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## INTRODUCTION

## **Background**

- 13.1 This chapter assesses the landscape and visual effects arising from the proposed replacement of the renewable energy plant at Medite's existing MDF manufacturing plant in the townland of Redmondstown, Clonmel, Co. Tipperary.
- 13.2 Please refer to **Chapter 2** of this EIAR for a detailed description of the Proposed Development, i.e. 'the project' including the existing and proposed site layout and details on the dimensions of all proposed structures.
- 13.3 The 29.7ha planning application area, comprises the entire existing production facility, including associated storage areas, access roads, car parking areas and office buildings, as well as some of the existing screening vegetation surrounding the facility. This proposed development sits within the wider 69ha landholding boundary, which expands to the nearest local roads to the west (between 200-450m), across the local road and up to the River Anner to the east and across the local road into a neighbouring field to the south.
- 13.4 All structures associated with the Proposed Development would be contained within three 'development areas' located to the west / south-west of the existing main factory buildings.

These new structures would be placed around and tie in with the existing buildings/structures, silos and conveyor belts. A small stand of mature trees within one of the development areas would be removed, to facilitate the development. The tallest and therefore potentially most visible new structures would be:

- the Edge Trim Silo (19.50m tall; top at 49m above Ordnance Datum (AOD));
- the Line 1 Energy Plant (33m tall; top at 58.5m AOD);
- the Line 1 Dry Electrostatic Precipitator (23.3m tall; top at 48.8m AOD);
- the Line 1 Start up Stack (30.00m tall; top at 55.5m AOD);
- the Line 2 Energy Plant (18.50m tall; top at 48m AOD); and
- the Line 2 Start up Stack (30.00m tall; top at 59.5m AOD).
- 13.5
- 13.6 This chapter should be read in conjunction with the following figures, which have been produced to inform the EIAR chapter:
  - **Figure 13-1:** Landscape Baseline and Viewpoint Locations
  - Figure 13-2: Zone of Theoretical Visibility (ZTV) Map
  - Figure 13-3: Viewpoints A & B
  - Figure 13-4: Viewpoints C & D



- Figure 13-5: Viewpoint and Photomontage E
- Figure 13-6: Viewpoint and Photomontage F
- Figure 13-7: Viewpoint and Photomontage G
- Figure 13-8: Viewpoint and Photomontage H
- Figure 13-9: Viewpoint and Photomontage I
- Figure 13-10: Viewpoint and Photomontage J
- Figure 13-11: Proposed Landscape Plan

## Scope of Work / Assessment Methodology

- 13.7 The European Commission Guidance on the preparation of the Environmental Impact Assessment report (2017)1 was taken into account with regard to the structure of this chapter, including headings covered, as well as general EIA terminology. Regarding the content of the landscape chapter, the EPA guidelines in relation to information to be contained in Environmental Impact Assessment Reports (May 2022)<sup>2</sup> suggest the following typical headings that may be included in respect of the prescribed environmental factor 'The Landscape':
  - Landscape Appearance and Character;
  - Landscape Context;
  - Views & Prospects; and
  - Historical Landscapes.
- 13.8 These headings are incorporated in the below assessment, as appropriate. However, in the absence of more detailed Irish guidance, the assessment contained within this chapter is based on the Third Edition of the Guidelines for Landscape and Visual Impact Assessment issued by the Landscape Institute and Institute of Environmental Management and Assessment<sup>3</sup> (hereinafter referred to as 'GLVIA3'). These guidelines are widely accepted as best practice for LVIA in Ireland.
- 13.9 GLVIA3 emphasises that landscape and visual effects are related but independent issues; landscape effects are changes in the landscape, its character and quality; while visual effects relate to the appearance of these changes and the resulting effect on visual amenity.
- 13.10 The assessment of overall landscape and visual effects and their significance is defined in terms of the relationship between the sensitivity of the landscape/visual receptors and the magnitude of the change.

<sup>&</sup>lt;sup>3</sup> Landscape Institute and Institute of Environmental Management & Assessment (2013) Guidelines for Landscape and Visual Impact Assessment. Third Edition, Routledge.



<sup>&</sup>lt;sup>1</sup> European Union (2017). Environmental Impact Assessment of Projects, Guidance on the preparation of the Environmental Impact Assessment Report. European Commission

<sup>&</sup>lt;sup>2</sup> Environmental Protection Agency (2022). Guidelines on the Information to be Contained in Environmental Impact Assessment Reports. Published May 2022. Environmental Protection Agency, Johnstown Castle Estate, Co. Wexford

- 13.11 As GLVIA3 (paragraph 2.23) states, professional judgement is an important part of the LVIA process: whilst there may be some scope for objective measurement of landscape and visual changes, much of the assessment must rely on qualitative judgements. It is critical that these judgements are based upon a clear and transparent method so that the reasoning can be followed and examined by others.
- 13.12 GLVIA3 sets out a framework for making judgements about the level of effects that may result from change or development. It describes a step by step approach in which: judgements about the value and susceptibility of the receptor are combined into a judgement about sensitivity; judgements about the size/scale of the effect, its geographical extent and its duration and reversibility are combined into a judgement about the magnitude of the effect; and finally, the judgements about sensitivity of the receptor and the magnitude of the effect are combined to judge the level of the effect. If the assessment forms part of an EIA, a threshold may then be identified to show which effects are considered to be significant and which are not.
- 13.13 GLVIA3 is not prescriptive about exactly how the various judgments required in this framework should be made. This is a matter for individual practitioners to decide and explain. In this document it has been assessed that Major or Major/Moderate levels of effect are significant.
- 13.14 The full LVIA methodology is described in Appendix 13-A. Please note that much of the terminology used in assessing the landscape and visual effects is in accordance with the above-mentioned EPA Guidelines. However, the terminology used in the LVIA methodology to describe the level of effects, which is based on examples provided in GLVIA3, differs slightly from the description of the "significance of effects" in the EPA Guidelines.

### **Technical Standards**

- 13.15 Photography and visual representations are based on the principles set out in the Landscape Institute – Technical Guidance Note 06/19 – Visual Representation of Development Proposals<sup>4</sup>. There is no Irish standard/guidance, and in SLR's experience it is typically considered sufficient to provide two (annotated) viewpoints on one A3-sized sheet, using a range of horizontal angles of view (i.e. 40°-110°) to illustrate the full extent of the development within each photograph presented, as well as the context within which the project area is located. For this project, photomontages were produced for six of the ten viewpoints and these are also provided on A3sized sheets with both the existing photograph and photomontage view on one sheet.
- The Landscape Institute Technical Guidance Note 02/21 Assessing landscape value outside 13.16 national designations<sup>5</sup> was taken account of in the preparation of the assessment methodology, as provided in **Appendix 13-A** at the end of this chapter.

# **Consultations / Consultees**

13.17 Pre-planning consultations were held with representatives of An Bord Pleanala (ABP) and Tipperary County Council (TCC). Eight viewpoint locations were proposed and as a result of these consultations two additional viewpoints were requested, i.e. one along the N24 south of the project and one along the River Suir Blueway, also to the south. Therefore, a total of 10 viewpoints are now provided as part of this LVIA. For six of these viewpoints, photomontages were prepared,



<sup>&</sup>lt;sup>4</sup> The Landscape Institute (2019) Technical Guidance Note 06/19: Visual Representation of Development Proposals, Landscape Institute.

<sup>&</sup>lt;sup>5</sup> The Landscape Institute (2021) Technical Guidance Note 02/21: Assessing landscape value outside national designations.

- as requested by TCC (note: the proposed development will not be visible from the remaining four viewpoints, hence no photomontages are provided for these).
- 13.18 ABP highlighted that the landscape assessment "should have due regard to any potential impacts on" the Suir Blueway. Views from this recreational facility were considered, as part of the visual assessment.
- 13.19 Following a review of published development plans and following an initial site survey in 2020, it was deemed that there was no requirement for other separate formal consultations to be carried out regarding the landscape and visual effects of the proposed development.

## **Contributors / Author(s)**

- 13.20 The LVIA including site work and completion of drawings was carried out by Anne Merkle, a Principal Landscape Architect with SLR Consulting Ireland. Anne graduated from the Nürtingen-Geislingen University (Germany) in Landscape Architecture (Dipl.-Ing. (FH)), in 2002. She has 20 years' experience working for landscape consultancies in Ireland, specialising in Landscape and Visual Impact Assessments for a wide range of projects, including quarries, waste recovery facilities, wind farms, powerlines and mixed developments. In 2017, Anne completed an MSc in Biodiversity and Land Use Planning at NUI Galway. She is a full member of the Irish Landscape Institute (MILI) since 2005.
- 13.21 A technical review of the LVIA was carried out by Emma Jinks, the Technical Discipline Manger for Landscape Architecture at SLR. Emma holds a PG Dip in Landscape Architecture and is a Chartered Member of the Landscape Institute (CMLI). She has over 15 years of professional experience in Landscape and Visual Impact Assessment.

### **Sources of Information**

- 13.22 The assessment is based upon a desk top assessment of relevant plans, guidance and landscape character assessments, as well as thorough site assessments carried out in February 2020 and June 2022. Following discussions with the project team it was decided that no further, more recent, site visits are required, as the local landscape character and existing views have not been noticeably changed since the last visit, e.g. by third party developments in the local area. The desktop study and field work were informed by:
  - Tipperary County Development Plan 2022 2028
  - Clonmel & Environs Development Plan 2013
  - Draft Clonmel and Environs Local Area Plan 2024-2030
  - Waterford City and County Development Plan 2022 2028
  - digital and paper (Ordnance Survey Ireland) mapping at different scales; and
  - information available on the internet (such as satellite images and information on recreational facilities and nature conservation sites).



## **Study Area**

13.23 A study area of up to 5km surrounding the proposed development site was identified during the desktop study, based on the Zone of Theoretical Visibility Map (refer to Figure 13-2), which indicates potential visibility in many areas within that range. It was confirmed during the field survey that the actual visibility is much reduced by hedgerows, forestry plantations and built structures in the wider landscape (which were not taken account of as part of the ZTV calculation). Nevertheless, the 5km study area is maintained for the purposes of providing landscape context.

## **Field Survey**

- A detailed site survey was carried out on 27th February 2020 in sunny and bright conditions with 13.24 good visibility. A second site survey was carried out on 15th June 2022 to re-take the first set of viewpoint photography, as well as take the additional viewpoint photography requested during the pre-planning consultations. Conditions during the second visit were also sunny and bright with good visibility. Photographs were taken using a Nikon D610 digital SLR full frame camera, with a fixed 50mm lens, mounted on a tripod with a panoramic head. The individual photos were taken in portrait format.
- 13.25 In accordance with GLVIA3, the field survey and viewpoint photography concentrated on publicly accessible areas, such as the road and public footpath networks, residential and outdoor recreational areas.

## **Limitations / Difficulties Encountered**

13.26 No difficulties were encountered during the desktop study, field survey or in the preparation of this report.

# **Significant Risks**

13.27 There are no known significant risks to human health or environmental effects, which may occur in relation to this landscape and visual impact assessment.



## REGULATORY BACKGROUND

13.28 The following paragraphs set out the regulatory background with regard to LVIA in Ireland in general and the site-specific planning background relevant to the proposed development, in particular.

## Legislation

- 13.29 In 2002, Ireland ratified the European Landscape Convention<sup>6</sup>, which promotes the protection, management and planning of landscapes. The National Landscape Strategy for Ireland 2015-2025<sup>7</sup> was published "to ensure compliance with the European Landscape Convention and establish principles for protecting and enhancing the landscape while positively managing its change".
- 13.30 Article 1a of the European Landscape Convention defines landscape as "an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors". This definition has been included in the Planning and Development Act 2000 (as amended), along with the requirement that objectives relating to landscape shall be included in development plans.
- 13.31 There is no Irish legislation specifically governing the preparation of landscape and visual impact assessments.

## **Planning Policy**

- 13.32 The Tipperary County Development Plan (TCDP) 2022-20288 is the statutory plan detailing the development objectives/policies of the authority, covering the proposed development site. Further to that, some of the objectives/policies in the Clonmel & Environs Development Plan 20139 are of relevance to this assessment. The Draft Clonmel and Environs Local Area Plan 2024-2030 was reviewed as well. However, no relevant new/additional objectives/policies were identified. Due to the proximity of the proposed development site to the boundary with County Waterford, the Waterford City and County Development (WCCDP) 2022 - 2028<sup>10</sup> was also reviewed.
- 13.33 Refer to Figure 13-1 - Landscape Baseline and Viewpoint Locations for the location and extent of the relevant designations within the study area.

Tipperary County Development Plan 2022-2028

#### Landscape

13.34 Section 11.7 'Landscape' of the current TCDP states that "Tipperary is well known for its dramatic and diverse landscapes, ranging from the rich 'Golden Vale' to the dramatic Galtee Mountains and to the scenic Lough Derg Lakelands. Landscape Character Assessment (LCA) has been prepared to describe, map and classify landscapes and support an understanding of their value and importance, and their capacity for change. The LCA establishes a basis for the protection, management and

<sup>&</sup>lt;sup>10</sup>Waterford City and County Development 2022 - 2028: https://waterfordcouncil.ie/media/plans\_strategies/development-plan/index.htm



<sup>&</sup>lt;sup>6</sup> European Landscape Convention: https://www.coe.int/en/web/conventions/full-list/-/conventions/rms/0900001680080621

<sup>&</sup>lt;sup>7</sup> National Landscape Strategy for Ireland 2015-2025: <a href="https://www.chg.gov.ie/app/uploads/2015/07/N-Landscape-Strategy-english-Web.pdf">https://www.chg.gov.ie/app/uploads/2015/07/N-Landscape-Strategy-english-Web.pdf</a>

<sup>8</sup> Tipperary County Development Plan 2022-2028: https://www.tipperarycoco.ie/cdp#:~:text=The%20Plan%20is%20a%  $20 fra \underline{mework, communities \%20 and \%20 supporting \%20 job \%20 creation.}$ 

<sup>9</sup> Clonmel & Environs Development Plan 3013: https://www.tipperarycoco.ie/sites/default/files/Volume%201%20-%20Clonmel%20%20Environs%20Development%20Plan%202013%20%282%29.pdf

- planning of landscapes having regard to those features that give Tipperary its unique 'sense of place'."
- 13.35 Policy 11-16, contained in section 11.9 (Planning Policy) of the current TCDP states that "It is the policy of the Council to: Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported."
- The Landscape Character Assessment of Tipperary 2016 is contained in Appendix 3 of the current 13.36 TCDP. Relevant content regarding Landscape Character Areas (LCA), sensitivity and values associated with the study area is provided as part of the Landscape Baseline description further on in this chapter.
- 13.37 Relevant Views and Routes are described under a separate heading below.

