13.0 LANDSCAPE AND VISUAL IMPACT

13.1 INTRODUCTION

This chapter describes the landscape context of the proposed Cloghercor Wind Farm and assesses the likely landscape and visual impacts of the scheme on the receiving environment. Although closely linked, landscape and visual impacts are assessed separately.

Landscape Impact Assessment (LIA) relates to changes in the physical landscape brought about by the proposed project, which may alter its character, and how this is experienced. This requires a detailed analysis of the individual elements and characteristics of a landscape that go together to make up the overall landscape character of that area. By understanding the aspects that contribute to landscape character, it is possible to make judgements in relation to its quality (integrity) and to identify key sensitivities. This, in turn, provides a measure of the ability of the landscape in question to accommodate the type and scale of change associated with the proposed project without causing unacceptable adverse changes to its character.

Visual Impact Assessment (VIA) relates to assessing effects on specific views and on the general visual amenity experienced by people. This deals with how the surroundings of individuals or groups of people may be specifically affected by changes in the content and character of views as a result of the change or loss of existing elements of the landscape and/or introduction of new elements. Visual impacts may occur from; Visual Obstruction (blocking of a view, be it full, partial or intermittent) or; Visual Intrusion (interruption of a view without blocking).

Cumulative landscape and visual impact assessment is concerned with additional changes to the landscape or visual amenity caused by the proposed project in conjunction with other developments (associated or separate to it), or actions that occurred in the past, present or are likely to occur in the foreseeable future.

The LVIA uses methodology as prescribed in the following guidance documents:

- European Union (2017) Guidance on the preparation of the EIA Report (Directive 2011/92/EU as amended by 2014/52/EU);
- Environmental Protection Agency (EPA) publication '*Guidelines on the Information to be contained in Environmental Impact Statements* (2022) and the accompanying *Advice Notes on Current Practice in the Preparation of Environmental Impact Statements* (Draft 2015);
- Landscape Institute and the Institute of Environmental Management and Assessment (IEMA) publication entitled Guidelines for Landscape and Visual Impact Assessment – Third Addition (2013).
- NatureScot (2021) Guidance - Assessing the cumulative landscape and visual impact of onshore wind energy developments. [online]
- Department of the Environment, Heritage and Local Government Wind Energy Development Guidelines (2006 and 2019 draft).
- Scottish Natural Heritage (SNH) Visual representation of wind farms: Best Practice Guidelines (version 2.2 - 2017).

13.1.1 Statement of Authority

This Landscape and Visual Assessment (LVIA) chapter was prepared by Cian Doughan, Bachelor of Science in Landscape Architecture and Corporate Member of the Irish Landscape

Institute (MILI) with six years of experience. The chapter was reviewed by Richard Barker (Masters in Landscape Architecture and MILI) of Macro Works Ltd, who has 18 years of experience in the appraisal of effects from a variety of energy, infrastructure and commercial developments.

13.1.2 Description of the Proposed Project

A full description of the proposed project is provided in Chapter 2 of this EIAR.

13.1.3 Definition of the Study Area

Both the 2006 Wind Energy Development Guidelines and draft revised 2019 Wind Energy Development Guidelines published by the Department of the Environment, Heritage and Local Government specify radii for examining the zone of theoretical visibility of proposed wind farm projects (ZTV). The extent of this search area is influenced by turbine height, as follows (the guidance in the 2006 and draft revised 2019 guidance is identical in relation to defining the radii for examining the zone of theoretical visibility of proposed wind farm projects):

- 15 km radius for blade tips up to 100m;
- 20 km radius for blade tips greater than 100m and;
- 25 km radius where landscape features of national and international importance exist.

In the case of this project, the blade tips are up to 200m high and, thus, the minimum ZTV radius recommended is 20 km from the outermost turbines of the scheme. There are not considered to be any sites of national or international importance between 20 – 25km and thus, the radius of the study area will remain at 20km. Notwithstanding the full 20km extent of the LVIA study area, there will be a particular focus on receptors and effects within the central study where there is higher potential for significant impacts to occur. When referenced within this assessment, the 'central study area' is the landscape within 5km of the site.

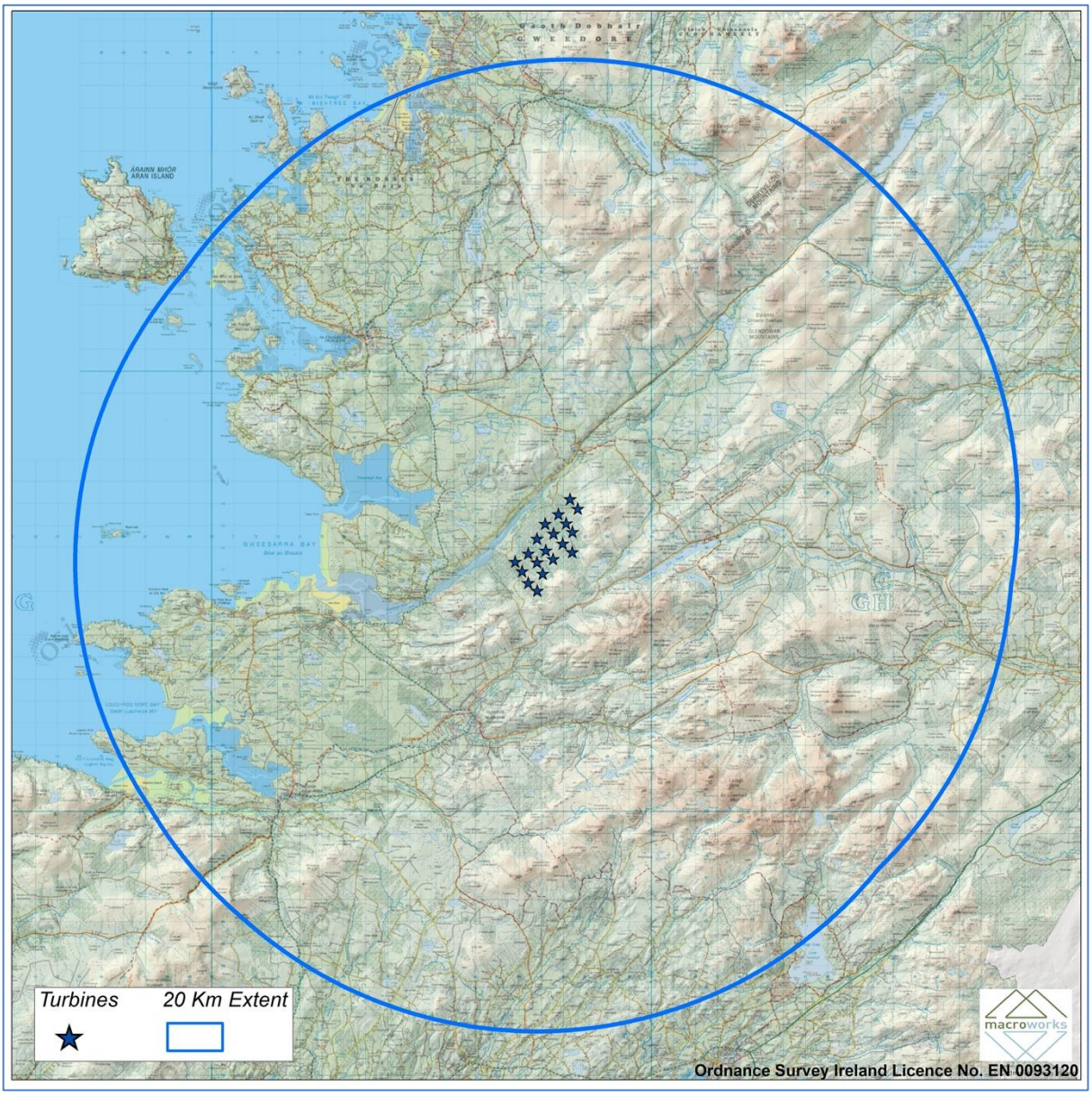

Figure 13-1: Full 20km extend of the study area

13.2 ASSESSMENT METHODOLOGY

Production of this Landscape and Visual Impact Assessment involved baseline work in the form of desktop studies and fieldwork comprising professional evaluation by qualified and experienced Landscape Architects. This entailed the following:

13.2.1 Desktop Study

- Establishing an appropriate Study Area from which to study the landscape and visual impacts of the proposed wind farm;
- Review of a Zone of Theoretical Visibility (ZTV) map, which indicates areas from which the development is potentially visible in relation to terrain within the Study Area;
- Review of relevant County Development Plans, particularly with regard to sensitive landscape and scenic view/route designations;
- Selection of potential Viewshed Reference Points (VRPs) from key visual receptors to be investigated during fieldwork for actual visibility and sensitivity;
- Consideration of scoping responses received relating to landscape and visual.

- A response was received from Donegal County Council planning office in November 2022 where they highlighted a concern that they would have relating to the preservation of local views as well as that any development should be of a nature, location and scale that allows the development to integrate within and reflect the character and amenity designation of the landscape. They had particular concern relating to the protected view from the Gweebarra Bridge near Lettermacaward. The response can be seen in full in Appendix 1-3.

13.2.2 Fieldwork

- Recording of a description of the landscape elements and characteristics within the Study Area.
- Selection of a refined set of VRP's for assessment. This includes the capture of reference images and grid reference coordinates for each VRP location for the visualisation specialist to prepare photomontages.

13.2.3 Appraisal

- Consideration of the receiving landscape with regard to overall landscape character as well as the salient features of the study area including landform, drainage, vegetation, land use and landscape designations.
- Consideration of the visual environment including receptor locations such as centres of population and houses; transport routes; public amenities and facilities and; designated and recognised views of scenic value.
- Consideration of design guidance and planning policies.
- Consideration of potentially significant effects and the mitigation measures that could be employed to reduce such effects.
- Estimation of the significance of residual landscape impacts.
- Estimation of the significance of residual visual impacts aided by photomontages prepared at all of the selected VRP locations.
- Estimation of cumulative landscape and visual effects in combination with other surrounding developments that are either existing or permitted.

13.2.4 Assessment Criteria for Landscape Impact

The classification system used by Macro Works to determine the significance of landscape and visual impacts is based on the IEMA Guidelines for Landscape and Visual Impact Assessment (2013). When assessing the potential impacts on the landscape resulting from a wind farm development, the following criteria are considered:

- Landscape character, value and sensitivity
- Magnitude of likely impacts; and
- Significance of landscape effects

The sensitivity of the landscape to change is the degree to which a particular landscape receptor (Landscape Character Area (LCA) or feature) can accommodate changes or new features without unacceptable detrimental effects to its essential characteristics. Landscape Value and Sensitivity is classified using the following criteria outlined in Table 13-1 below;

Table 13-1: Landscape Value and Sensitivity

Sensitivity	Description
Very High	Areas where the landscape character exhibits a very low capacity for change in the form of development. Examples of which are high value landscapes, protected at an international or national level (World Heritage Site/National Park), where the principal management objectives are likely to be protection of the existing character.
High	Areas where the landscape character exhibits a low capacity for change in the form of development. Examples of which are high value landscapes, protected at a national or regional level (Area of Outstanding Natural Beauty), where the principal management objectives are likely to be considered conservation of the existing character.
Medium	Areas where the landscape character exhibits some capacity and scope for development. Examples of which are landscapes, which have a designation of protection at a county level or at non-designated local level where there is evidence of local value and use.
Low	Areas where the landscape character exhibits a higher capacity for change from development. Typically, this would include lower value, non-designated landscapes that may also have some elements or features of recognisable quality, where landscape management objectives include, enhancement, repair and restoration.
Negligible	Areas of landscape character that include derelict, mining, industrial land or are part of the urban fringe where there would be a reasonable capacity to embrace change or the capacity to include the development proposals. Management objectives in such areas could be focused on change, creation of landscape improvements and/or restoration to realise a higher landscape value.

