m setback distance from residential receptors, which is compliant with a 4 times tip height set-back distance.

Figure 3-10 above displays a map of the residential receptors within 1.5km of a proposed turbine. As stated in Chapter 5 (Population and Human Health) of the EIAR “There are 18 no. occupied dwellings

located within one kilometre of the proposed turbine locations. The closest occupied dwelling H14 (i.e. dwelling not involved with the Proposed Development) is located at a distance of approx. 700 metres from the nearest proposed turbine T11. There are two dwellings, H18 & H24 which are located at distances of 638m and 679m from T15 respectively however these are individuals involved with the Proposed Development.” As stated above all occupied residential dwellings comply with the mandatory setback distance of 500m. Any other dwellings within the set-back distances area are either commercial/agricultural dwellings (H041 and H040) or derelict (H043, H034, H07). Therefore, it is emphasised (as stated within the EIAR) that the Proposed Development is compliant with the required set-back distances for residential visual amenity.

### Photomontages Representing visual amenity

Another 3<sup>rd</sup> party concern highlighted by several individuals was that there were no photomontages taken or route screening analysis completed from roads close to the Proposed Development where a number of residents are situated. Potential for impact on sensitive residential receptors has been kept to the fore throughout the iterative design process adopted for the Proposed Development and has been considered in full within the EIAR. In relation to the selection of Viewpoint locations, the GLVIA (2013) states:

*“The emphasis must always be on proportionality in relation to the scale and nature of the development proposal and nature of the development proposal and its likely significant effects.”*

During the LVIA conducted as part of the EIAR and reported in Chapter 12 (Landscape and Visual) a rigorous and robust scoping exercise, desk study and baseline study was conducted. The scoping exercises including the ZTV, site visits and viewpoint selection resulted in a widespread final selection of 22 no. photomontages in total. Photomontages are just one of the tools employed during the LVIA that was conducted in order to inform the assessment of landscape and visual effects. It would be a disproportionate measure to include an individual photomontage from every residential dwelling and this is not required to conduct a thorough and robust assessment of landscape and visual effects. In line with the guidance laid out in the GLVIA (2013), the viewpoints selected for the LVIA conducted were informed by a range of factors including the “ZTV analysis, by fieldwork, and by desk research” (para 6.18, GLVIA 2013). Furthermore, the GLVIA (2013) states that representative viewpoints are “selected to represent the experience of different types of visual receptor, where larger numbers of viewpoints cannot all be included individually and where the significant effects are unlikely to differ” (para 6.19 GLVIA, 2013). It is submitted that the large number of viewpoints used in the conduct of the LVIA are sufficient to represent the visual receptors within the LVIA study area, including the “distribution of population” (para 6.18, GLVIA 2013). 11 of the 22 total photomontages produced are located within 5km of the Proposed Development, and in fact 7 of these are located within 3 km of the Proposed Development, and these viewpoints are located at varying geographic perspectives and orientation, enabling a sufficient and appropriate number of Photomontages for the assessment of landscape and visual effects.

## 3.4 Landscape Character

Several 3<sup>rd</sup> party submissions address the suitability of the landscape character of the Proposed Development site and surrounding area. In relation to these concerns, the proposed turbines are subject to extensive discussion, relating to the landscape, landscape type, and landscape character of the site and surrounds in a number of sections within the EIAR (see Section 12.4, Section 12.5, and Section 12.8). A comprehensive assessment of each Landscape Character Area within the wider LVIA study area was detailed in Appendix 12-2 and no significant effects on landscape character were recorded. The Northern Hills and Lakes LCA were deemed to experience a Slight residual effect on landscape character. It is comprehensively demonstrated within the EIAR that the landscape of the Proposed Development Site is suitable for a wind energy development of the scale proposed in the case of the Proposed Development. It is also apparent throughout the entire range of Photomontages presented

that the Proposed Development is effectively absorbed within the landscape within which it is viewed, particularly from locations where the Proposed Development is viewed from long-range views (see Appendix 12-3 for a comprehensive discussion of this).

Similar 3<sup>rd</sup> party submissions argue that the area designated as ‘Low Capacity’ in terms of wind energy development, within the Westmeath County Development Plan (2014-2020), is not suitable for industrial wind farms. This point is comprehensively addressed within the landscape and visual chapter (Chapter 12) within the EIAR, for example see the following quote:

*“It is noted that while the Wind Energy Development Capacity Map (Map 5) in the current WCDP indicates that this LCA has a Low Capacity for wind energy development, the LCA is described as having extensive areas of cutaway bog. With reference to the Regional Planning Guidelines for the Midland Region, flat peatlands are considered the preferred location for wind energy developments in County Westmeath.”*

In relation to wind energy development capacity in the WCDP, the policy context remains largely unchanged. The Wind Energy Development Capacity Map in the current Westmeath County Development Plan 2021-2027 still indicates that the LCA has a Low Capacity for wind energy development. The current WCDP (2021-27) also acknowledges the LCA as having “*extensive areas of cutaway bog*”. The policy regarding the siting of wind farms on cutaway peatland sites also remains unchanged. The WCDP 2021-27 states “*The preferred locations for large scale energy production, in the form of windfarms, is onto cutover cutaway peatlands in the County*”.

The Midlands Regional Planning Guidelines and the Wind Energy Development Guidelines state that the flat peatland and cut away bog landscapes are suitable landscapes for accommodating wind energy developments. The Midland Regional Guidelines state that

*“The Midland Region is well placed for the development of renewable energy such as wind and biomass/biofuels given the predominantly rural nature of the landscape which includes large expanses of worked out peatland.”*

In addition, the Proposed Development aligns well with the guidelines on siting and design (Wind Energy Development Guidelines (2006, DoEHLG) and the Draft Revised Wind Energy Development Guidelines (2019, DoHPLG)), as covered in full in Section 12.4.5 within the EIAR. It is stated within the Wind Energy Development Guidelines that “*aesthetically, tall turbines would be most appropriate*” in flat peatland sites. The proposed turbines of the Proposed Development are consistent with this guidance (again as addressed in greater detail in Section 12.4.5). By using this turbine height (175m Tip Height), it allows for fewer, taller turbines within the site, improving the visual congruency of the Proposed Development within the landscape type within which it is located, as detailed in full within the assessment of Photomontages contained within Appendix 12-3 and the assessment of landscape and visual effects contained within Section 12.9. In conclusion, in relation to the 3<sup>rd</sup> party submissions addressing the suitability of the landscape character of the site and surrounds for the Proposed Development it is submitted that the lengthy and comprehensive discussion within the sections of the EIAR referenced above clearly demonstrate that the landscape of the site is suitable for the Proposed Development and that Significant landscape effects will not arise in relation to the Proposed Development.



## APPENDIX 6

*LVIA Response*