### **Primary and Secondary Amenity Areas**

- 13.38 A number of Primary and Secondary Amenity Areas are designated in the TCDP. Section 11.7.1 of the TCDP states that these "are particularly notable by virtue of their scenic and visual quality and offer significant opportunities for tourism development and rural recreational activities. The Council will seek to ensure that a balance is achieved between the protection of sensitive landscapes and the appropriate socio-economic development of these areas. In this respect, development proposals will be required to demonstrate that they integrate and respect the visual quality of the amenity area."
- 13.39 Policy 11-17 contained in section 11.9 (Planning Policy) of the TCDP states that "It is the policy of the Council to ensure the protection of the visual amenity, landscape quality and character of designated 'Primary' and 'Secondary' Amenity Areas. Developments which would have a significant adverse material impact on the visual amenities of the area will not be supported. ..."
- 13.40 The nearest Primary Amenity Area to the proposed development covers the mountain of Slievenamon, approximately 3.3km to the north-east of the proposed development site, at its closest point. There are no other Primary or any Secondary Amenity Areas with relevance to this assessment.

#### **Scenic routes and Views**

- Section 11.7.2 states "The Council has designated a series of scenic views and routes in the county, 13.41 which include views of key heritage sites, and inter-county scenic tourism routes. In assessing new development, consideration will be given to ensuring that views are not obstructed or significantly altered, and the visual impact of the new development be minimised by careful design and siting."
- 13.42 The following Listed Scenic Routes and Views within the study area are contained in Appendix 3 of the current TCDP.
  - **V09 -** Views over River Suir Valley along Clonmel Carrick-on-Suir Road (N24)
  - V10 Views to Slievenamon along Clonmel Kilkenny Road (N76), from Kilhefferan Clashinisky
  - **V11 -** Views to Slievenamon along Seskin Killusty Road (R706)



- **V21 -** Views south to Comeragh foothills from Kilsheelan
- **V22 -** Views north to Slievenamon from Kilsheelan
- **V23** Views north to Slievenamon and south to the Comeraghs, east of Kilsheelan (N24)
- **V36** Views of the Comeragh Mountains looking south on the approach R689 from Fethard
- **V37 -** Views South over River Suir Valley from Marlfield Knocklofty Road
- **V38** View on the Cahir approach road to Clonmel looking southeast to lands north of Marlfield and west of the town.
- 13.43 None of the views from the above listed Scenic Routes and Viewpoints are directed towards the proposed development site and the proposed development would therefore not become visible in any of these protected views. These will therefore not be considered further, as part of this assessment.

### Clonmel & Environs Development Plan 2013

#### **Views, Prospects and Vistas**

- 13.44 Chapter 7.5 View, Prospects and Vistas of the current Clonmel & Environs Development Plan 2013 states the following: "Clonmel's location at the foothills of the Comeragh Mountains provides the town with a very picturesque setting with views and prospects of value from many directions and locations. Views of the Knockmealdown Mountains and Slievenamon are also available from within the plan area. Within the built up area there are also vistas and framed views that are of value and add greatly to the urban environment. The Council will ensure that all important views, prospects and vistas are maintained, enhanced where possible and not obscured by insensitive or poorly designed development."
- 13.45 Policy AH8: View, Prospects and Vistas states that "It is the policy of the Council to ensure that important views, prospects and vistas are maintained, enhanced where possible and not obscured by insensitive or poorly designed development."
- 13.46 There are no known "views and prospects of value" within the plan boundary, in which the proposed development would be visible in conjunction with the Comeragh Mountains. Further to that, there are no known "important views, prospects or vistas" from locations within the built-up area of Clonmel, in which the proposed development would become visible.

#### **Development Management Guidelines**

- 13.47 The proposed development site is located within the General Industry Land Use Zoning Designation ("To provide for heavy industry and related uses").
- 13.48 Chapter 9.0 Development Management Guidelines includes the following Minimum Standards for Industrial Developments, regarding Boundary treatment/Landscaping: "A comprehensive boundary treatment and landscape plan providing for details of uniform approach to boundary treatment and planting shall accompany applications. Existing trees and hedgerows shall be incorporated where practicable and new planting shall utilise trees and shrubs that are indigenous to the area. All services shall be laid underground."



#### Waterford City & County Development Plan 2022-2028

#### Landscape/Seascape

- 13.49 The relevant Landscape Policy Objectives from Chapter 10, 'Landscape, Coast/Marine and Blue Green Infrastructure' of the current WCCDP are listed below:
- 13.50 L 02 - "Protecting our Landscape and Seascape

We will protect the landscape and natural assets of the County by ensuring that proposed developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area and ensuring that such proposals are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the uplands, along river corridors, coastal or other distinctive landscape character units."

13.51 The scenic routes and protected views, as well as sensitive/visually vulnerable areas with relevance to this assessment are discussed below.

#### **Scenic Routes and Protected Views**

- 13.52 The following landscape policy objective regarding scenic routes and protected views can be found in Chapter 10 of the current WCCDP.
- 13.53 L 04 - "Scenic Routes and Protected Views

We will protect the scenic routes and specified protected views identified in our Landscape Character Assessment (Appendix 8), including views to and from the sea, rivers, landscape features, mountains, landmark structures and urban settlements from inappropriate development that by virtue of design, scale, character or cumulative impact would block or detract from such views."

- 13.54 Section 5 of Appendix 8, 'Landscape and Seascape Character Assessment', describes scenic routes and protected views as "Scenic routes and protected views indicate public roads and viewing points from which views and prospects of areas of natural beauty and interest can be enjoyed. Sightseeing visitors are more likely to be concentrated along these routes. The onus should be on the applicant for permission to develop in the environs of a scenic route, to demonstrate that there will be no obstruction or degradation of the views towards visually vulnerable features nor significant alterations to the appearance or character of sensitive areas."
- 13.55 The following scenic routes, listed in Appendix 8, are located within a 5km radius of the proposed development site:
  - SR 8: North-west from Dungarvan to Tooraneena on the R672. Third class North to Ballymacarbry. Join R671 to Clonmel taking the R678 and turning south for third class route through the Comeraghs.
  - SR 12: R680 East from Clonmel to Carrick-on-Suir. Turn south onto third class route to R678 or through Coolnamuck Wood onto R676.
- 13.56 It should be noted that due to the location of the proposed development in Co. Tipperary, views from these scenic roads towards any visually vulnerable features or sensitive areas within Co. Waterford would not be affected by the development. Nevertheless, views from these scenic routes in general will be considered in the assessment below, due to the above-mentioned likelihood of sightseeing visitors being concentrated along these routes.



### RECEIVING ENVIRONMENT

### **Landscape Baseline**

Existing Relevant Landscape Character Assessments

#### **Landscape Character Assessment of Tipperary**

- 13.57 The Landscape Character Assessment of Tipperary 2016 divides the landscapes of Co. Tipperary into four Architypes and further into seven Landscape Character Types (LCT) and 23 Landscape Character Areas (LCA).
- 13.58 The proposed development site is fully located within *The Plains* Architype, within LCT A1 Lowland Pasture & Arable and within LCA 1 Urban and Fringe Areas. LCA 1 is considered a sub-area of the surrounding LCA 4 River Suir Central Plan.

#### LCA 1 – Urban and Fringe Areas

- 13.59 The generalised description of LCA 1 in the Landscape Character Assessment of Tipperary 2016 states that "These towns represent the largest settlements of the county and due to their size relative to the smaller county settlements, they are considered to have an urban character that sets them apart from the surrounding rural hinterland. It is also notable that each of these settlements is very much integral to the character of the Plains (as are the smaller villages) and thus are considered to be Subareas of their respective LCAs."
- 13.60 The sensitivity of LCA 1 has been assessed as Sensitivity Class 0 - Robust, i.e. "could be improved by change". Robust sensitivity is described as "Areas lacking normal features with disturbance, brownfield and significant development." The objective for this Sensitivity Class is to improve, with the associate guideline to "encourage development that will improve the appearance and character of the area".
- 13.61 Appendix I – Consolidated Landscape Character Areas of Tipperary, of the Landscape Character Assessment of Tipperary 2016 provides further detail for each of the LCAs, including the following Landscape Characteristics of LCA 1:
  - "The settlements identified above share many very similar characteristics notably their locations on areas of level topography. Many of the towns also have fortified structures and Castles associated with this age. These settlements have all grown in population in recent years and form the service centre for the surrounding population."

#### LCA 4 - River Suir Central Plain

- 13.62 The generalised description of LCA 4 in the Landscape Character Assessment of Tipperary 2016 states that "This area is also known as part of the 'Golden Vale'. It is the most extensive and coherent landscape area in the county. It forms the large central area of the county where it is associated with the River Suir and also extends west along the tributaries of the Multeen, Thonouge and Tar and eastwards along the Anner. It is characterised by its rich and productive agricultural lands and rolling landscape. It also incorporates the large towns of the County and many settlements and villages. The M8 Motorway transverses the central plain in a neat east – west divide. The six main towns and urban areas are subareas of this LCA – see 1,2,3"
- 13.63 The sensitivity of LCA 4 has been assessed as Sensitivity Class 1 – Normal, i.e. "low sensitivity to change". Normal sensitivity is described as "Working landscapes with no sensitivities and



established patterns of use and settlement." The objective for this Sensitivity Class is to continue, with the associate guideline to "Facilitate development that continues established patterns of use and settlement".

- 13.64 Appendix I - Consolidated Landscape Character Areas of Tipperary provides the following Landscape Characteristics of LCA 4:
  - "Wide rolling vistas with large fertile fields, surrounded by dense hedgerows. Agriculture is intensive, and the equine industry is especially noticeable. Biodiversity in the landscape is less conspicuous then in some of the other county LCAs, and very little natural landscape or habitats remain."
  - "Strong settlement network built on an extensive transport network that includes, the M8 Motorway, the national Rail Line, the N24 and N76 and the regional and local road network. The large towns of Clonmel, Carrick-on-Suir, Tipperary, Cashel and Cahir are located in the LCA along with the smaller settlements and villages. A pattern of one-off housing occurs along local roads in many areas especially the urban hinterlands of the larger towns."
  - "The existence of views towards the Galtee Mountains, the Commeraghs, the Knockmealdowns and Slievenamon. Views towards one or more of these ranges can be found almost anywhere in the LCA."
- 13.65 A list of Distinctive Features is also included in the consolidated description of LCA 4. This includes the following items with relevance to this assessment:
  - "Certain man-made features form prominent and immediately recognisable features in the landscape. These include: The Rock of Cashel, The steam clouds from the Medite Wood Products factory in Clonmel, the M8 Motorway and the tower of Rockwell College at New Inn."
  - "An established and extensive equine industry and associated infrastructure and employment base. The equine industry is attracted to the River Suir Central Plains due to the rich limestone based soils in the area."
  - "Rich and established arable and pastoral agriculture with focus on dairying and open field of tillage crops."
  - "It is notable that the landscape has been heavily influenced by man's activities i.e. the network of field enclosures and the transport and settlement network."
- 13.66 The Principals of Management included in the consolidated description of LCA 4 state that "The River Suir Central Plain is an actively worked and highly productive environment and new development would sit comfortably in the landscape and not interfere with or eliminate its character and values subject to appropriate sitting and design. Outside of the settlements the land is intensively farmed and highly productive in line with its reputation as the 'Golden Vale' of the county. Notwithstanding this, the visual aspect of the landscape is remarkable especially in the south of the county where views towards the Knockmealdown and Commeragh Mountains are breath-taking in places and form distinctive visual units. Elsewhere the landscape is more robust is its capacity to absorb development due to the rolling nature of the topography. ...
- 13.67 Facilitation of the optimal use of the area's agricultural and settlement development values should be the ultimate objective in the management of this area, along with the conservation and improvement of the visual and environmental quality of the area."



13.68 The following description of the Landscape Condition is also included in the consolidated description of LCA 4. "The landscape of the Suir Central Plain has been heavily influenced by man's activities since early times and the LCA offers a rich palimpsest of layers of agriculture and settlement activity. It is considered that in general the Suir Valley Central Plain is robust in its ability to absorb change and especially change associated with the existing agricultural uses outside of settlements and change associated with development and growth in the larger towns and smaller villages. As stated above a widespread change in farming practices to intensive open plan farming with the removal of field patterns would alter the character of the landscape as would unregulated urban generated housing in the open countryside or the urban fringes of the settlements."

#### **Waterford Landscape Character Assessment**

- 13.69 The 2020 Waterford Landscape Character Assessment is contained in Appendix 8 of the current WCCDP. It identifies seven LCTs. Of these three are present within the 5km study area, i.e. LCT3 Rivers, LCT5 Foothills and LCT6 Uplands. These LCTs are subdivided into Landscape Character Units (LCU). Those located within the study area are (note: no descriptions are provided for any of the LCTs or LCUs):
  - LCU 3B Suir River Corridor
  - LCU 5B Ballymacarbry/Nire Valley
  - LCU 6A Comeragh Uplands
- 13.70 The Waterford Landscape Character Assessment further provides an assessment of Landscape Capacity and Sensitivity. Four degrees of sensitivity are identified, i.e. most, high, low and least sensitive. These are classified as follows:
  - Most Sensitive "Very distinctive features with a very low capacity to absorb new development without significant alterations of existing character over an extended area."
  - High Sensitivity "Distinctive character with some capacity to absorb a limited range of appropriate new developments while sustaining its existing character."
  - Low Sensitivity "A common character type with a potential to absorb a wide range of new developments."
  - Least Sensitive "Areas of existing development and infrastructure. New development reinforces existing desirable land use patterns."
- 13.71 The sensitivity areas are loosely aligned with the LCUs, but with a focus on landcover and specific landscape features, such as skylines, and the banks of rivers. Three of the four sensitivity categories are located within the study area, as described below:
  - Most Sensitive: the banks of the River Suir and the upland area of the Comeragh Mountains, approximately above the 200m contour.
  - High Sensitivity: some small areas in the foothills of the Comeragh Mountains. These are not clearly identified but are assumed to be areas of transitional woodland scrub and semi-natural grassland.
  - Low Sensitivity: the pasture land and conifer plantations on the foothills of the Comeragh Mountains.