The magnitude of a predicted landscape impact is a product of the scale, extent or degree of change that is likely to be experienced as a result of the proposed project. The magnitude takes into account whether there is a direct physical impact resulting from the loss of landscape components and/or a change that extends beyond the proposal site boundary that may have an effect on the landscape character of the area. Table 13-2 refers.

Table 13-2: Magnitude of Landscape Impacts

Magnitude of Impact	Description
Very High	Change that would be large in extent and scale with the loss of critically important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an extensive change of the landscape in terms of character, value and quality.
High	Change that would be more limited in extent and scale with the loss of important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to a considerable change of the landscape in terms of character, value and quality.

Medium	Changes that are modest in extent and scale involving the loss of landscape characteristics or elements that may also involve the introduction of new uncharacteristic elements or features that would lead to noticeable changes in landscape character, and quality.
Low	Changes affecting small areas of landscape character and quality, together with the loss of some less characteristic landscape elements or the addition of new features or elements that would lead to discernible changes in landscape character, and quality.
Negligible	Changes affecting small or very restricted areas of landscape character. This may include the limited loss of some elements or the addition of some new features or elements that are characteristic of the existing landscape or are hardly perceivable leading to no material change to landscape character, and quality.

The significance of a landscape impact is based on a balance between the sensitivity of the landscape receptor and the magnitude of the impact. The significance of landscape impacts is arrived at using the following matrix set out in Table 13-3.

Table 13-3: Impact Significance Matrix

	Sensitivity of Receptor				
Magnitude	*Very High*	*High*	*Medium*	*Low*	*Negligible*
Very High	Profound	Profound-substantial	Substantial	Moderate	Slight
High	Profound-substantial	Substantial	Substantial - moderate	Moderate-slight	Slight-imperceptible
Medium	Substantial	Substantial - moderate	Moderate	Slight	Imperceptible
Low	Moderate	Moderate-slight	Slight	Slight-imperceptible	Imperceptible
Negligible	Slight	Slight-imperceptible	Imperceptible	Imperceptible	Imperceptible

Note: Judgements deemed 'substantial (yellow colour)' and above are considered to be 'significant impacts' in EIA terms.

13.2.5 Assessment Criteria for Visual Impact

As with the landscape impact, the visual impact of the proposed wind farm will be assessed as a function of receptor sensitivity versus magnitude. In this instance, the sensitivity of visual receptors, weighed against the magnitude of visual effects.

13.2.5.1 Visual Sensitivity

Unlike landscape sensitivity, visual sensitivity has an anthropocentric basis. Visual sensitivity is a two-sided analysis of receptor susceptibility (people or groups of people) versus the value of the view on offer at a particular location.

To assess the susceptibility of viewers and the amenity value of views, the assessors use a range of criteria and provide a four-point weighting scale to indicate how strongly the viewer/view is associated with each of the criterion. Susceptibility criteria is extracted directly from the IEMA Guidelines for Landscape and Visual Assessment (2013), whilst the value criteria

relate to various aspects of a view that might typically be related to high amenity including, but not limited to, scenic designations. These are set out below:

13.2.5.1.1 Susceptibility of receptor group to changes in view.

This is one of the most important criteria to consider in determining overall visual sensitivity because it is the single category dealing with viewer susceptibility. In accordance with the IEMA Guidelines for Landscape and Visual Assessment (3rd edition 2013) visual receptors most susceptible to changes in views and visual amenity are;

- Residents at home;
- People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focussed on the landscape and on particular views;
- Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;
- Communities where views contribute to the landscape setting enjoyed by residents in the area; and
- Travellers on road rail or other transport routes where such travel involves recognised scenic routes and awareness of views is likely to be heightened.
- Visual receptors that are less susceptible to changes in views and visual amenity include;
- People engaged in outdoor sport or recreation, which does not involve or depend upon appreciation of views of the landscape; and
- People at their place of work whose attention may be focussed on their work or activity, not their surroundings and where the setting is not important to the quality of working life.

13.2.5.1.2 Value Associated with the View

- **Recognised scenic value of the view** (County Development Plan designations, guidebooks, touring maps, postcards etc). These represent a consensus in terms of which scenic views and routes within an area are strongly valued by the population because in the case of County Development Plans, at least, a public consultation process is required.

- **Views from within highly sensitive landscape areas**. Again, highly sensitive landscape designations are usually part of a county's Landscape Character Assessment, which is then incorporated with the County Development Plan and is therefore subject to the public consultation process. Viewers within such areas are likely to be highly attuned to the landscape around them;

- **Intensity of use, popularity**. Whilst not reflective of the amenity value of a view, this criterion relates to the number of viewers likely to experience a view on a regular basis and whether this is significant at county or regional scale;

- **Connection with the landscape**. This considers whether or not receptors are likely to be highly attuned to views of the landscape i.e. commuters hurriedly driving on busy national route versus hill walkers directly engaged with the landscape enjoying changing sequential views over it;

- **Provision of elevated panoramic views**. This relates to the extent of the view on offer and the tendency for receptors to become more attuned to the surrounding landscape at locations that afford broad vistas.

- **Sense of remoteness and/or tranquillity**. Remote and tranquil viewing locations are more likely to heighten the amenity value of a view and have a lower intensity of development in comparison to dynamic viewing locations such as a busy street scene, for example;

- **Degree of perceived naturalness**. Where a view is valued for the sense of naturalness of the surrounding landscape it is likely to be highly sensitive to visual intrusion by obvious human interventions;

- **Presence of striking or noteworthy features**. A view might be strongly valued because it contains a distinctive and memorable landscape feature such as a promontory headland, lough or castle;

- **Historical, cultural or spiritual value**. Such attributes may be evident or sensed at certain viewing locations that attract visitors for the purposes of contemplation or reflection heightening the sense of their surroundings;

- **Rarity or uniqueness of the view**. This might include the noteworthy representativeness of a certain landscape type and considers whether other similar views might be afforded in the local or the national context;

- **Integrity of the landscape character in view**. This criterion considers the condition and intactness of the landscape in view and whether the landscape pattern is a regular one of few strongly related components or an irregular one containing a variety of disparate components;

- **Sense of place**. This criterion considers whether there is special sense of wholeness and harmony at the viewing location; and

- **Sense of awe**. This criterion considers whether the view inspires an overwhelming sense of scale or the power of nature.

Those locations where highly susceptible receptors or receptor groups are present and which are deemed to satisfy many of the view value criteria above are likely to be judged to have a high visual sensitivity and vice versa.

13.2.5.2 Visual Impact Magnitude

The magnitude of visual effects is determined on the basis of two factors; the visual presence of the proposal and its effect on visual amenity.

Visual presence is a somewhat quantitative measure relating to how noticeable or visually dominant the proposal is within a particular view. This is based on a number of aspects beyond simply scale in relation to distance. Some of these include the extent of the view as well as its complexity and the degree of existing contextual movement experienced such as might occur where turbines are viewed as part of / beyond a busy street scene. The backdrop against which the project is presented and its relationship with other focal points or prominent features within the view is also considered. Visual presence is essentially a measure of the relative visual

dominance of the proposal within the available vista and is expressed as such i.e. minimal, sub-dominant, co-dominant, dominant, highly dominant.

For wind energy developments, a strong visual presence is not necessarily synonymous with adverse impact. Instead, the 2012 Fáilte Ireland survey entitled 'Visitor Attitudes On The Environment – Wind Farms' found that *"Compared with other types of development in the Irish landscape, wind farms elicited a positive response when compared to telecommunication masts and steel electricity pylons"* .... and that *"most* (tourists) *felt that their presence did not detract from the quality of their sightseeing, with the largest proportion (45%) saying that the presence of the wind farm had a positive impact on their enjoyment of sightseeing…"*. The purpose here is not to suggest that turbines are either inherently liked or disliked, but rather to highlight that the assessment of visual impact magnitude for wind turbines is more complex than just the degree to which turbines occupy a view. Furthermore, a clear and comprehensive view of a wind farm might be preferable in many instances to a partial, cluttered view of turbine components that are not so noticeable within a view. On the basis of these reasons, the visual amenity aspect of assessing impact magnitude is qualitative and considers such factors as the spatial arrangement of turbines both within the scheme and in relation to surrounding terrain and land cover. It also examines whether the project contributes positively to the existing qualities of the vista or results in distracting visual effects and disharmony.

It should be noted that as a result of this two-sided analysis, a high order visual presence can be moderated by a low level of effect on visual amenity and vice versa. Given that wind turbines do not represent significant bulk, visual impacts result almost entirely from visual 'intrusion' rather than visual 'obstruction' (the blocking of a view). The magnitude of visual impacts is classified in the following table:

Table 13-4: Magnitude of Visual Impact

Criteria	Description
Very High	The proposal obstructs or intrudes into a large proportion or critical part of the available vista and is without question the most noticeable element. An extensive degree of visual change will occur within the scene completely altering its character, composition and associated visual amenity
High	The proposal obstructs or intrudes into a significant proportion or important part of the available vista and is one of the most noticeable elements. A considerable degree of visual change will occur within the scene substantially altering its character, composition and associated visual amenity
Medium	The proposal represents a moderate intrusion into the available vista and is a readily noticeable element. A noticeable degree of visual change will occur within the scene perceptibly altering its character, composition and associated visual amenity
Low	The proposal intrudes to a minor extent into the available vista and may not be noticed by a casual observer and/or the proposal would not have a marked effect on the visual amenity of the scene
Negligible	The proposal would be barely discernible within the available vista and/or it would not influence the visual amenity of the scene

13.2.5.3 Visual Impact Significance

As stated above, the significance of visual impacts is a function of visual receptor sensitivity and visual impact magnitude. This relationship is expressed in the same significance matric included for Landscape Impact Significance at Table 13-3.

13.2.5.4 Quality and Timescale in Effects

In addition to assessing the significance of landscape effects and visual effects, EPA Guidance for EIAs requires that the quality of the effects is also determined. This could be negative/adverse, neutral, or positive/beneficial. In the case of new energy / infrastructure developments within rural and semi-rural settings, the landscape and visual change brought about by an increased scale and intensity of built form is seldom considered to be positive / beneficial.

Landscape and Visual effects are also categorised according to their duration:

- Temporary – Lasting for one year or less;
- Short Term – Lasting one to seven years;
- Medium Term – Lasting seven to fifteen years;
- Long Term – Lasting fifteen years to sixty years; and
- Permanent – Lasting over sixty years.

13.3 BASELINE DESCRIPTION

13.3.1 Landscape Baseline

The landscape baseline represents the existing landscape context and is the scenario against which any changes to the landscape brought about by the proposal will be assessed. This also includes reference to any relevant landscape character appraisals and the current landscape policy context (both are generally contained within County Development Plans).

A description of the landscape context of the proposed wind farm site and wider study area is provided below under the headings of landform and drainage and vegetation and land use. Centres of population, transport routes and tourism, recreation and heritage features form part of the visual baseline and are dealt with in Section 13.3.3 below.

Figure 13-2: Aerial photograph showing the landscape context of the site and its immediate surrounds.

13.3.1.1 Landform and Drainage

The proposed project is located in a complex landscape of rolling rugged upland terrain, winding river valleys and distinctive coastal features. The proposed project is located along the northwest-facing slopes of the Gweebarra River valley. The site's terrain rises between c. 0m – 350m AOD, with the most elevated terrain located along the northern and north-eastern site boundaries. The site and Gweebarra River are contained to the south by a broad rolling ridge oriented in a general northeast by southwest direction that comprises hilltops summits including Croaghleheen (385m AOD), Cloghercor South (301m), Gaffartemor (270m AOD) and Derkbeg Hill (332m AOD). The site is contained to the southwest by Cleangort Hill, which rises to a height of 212m AOD. Immediately north of the site on the south-facing slopes of the Gweebarra River Valley, the terrain ascends, but not as rapidly as it does to the south of the river. The terrain north of the river rises from the valley context to a broad plateau that contains Gannivegil Bog. This broad plateau extends northwards and comprises numerous lakes of varying size, whilst three prominent hills rise in the centre, south and east of the bog complex,

the steepest of which is Croaghleconnel rising to a height of 226m AOD. Other notable landscape features within the central study area include Finntown Valley, located northeast of the site. Located c. 2.5km east of the site Lough Finn is one of the largest loughs within the central and wider study area and is contained to the south by several distinctive mountains and hills in the northern extent of the Bluestack Mountains, including Scraigs (426m AOD) and Aghla Mountain (593 AOD). West of the site, the landscape transitions towards the coastal parts of the study area and includes the broad Gweebarra Estuary, which is bound to the north and south by rolling coastal hills.