### Landscape of the Site and its Context

- 13.72 GLVIA3 recommends that a landscape character assessment should be carried out as part of the baseline study (paragraph 5.4). This should consider:
  - The elements that make up the landscape (physical, land cover and the influence of human activity);
  - Aesthetic and perceptual aspects; and
  - The overall character of the area.

#### **Landscape Elements**

- 13.73 As mentioned previously, the 29.7ha proposed development site comprises the entire existing Medite production facility, including associated storage areas, access roads, car parking areas and office buildings, as well as some of the existing screening vegetation surrounding the facility. The site entrance is located near the south-eastern corner of the proposed development site, along the local road running north from the N24, to the west of the River Anner.
- 13.74 The main factory buildings, consisting of a series of large buildings/warehouses and the associated stacks, silos, roads and car parking areas are located within the south-eastern third of the proposed development site. Log and wood chip storage areas are located along its western boundary, with further log storage areas along the northern boundary, separated from the remainder of the proposed development site by a woodland belt. Largely, the proposed development site has an industrial character.
- 13.75 The structural changes associated with the proposed development would be concentrated in the area to the west / south-west of the existing main factory buildings. This area contains a number of buildings/structures, silos, conveyor belts and hardstanding areas, as well as a small area of mature trees, dominated by non-native sycamore.
- 13.76 Substantial belts of woodland (in the ownership of the applicant) are located along the boundaries of the proposed development site, with the exception of parts of the northern boundary which are marked by mature hedgerows. Further areas of mixed woodland plantations, in the ownership of the applicant, are located to the immediate west of the proposed development site. Local roads adjoin the proposed development site to the south and east. The neighbouring land surrounding the proposed development site is made up from a mix of agricultural fields, orchards, woodland areas and some residential properties along the local roads.
- 13.77 Levels range from 20m AOD at the site entrance, to 42m AOD in the north-western corner of the proposed development site. The southern two thirds of the proposed development site, containing the main plant are mostly flat rising to 30m AOD north-west of the factory. The northern third of the proposed development site is gently sloping from 23m AOD along the eastern boundary to the 42m AOD highpoint in the north-western corner.
- 13.78 Within 6km to the south-west of the proposed development site, the landscape is dominated by the urban centre of Clonmel. The landscape to the north-west, north and east is dominated by agricultural land, which forms part of the aforementioned Tipperary LCA 4 River Suir Central Plain. Landcover is a mix of arable and pasture fields, as well as several orchards in the vicinity of Clonmel. Field sizes range from small to large and are of irregular shapes, but with typically straight boundaries marked with tree lined hedgerows. In the case of the larger fields, it is assumed that these were created by removing previously present dividing hedgerows. The few small woodlands



present in this landscape are typically associated with riverbanks, steep slopes or old demesne landscapes. Nevertheless, the landscape has a well wooded appearance, as several layers of hedgerows combine and block views of the intervening fields, from many locations within the area. Levels within this rolling landscape range from 20m to 80m AOD, with many local highpoints and ridgelines.

- 13.79 To the south of the proposed development site the River Suir and its floodplain, differ from the agricultural land to the north, due to its flat topography. The floodplain is up to 1km wide, lies at an elevation of 15-20m AOD and is dominated by large arable fields bound mostly by tree-lined hedgerows.
- 13.80 To the south of the river / floodplain, the land begins to rise steeply, reaching the summits of Long Hill (404m AOD) and Lachtnafrankee (520m AOD) within 2-5km. These form the northern end of the Comeragh Mountains. The land cover on the lower slopes (approximately up to the 200m contour) is dominated by mixed/coniferous forestry plantations and pasture fields, changing to heathland approximately above the 200m contour.
- 13.81 The main transport routes through the study area are the N24 – National Road parallel and to the north of the River Suir, and the N76 branching off the N24 in a north-eastern direction, 4km east of Clonmel. There are also a number of Regional Roads, i.e.
  - the R678, through the Comeragh Mountains;
  - the R680, parallel and to the south of the River Suir;
  - the R688, leaving Clonmel in a north-western direction;
  - the R689, leaving Clonmel in a northern direction; and
  - The R707 traversing Clonmel in an east-west direction, north of the River Suir.
- 13.82 A dense network of local roads, connects the National and Regional Roads, within and to the north/north-east of Clonmel. There are also a number of local roads accessing the foothills of the Comeragh Mountains. However, the further upland one gets into the mountains, the fewer roads are present.
- 13.83 In addition to dense residential development within Clonmel, there is extensive ribbon development along all roads surrounding the town. This includes the roads on the lower slopes of the Comeragh Mountains, south of Clonmel, approximately up to the 200m contour, where numerous residential properties are present. The eastern outskirts of Clonmel, within 1km to the south/south-west of the proposed development site, are dominated by industrial and commercial developments, including the large C&C Group PLC facility (producing the Bulmers brand of cider as well as other products) and the Medite site itself.
- 13.84 Human activity has strongly shaped the lowland landscape surrounding the proposed development site, including the floodplain of the River Suir. While the natural topography largely remains, the natural landcover has been replaced by agricultural land with straight field boundaries interspersed with many manmade structures, such as roads, residential properties, electricity poles, residential dwellings and farm/industrial buildings.
- 13.85 The lower slopes of the widely visible Comeragh Mountains, as well as Slievenamon at the northeastern edge of the study area, have also been influenced by human activity in the form of pasture fields and forestry plantations. Only approximately above the 200m contour does the human influence recede and the natural heathland land cover prevail.



#### **Aesthetic and Perceptual Aspects**

- 13.86 The proposed development site is complex, with many buildings and structures, log storage and wood chip stockpiles of different shapes, sizes and textures, as well as some areas of trees. Colours within the proposed development site are simple, with greys and browns dominating the buildings, hard surfaces and storage areas, surrounded by the dark green of trees. There is a high level of enclosure from the trees along the proposed development site boundaries and taller structures within the proposed development site.
- 13.87 The urban environment of Clonmel is similarly complex and enclosed, with a great range of residential, commercial, and industrial buildings, interspersed with open spaces.
- 13.88 Due to the strong influence from visible and some audible manmade elements, including vehicle noises (N24), the humming from the existing plant at the Medite site and other nearby industrial facilities, there is no sense of tranquillity or wildness in the vicinity of the proposed development
- 13.89 The rolling agricultural landscape to the north-west, north and east consists of fewer and simpler elements, compared with the proposed development site, i.e. rolling pasture/arable fields, bound by hedgerows, dominated by shades of green. Away from the larger roads, the ambience within this area becomes quieter and more rural, however still not one of tranquillity or wildness. In views from many locations within this area, the Comeragh Mountains are visible to the south, while Slievenamon, at 721m AOD, is a distinctive feature to the north-east, resulting in a large-scale landscape, with scenic qualities. Where roadside vegetation is present and in some low points, the landscape becomes locally enclosed and smaller scale. Due to the rolling topography, irregular shape of fields and hedgerows breaking up views, there is no distinct pattern visible in this landscape.
- 13.90 Along the floodplain of the River Suir, the landscape elements and their colours are similarly simple, as within the rolling agricultural landscape to the north. Due to the flat topography, in combination with the tree lined hedgerows in this area, the scale of the landscape is reduced in some locations, coupled with a sense of enclosure. This is particularly the case along the cycling/walking route, along the northern bank of the River Suir and along the river itself, i.e. the Suir Blueway.
- 13.91 While the dominant landscape elements change to forestry plantations and heathland on the northern slopes of the Comeragh Mountains, these are still simple elements, with a reduced colour palette of greens and browns. Considering the typically large areas covered by each of these elements, this landscape has a somewhat monotone appearance. Roadside hedgerows, as well as the forestry plantations block views in many locations along the roads approximately below the 200m contour, thereby locally reducing the scale of the landscape. However, where views open up, they are vastly panoramic and scenic. Approximately above the 200m contour, where heathland dominates, the scale and openness of the landscape increases dramatically. Also, the sense of tranquillity increases significantly, due to the less frequently used roads and distance from settlements. However, the sense of wildness/remoteness is still lessened by the presence of conifer plantations visible on the lower slopes and many manmade structures visible across the lowland landscape.

#### **Overall Character**

13.92 As alluded to in the above descriptions, the landscape surrounding the proposed development site is made up from four distinct character types, roughly aligning with the LCAs and LCUs identified in



the Tipperary and Waterford Landscape Character Assessments. The key characteristics for each of these landscape character types are summarised as:

- Clonmel Urban and Fringe Areas (Tipperary LCA 1): urban character, consisting of mix of residential estates, community facilities and commercial/industrial units;
- Rolling agricultural lowland landscape (part of Tipperary LCA 4 River Suir Central Plain): rolling, intensively managed agricultural land, with scenic views towards the mountains to the north-east and south;
- River Suir and floodplain (part of Tipperary LCA 4 River Suir Central Plain and Waterford LCU 3B - Suir River Corridor): flat arable land with views of the River Suir and/or glimpses of the mountains to the north-east and south; and
- North Comeragh Mountains (part of Waterford LCU 5B Ballymacarbry/Nire Valley & LCU 6A -Comeragh Uplands): Pasture and forestry covered slopes and heathland summits, with highly scenic views over the River Suir and southern Tipperary.

#### **Protected Nature Conservation Sites**

- 13.93 The National Parks and Wildlife Service (NPWS) website<sup>11</sup> was reviewed for protected nature conservation sites in proximity to the proposed development site, as these provide an indication of the natural heritage value placed on the local landscape.
- 13.94 One Special Area of Conservation (SAC), one Natural Heritage Area (NHA) and four proposed Natural Heritage Area (pNHA) were identified within or in the vicinity of the study area, as listed in **Table 13-1** below.

Table 13-1
Nature Conservation Sites

Type	Site Code	Site Name	Distance and Direction from Project Area
SAC	002137	Lower River Suir SAC	0.3km to the east
NHA	002388	Slievenamon Bog NHA	5.8km to the north-east
pNHA	001701	Kilsheelin Lake	2.3km to the south-east
pNHA	001982	Templetney Quarry	3.4km to the north-east
pNHA	001981	Marlfield Lake	6.8km to the south-west
pNHA	001708	Toor Wood	6.4km to the south-east

#### Potential Landscape Receptors

- 13.95 The potential landscape receptors, to be considered as part of the assessment of landscape effects, are:
  - Landscape Elements
    - o small area of trees within the proposed development site;



<sup>&</sup>lt;sup>11</sup> National Parks and Wildlife Service: <a href="https://www.npws.ie/">https://www.npws.ie/</a>

- Aesthetic and Perceptual Aspects
  - Complex shapes/textures with simple colour palette, within the proposed development site and nearby urban environment;
  - Simpler shapes/textures with simple colour palette, within the rolling agricultural landscape and floodplain of the River Suir, with views of mountains to the south and north-east; and
  - Large scale, monotone shapes/textures, within the Comeragh Mountains, with scenic panoramic views and a sense of tranquillity.
- **Overall Character** 
  - Clonmel Urban and Fringe Areas (Tipperary LCA 1);
  - Rolling agricultural lowland landscape (part of Tipperary LCA 4 River Suir Central Plain); 0
  - River Suir and floodplain (part of Tipperary LCA 4 River Suir Central Plain and Waterford LCU 3B - Suir River Corridor); and
  - North Comeragh Mountains (part of Waterford LCU 5B Ballymacarbry/Nire Valley & LCU 6A - Comeragh Uplands).

### **Visual Baseline**

#### Zone of Theoretical Visibility (ZTV)

- 13.96 The visibility of the proposed development site was initially assessed by a desktop study of OSI Discovery Maps (1:50,000) and available aerial / satellite photography. This was followed by 3D computer modelling and calculation of the zone of theoretical visibility (ZTV), using LSS (McCarthy Taylor) software, in accordance with the methodology provided in Appendix 13-B at the end of this section.
- 13.97 The ZTV was calculated for the three tallest elements associated with the Proposed Development, i.e. the Line 1 Energy Plant, the Line 1 start-up stack and the Line 2 start-up stack. The existing tall trees immediately surrounding the proposed development site and the tallest existing buildings within it were included in the calculation of the ZTV, to illustrate their screening effects, in particular for nearby residential properties. It should, however, be noted that for the wider landscape the ZTV mapping is based on a bare terrain; that is, the computer model does not include any vegetation or built structures, beyond the trees immediately surrounding the proposed development site. As a result, the extent of visibility, which is illustrated by the ZTV mapping, is regarded as a near worst-case scenario, and would be greatly reduced if vegetation and buildings, such as the hedgerows and wooded areas / forestry plantations in the wider landscape, were included in the model.
- 13.98 In SLR's experience, views from within areas with a visibility of a subtended vertical angle of up to 0.4 degrees tend to be screened by hedgerows and other vegetation (if present) and/or built structures in an urban environment. These areas are, therefore, coloured in shades of grey on the ZTV mapping, in order to differentiate them from the other areas of more probable visibility (i.e.



- subtended vertical angles above 0.4 degrees), which are marked in shades of yellow, orange and
- 13.99 The resulting ZTV is depicted on Figure 13-2. It indicates that the highest likelihood of visibility of the energy plant and two start-up stacks would be within a 3km radius to the north and east and up to 4km to the south-west (i.e. areas of theoretical visibility in yellow, orange and red). It should be noted that large sections of these areas of more probable visibility cover agricultural land, which is not publicly accessible, particularly in the area to the north-east of proposed development site and within the floodplain of the River Suir.
- Reduced visibility (i.e. areas shaded in grey) is indicated for over 7km to the north-east and south-13.100 west, up to 7km to the east and south and up to 5km to the south-east. Considering the presence of many tree-lined hedgerows and forestry plantation in most areas indicated in grey, actual visibility is unlikely. This is with the exception of the most elevated sections of the Comeragh Mountains, which are covered by heathland with no/few trees present.
- 13.101 As the topography of the agricultural land to the north-west of the proposed development site is slightly more undulating than that to the north and north-east, very little visibility is predicted by the ZTV in views from this direction. Also, the ZTV illustrates that the existing tall trees on the proposed development site boundaries and tall existing buildings within proposed development site, which were included in the ZTV calculation, provide some screening to the local roads surrounding the proposed development site, including the nearest residential properties.

#### Outdoor Recreational Facilities within the Study Area

- 13.102 Outdoor recreational facilities within the study area were considered, as these provide an indication of potential visual receptors present within the study area.
- The Suir Blueway passes within 1km to the south of the proposed development site. It consists of a 13.103 walking/cycling route following the tow path on the northern bank of the River Suir, as well as the river itself which is suitable for kayaking/canoeing.
- 13.104 The East Munster Way long distance walking route passes within 1.3km of the proposed development site at its closest point, on the north side of Sir Thomas' Bridge. It arrives at the bridge from the west, along the tow path on the northern bank of the River Suir. After crossing the bridge, it follows the R680 in a southern then eastern direction, to the first junction with a public road, along which it is heading south up the northern slopes of the Comeragh Mountains.
- 13.105 Both the Kelly Comeragh Challenge cycle route and the Kelly Legacy cycle route follow the R680 – Regional Road, which passes the proposed development site just over 1km to the south, at an elevation of around 20m AOD. The route of the Kelly Comeragh Challenge also follows a section of the R678 and comes within 4km to the south-east of the proposed development site, at an elevation of 300m AOD.
- The Glenpatrick Bridge Loop walking trail follows forestry roads and grassy tracks in the Comeragh 13.106 Mountains, just over 4km south-east of the proposed development site, at its nearest point, at an elevation of just under 300m AOD.
- 13.107 While there are no paths marked in the OSI Discovery Series maps, there are signs that the heathland surrounding Long Hill in the northern Comeragh Mountains is regularly used by hill walkers. Several tracks are clearly visible on the satellite photography available on Google Maps<sup>12</sup>.



<sup>12</sup> https://www.google.com/maps/@52.3326835,-7.690274,632m/data=!3m1!1e3

### **Actual Visibility**

- 13.108 The existing ground within the proposed development site is substantially screened by the existing woodland belts surrounding it, in views from all except the most elevated viewpoints within the Comeragh Mountains to the south. In order to gage the visibility of the Proposed Development and be able to identify suitable viewpoints, the visibility of the existing Medite facility was therefore evaluated during the field survey. Considering the existing tallest stacks within the Medite site are slightly taller than and in close proximity of the Proposed Development, their visibility was checked against the areas of theoretical visibility indicated by the ZTV mapping (Figure 13-2). It can be assumed that the existing facility is slightly more visible than the proposed development would be, due to its greater height and mass. Similarly, it can be assumed that where the existing Medite facility is not visible, the proposed development would not be visible either.
- The field survey confirmed that the existing Medite facility is screened in views from many locations 13.109 within the study area, due to intervening vegetation and structures. This includes almost all areas indicated in shades of grey on the ZTV mapping, as well as sections of the areas indicated in shades of yellow, orange and red. Particularly within 2km to the south of the proposed development site, where slightly higher visibility is predicted, existing tall trees and/or buildings provide substantial screening.
- 13.110 The main views of the existing Medite site can be gained from the slightly elevated agricultural landscape within 1-3km to the north/north-east of the proposed development site and from those parts of the northern slopes of the Comeragh Mountains, within 2-5km to the south, where residential properties are orientated to experience views over the River Suir valley or little/no intervening vegetation is present.
- 13.111 It should be noted that, while the existing facility is screened in many views, the plumes from the existing stacks are visible in a larger number of views, above the screening vegetation/structures. This is somewhat dependant on the weather conditions, as the plumes are less visible against a white sky and in hot weather and rise higher in calm conditions. In windy conditions, the wind direction further influences the extent of visibility.
- 13.112 Viewpoint photography was taken during the field survey from several locations throughout the study area. Ten of these, as agreed with the planning authority, were selected to represent the range of available views. The location of the ten viewpoints is illustrated on Figures 13-1 & 13-2. For each of the viewpoints, annotated photographs of the existing views are provided (refer to Viewpoints A-J on Figures 13-3 to 13-10). These photographs are made up from 4-6 individual photographic frames, which were merged together using Adobe Photoshop software. It should be noted that photography is a tool to assist in the visualisation process and cannot be expected to replicate the actual view that would be attained on the ground.
- Viewpoints A, B & C represent views from the local roads immediately surrounding the proposed 13.113 development site, including adjoining properties. The existing Medite facility is fully screened in the majority of views from these roads by the existing woodland belts along the application site boundaries, as well as topography in views from locations to the north. The top of the tallest existing stack within the proposed development site is visible above the boundary vegetation in the background of views from a number of locations along the local road leading to the N24 (refer to Viewpoint C). However, the majority of the existing facility remains fully screened. Depending on the weather conditions, the existing plumes can be visible from some locations along these roads.
- 13.114 Viewpoint D represents views from locations along an approximately 500m long stretch of the N24 within 1km to the south-east of the proposed development site. There are no residential properties along this section of the N24. Roadside hedgerows, glimpses of agricultural fields and tall trees are



visible in the foreground and midground of views north from this section of road. The top of some of the existing tallest stacks within the proposed development site are visible above the intervening vegetation in the background of views, taking up a small portion of the overall view. The majority of the existing facility is fully screened. Depending on the weather conditions, the existing plumes are also visible.

- Viewpoint E represents views from the section of the Suir Blueway within 1km south-east of the 13.115 proposed development site. In views north from the cycling/walking track, i.e. looking away from the River Suir, agricultural land is visible in the foreground, the N24 in the midground and tall trees/hedgerows in the background. Similar to Viewpoint D, the top of some of the existing tallest stacks within the proposed development site are visible in the background, above intervening vegetation, taking up a small portion of the view. The majority of the existing facility is fully screened. Depending on the weather conditions, the existing plumes are also visible.
- 13.116 Viewpoint F represents incidental views from the R680, within 2km to the south-west, south and south-east of the proposed development site, as well as views from a small number of properties along this section of the R680. Views from many locations are screened by roadside and intervening vegetation. However, in some locations, where there are gaps in this vegetation or where it is kept low, views over the River Suir valley open up. Due to the low elevation of the R680, the many tree lined hedgerows within the floodplain and along the river are visible in the midground and background of views, giving the river valley a well wooded appearance. In some of the available views, the existing tallest stacks within the proposed development site are visible in the background of views, above intervening vegetation, taking up a small portion of the view. The majority of the existing buildings/structures are, however, screened by the intervening vegetation. Depending on the weather conditions, the existing plumes are also visible in these views, as well as in some additional views.
- **Viewpoint G** represents views from the most elevated parts of the northern slopes of the Comeragh 13.117 Mountains, i.e. those approximately above the 200m contour. Widely open panoramic views over the River Suir valley and southern Tipperary are available, due to the lack of trees at this elevation. While there are no residential properties present within this area, there are hill walkers. Heathland is visible in the foreground of views, the forestry plantations on the lower slopes in the midground and the expansive agricultural lowland landscape to the north of the River Suir in the background. The existing Medite facility is openly, however, distantly visible in these views, in an area dotted with a number of industrial / commercial facilities, including the large C&C Group PLC facility, south of the proposed development site. The visible section of the proposed development site takes up a minute portion of the overall vastly panoramic view. The existing plumes are more noticeable in these views as they are seen against a green background of agricultural land, instead of the sky.
- 13.118 Viewpoint H represents incidental views from the roads on the lower northern slopes of the Comeragh Mountains, i.e. approximately between the 50m and the 200m contour. Roadside vegetation restricts views from most locations along the roads within this area. However, there are many properties within this area, which forms the southern outskirts of Clonmel, that enjoy open views across the River Suir valley. Where such views are available, the lush gardens of local properties and / or pasture fields on the lower slopes are visible in the foreground. The Suir valley and rolling agricultural landscape to its north are visible in the midground and background, both of which have a well wooded appearance in these views. Slievenamon is a distinct feature in the far distance, in views to the north-east. The existing Medite facility is distantly visible in these views, with its lower parts screened by intervening vegetation, taking up a minute portion of the overall panoramic view. A number of other industrial / commercial facilities, including the large C&C Group PLC facility, are visible to the front of the Medite site. The existing plumes are more noticeable in these views as they are seen against a green background of agricultural land, instead of the sky.



- 13.119 Viewpoint I represents views from Powerstown Road and adjoining properties, as well as the easternmost residential areas of Clonmel in general. Views from the roads in this area are restricted by roadside vegetation, as well as existing structures. Where views into the neighbouring fields open up, agricultural land and associated hedgerows are visible in the foreground and midground. The top of some of the existing tallest stacks within the site are visible above the intervening vegetation in the background of views, taking up a minute portion of the views. However, the majority of the existing facility is fully screened. Depending on the weather conditions, the existing plumes are also visible.
- 13.120 Viewpoint J represents views from the slightly elevated sections of roads between 1-3km to the north / north-east of the proposed development site. There are several residential properties in the vicinity of these roads. As with most other locations within the study area, views are restricted from many locations by roadside and intervening vegetation. However, where views open up, agricultural land is visible in the foreground and midground, with the Comeragh Mountains in the background. The upper sections of some of the existing tallest stacks within proposed development site are visible above the intervening vegetation in the midground of views, taking up a minute portion of the view. However, the majority of the existing facility is fully screened. The existing plumes are more noticeable in these views as they are seen against a green background of agricultural land, instead of the sky.

### **Potential Visual Receptors**

13.121 The potential visual receptors, to be considered as part of the assessment of visual effects, are:

#### Residents

- along the local road to the south of the proposed development site, leading to the N24 (represented by Viewpoint C on Figure 13-4);
- along the R680, within 2km south of the proposed development site (represented by Viewpoint F on Figure 13-6);
- within 2-3km to the south-west of the proposed development site (represented by Viewpoint H on Figure 13-8);
- on the eastern edge of Clonmel (Powerstown Road area; represented by Viewpoint I on **Figure 13-9**); and
- within 1-3km to the north / north-east of the proposed development site (represented by **Viewpoint J on Figure 13-10**).

#### Recreational Users

- along the Suir Blueway within 1km south-east of the proposed development site (represented by Viewpoint E on Figure 13-5);
- cyclists along the R680, within 2km south of the proposed development site (represented by Viewpoint F on Figure 13-6); and
- users of the scenic routes, cyclists and hill walkers within 2-5km south / south-west of the proposed development site (represented by Viewpoints G & H on Figures 13-7 & 13-8).



#### Vehicle users

- along the local road to the south of the proposed development site, leading to the N24 (represented by Viewpoint C on Figure 13-4);
- along the N24 within 1km south-east of the proposed development site (represented by Viewpoint D on Figure 13-4);
- incidental views along the R680, within 2km south of the proposed development site (represented by Viewpoint F on Figure 13-6);
- incidental views along the roads within 3-5km south of the proposed development site (represented by Viewpoint G on Figure 13-7);
- incidental views along the roads within 2-3km to the south-west of the proposed development site (represented by Viewpoint H on Figure 13-8); and
- incidental views along Powerstown Road on the eastern edge of Clonmel (represented by Viewpoint I on Figure 13-9); and
- incidental views along the roads within 1-3km to the north / north-east of the application area (represented by Viewpoint J on Figure 13-10));



### **IMPACT ASSESSMENT**

13.122 This section sets out the effects that the proposed development would have on sensitive landscape and visual receptors, during the construction and operational stage of the proposed development. These two stages are not assessed separately, as the effects arising from both are expected to be very similar, in landscape and visual terms. The assessment is based on the detailed project description and layout drawings contained in chapter 2 of this EIAR.

## Aspects of the Development which Have the Potential to Cause Landscape and Visual Effects

#### Construction and Operational Stage

- 13.123 The construction of the proposed replacement renewable energy plant is going to take place over a 10-year period, followed by an approximately 30 years operational period of the overall Medite facility.
- 13.124 The following elements associated with the proposed development are those which are most likely to result in landscape & visual effects:
  - The physical changes to the existing proposed development site;
  - the visibility of the construction works, including the visibility of cranes, within the proposed development site;
  - the visibility of the completed replacement renewable energy plant, in particular the tallest structures associated with it, i.e.
  - the Edge Trim Silo (19.50m tall; top at 49m above Ordnance Datum (AOD));
  - the Line 1 Energy Plant (33m tall; top at 58.5m AOD);
  - the Line 1 Dry Electrostatic Precipitator (23.3m tall; top at 48.8m AOD);
  - the Line 1 Start up Stack (30.00m tall; top at 55.5m AOD);
  - the Line 2 Energy Plant (18.50m tall; top at 48m AOD); and
  - the Line 2 Start up Stack (30.00m tall; top at 59.5m AOD).
- 13.125 While there is outdoor lighting within the proposed development site, this is only used on an occasional basis, e.g. for maintenance. This would continue to be the case when the proposed development is operational. Therefore, there would continue to be no / very limited night-time light pollution for surrounding visual receptors. Lighting is therefore not considered to have the potential to cause significant visual effects.