The wider study area also comprises a complex mix of landforms and some prominent landscape features. Within the study area's wider northern and eastern extents, the terrain ascends towards the Glendowan and Derryveagh Mountains and encompasses parts of Glenveagh National Park. Some of the most elevated peaks in Donegal are located in this part of the study area and include Mount Errigal (751m AOD) and Slieve Snaght (678m AOD), whilst broad linear loughs intersect these uplands and include Lough Veagh and Lough Nacung. The study area's wider southern and eastern half is dominated by the Bluestack Mountain range, which extends south and east from Finntown Valley. The most elevated mountain in the Bluestack Mountains is Croaghgorm rising to a height of c. 674m AOD. In the wider western half of the study area, the terrain tends to descend towards a more lowland and settled landscape comprised of rugged coastlines and low rolling coastal hills. Donegal is renowned for its scenic and varied coastline, which is evident within the study area and comprises long sandy beaches, rocky sea cliffs, coastal dunes, broad river estuaries, coastal inlets and numerous islands.

13.3.1.2 Vegetation and Land Use

In a similar manner to the landform of the study area, the land use of the study area is similarly complex and varied. Whilst much of the site itself is cloaked in extensive areas of commercial conifer forestry, the surrounding landscape comprises a mix of mountain moorland, areas of farmland, broad peat bogs and small settlements. Broad open areas of upland land use, including rocky outcrops, mountain moorland and heathland, are the most prominent land uses within the study area, whilst blocks of forestry are also a notable land use throughout the study area, most notably in its southern half. Areas of pastoral farmland are also located throughout the central and wider study area. The nearest farmed landscape occurs immediately to the north of the Gweebarra River and the site, where a linear patchwork of small pastoral fields is situated between the settlements of Doochary and Lettermacaward. Some more notable areas of pastoral farmland occur in the western portions of the central study area along low rolling terrain west of Lettermacaward and in the immediate surrounds of the Gweebarra River estuary. Field boundaries within these farmed landscapes comprise a mix of hedgerow vegetation, dry stone walls and post and wire fencing. The most notable areas of vegetation typically relate to the extensive forestry plantations throughout the study area. However, linear swathes of riparian vegetation often cloak the corridors of the rivers and streams within the study area, whilst some of the transitional foothills within the study area are also cloaked in areas of woodland scrub.

Other notable anthropogenic land uses within the study area include the numerous small to medium-sized settlements within the study area, the N56 national secondary route and regional road network, and the overhead cable corridors that traverse the central and wider study area. In addition, numerous existing wind farm developments are also located throughout the study area, the nearest of which is located less than 5km southwest of the site at its nearest point.

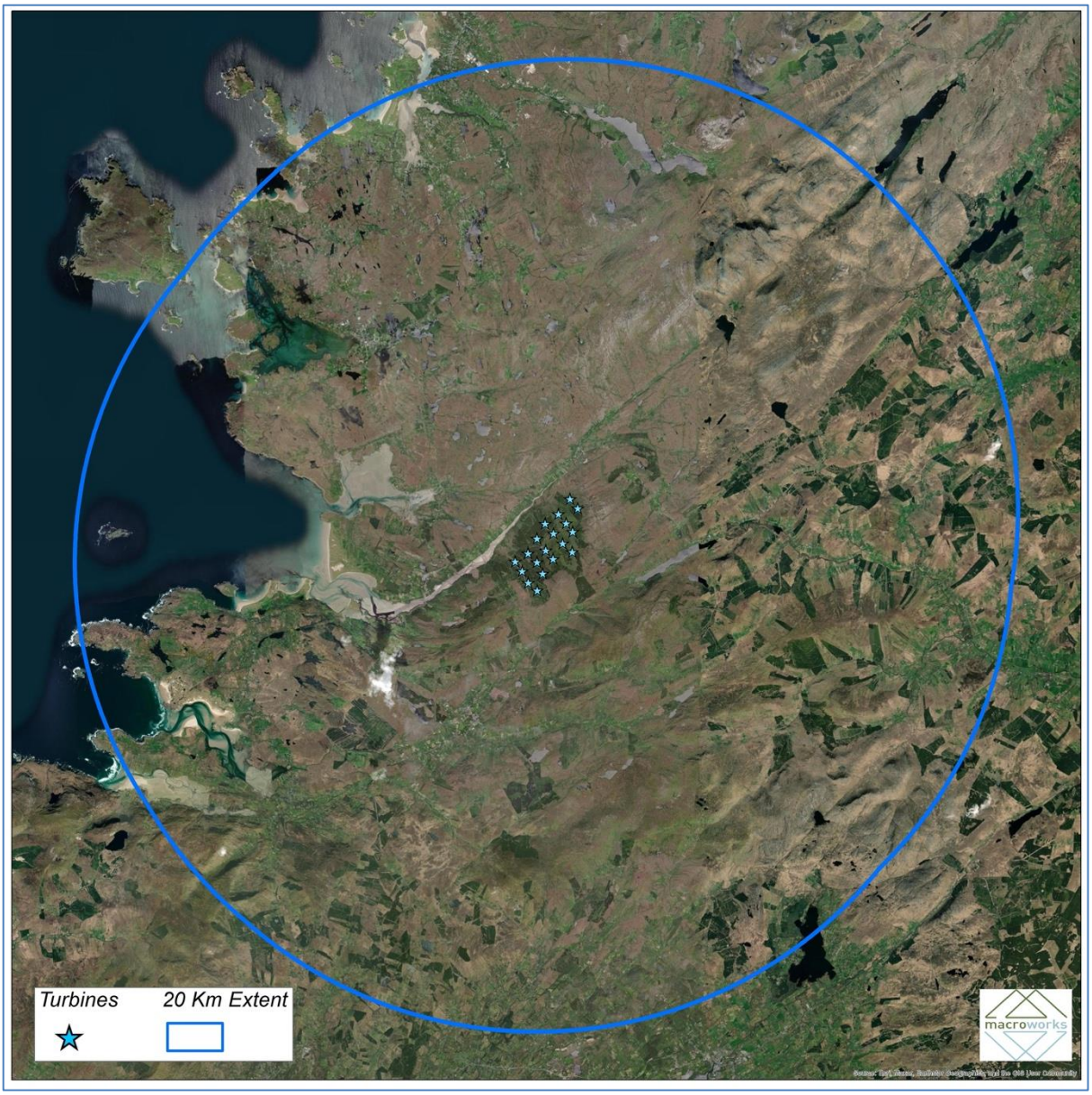

Figure 13-3 : Aerial photograph showing the landscape context of the wider study area.

13.3.2 Landscape Policy Context and Designations

13.3.2.1 The Department of Environment, Heritage and Local Government Wind Energy Development Guidelines 2006 and draft revised 2019 Wind Energy Development Guidelines

The Wind Energy Development Guidelines (2006/2019 Draft revision) provide guidance on wind farm siting and design criteria for a number of different landscapes types. The site of the proposed project is relatively complex in terms of its land use and landscape features and comprises of characteristics that are associated with both the '*Mountain Moorland'* landscape type and the *'Transitional Marginal'* landscape type. Thus, a combination of the siting and design recommendations for both landscape types were considered within this assessment. Siting and design recommendations for these landscape types include the following:

Transitional Marginal Landscapes:

Location – *"As wind energy developments, for reasons of commercial viability, will typically be located on ridges and peaks, a clear visual separation will be achieved from the complexity of lower ground."*

Spatial extent – *"Wind energy developments in these landscapes should be relatively small in terms of spatial extent. It is important that they do not dominate but achieve a balance with their surrounds, especially considering that small fields and houses are prevalent"*

Spacing - *"All options are possible, depending on the actual landscape characteristics. However, irregular spacing is likely to be most appropriate."*

Layout - *"The likely location of wind energy developments on ridges suggests a linear or staggered linear layout whereas on broader hilltops they could be linear or clustered"*

Height - *"…where the upper ground is relatively open and visually extensive, taller turbines may be more appropriate"*

Cumulative - *"This would have to be evaluated on a case-by-case basis, but great caution should be exercised. The spatial enclosure often found in transitional marginal landscapes is likely to preclude the possibility of seeing another wind energy development. However, should two or more wind energy developments be visible within a confined setting a critically adverse effect might result, depending on turbine height and wind energy development extent and proximity."*

Mountain Moorland:

Location – *"Ridges and saddles are generally acceptable."*

Spatial extent - *"Tend towards large, depending on scale of actual context"*

Spacing - *"Any spacing may be acceptable, but regular spacing may be best on a simple ridge or on broad sweeping areas."*

Layout - *"Any layout may be acceptable, but random or clustered may be best on ridges and hilltops, respectively, and grid on broad sweeping areas"*

Height - *"There would generally be no height restrictions on mountain moorlands as the scale of the landscape is so great…..Profile, whether even or uneven is dependent on topography: the more rugged and undulating the more uneven it will be"*

Cumulative - *"The open expanse of such landscapes can absorb a number of wind energy development, depending on their proximity. The cumulative impact will also depend on the actual visual complexity of landform, whether steeply rolling, undulating or gently sweeping."*

Due to the complexities of this transitional landscape setting that comprises a range of landscape types and features, it would be difficult to be consistent with all of the guidance notes identified above. Nonetheless, in general, the proposed project has been designed and sited to be cognizant of the most relevant and relatable aspects of the guidance notes outlined above. The key consideration is that the landform is broad and reflects the Mountain Moorland character type, but the land use is more akin to the Transitional Marginal character areas. Thus,

the proposed scale of the development and height of turbines does not contradict the more conservative guidance of the Transitional Marginal landscape type where the guidance clearly anticipates a more intricate and enclosed setting.

Siting in Relation to Individual Properties ('Setback')

Section 6.18 of the Draft Revised Wind Energy Development Guidelines (December 2019) refers to appropriate setback distances for visual amenity purposes. The guidelines outline a mandatory minimum setback distance of *"500 meters"* or the distance of *"4 times the tip height"* of the proposed *turbines "between the nearest point of the curtilage of any residential property"*. This is set out in SPPR2 which is included below:

> *SPPR 2: With the exception of applications where reduced setback requirements have been agreed with relevant owner(s) as outlined at 6.18.2 below, planning authorities and An Bord Pleanála (where relevant), shall, in undertaking their development planning and development management functions, ensure that a setback distance for visual amenity purposes of 4 times the tip height of the relevant wind turbine shall apply between each wind turbine and the nearest point of the curtilage of any residential property in the vicinity of the proposed development, subject to a mandatory minimum setback of 500 metres from that residential property. Some discretion applies to planning authorities when agreeing separation distances for small scale wind energy developments generating energy primarily for onsite usage. The planning authority or An Bord Pleanála (where relevant), shall not apply a setback distance that exceeds these requirements for visual amenity purposes.*

The nearest residential dwelling to any of the proposed turbines is approximately 925 m from turbine T16 which exceeds and fully complies with the setback distance outlined in the both the current 2006 Guidelines and the Draft Revised Guidelines (2019).

13.3.2.2 Donegal County Development Plan 2018-2024

Chapter 7 – 'The Natural and built Heritage' of the current Donegal County Development Plan incorporates landscape and visual policies and objectives. The main aim of this chapter is *"to conserve, protect and enhance the County's natural, built and cultural heritage for future generations and encourage appreciation, access and enjoyment of these resources."* In relation to the landscape this chapter also states that "*the landscape of County Donegal is distinctive, unique and synonymous with the identity of County Donegal, and the extensive coastline and seascape is an integral and constituent element. The nature of the landscape is such that it is a contributory factor in the economic draw owing to its quality as a place to live and work, attracting Foreign Direct Investment and associated population growth, of note is the growing tourism market, evidenced by its recent accolades as a set location for the next 'Star Wars' movie and being voted 'The Coolest Place on the Planet' by National Geographic Traveller Magazine (Jan/Feb 2017)".*

Within the current County Development Plan the landscape of County Donegal is categorised into '3 layers of value' shown on map 7.1.1 of the current plan (Figure 13.4). The 3 layers of value include:

> ***Areas of Especially High Scenic Amenity (EHSA)*** *- Areas of Especially High Scenic Amenity are sublime natural landscapes of the highest quality that are synonymous with the identity of County Donegal. These areas have extremely limited capacity to assimilate additional development.*

Areas of High Scenic Amenity (HSA) *- Areas of High Scenic Amenity are landscapes of significant aesthetic, cultural, heritage and environmental quality that are unique to their locality and are a fundamental element of the landscape and identity of County Donegal. These areas have the capacity to absorb sensitively located development of scale, design and use that will enable assimilation into the receiving landscape and which does not detract from the quality of the landscape, subject to compliance with all other objectives and policies of the plan.*

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

The proposed Clogher Wind Farm project is primarily located within a Moderate Scenic Amenity' (MSA) designation (see Figure 13-4), the lowest of three scenic amenity designations within the county development plan. Nonetheless, some parts of the site encompass an 'Especially High Scenic Amenity' (EHSA) designation and include areas of the site adjacent to the Gweebarra River and the most elevated eastern parts of the proposed project site. It is important to note that as part of early stage mitigation measures, the proposed turbines were removed from all EHSA areas within the site. Refer to Section 13.5.1 below

The central and wider study area encompasses a mix of all three scenic amenity designations, with many of the upland coastal parts of the study area classified with an EHSA designation. Less elevated settled parts of the study area tend to be classified with an MSA designation, whilst transitional parts of the study area and broad heathland and boglands are often classified with a 'high scenic amenity' (HSA) designation, the median scenic amenity designation.

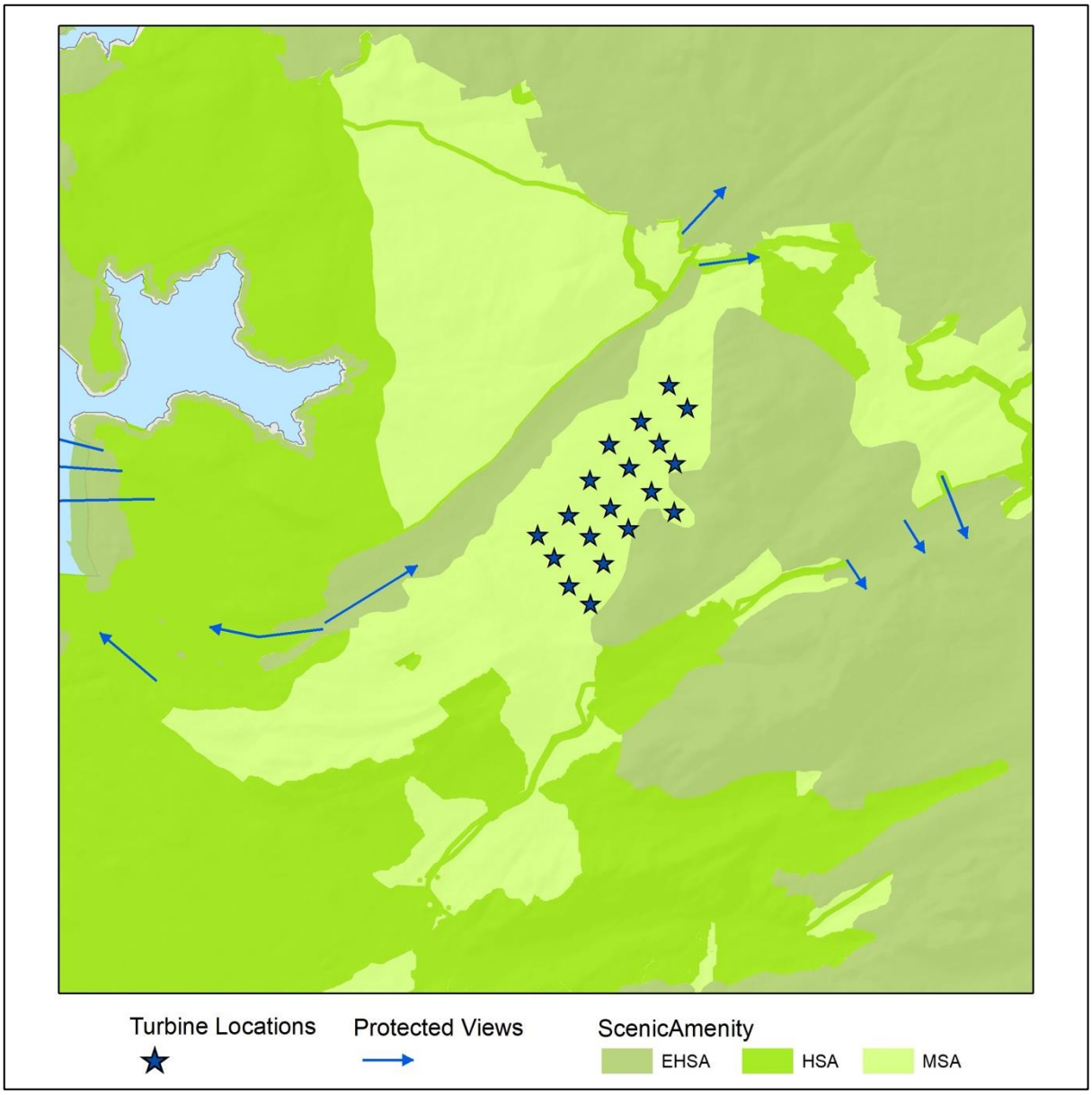

Figure 13-4: Excerpt from the current Donegal County Development Plan 2018-2024 showing scenic amenity designations in relation to the proposed project.

Chapter 7 of the County Development Plan also lists a number of objectives and policies some of which are relevant to the development and are included below.

Relevant objectives:

> ***NH-O-4:*** *To ensure the protection and management of the landscape in accordance with current legislation, ministerial and regional guidelines and having regard to the European Landscape Convention 2000.*
>
> ***NH-O-5:*** *To protect, manage and conserve the character, quality and value of the landscape having regard to the proper planning and development of the area, including consideration of the scenic amenity designations of this plan, the preservation of views and prospects and the amenities of places and features of natural, cultural, social or historic interest.*

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

NH-O-8: *To ensure where appropriate the protection and conservation of hedgerows, stone walls and traditional field boundaries as natural heritage corridors and migration routes for wildlife where they are shown to play a significant heritage role.*

Relevant policies:

NH-P-1: *It is a policy of the Council to ensure that development proposals do not damage or destroy any sites of international or national importance, designated for their wildlife/habitat significance in accordance with European and National legislation including: SACs, Special SPAs, NHAs, Ramsar Sites and Statutory Nature Reserves.*

NH-P-5: *It is a policy of the Council to require consideration of the impact of potential development on habitats of natural value that are key features of the County's ecological network and to incorporate appropriate mitigating biodiversity measures into development proposals.*

NH-P-6: *It is a policy of the Council to protect areas identified as Especially High Scenic Amenity on Map 7.1.1: 'Scenic Amenity'. Within these areas, only developments assessed to be of strategic importance or developments that are provided for by policy elsewhere in this Plan shall be considered.*

NH-P-7: *Within areas of 'High Scenic Amenity' (HSC) and 'Moderate Scenic Amenity' (MSC) as identified on Map 7.1.1: 'Scenic Amenity', and subject to the other objectives and policies of this Plan, it is the policy of the Council to facilitate development of a nature, location and scale that allows the development to integrate within and reflect the character and amenity designation of the landscape.*

NH-P-8: *It is the policy of the Council to safeguard the scenic context, cultural landscape significance, and recreational and environmental amenities of the County's coastline from inappropriate development.*

NH-P-9: *It is the policy of the Council to manage the local landscape and natural environment, including the seascape, by ensuring any new developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of the area.*

NH-P-10: *It is a policy of the Council to retain and protect significant stands of existing trees/hedgerows/woodlands and seek increased planting of native trees where appropriate in new developments.*

NH-P-13: *It is a policy of the Council to protect, conserve and manage landscapes having regard to the nature of the proposed development and the degree to which it can be accommodated into the receiving landscape. In this regard the proposal must be considered in the context of the landscape classifications, and views and prospects contained within this Plan and as illustrated on Map 7.1.1: 'Scenic Amenity'.*

NH-P-15: *It is a policy of the Council to safeguard prominent skylines and ridgelines from inappropriate development.*

NH-P-17: *It is a policy of the Council to seek to preserve the views and prospects of special amenity value and interest, in particular, views between public roads and the sea, lakes and rivers. In this regard, development proposals situated on lands between the road and the sea, lakes or rivers shall be considered on the basis of the following criteria:*

- *Importance value of the view in question*
- *Whether the integrity of the view has been affected to date by existing development*
- *Whether the development would intrude significantly on the view*
- *Whether the development would materially alter the view*

13.3.2.3 Donegal County Development Plan 2018-2024 – Landscape Character Assessment

A landscape character assessment was prepared in May 2016 and is included as part of the current Donegal County Development Plan 2018-2024. The assessment identified landscape types and landscape character areas throughout the county. The landscape types in Donegal (Figure 13-5) are described as *"the foundations of its rich and unique character; in both the variety of types and in their juxtaposition, giving a strong and vibrant contrast in many areas, with mountains and uplands overlooking beaches, estuaries, farmland and lakes, resulting in a dynamic and striking landscape of discernible scenic quality"*. The proposal site is entirely contained in a mix of landscape types including within the landscape '0-200m Atlantic Blanket Bog', 'Forest/Woodland' and '200-300m Highland Blanket Bog'. Other landscape types in the near surrounds include 'Waterbodies', 'Upland Heath and Moorland' and 'Estuarine'.