## **Sensitive Receptors**

#### Landscape Receptors

- 13.126 The proposed development site is located in an area zoned as "General Industry" and is of an industrial character, considering the presence of the existing Medite facility. This facility, including its steam plumes is long established in the local landscape. The structures associated with the proposed development would be constructed around the existing buildings, silos and conveyor belts, within the proposed development site. They would be smaller in mass than the existing buildings, lower in height and similar in colour and complexity and would tie in with the existing industrial character of the proposed development site.
- No individual landscape elements, which contribute to the character of the local or wider 13.127 landscape, would be affected by the proposed development. This includes the small area of trees, which would be removed to facilitate the construction of some of the Line 1 infrastructure, as this does not contribute to the (industrial) character of the proposed development site itself and has no tangible connection to the character of the wider landscape. All existing woodland belts surrounding the proposed development site would be retained. Therefore, no individual landscape elements are identified as sensitive landscape receptors.
- 13.128 Considering the existing industrial character, comprising among other things humming noises audible within the local area, it is highly unlikely that any of the aesthetic or perceptual aspects identified in the vicinity of the proposed development site or in the wider landscape would be affected by the proposed development. These aspects are therefore not identified as sensitive landscape receptors.
- 13.129 The majority of the landscape character areas/types surrounding the proposed development site have been described as being of low sensitivity to change in the existing landscape character assessments for Tipperary and Waterford. This is with the exception of the Comeragh Mountain uplands, which are described as being high/most sensitive. However, considering the distance to the proposed development site and integration of the proposed development with the longestablished existing Medite facility, significant effects on the upland character are highly unlikely. None of the LCTs surrounding the proposed development site are therefore identified as sensitive landscape receptors.
- 13.130 In summary, no sensitive landscape receptors were identified. This is due to the industrial character of the proposed development site, the similarity of the proposed development to the existing character of and its containment within the existing Medite facility, which is well screened, as well as the largely low sensitivity of the surrounding landscape.

### Visual Receptors

- 13.131 In order to aid the identification of sensitive visual receptors, the potential visibility of the proposed development from the chosen viewpoint locations was checked using a 3D model of the tallest structures associated with the proposed development (as listed under paragraph 13.124 above), of the existing screening vegetation on the proposed development site boundaries and of the surrounding landform. Photomontages for six of the viewpoints were subsequently produced, in line with the Photomontage Methodology in Appendix 13-C of this section of the EIAR.
- The review revealed that the proposed development would not be visible in the vast majority of 13.132 views from locations within the lowland landscape surrounding the proposed development site, including the Suir Blueway, the Munster Way and the scenic driving and the cycling routes along



- the R680. This is due to the low elevation of most viewpoints, in combination with the existing abundant intervening vegetation. Also, the existing Medite facility would provide screening in some views from locations to the south-east of the proposed development site. Please refer to Viewpoints A-F & I on Figures 13-3, 13-4, 13-5, 13-6 & 13-9 for samples of such lowland viewpoints.
- 13.133 From Viewpoints A-D none or very little of the existing Medite facility are visible and the proposed development would be fully screened. This is also the case for Viewpoints E, and I, however, in order to demonstrate this clearly, photomontages are provided for these two viewpoints. The location of the proposed structures behind the existing screening vegetation is indicated in these photomontages.
- 13.134 Four further photomontages are provided for the three remaining viewpoints, three on the northern slopes of the Comeragh Mountains (refer to Viewpoints F, G and H on Figures 13-6, 13-7 & 13-8) and one in a slightly elevated position within the lowland landscape to the north of the proposed development site (refer to Viewpoint J on Figure 13-10). These viewpoints represent the only areas from where the structures associated with the proposed development would actually be visible, albeit partially. Consequently, the sensitive visual receptors potentially affected by the proposed development, and therefore considered as part of the assessment of visual effects, are:
  - Residents:
    - In the region of 50 residential properties within 2-3km to the south-west of the proposed development site (represented by Viewpoint H on Figure 13-8);
    - In the region of 20 residential properties within 1-3km to the north / north-east of the proposed development site (represented by Viewpoint J on Figure 13-10).
  - Recreational Users:
    - Users of the scenic routes, cyclists and hill walkers within 1.5-5km south / south-west of the proposed development site (represented by Viewpoints F, G & H on Figures 13-6, 13-7 & 13-8).
  - Vehicle users:
    - Incidental views along the roads within 1.5-5km south / south-west of the proposed development site (represented by Viewpoints F, G & H on Figure 13-6, 13-7 & 13-8);
    - Incidental views along the roads within 1-3km to the north / north-east of the proposed development site (represented by Viewpoint J on Figure 13-10).
- Please note that no change to the existing plumes, due to the Proposed Development, are expected and there will be minimal plumes for very short periods from the proposed start-up stacks. Therefore, only visual receptors with potential visibility of the proposed structures are identified as sensitive visual receptors.

# **Construction and Operational Stage Landscape Effects**

As no sensitive landscape receptors are identified, there is no need to carry out an assessment of 13.136 landscape effects. In other words, the Proposed Development is not considered to result in significant effects on any landscape receptors within the study area, or rather it is not going to result in any landscape effects.



## **Construction and Operational Stage Visual Effects**

### Visual Receptor Sensitivity

13.137 The value placed on each of the types of visual receptors identified above is described in Table 13-2 below. Also, the susceptibility to change of each of the receptor types (as per the LVIA Methodology in **Appendix 13-A**) is described and a judgement of the overall sensitivity made.

**Table 13-2 Sensitivity of Visual Receptors** 

Visual Receptors Value		Susceptibility	<b>Overall Sensitivity</b>		
Residents					
Within 2-3km to south-west	MEDIUM	HIGH	MEDIUM-HIGH		
(Viewpoint H)	(Some along road designated	(Susceptible to changes in			
	as scenic route in WCCDP)	views, particularly from			
		gardens and living rooms)			
Within 1-3km to	LOW	HIGH	MEDIUM		
north/north-east	(No designated or locally	(Susceptible to changes in			
(Viewpoint J)	promoted views)	views, particularly from			
		gardens and living rooms)			
Recreational Users					
Users of scenic routes,	MEDIUM	HIGH	MEDIUM-HIGH		
cyclists and hill walkers (Views along locally impo		(Views are important part of			
within 1.5-5km south / visitor attractions)		experience)			
south-west (Viewpoint F, G					
& H)					
Vehicle Users					
Roads within 1.5-5km to	MEDIUM	LOW	MEDIUM-LOW		
south / south-west	n / south-west (Some roads designated as (Unlikely to be focused				
(Viewpoint F, G & H)	scenic route)	views)			
Local roads within 1-3km to	LOW	LOW	LOW		
north/north-east	(No designated or locally	(Unlikely to be focused on			
(Viewpoint J)	promoted views)	views)			

### Magnitude of Visual Change

13.138 **Table 13-3** describes the size and scale, geographical extent and duration/reversibility of the visual effects for each visual receptor, all of which contribute to the assessment of the magnitude of these effects. Please refer to the photomontages for Viewpoints G, H and J on Figures 13-7, 13-8 & 13-10, for and illustration of the size/scale of visibility.



**Table 13-3 Magnitude of Visual Change** 

Visual Receptors	Magnitude of Change	
Residents		Change
Within 2-3km to	Size & Scale: NEGLIGIBLE	SLIGHT
south-west	Geographical Extent: <b>MEDIUM</b>	
(Viewpoint H)	Duration / Reversibility: LONG-TERM	
	<b>Notes:</b> The upper half of the proposed start-up stacks and tops of the other proposed tall elements would become distantly visible, amongst the existing elements of the Medite Facility. The lower parts of the proposed development would be screened by intervening vegetation. Due to the proposed grey colour (like the existing elements) and distance, the changes would be barely perceptible in views.	
	Views would be available from a medium number of residential properties (i.e. ca. 50) and the changes would be long-term and could theoretically be reversed.	
	The negligible size/scale of the visible elements is judged to outweigh the medium geographical extent and the long-term duration.	
Within 1-3km to	Size & Scale: NEGLIGIBLE	NEGLIGIBLE
north/north-east (Viewpoint J)	Geographical Extent: SMALL	
(Viewpoint 3)	Duration / Reversibility: LONG-TERM	
	<b>Notes:</b> The tops of the proposed start-up stacks would become visible above screening vegetation/topography, amongst the existing tall stacks at the Medite Facility. The majority of the proposed development would be screened. Due to the proposed grey colour (like the existing elements) and small size/scale of visible elements, the changes would be barely perceptible in views.	
	Views would be available from a small number of residential properties (i.e. ca. 20) and the changes would be long-term and could theoretically be reversed.	
	The negligible size/scale of the visible elements is judged to outweigh the small geographical extent and the long-term duration.	
Recreational Users		
Users of scenic	Size & Scale: NEGLIGIBLE	SLIGHT
routes, cyclists and hill walkers within	Geographical Extent: <b>MEDIUM</b>	
1.5-5km south / south-west (Viewpoint F, G & H)	Duration / Reversibility: LONG-TERM	
	<b>Notes:</b> The upper sections of the proposed tall elements would become visible, mostly distantly, amongst the existing elements of the Medite Facility. The lower parts of some of the proposed development would be screened by intervening vegetation. Due to the proposed grey colour (like the existing elements), proximity to the existing development and in most cases distance, the changes would be barely perceptible in views.	
	Views would be incidental for the users of the scenic driving and cycling routes, but available over a wider area for hill walkers. The changes would be long-term and could theoretically be reversed.	
	The negligible size/scale of the visible elements is judged to outweigh the medium geographical extent and the long-term duration.	



Visual Receptors	Factors	Magnitude of Change
Vehicle Users		
Roads within 1.5-5km to south / south-west (Viewpoint F, G & H)	Size & Scale: NEGLIGIBLE  Geographical Extent: SMALL  Duration / Reversibility: LONG-TERM  Notes: The upper sections of the proposed tall elements would become visible, mostly distantly, amongst the existing elements of the Medite Facility. The lower parts of some of the proposed development would be screened by intervening vegetation. Due to the proposed grey colour (like the existing elements), proximity to the existing development and in most cases distance, the changes would be barely perceptible in views.  Views would be incidental for the general users of the roads within this area. The changes would be long-term and could theoretically be reversed. The negligible size/scale of the visible elements is judged to outweigh the small geographical extent and the long-term duration.	NEGLIGIBLE
Local roads within 1-3km to north/northeast (Viewpoint J)	Size & Scale: NEGLIGIBLE Geographical Extent: SMALL Duration / Reversibility: LONG-TERM Notes: The top of one of the proposed start-up stacks would become visible above screening vegetation/topography, amongst the existing tall stacks at the Medite Facility. The majority of the proposed development would be screened. Due to the proposed grey colour (like the existing elements) and small size/scale of visible elements, the changes would be barely perceptible in views.  Views would be incidental for the general users of the roads within this area. The changes would be long-term and could theoretically be reversed.  The negligible size/scale of the visible elements is judged to outweigh the small geographical extent and the long-term duration.	NEGLIGIBLE

# Assessment of Visual Effects and Significance

13.139 An assessment of the visual effects during the operational phase, based on the sensitivity of each of the visual receptors combined with the magnitude of change experienced by each of them, are provided in Table 13-4 below. The assessment also includes a judgment of the nature of the effect (i.e. negative/positive/neutral):



**Table 13-4 Assessment of Visual Effects** 

Visual Receptor	Sensitivity	Magnitude	Visual Effects	Nature of Effect	
Residents					
Within 2-3km to south-west (Viewpoint H)	MEDIUM-HIGH	SLIGHT	MODERATE- MINOR	Negative	
Within 1-3km to north/north-east (Viewpoint J)	MEDIUM	NEGLIGIBLE	MINOR- NEGLIGIBLE	Negative	
Recreational Users	Recreational Users				
Users of scenic routes, cyclists and hill walkers within 1.5-5km south / south-west (Viewpoint F, G & H)	MEDIUM-HIGH	SLIGHT	MODERATE- MINOR	Negative	
Vehicle Users					
Roads within 1.5-5km to south / south-west (Viewpoint F, G & H)	MEDIUM-LOW	NEGLIGIBLE	MINOR- NEGLIGIBLE	Negative	
Local roads within 1-3km to north/north-east (Viewpoint J)	LOW	NEGLIGIBLE	NEGLIGIBLE	Neutral	

13.140 Even though most of the visual effects are assessed as negative, none of these are assessed as being significant, due to the moderate-minor or lower level of the effects. In other words, the changes, due to the project, will become visible in some views and will be negative in nature, as they consist of new man-made structures included in the existing views and therefore cannot be classed as neutral. However, the levels of these effects are at the lower end of the spectrum, either due to the low sensitivity of the visual receptors or the low/negligible magnitude of the effects or both. Therefore, they are not considered significant.

## **Direct/Indirect Effects**

13.141 All landscape and visual effects described above are direct effects. The proposed development is not considered to have indirect effects in landscape and visual terms, i.e. the proposed development is unlikely to cause consequential changes to the surrounding landscape character areas or to existing views of the areas surrounding the application site.

# **Compliance with relevant Planning Policies**

#### **Development Management Guidelines**

13.142 The proposed development is fully contained within the existing Medite facility, the boundaries of which are marked by substantial woodland belts and tree-lined hedgerows. Additional planting for security reasons or additional screening is not required. However, in order to compensate the loss of the small area of trees within the proposed development site (ca. 0.42ha), it is proposed to carry out 0.42ha of diverse native woodland planting within the northern section of the proposed development site, as detailed on Figure 13-11 Proposed Landscape Plan. This would be integrated with existing hedgerows along the northern boundary, thereby improving habitat linkage. The proposed mix would contain flowering species suitable for pollinators and would provide nesting and feeding (i.e. berries) opportunities for birds.



13.143 It is therefore considered that the proposed development complies with the Minimum Standards for Industrial Developments as set out in Chapter 9.0 Development Management Guidelines of the current Clonmel & Environs Development Plan 2013.

### Tipperary Landscape / Amenity Areas / Scenic routes and Views

- The above assessment took account of the Tipperary Landscape Character Assessment. It was concluded that the proposed development would not result in any effects on landscape receptors within the study area. Further to that no significant visual effects on any views, including views from Primary Amenity Areas or Scenic Routes and Views, were identified.
- It is therefore considered that the proposed development complies with Policies 11-16 & 11-17 of 13.145 the current TCDP.