Within County Donegal, 44 individual landscape character areas were identified with the development situated in LCA 30 – 'Fintown Valley' (Figure 13-6 refers) which is described as *"a distinctive inland LCA defined by a chain of mountains in the North West and framed by Aghla and Screig Mountains along the south east, these upland areas are separated by Lough Finn and the River Finn on the valley floor mirroring the orientation of Gweebara Fault"*. Other landscape character areas within the Study Area include:

- LCA 14 – 'Finn Valley'
- LCA 16 – 'Cark Mountain Uplands'
- LCA 25 – 'Derryveagh Mountains'
- LCA 28 – 'The Rosses, Knock & Lochan, Islands & Coast
- LCA 30 – 'Ardara Bays & Coast An Gaeltacht'
- LCA 31 – 'Slievetooey Coast'
- LCA 35 – 'Ardara Bogland'
- LCA 37 – 'Donegal Bay Drumlins'
- LCA 38 – 'Bluestack'

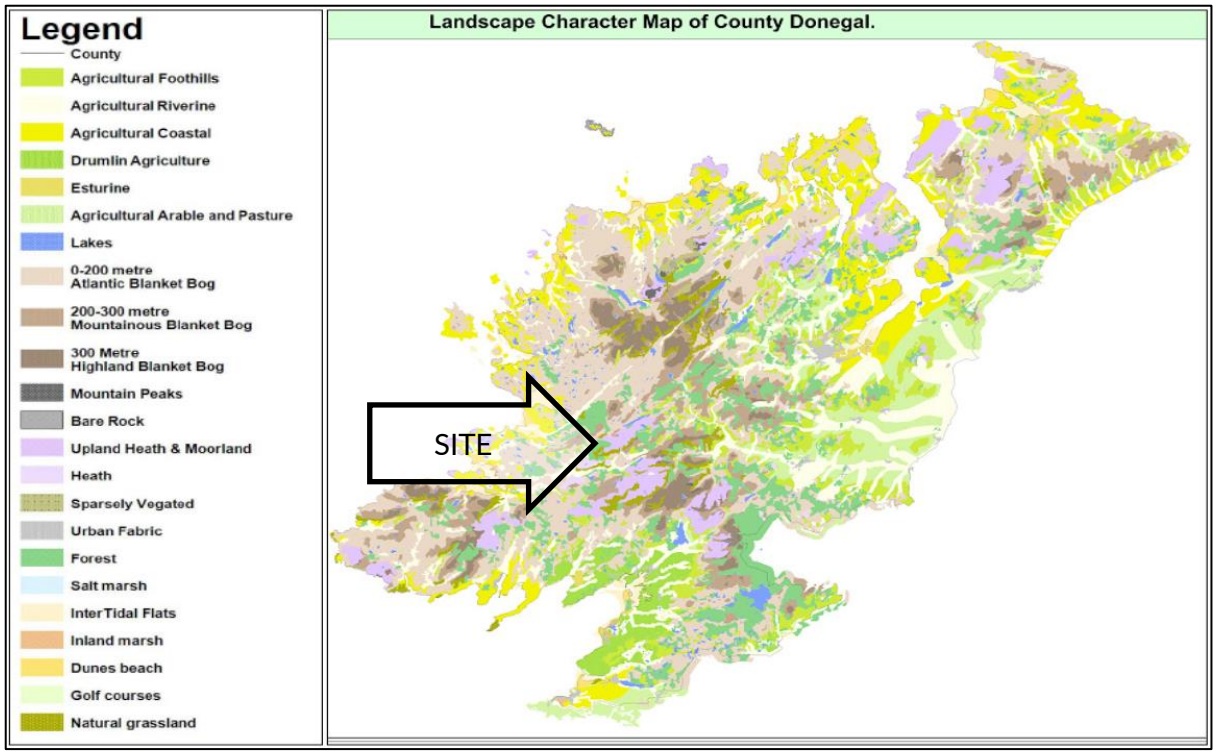

Figure 13-5: Figure 1.4 of the Landscape Character Assessment of Donegal (May 2016) showing approximate location of the site in relation to landscape character types in County Donegal.

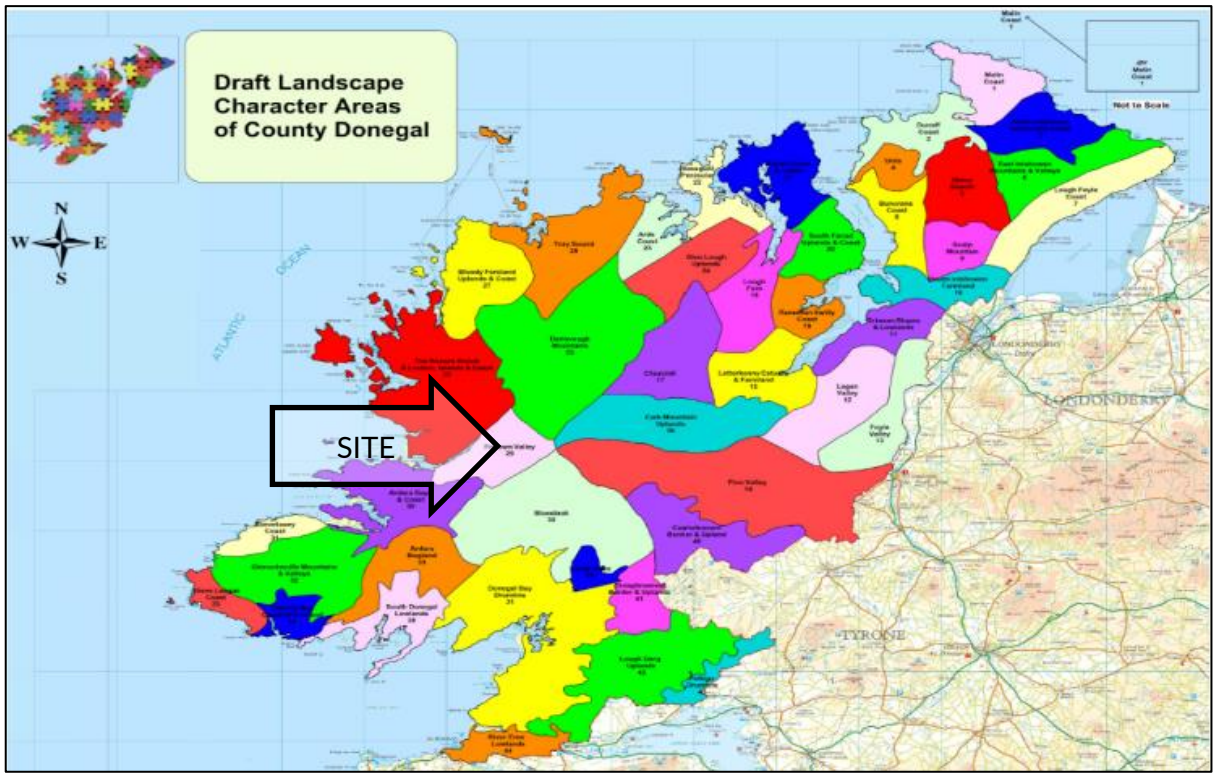

Figure 13-6: Figure 1.7 of the Landscape Character Assessment of Donegal (May 2016) showing approximate location of the site in relation to landscape character areas in County Donegal

13.3.2.4 Donegal County Development Plan 2018-2024 – Wind Energy Policy

The proposed Cloghercor Wind Farm is shown on the previously adopted, but subsequently removed mapping, within the zoning area *'open to consideration' of Donegal CDP 2018 - 2024* (Figure 13-7 refers). This zoning classification directly corresponds with the MSA designation that cloaks much of the site and extends to the southwest towards the N56 and Cleengort Hill. Much of the central and wider study area are contained in a '*Not Acceptable'* wind energy classification, whilst several *'Acceptable for augmentation of/improvements to existing windfarms'* designations are located in the wider southern half of the study area.

As set out in section 4.4.5.1 of Chapter 4 of the EIAR, it should be noted that following a High Court Order, certain provisions of the Donegal CDP relating to Wind Energy were ordered to be deleted/removed from the CDP. Specifically, this order required the removal of Map 8.2.1 of the Donegal County Development Plan 2018–2024, which originally indicated the proposed project to be entirely located within an area classified as 'Open for Consideration' for wind development.

On 18 July 2022, Donegal County Council decided to adopt a variation of their County Donegal Development Plan 2018-2024, in respect of the Wind Energy Policy Framework (Variation No. 2). The Office of the Planning Regulatory (OPR) subsequently made a recommendation to the Minister for Local Government and Planning (the Minister) in relation to Variation No. 2. On 29th August, 2022, the Minister issued a 'Notice of Intention to Issue a Direction' (the Draft Direction) to the Council under Section 31 of the Planning and Development Act, 2000 (as amended). The Minister's draft Direction proposed the following alterations to Variation No. 2:

1. - Omit Policy E-P-23 and Policy E-P-24.

2. - Amend map 8.2.1 to change the designation of "Lifford -Stranorlar Municipal District Areas at Risk of Landslides and Associated Environmental and Ecological Concerns" and "Moderately Low" and "Moderately High" landslide susceptibility areas identified as 'Not Normally Permissible' to 'Open-to-Consideration.

In accordance with Section 31(6) of the Planning and Development Act 2000, the parts of the Variation referred to in the Notice (noted above) are to be taken as not having come into effect, made or amended. The Council's chief executive consulted the public on the draft Direction and Cloghercor Wind Farm Limited lodged a submission as part of that consultation. The Chief Executive submitted a report to the OPR summarising the consultation and providing recommendations on the final Direction. We understand that the OPR has submitted its recommendation to the Minister under s31AN(4) of the Act although it has not been made publicly available as yet.

Following this, on the 20th of December 2022, the Minister's Planning and Development (Variation No. 2 to the Donegal Plan 2018-2024) Direction 2022) was published, which proposed alterations to Variation No. 2, which subsequently, results in the revised map 8.2.1 being amended. It directed the County Council to take the following steps with regard to Variation No. 2 to the Development Plan:

a. Omit Policy E-P-23(2) and (3) and associated endnote and Policy E-P-24.
b. Amend map 8.2.1 to change the designation of "Lifford-Stranorlar Municipal District at Risk of Landslides and Associated Environmental and Ecological Concerns" and "Moderately Low" and "Moderately High" landslide susceptibility areas identified as 'Not Normally Permissible' to 'Open to Consideration'.

For further discussion on the proposed variation to the wind energy, see Chapter 4 (Planning Policy & Development Context) of this EIAR.

As such, at the date of this application, Variation 2 has come into effect save for the alterations in the Direction noted above. We have therefore set out the planning policy position on this basis.

A number of policies and objectives that have been retained as part of the variation the County Donegal Development Plan 2018-2024 are also outlined within Chapter 8 of the current CDP, some of which relate to wind energy and the Development and are included below.

Objectives:

> ***E-O-1:*** *To develop sustainably a diverse renewable energy portfolio to meet demands and capitalize on the County's competitive locational advantage.*
>
> ***E-O-4:*** *To facilitate a sustainable and diverse mix of developments which limit the net adverse impacts associated with global warming such as promoting renewable energy, the growth of local farm produce and the promotion of sustainable modes of public transport.*
>
> ***E-O-5:*** *To ensure that wind energy developments meet the requirements and standards set out in the DEHLG Wind Energy Development Guidelines 2006, or any subsequent related Guidelines (or as may be amended).*
>
> ***E-O-6:*** *To ensure that wind energy developments do not adversely impact upon the existing residential amenities of residential properties, and other centres of human habitation (as defined at Para. 6.6, 'Wind Energy', Appendix 3, Development Guidelines and Technical Standards, Part B, Objectives and Policies of the Plan).*

Policies:

> ***E-P-2:*** *It is a policy of the Council to facilitate the appropriate development of renewable energy from a variety of sources, including, hydro power, ocean energy, bioenergy, solar, wind and geo-thermal and the storage of water as a renewable kinetic energy resource, in accordance with all relevant material considerations and the proper planning and sustainable development of the area.*
>
> ***E-P-10:*** *It is a policy of the Council that development proposals for wind energy shall be in accordance with the requirements of the Wind Energy Development Guidelines: Guidelines for Planning Authorities, 2006 (or as may be amended).*
>
> ***E-P-11:*** *It is a policy of the Council to consider the development of renewable energy, through the development of on offshore wind energy proposals, in accordance with the proper planning and sustainable development of the area.*
>
> ***E-P-12:*** *It is the policy of the Council to:*
>
> *Consider the development of appropriate new wind energy developments within the areas identified as 'Open To Consideration' on the Wind Energy Map 8.2.1, subject to compliance with all other relevant objectives and policies contained within this Plan.*

Consider the augmentation, upgrade and improvements of existing windfarm developments within areas identified as 'Acceptable for augmentation of/improvements to existing windfarms' on the Wind Energy Map 8.2.1 on a case by case basis subject to compliance with other relevant objectives and policies contained within this plan and the following:

a) Repowering

Repowering is the process of replacing older turbines with newer ones that either have a greater capacity or more efficiency which results in a net increase of power generated. Repowering may also seek to extend the overall lifespan of the development. Proposals for repowering, shall not result in a net increase in turbines, and it shall be demonstrated that there is no adverse impact on the receiving environment; or

b) Extension

In areas located outside of Natura 2000 sites, proposals for an extension to an existing windfarm (of up to 20% in terms of permitted numbers of turbines or in cases where 5 or less turbines are permitted in a windfarm, one additional turbine) will be considered. The proposal will be required to demonstrate that the additional turbines may be served by the infrastructure serving the existing development; or

c) Reapplication

In areas located outside of Natura 2000 sites, where an existing windfarm has been permitted and this permission has expired, a revised proposal will be considered within the planning unit of the previously permitted development, and where it is demonstrated that there is no net increase in turbines. Not favourably consider wind energy proposals in those areas identified as 'Not Acceptable' on the Wind Energy Map 8.2.1.

E-P-13: *Within the areas identified as 'Open To Consideration' on Map 8.2.1, it is a policy of the Council to encourage the development of community windfarms/co-operatives to enable communities to generate their own electricity, income and to sell surplus back to the grid, in accordance with other objectives and policies of this Plan and the proper planning and sustainable development of the area.*

E-P-14: *It is a policy of the Council to support voluntary initiatives from developers/renewable energy operators for local community benefits, in accordance with other policies of this Plan and the proper planning and sustainable development of the area.*

(Examples could include; shared ownership of development proposals, financial dividends, the development of improved local infrastructure, the donation of land for community use, such as playing fields, the development or refurbishment of local community facilities, the creation of rights of way/cycle, walking and bridleways, educational tours and promotional days).

E-P-16: *It is a policy of the Council to support the strengthening and enhancement of the capacity of existing windfarms, within the local environmental capacity*

including the sustainable upgrade/replacement of older turbines with newer and more efficient models.

E-P-17: *It is a policy of the Council to ensure that all roads associated with the development of windfarms are maintained or repaired at the developer's expense to the satisfaction of the Council.*

E-P-18: *It is a policy of the Council that potential impacts on natural, built and cultural heritage including impacts on archaeological monuments and watercourses are assessed as part of renewable development proposals. Where such impacts are identified, mitigation measures such as buffer zones, separation distances and access arrangements should be employed as appropriate.*

E-P-19: *It is a policy of the Council to facilitate the development of combined wind and wave, tidal and/or hydro proposals in areas where there are no significant environmental, heritage or landscape constraints, to generate and export renewable energy and to generate local revenue subject to the proper planning and sustainable development of the area.*

E-P-20: *It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.*

E-P-21: *It is the policy of the Council that all applications for renewable energy projects will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIS) and Natura Impact Statement as may be required.*

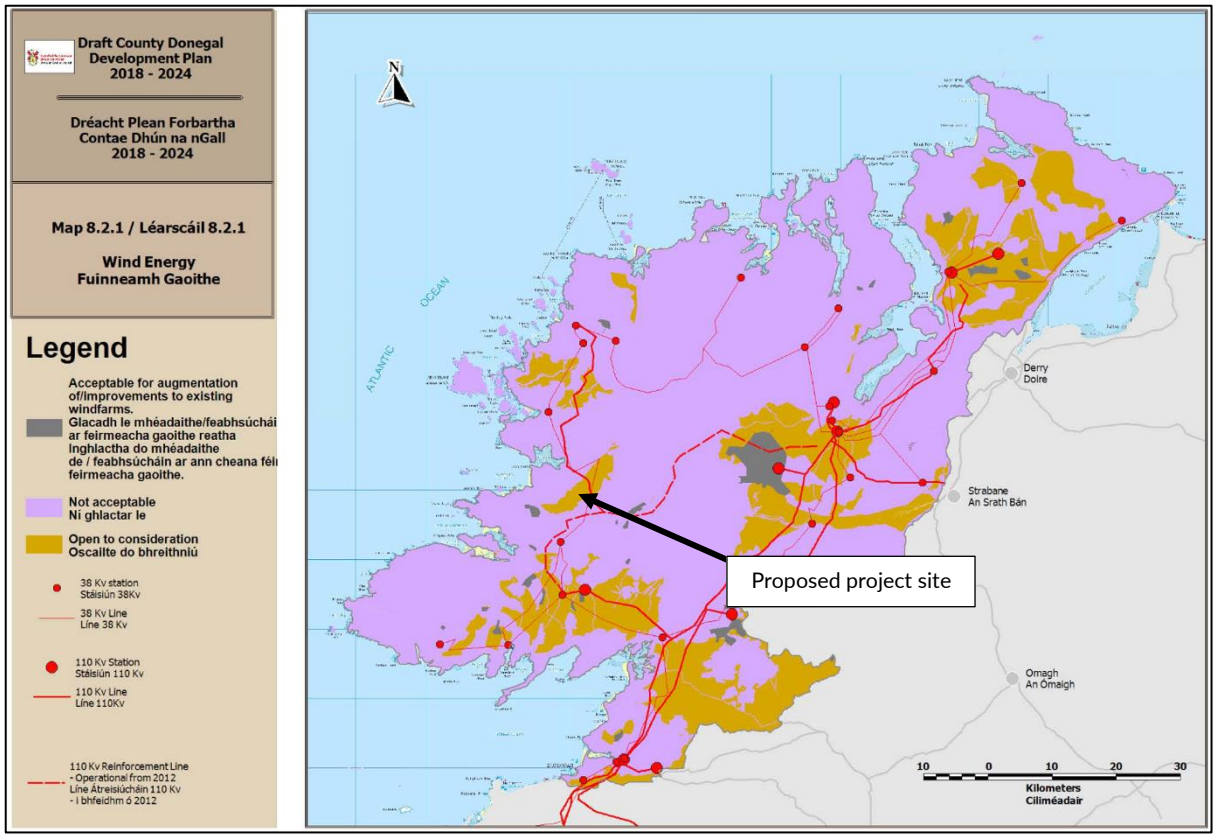

Figure 13-7: Original Map 8.2.1 of the Donegal County Development Plan 2018-2024 identifying wind energy designations in relation to the proposed Cloghercor Wind Farm. Note, this is now subject to the Variation No. 2 to the Donegal Plan 2018-2024 (described above).

13.3.2.5 Ecological Designations

Ecological designations such as Special Areas of Conservation (SAC's), Special Protection Areas (SPA's) and Natural Heritage Areas (NHA's) are relevant to the landscape and visual assessment as they can identify areas that are likely to exhibit naturalistic character and low levels of built development. They also highlight areas to which landscape conservation values are attached and they are often associated with outdoor amenity facilities where people go to enjoy the landscape setting.

In this instance there are seven ecological designations within the central study area, which are included below:

- Meenmore West Bog NHA – immediately east of the site.
- Coolvoy Bog SAC – immediately north of the site.
- West of Ardara/Maas Road SAC – immediately north and west of the site.
- Gannivegil Bog SAC – c.800m northwest of the site.
- Cloghernagore Bog and Glenveagh National Park SAC – c. 1.5km north of the site.
- Derryveagh and Glendowan Mountains SPA – c. 1.5km north of the site.
- River Finn SAC – C. 2.5km east of site.

For further discussions on designated ecological sites, please see Chapter 6 (Biodiversity).

13.3.3 Visual Baseline

Only those parts of the study area that potentially afford views of the proposed project are of interest to this part of the assessment. Therefore, the first part of the visual baseline is

establishing a 'Zone of Theoretical Visibility' and subsequently, identifying important visual receptors from which to base the visual impact assessment.

13.3.3.1 Zone of Theoretic Visibility

A computer-generated Zone of Theoretical Visibility (ZTV) map has been prepared to illustrate from where the proposed project is potentially visible. The ZTV below is based on a tip height of 200m as a worst-case scenario for potential visibility within the study area (i.e. there will be no increase in areas of potential turbine visibility with regard to the range of potential turbine dimensions outlined in section 13.8 below). A large scale map of a ZTV showing the potential visibility up to the highest possible hub height of the proposed turbines is also included in Appendix 13.2. The ZTV map is based solely on terrain data (bare ground visibility), and ignores features such as trees, hedges or buildings, which may screen views. Given the complex vegetation patterns within this landscape, the main value of this form of ZTV mapping is to determine those parts of the landscape from which the proposed project will definitely not be visible, due to terrain screening within the 20km study area.

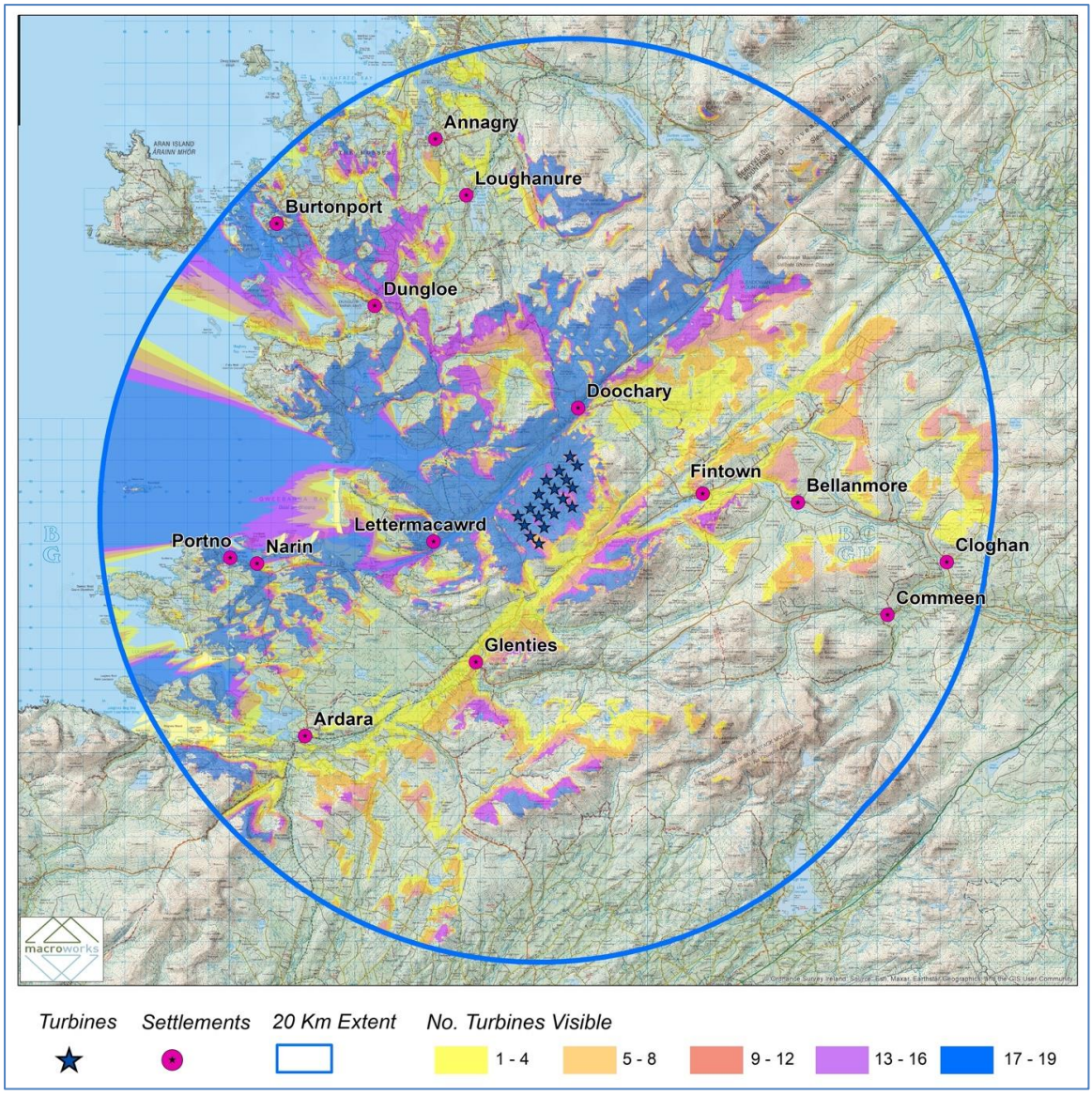

Figure 13-8: Bare-ground Zone of Theoretically Visibility (ZTV) Map based on a turbine tip height of 200m. (See Appendix 13.2 for larger scale map)

The following key points are illustrated by the 'bare-ground' ZTV map

- A considerable proportion (well over 50%) of the study area has no potential to view the proposed turbines.