#### Waterford Landscape / Scenic Routes and Protected Views

- 13.146 The above assessment took account of the Waterford Landscape Character Assessment. It was concluded that the proposed development would not result in any effects on landscape receptors within the study area. Further to that no significant visual effects on any views, including views from Scenic Routes and Protected Views or of visually vulnerable features, were identified.
- It is therefore considered that the proposed development complies with Policy Objectives L 02 & L 13.147 04 of the current WCCDP.

## **Unplanned Events (i.e. Accidents)**

It is highly unlikely that any unplanned events within the proposed development site would result in noticeable landscape or visual effects.

# **Cumulative / Synergistic Impacts**

- 13.149 The cumulative developments list in **Appendix 1-5** of this EIAR was reviewed for any projects, which may result in cumulative landscape or visual impacts, in combination with the proposed development at the Medite site. The majority of the cumulative projects identified are small in scale, such as the alteration of existing buildings, the construction of new low-rise buildings (in the vicinity of existing buildings) and associated ground works, as well as the restoration of a number of existing sand and gravel pits. All of these developments are unlikely to result in great visibility, due to their low elevations, as well as existing screening from vegetation and topography. In combination with the absence of predicted landscape effects and low predicted visual effects for this project, significant cumulative landscape or visual impacts are therefore highly unlikely.
- A number of larger scale projects were identified in **Appendix 1-5**, and were reviewed individually, 13.150 as listed in Table 13-5 below:



**Table 13-5 Assessment of Visual Effects** 

Applicant /	Planning Register	Distance	Comments
Springmount Solar Farm Limited - 60MW solar PV farm	Reference P. Ref. 23172	9.7km W	Cumulative landscape or visual effects highly unlikely, due to low-rise solar development and large separation distance, i.e. visual separation, due to screening from topography and vegetation.
MSD Ireland (Ballydine) – solar PV energy development on a 7.48ha site	P. Ref. 211365	9.1km E	Cumulative landscape or visual effects highly unlikely, due to low-rise solar development and large separation distance, i.e. visual separation, due to screening from topography and vegetation.
ABO Wind Ireland Limited – 7 no. turbine wind farm and 20kV underground connection to the existing 30/110kV Doon substation	P. Ref. 211502 EIA Portal Ref. 2021214	2.0km N (at closest point)	Cumulative landscape or visual effects highly unlikely, due to large separation distance, i.e. visual separation, due to screening from topography and vegetation.  Note: the turbine location is over 10km to the north with screening provided by Slievenamon. There is no intervisibility between Doon substation and the project site.
Grian PV Ballyboe Ltd – 16MV solar PV farm	P. Ref. 21403 (amendment of Planning Ref: 19/600239)	4.0km NE	Cumulative landscape or visual effects highly unlikely, due to low-rise solar development and separation distance, i.e. visual separation, due to screening from topography and vegetation.
Grian PV Ltd – 11.188MV solar PV farm at Horsepasture / Doon	P. Ref. 211051 (amendment of P. Ref. 16601136)	2.8km NW	Cumulative landscape or visual effects highly unlikely, due to low-rise solar development and separation distance, i.e. visual separation, due to screening from topography and vegetation.
MSD Ireland – three storey pilot plant manufacturing facility (approx. 20.75m high)	P. REF. 21407  EIA Portal Ref. 2021056	9.5km E	Cumulative landscape or visual effects highly unlikely, despite height of 20.75m due to large separation distance, i.e. visual separation, due to screening from topography and vegetation.
Bulmers Limited, Annerville, Clonmel, Co. Tipperary – 10,058m2 of PV panels on existing roof	P. Ref 21364	0.6km S	Cumulative landscape or visual effects highly unlikely, despite proximity to the project site, as the solar panels are flush with the roof and therefore not visible from the surrounding area.
Dyrick Hill Wind Farm Limited - 12 no. turbine wind farm	ABP-317265-23	19.4km S	Cumulative landscape or visual effects highly unlikely, due to large separation distance, i.e. visual separation, due to screening from topography and vegetation.
and grid connection to Dungarvan			Note: the turbine location is 19km to the north with screening provided by the northern part of the Comeragh Mountains.



Applicant / Development	Planning Register Reference	Distance	Comments
Coumnagappul Wind Farm Limited – 10 no. turbine wind farm and grid connection	P. Ref. ABP- 318446-23	13.5km S	Cumulative landscape or visual effects highly unlikely, due to large separation distance, i.e. visual separation, due to screening from topography and vegetation.  Note: the turbine location is 13km to the north with screening provided by the northern part of the Comeragh Mountains.

## **Transboundary Impacts**

The proposed development is not located in the vicinity of a national boundary. Therefore, transboundary landscape or visual effects would not arise.

## **Interaction with Other Impacts**

13.152 There are no known interactions with other impacts.

## 'Do-nothing Scenario'

13.153 If the proposed development was not carried out, the existing Medite facility would be likely to continue to operate in the existing manner in the short term, resulting in no landscape or visual effects. Considering the absence of predicted landscape effects and low level of predicted visual effects (i.e. not significant), the current proposal would not be dissimilar to the do-nothing scenario.

### **MITIGATION MEASURES**

## **Construction and Operational Stage**

- 13.154 The design of the proposed development includes a number of elements, which contribute to the avoidance of significant landscape and visual effects. These elements include:
  - the location of the proposed development within the proposed development site, which has an industrial in character;
  - the similarity to and integration with the existing Medite facility;
  - the painting of all proposed structures in a grey colour similar to that of the existing structures; and
  - the retention of all existing screening vegetation along the proposed development site boundaries.
- In order to mitigate the loss of a small area of trees within the proposed development site, it is 13.155 proposed to plant a similar sized area within the northern section of the proposed development



site with a diverse native woodland mix (Figure 13-11 Proposed Landscape Plan). Please note that the woodland area will be kept close to the existing boundary hedgerow, in order to maximise the distance to the nearby residential property and local road. Also, the proposed mix only includes shrub and small tree species (growing to a maximum height of 20m). Both will ensure that there will be no shading experienced in the property or along the road, due to the proposed planting, even when this matures.

13.156 No further landscape or visual mitigation measures are considered necessary during the construction and operational stage.

### RESIDUAL IMPACT ASSESSMENT

## **Construction and Operational Stage**

- As no additional mitigation measures are required during the construction and operational stage, the residual levels of landscape and visual effects would be as per the assessment above. In summary, the assessment has found that there would be no landscape effects on any landscape receptors within the study area (i.e. levels of effects not considered to be significant).
- 13.158 The visual effects on views range from none for the vast majority of locations within the study area, to moderate-minor or less for a small number of locations between 1-3km to the north-east and between 2-5km to the south / south-west of the proposed development site (i.e. effects not regarded as significant).

### MONITORING

13.159 There are no monitoring requirements, arising from this landscape and visual assessment.



### REFERENCES

Environmental Protection Agency (May 2022) Guidelines on the Information to be contained in Environmental Impact Assessment Reports, EPA Ireland

European Commission (2017) Environmental Impact Assessment of Projects, Guidance on the preparation of the Environmental Impact Assessment Report

The Landscape Institute with the Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, Third Edition, Routledge

The Landscape Institute (2019) Technical Guidance Note 06/19: Visual Representation of Development Proposals, Landscape Institute

The Landscape Institute (2021) Technical Guidance Note 02/21: Assessing landscape value outside national designations, Landscape Institute



# **FIGURES**

Figure 13-1 Landscape Baseline and Viewpoint Locations

Figure 13-2 Zone of Theoretical Visibility (ZTV) Map

> Figure 13-3 Viewpoints A & B

Figure 13-4 Viewpoints C &D

Figure 13-5 Viewpoint and Photomontage E

Figure 13-6 Viewpoint and Photomontage F

Figure 13-7 Viewpoint and Photomontage G

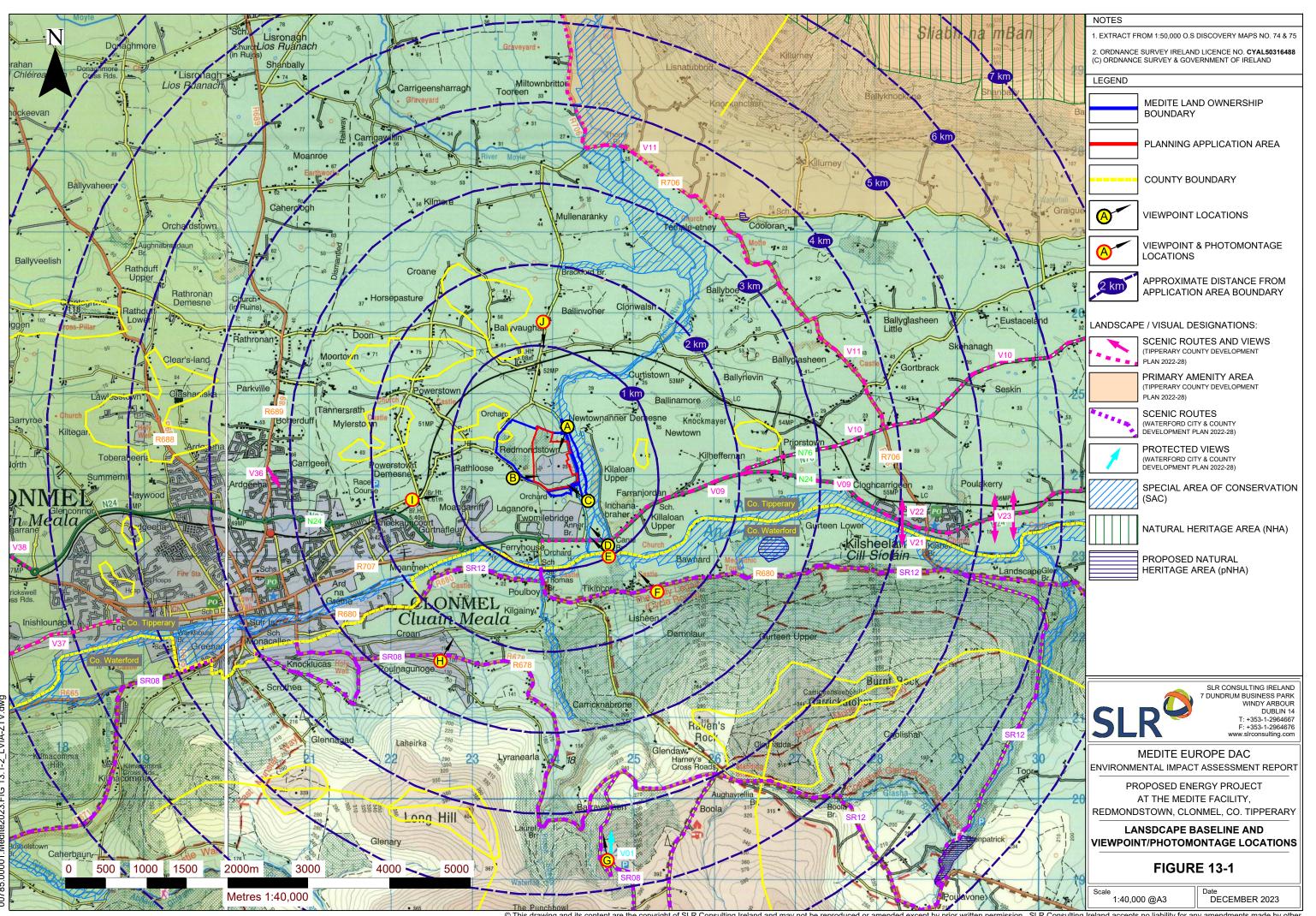
Figure 13-8 Viewpoint and Photomontage H

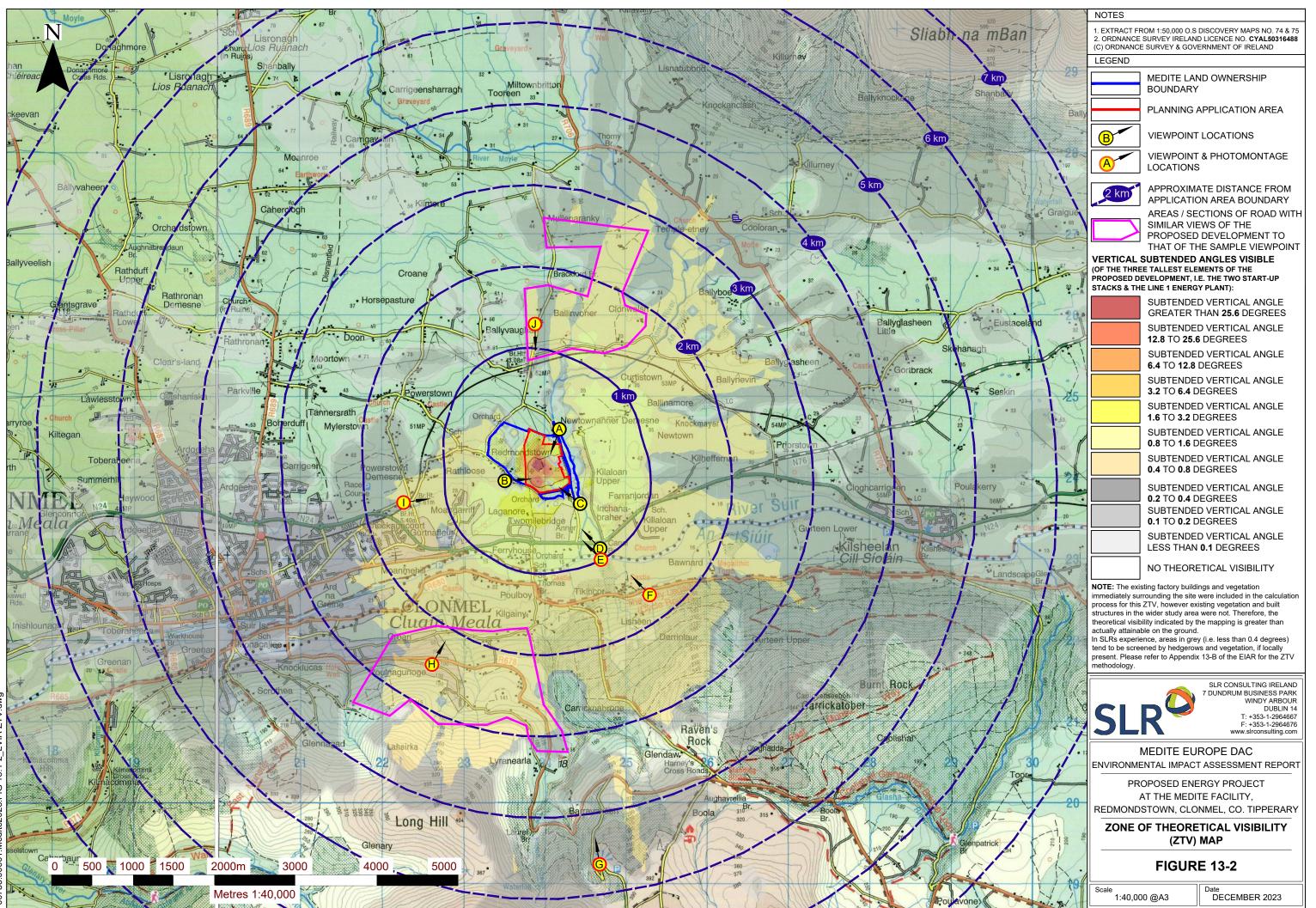
Figure 13-9 Viewpoint and Photomontage I