- All of the proposed turbines have the potential to be viewed within the context of the Gweebarra river valley in the near surrounds of the site. On the northern banks of the Gweebara River to the north, west and southwest of the site, there is potential to afford views of all 19 of the proposed turbines.

- Comprehensive visibility of the proposed turbines also extents northeast along the Gweebarra river valley and southwest towards the Gweebarra River estuary and its surrounding low rolling coastal terrain.

- As a consequence of the proposed turbines' location within a steep valley context, the proposed turbines will be heavily screened in the wider surrounds of the study area beyond the context of the Gweebarra River valley. This is evident in the southern half of the study area, where visibility beyond the immediate surrounds of the site is limited to elevated hills and ridges.

- As the northern slopes of the Gweebarra River valley are not as elevated as those to the south of the Gweebarra River, the potential for comprehensive visibility extends notably further into the northern half of the study area. Comprehensive ZTV pattern extends northwest from the proposed wind farm and cloaked the coastal terrain in the surrounds of Trawenagh Bay, the rolling hills north of and east of Dungloe and the rolling coastal hills in the surrounds of Burtonport. Pockets of comprehensive visibility also occur in the wider study area to the north and northeast, however much of the theoretical ZTV pattern occurs along upland hills and broad ridges.

- Within the wider south-western quadrant of the study area, pockets of comprehensive ZTV pattern emerges along the rolling coastal hills south of Gweebarra Bay and extends as far southwards Loughros Point and upland terrain southwest of Ardara.

- In terms of settlements, the nearest villages of Doochary and Lettermacaward will afford comprehensive visibility of the proposed turbines. The central parts of the larger towns of Glenties and Ardara will afford limited potential for visibility, which is contained along hills and ridges surrounding the town centres. The coastal villages of Portnoo and Burtonport in the eastern half of the study area will afford comprehensive theoretic visibility of the turbines, whilst the northern and eastern outskirts of the larger settlement of Dungloe have the potential to afford views of between 9-19 of the proposed turbines. There is limited potential for visibility of turbine tip heights at the lakeside villages of Fintown to the southeast of the site and Loughanure to the north of the site.

- There is no potential for visibility at the settlements of Annagary, Loughanure, Crolly, Glendowan, Clogher and Commeen, all of which are located in the wider study area

13.3.3.2 Views of Recognised Scenic Value

Views of recognised scenic value are primarily indicated within County Development Plans in the context of scenic views/routes designations, but they might also be indicated on touring maps, guidebooks, road side rest stops or on post cards that represent the area.

All of the scenic routes and views that fall inside the ZTV pattern (see Figure 13-8) were investigated during fieldwork to determine whether actual views of the proposed wind farm might be afforded. Where visibility may occur, a viewpoint has been selected for use in the visual impact appraisal later in this chapter. In some instances, a single viewpoint is selected to represent a stretch of designated scenic route or a cluster of designated scenic views, particularly distant ones.

13.3.3.2.1 Donegal County Development Plan 2018-2024

The current County Development Plan (2018-2024) categorises the landscape into three layers of value which are noted in Section 13.3.2 of this chapter. Scenic views in county Donegal are also identified on Map 7.1.1 of the current County Development Plan. As there are no reference numbers/titles for each of the views within the 20km study area identified on Map 7.1.1, they have been categorised based on their location in Table 13-5 below in addition to their rationale for selection/omission as a viewpoint for this assessment.

Table 13-5:Rationale for selection of scenic designations within the Donegal County Development Plan

Scenic View ref:	Relevance to visual impact appraisal	VP ref no. herein
1 – Views east of the N56 at Fawnaboy (Views of Mt Errigal)	**Not Relevant** – Views located outside of ZTV pattern	-
2 - Views west and south from the R251 regional road northeast of Dunlewy Lough	**Not Relevant** – Views located outside of ZTV pattern	-
3 – Views from the R254 east of Slieve Snaght	**Relevant** – Views oriented in the direction of the site	VP2
4 – Views east and south from Lough Anure	**Relevant** – Views oriented in the direction of the site	VP1
5 – Views from the coastline east of Arranmore	**Not Relevant** – Views oriented in the opposite direction to the site	-
6 - Views northeast along Gweebarra River corridor from Docharry	**Not Relevant** – Views oriented in the opposite direction to the site. However, clear views of the site will likely be afforded from here and therefore a representative viewpoint for assessment has been included.	VP5
7 - Views west from Crohy Head and southwest across Gweebarra Bay	**Not Relevant** – Views oriented in the opposite direction to the site	-
8 - Views west across Gweebarra Bay from Dooey	**Not Relevant** – Views oriented in the opposite direction to the site. However, clear views of the site will likely be afforded from here and therefore a representative viewpoint for assessment has been included.	VP24
9 - Views northeast and southwest across Gweebarra River from Gweebarra Bridge	**Relevant** – Views oriented in the direction of the site	VP20
10 - Views southeast across Lough Finn from R250	**Not Relevant** – Views oriented in the opposite direction to the site	-
11 - Views west from N56 at Maas	**Not Relevant** – Views oriented in the opposite direction to the site	-

Scenic View ref:	Relevance to visual impact appraisal	VP ref no. herein
12 - Views north towards Inishkeel from Portnoo	**Not Relevant** – Views oriented in the opposite direction to the site	-
13 – Views west from the R252 north of Cloghan	**Not Relevant** –Limited potential for turbine visibility	-
14 – Views southwest from the R235 at Commeen	**Not Relevant** – Views located outside of ZTV	-
15 – Views southwest, south and east from the R253 at Clogher East and Glashydevet	**Not Relevant** – Views located outside of ZTV	-
16 - Views north from Lakaduff across Loughros More Bay	**Not Relevant** - Views oriented in the opposite direction to the site	-
17 – Views north and east from Edergole Bridge	**Not Relevant** – Views located outside of ZTV	-
18 – Views northeast and southwest along the Eglish River	**Not Relevant** – Views located outside of ZTV	-
19 – Views northwest from Letterfad	**Not Relevant** – Views located outside of ZTV	-
20 - Views northeast from the R230, west of Common Mountain	**Not Relevant** –Limited potential for turbine visibility	-

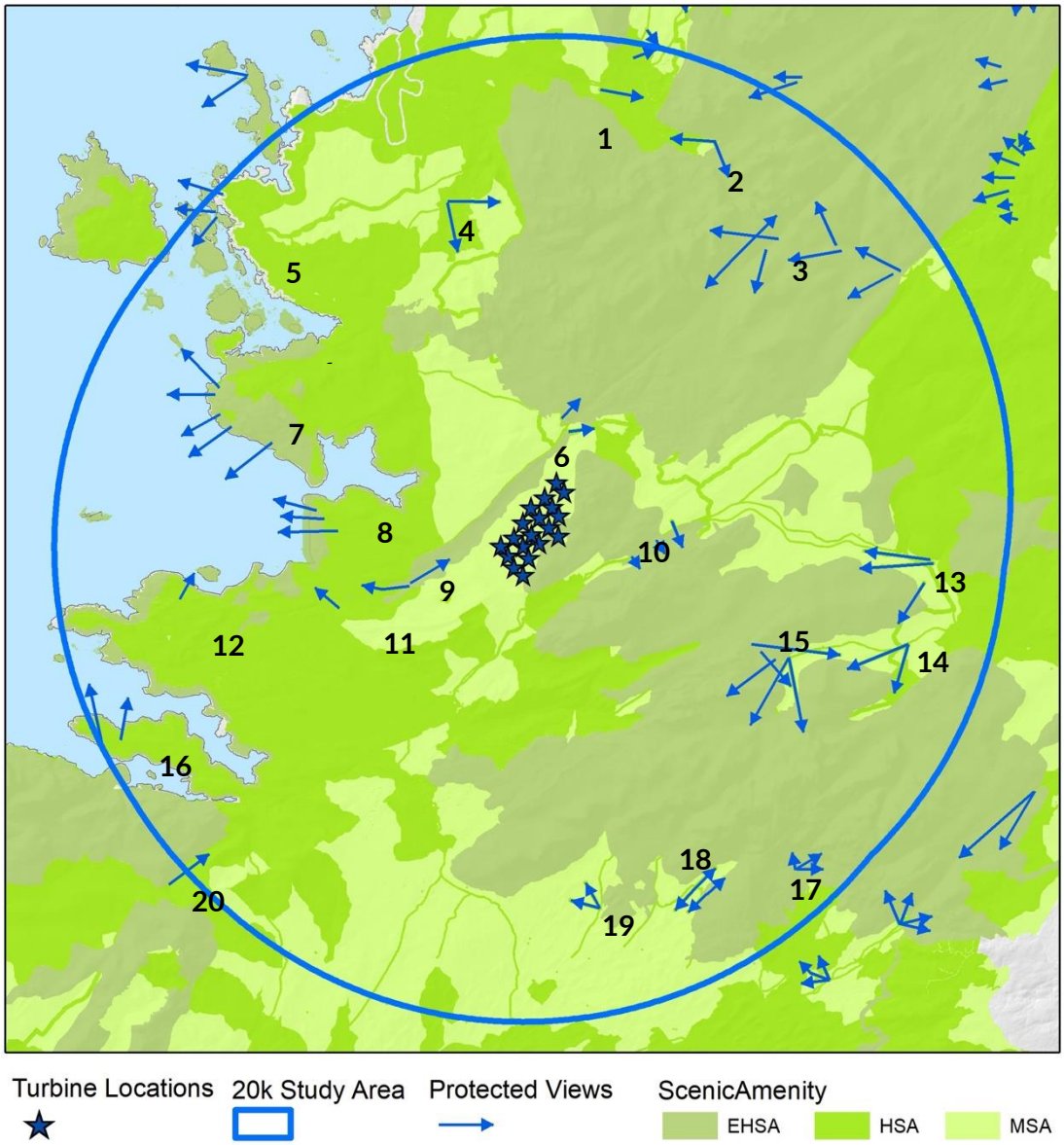

Figure 13-9:Excerpt from the Donegal County Development Plan 2018-2024 - showing approximate location of proposed project site in relation to protected views

13.3.3.3 Centres of Population

The nearest settlements to the proposed project include the small village of Doochary located along the Gweebarra River corridor some c.800m north of the site and the dispersed settlement of Lettermacaward situated to the north of the Gweebarra estuary and just over c. 700m north of the site at its nearest point. The lakeside settlement of Finntown is located along the R250 regional road some c.4km east of the site at its nearest point. The larger settlements of Glenties and Ardara are located 3km south and 9km southwest of the site, respectively, whilst the small picturesque coastal village of Narran and Portnoo are located 9km and 10km west of the site, respectively.

The coastal town of Dungloe is situated 10km northwest of the site, whilst Loughanure is situated 12km north of the site. The wider northern extents of the study area encompass the small villages of Burtonport and Annagary, and whilst not a typical settlement, the Gaeltacht area of Gweedore is said to be one of the most densely populated rural areas in Europe and

comprises a loose arrangement of small village and town settlements located throughout the northern periphery of the study area. Several small villages are also located throughout the wider eastern periphery of the study area and include Bellanamore, Cloghan and Commeen

13.3.3.4 Transport Routes

The principal transport route in relation to the proposed project is the N56 national secondary route, which traverses the study area in a general north-south direction in its eastern half. The N56 passes just under c. 1km to the northwest of the site and some c.3km west of the nearest turbine as it passes through the village of Lettermacaward. The N56 links all the main settlements within the study area, including Ardara, Glenties, and Dungloe.