Figure 13-10 Viewpoint and Photomontage J

Figure 13-11 Proposed Landscape Plan









VIEWPOINT A: Local road to the east of the Medite facility, at the north-eastern corner of the Medite land ownership boundary

Grid Coordinates (ITM): 624103:624562

Approximate Elevation: 27m AOD

Distance from planning application boundary: 110m

Direction of View: South-west

Date/time of photograph: 15/06/2022 @ 10:10

Description: This viewpoint represents views along this road from the entrance to the Medite facility, south of this viewpoint, to the northern end of this road, as well as residential properties along this part of the road. Also, views from the local road to the north-west of the application area, within the townland of Redmondstown are represented by Viewpoint A. None of the existing facility is visible in any views from these sections of road, due to intervening topography and vegetation. Only the plumes from the existing stacks can be seen from some locations and depending on the weather conditions. Considering all of the structures associated with the proposed development would be lower than the existing facility, none of the proposed development would become visible in these views. The changes to the plumes from the existing and proposed stacks will be minimal and therefore imperceptible in these views.



VIEWPOINT B: Local road to the west of the Medite facility, along the south-western boundary of the Metite land ownership boundary Grid Coordinates (ITM): 623553:624002 Approximate Elevation: 35m AOD

Distance from planning application boundary: 170m

Direction of View: East

Date/time of photograph: 15/06/2022 @ 14:45

Description: This viewpoint represents views from the whole length of this local road, as well as adjoining residential properties. None of the existing facility is visible in any views from this road, due to intervening vegetation. Only the plumes from the existing stacks can be seen from some locations and depending on the weather conditions. Considering all of the structures associated with the proposed development would be lower than the existing facility, none of the proposed development would

Cluain Meala SLR CONSULTING IRELAND 7 DUNDRUM BUSINESS PARK T: +353-1-2964667 F: +353-1-2964676 MEDITE EUROPE DAC ENVIRONMENTAL IMPACT ASSESSMENT REPORT PROPOSED ENERGY PROJECT AT THE MEDITE FACILITY, REDMONDSTOWN, CLONMEL, CO. TIPPERARY **VIEWPOINTS A & B FIGURE 13-3** 

MEDITE LAND OWNERSHIP

PLANNING APPLICATION AREA

VIEWPOINT / PHOTOMONTAGE

APPROXIMATE DISTANCE FROM APPLICATION AREA BOUNDARY

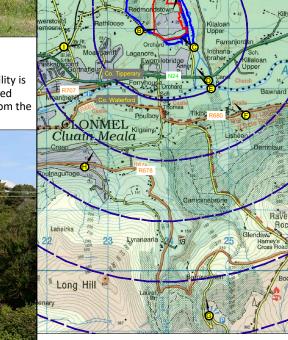
BOUNDARY

LOCATIONS

DECEMBER 2023

**DUBLIN 14** 







VIEWPOINT D: N24 - National Raod, approximately 200m east of the junction with the local road leading to the Medite facility - Scenic Route V09 in the Tipperary County Development Plan 2022-28

Grid Coordinates (ITM): 624578:623235

Approximate Elevation: 28m AOD

Distance from planning application boundary: 780m

Direction of View: North-West

Date/time of photograph: 15/06/2022 @ 10:50

**FIGURE 13-4** 

**VIEWPOINTS C & D** 

MEDITE EUROPE DAC ENVIRONMENTAL IMPACT ASSESSMENT REPORT PROPOSED ENERGY PROJECT AT THE MEDITE FACILITY, REDMONDSTOWN, CLONMEL, CO. TIPPERARY

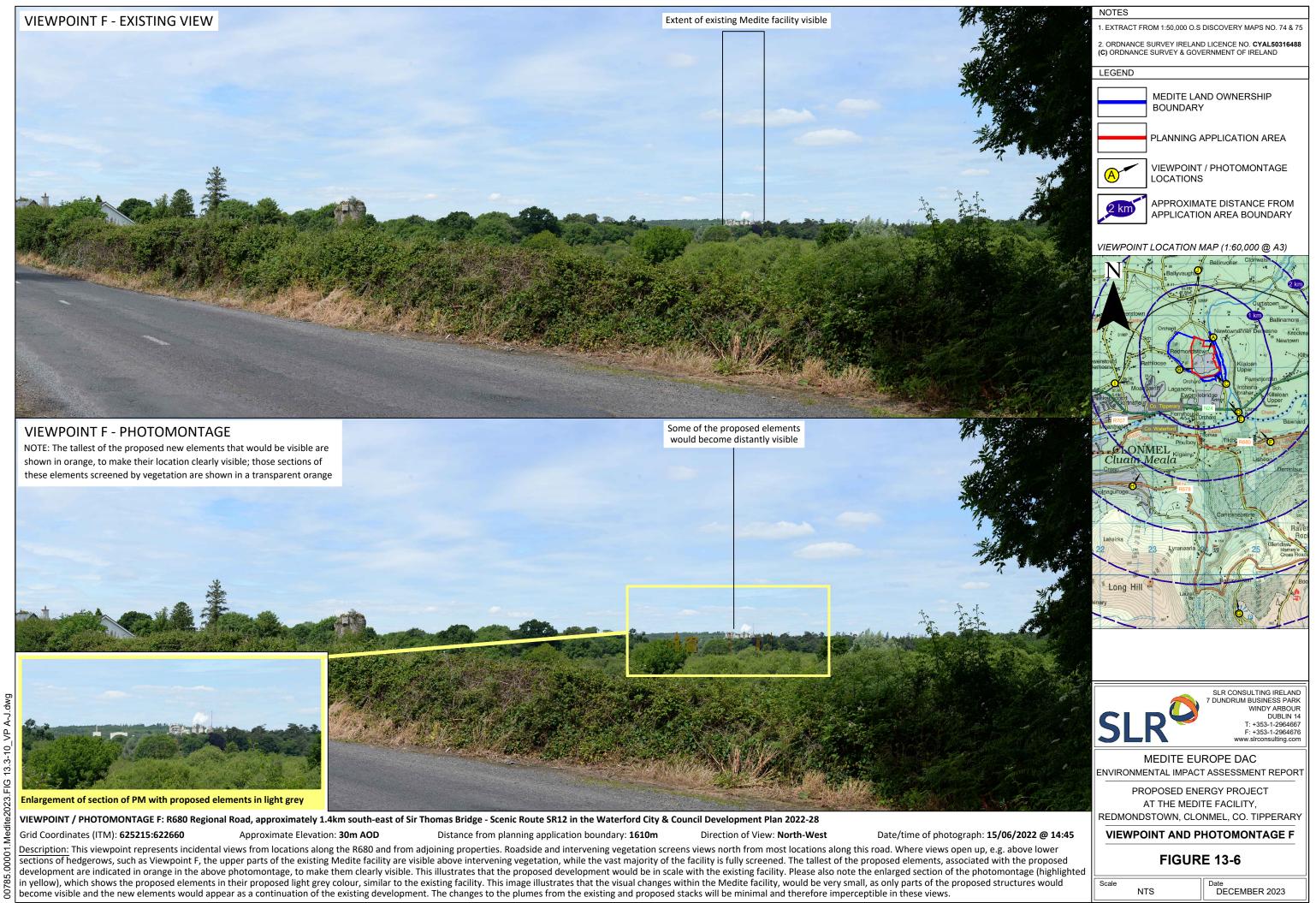
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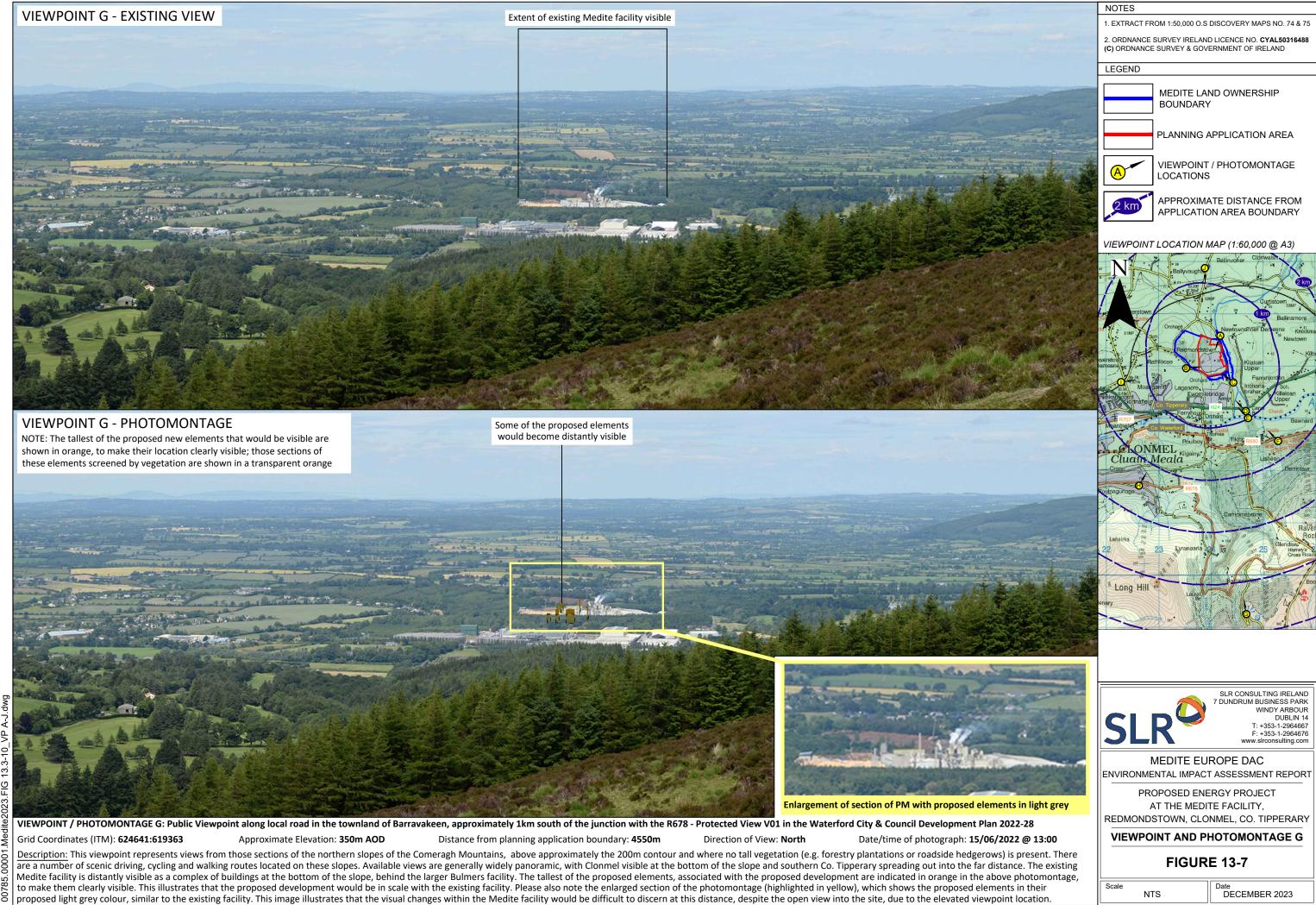
WINDY ARBOUR DUBLIN 14 T: +353-1-2964667

Description: This viewpoint represents views from the N24 from approximately 200m west and east of this viewpoint (note: there are no residential properties along this stretch of the N24). The tops of the existing tallest stacks associated with the Medite facility are visible above boundary and other intervening vegetation. However, the vast majority of the facility is fully screened. The plumes from the existing stacks can be seen from some locations and depending on the weather conditions. Considering all of the structures associated with the proposed development would be lower than the existing facility and mostly located behind the existing facility in views from this direction, none of the proposed development would become visible in these views. The 8 changes to the plumes from the existing and proposed stacks will be minimal and therefore imperceptible in these views. There are/would be no views of the existing facility or the proposed development from other locations along the N24.





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VIEWPOINT / PHOTOMONTAGE H: R678 Regional Road, approximately 2.5km south-west of the application area - Scenic Route SR08 in the Waterford City & Council Development Plan 2022-28

Grid Coordinates (ITM): 622628:621815 Approximate Elevation: 90m AOD Distance from planning application boundary: 2425m

Direction of View: North-East

Date/time of photograph: 15/06/2022 @ 13:55

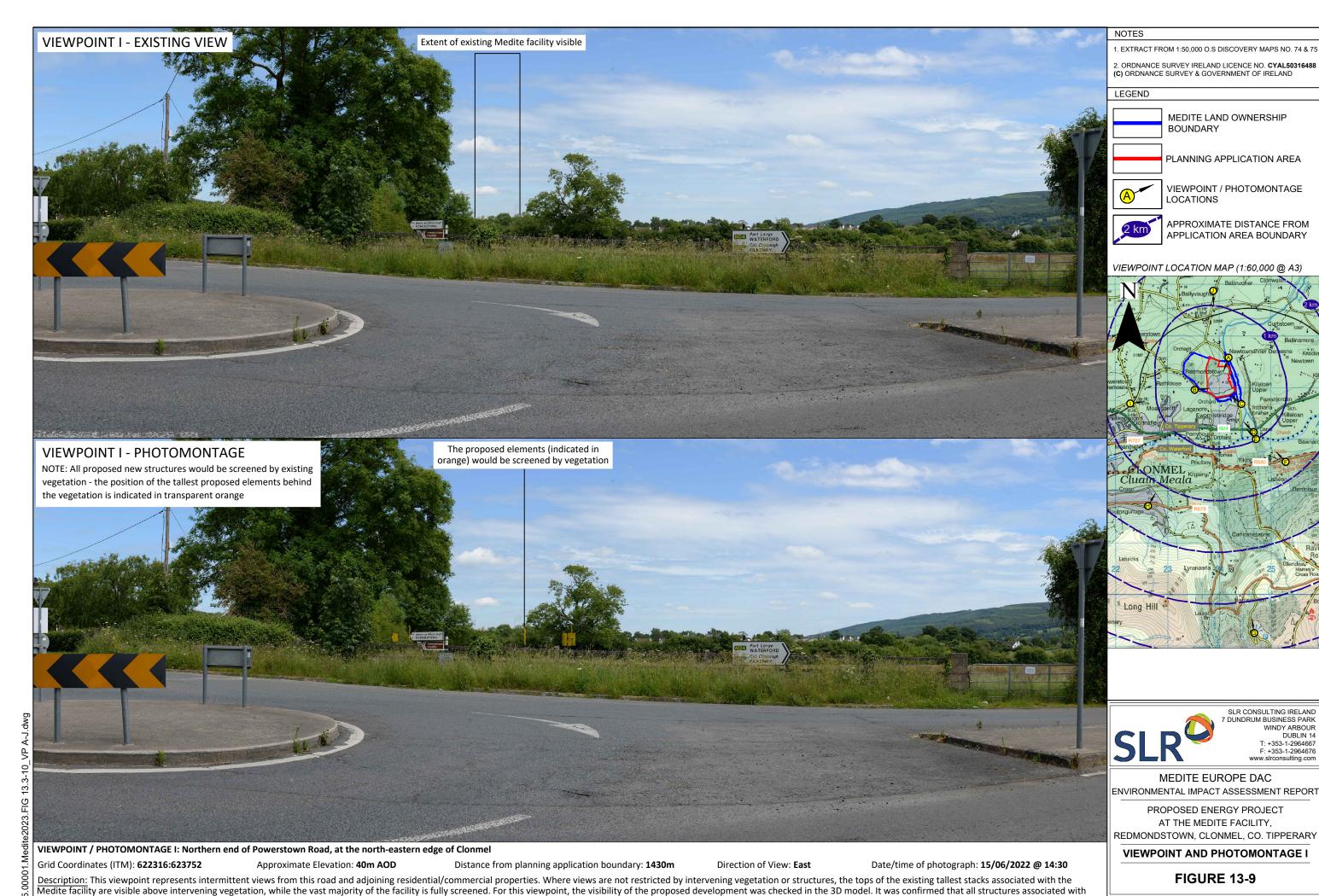
**VIEWPOINT AND PHOTOMONTAGE H** 

REDMONDSTOWN, CLONMEL, CO. TIPPERARY

**FIGURE 13-8** 

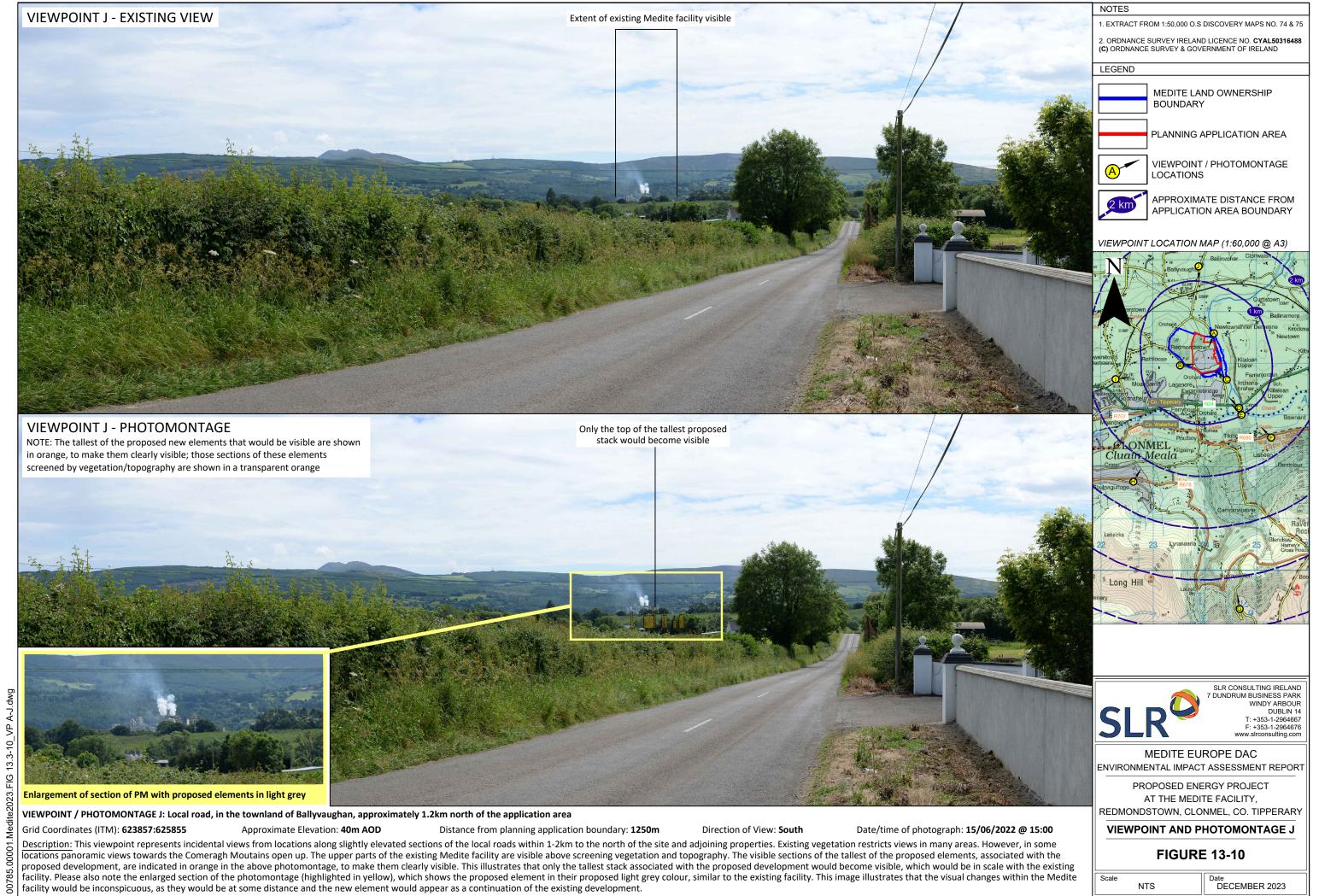
Scale

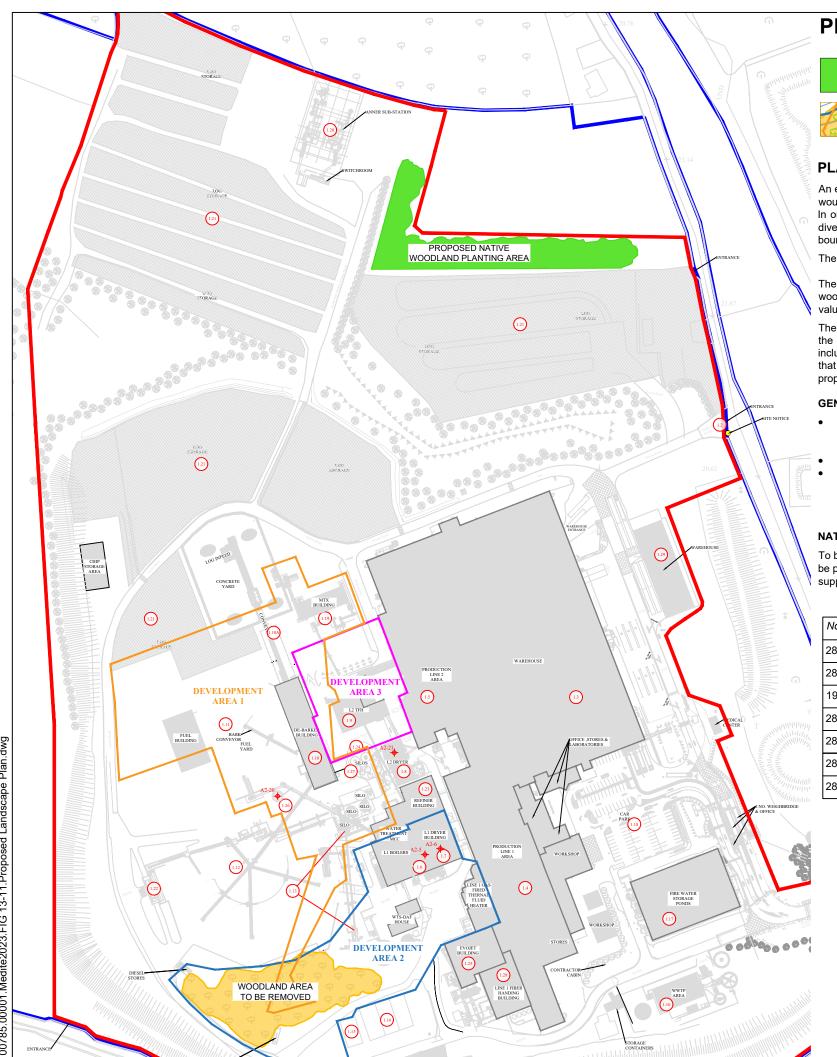
DECEMBER 2023



the proposed development would be fully screened by intervening vegetation. This is illustrated by the above photomontage, which indicates the position of the tallest of the proposed structures in this view in a transparent orange. All of these structures would be located behind existing vegetation. The changes to the plumes from the existing and proposed stacks will be minimal and therefore imperceptible in these views.

DECEMBER 2023





# **PLANTING LEGEND**



PROPOSED NATIVE WOODLAND PLANTING AREA (CA. 4,200M²; TO BE PLANTED ON COMMENCEMENT OF THE DEVELOPMENT)



WOODLAND AREA (CA. 4,200M²) TO BE REMOVED PRIOR TO WORKS IN DEVELOPMENT AREA 2 TAKING PLACE

# N

Ordnance Survey Ireland Licence No.

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LEGEND

NOTES

MEDITE LANDOWNERSHIP BOUNDARY

PLANNING APPLICATION

EXISTING BUILDINGS AND PLANT

AREA

#### PLANTING PROPOSALS

An existing woodland area (ca. 4,200m²) near the south-western corner of the application area would have to be removed to facilitate the proposed development within Development Area 2. In order to compensate the loss of this woodland area, it is proposed to carry out a block of diverse native woodland planting of the same size in the pasture field along the northern boundary of the application area.

The proposed planting would be carried out on commencement of the development.

The proposed mix is made up of native species, which is more diverse than the existing woodland, as this is dominated by non-native sycamore. The proposed tree species will be of value both to pollinator and bird species.

The woodland area will be kept close to the existing boundary hedgerow, in order to maximise the distance to the nearby residential property and local road. Also, the proposed mix only includes shrub and small tree species (growing to a maximum height of 20m). Both will ensure that there will be no shading experienced in the property or along the road, due to the proposed planting, even when this matures.

#### **GENERAL NOTES:**

- All plant handling, planting and establishment works to be carried out in accordance with current best practice and to take place in the appropriate planting season (e.g. bareroot planting: November to March only) and in favourable weather conditions.
- All works to be carried out by a suitably qualified landscape contractor.
- Establishment maintenance to be carried out for 2 years following the completion of planting (minimum 3 maintenance visits per year; i.e. spring, summer and autumn).
   Works to include weed control, replacement planting (where required) and the adjustment/removal of tree ties and spiral guards.

#### NATIVE WOODLAND MIX:

To be planted at 1.5m centres (i.e. 1 plant/2.25m²; approx. 4,200m² in total = 1,900 plants). To be planted randomly with no more than 4-6 plants of the same species in one group and to be supplied with spiral guards.

No.	Plant Name	Common Name	Height (cm)	Age/Pot Size	%
285	Corylus avellana	Common Hazel	60-90	1+0	15
285	Crataegus monogyna	Hawthorn	60-90	1+1	15
190	llex aquifolium	Common Holly	60-80	2L	10
285	Malus sylvestris	Crabapple	60-90	1+1	15
285	Prunus spinosa	Blackthorn	60-90	1+0	15
285	Sambucus nigra	Elder	60-90	1+1	15
285	Sorbus aucuparia	Rowan	60-90	1+1	15





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MEDITE EUROPE DAC ENVIRONMENTAL IMPACT ASSESSMENT REPORT

PROPOSED ENERGY PROJECT
AT THE MEDITE FACILITY,
REDMONDSTOWN, CLONMEL, CO. TIPPERARY

PROPOSED LANDSCAPE PLAN

**FIGURE 13-11** 

Scale 1:2,500 @ A3

200

Date DECEMBER 2023

Metres 1:2500

# **APPENDICES**

Appendix 13-A - A Method used in Assessing Landscape and Visual Impact Effects

Appendix 13-B - Zone of Theoretical Visibility (ZTV) Methodology

Appendix 13-C – Viewpoint Photography and Photomontage Methodology

(Refer to EIAR Volume 3 for Appendices)