The nearest major routes to the proposed project include the R250 and R252. The R250 is situated some c. 1.2km south of the site and connects the settlements of Glenties and Fintown. The R252 extends north from Fintown and passes through the valley side settlement of Doocarhy just over 2km north of the nearest turbine. Other major routes within the wider study area include the R230, R251, R253, R257, R259, R261 and R262.

A web of local roads also connects the study area, the nearest and most notable of which is the L1783 local road situated to the north of the Gweebarra River, some c. 1.2km north of the nearest turbine. A local road laneway also traverses the sloping terrain that contains the site and is situated less than 200m from the nearest turbine.

13.3.3.5 Tourism, Recreational and Heritage Features

The Wild Atlantic Way, a 2,500km long tourist driving route, enters the study area in its northwest quadrant at the dispersed settlement of Gweedore and traverses large sections of the coastline within the study area. The nearest section of this tourist driving route is situated some c.3km west of the nearest turbine as it passes through the village of Lettermacaward on the N56 national secondary route.

The Eurovelo Atlantic's Coast Route is an 11,000km long cycling trail that traverses the coastline of several countries along the western coast of Europe, including Ireland. The Celtic Coast section of this route follows a similar route to the Wild Atlantic Way within the study area, passing some c. 3km west of the nearest turbine through the settlement of Lettermacaward.

A number of way marked trails, walking, and cycle routes are also located throughout the central and wider study area. The nearest of these is a section of the Donegal Way – Slí na Rosann which passes along rolling terrain north of the site and through the small village of Doochary. The route is situated some c. 1.6km north of the site at its nearest point. The Lettermacaward to Mount Charles section of the Donegal Cycle Route crosses the Gweebarra Bridge some 4km west of the nearest turbine, whilst a section of the Bluestack Way National Waymark trail passes through the settlement of Glenties and is located c. 6.5km southwest of the nearest turbine. Numerous other local walks and waymarked walking trails also occur throughout the wider study area, many of which afford views across the rolling uplands or the rugged coastline.

A small section of Glenveagh National Park is located on the north-eastern periphery of the study area, where the designation covers a large proportion of the Derryveagh Mountains and its surrounding uplands. The national park, centred around Lough Beagh, is surrounded by rolling upland mountains and ridges and encompasses numerous mountain trails and lakeside walks, in addition to Glenveagh Castle and Gardens.

Located some 16km north of the site, Mount Errigal is the tallest peak in Donegal and is popular among hikers and local walkers, and is a highly distinctive landscape feature within the study area.

The numerous coastal settlements within the study area also have strong tourist value and often comprise caravan parks and holiday lets. Narin and Portnoo Links is a picturesque golf course situated at the settlement of Narin, some 11km west of the site.

There is also a notable sense of heritage within the study area (Refer to Chapter 15 (Cultural Heritage) of the EIAR). Doon Fort is an oval stone fort situated on Doon Lough, some 10km west of the site, dating back to the 4th Century. Iniskeel island is located a similar distance to the west of the site and contains several heritage features, including the remnants of a 6th Century Monastery and the remnants of 2 churches and a graveyard. Other notable public amenities along the coastline include the Maghera Caves and Assaranaca Waterfall, located in the wider southwest quadrant of the study area, in addition to the numerous broad beaches, picnic areas, and scenic viewing points.

13.3.4 Identification of Viewshed Reference Points as a Basis for Assessment

The results of the ZTV analysis provide a basis for the selection of Viewshed Reference Points (VRP's), which are the locations used to study the landscape and visual impact of the proposed wind farm in detail. It is not warranted to include each and every location that provides a view of this development as this would result in an unwieldy report and make it extremely difficult to draw out the key impacts arising from the project. Instead, a variety of receptor locations was selected that are likely to provide views of the proposed wind farm from different distances, different angles and different contexts.

The visual impact of a proposed project is assessed using up to 6 categories of receptor type as listed below:

- Key Views (from features of national or international importance);
- Designated Scenic Routes and Views;
- Local Community views;
- Centres of Population;
- Major Routes; and
- Amenity and heritage features;

Where a VRP might have been initially selected for more than one reason it will be assessed according to the primary criterion for which it was chosen. The characteristics of each receptor type vary as does the way in which the view is experienced. These are described below.

Key Views

These VRPs are at features or locations that are significant at the national or even international level, typically in terms of heritage, recreation or tourism. They are locations that attract a significant number of viewers who are likely to be in a reflective or recreational frame of mind, possibly increasing their appreciation of the landscape around them. The location of this receptor type is usually quite specific.

Designated Scenic Routes and Views

Due to their identification in the County Development Plan this type of VRP location represents a general policy consensus on locations of high scenic value within the Study Area. These are commonly elevated, long distance, panoramic views and may or may not be mapped from precise

locations. They are more likely to be experienced by static viewers who seek out or stop to take in such vistas.

Local Community Views

This type of VRP represents those people who live and/or work in the locality of the proposed EIA Development, usually within a 5 km radius of the site. Although the VRPs are generally located on local level roads, they also represent similar views that may be available from adjacent houses. The precise location of this VRP type is not critical; however, clear elevated views are preferred, particularly when closely associated with a cluster of houses and representing their primary views. Coverage of a range of viewing angles using several VRPs is necessary in order to sample the spectrum of views that would be available from surrounding dwellings.

Centres of Population

VRPs are selected at centres of population primarily due to the number of viewers that are likely to experience that view. The relevance of the settlement is based on the significance of its size in terms of the Study Area or its proximity to the site. The VRP may be selected from any location within the public domain that provides a clear view either within the settlement or in close proximity to it.

Major Routes

These include national and regional level roads and are relevant VRP locations due to the number of viewers potentially impacted by the proposed project. The precise location of this category of VRP is not critical and might be chosen anywhere along the route that provides clear views towards the proposal site, but with a preference towards close and/or elevated views. Major routes typically provide views experienced whilst in motion and these may be fleeting and intermittent depending on screening by intervening vegetation or buildings.

Tourism, Recreational and Heritage Features

These views are often one and the same given that heritage locations can be important tourist and visitor destinations and amenity areas or walking routes are commonly designed to incorporate heritage features. Such locations or routes tend to be sensitive to development within the landscape as viewers are likely to be in a receptive frame of mind with respect to the landscape around them. The sensitivity of this type of visual receptor is strongly related to the number of visitors they might attract and, in the case of heritage features, whether these are discerning experts or lay tourists. Sensitivity is also heavily influenced by the experience of the viewer at a heritage site as distinct from simply the view of it. This is a complex phenomenon that is likely to be different for every site. Experiential considerations might relate to the sequential approach to a castle from the car park or the view from a hilltop monument reached after a demanding climb. It might also relate to the influence of contemporary features within a key view and whether these detract from a sense of past times. It must also be noted that the sensitivity rating attributed to a heritage feature for the purposes of a landscape and visual assessment is not synonymous with its importance to the Archaeological or Architectural Heritage record.

The Viewshed Reference Points selected in this instance are set out in the Table 13-6 and Figure 13-10 below.

Table 13-6:Outline description of selected Viewshed Reference Points (VRPs)

VRP No.	Location	Distance to nearest turbine	Direction of view
VP1	N56 at Loughanure	13.2km (T1)	S
VP2	R254 at Bingorms north of the River Barra	12.5km (T1)	SW
VP3	N56 north of Dungloe at Meenmore	12.1km (T1)	SE
VP4	R254 at Commeen north of the Owenwee River	7.5km (T1)	SW
VP5	Picnic Area at the R252 north of Doochary	2.6km (T1)	S
VP6	Local road at Doochary east of the Gweebarra River	2.2km (T1)	S
VP7	L1783 at Derryleconnell Far south of Doochary	1.6km (T1)	S
VP8	Local road at Drumlaghdrid west of the N56	5.4km (T16)	SE
VP9	L1783 at Galwolie (1)	1.5km (T3)	S
VP10	Local road at Cloherachullion	733m (T3)	S & E
VP11	L1783 at Galwolie (2)	1.6km (T10)	SE
VP12	N56 at Boyoughter west of Lough Nascollop	3.6km (T16)	E
VP13	Local road at Cloghercor	937m (T13)	S & E
VP14	Local road south of Lough Finn at Meentymorgal	6.4km (T2)	W
VP15	Local graveyard north of the Gweebarra River at Boyoughter	1.9km (T16)	E
VP16	N56 at Lettermacaward	3.7km (T16)	E
VP17	Local road at Corr Point	6.0km (T16)	E
VP18	Local road at Meenagowan	4.8km (T16)	E
VP19	Local road laneway at Derryloghan (1)	1.0km (T18)	NE
VP20	Gweebarra Bridge	4.4km (T16)	NE
VP21	Portnoo Harbour	13.8km (T16)	E
VP22	Local road laneway at Derryloghan (2)	12.1km (T19)	NE
VP23	R250 at Shallogan More	2.3km (T9)	NW
VP24	Viewing point on the N56 at Mulnamin More south of the Gweebarra Estuary	7.5km (T16)	NE
VP25	R250 at Shallogan More	1.7km (T19)	N
VP26	R250 at Straboy north of the Stracashel River	3.9km (T19)	N
VP27	R250 at Gortnamucklagh north of Genties	5.8km (T19)	N
VP28	N56 at Main Street Glenties	6.4km (T19)	N

VP29	R261 Portnoo Road at Ardara	14.1km (T18)	NW

Figure 13-10: Map of Viewpoint Locations

13.4 POTENTIAL IMPACTS

Based on the assessment criteria employed herein, potential significant impacts are considered most likely to occur in instances where highly sensitive landscape and visual receptors coincide with high order landscape and visual effects (see descriptions Table 13-1, Table 13-2 and Table 13-4). From Macro Works previous experience of this type of development in a rural / transitional setting, it is considered that potentially significant landscape and visual impacts have the potential to occur in the following ways:

Landscape Impacts

a) Irreversible physical effects on sensitive landscape features

b) Disruption of sensitive land cover and/or land use patterns

c) Substantial and incongruous change to areas of sensitive landscape character

Visual Impacts

a) A sense of spatial dominance as seen from highly sensitive receptor locations. This is most likely to occur within 3km of the proposed project.

b) Visual clutter and ambiguity as seen from highly sensitive receptor locations. This can occur at any distance but tends to occur beyond 2-3km as turbines become stacked in perspective and a more two-dimensional layout is perceived.

c) A combination of both of the above effects.

From baseline studies and early-stage assessments specific to the proposed project, some of the most susceptible physical landscape receptors are considered to be the Gweebarra River corridor and estuary, the rugged and highly scenic coastline in the wider western half of the study area, and the elevated remote upland areas within the wider northern and eastern half of the study area. Whilst there is some localised sensitivity associated with the upland areas that contain the site and study area, these are not considered to be as highly sensitive as the more remote uplands in the wider study area as they are heavily influenced by anthropogenic land uses, including extensive areas of commercial conifer forestry, overhead electricity cable corridors, and major route corridors such as the N56 and regional road networks.

In this instance, the most sensitive visual receptors are the local residential receptors located north of the site along the L7183 local road on the south-facing slopes of the Gweebarra River valley. The primary aspect of views from many of these dwellings is to the south in the direction of the proposed project site. The central and wider study area also encompasses numerous scenic view designations (identified in the current Donegal County Development Plan), whilst other sensitive receptors within the central study and wider study area include the Wild Atlantic Way scenic driving route and the Donegal Way, and numerous other recreational trails in the wider study area that present with a high degree of scenic and recreational amenity.

13.5 MITIGATION MEASURES

Given the highly visible nature of commercial wind energy developments it is not generally feasible to screen them from view using on-site measures as would be the primary form of mitigation for many other types of development. Instead, landscape and visual mitigation for wind farms must be incorporated into the early-stage site selection and design phases.

In this instance, the two main forms of landscape and visual mitigation employed were:

- Mitigation by avoidance and design
- Buffering of Residential Receptors

13.5.1 Mitigation by Avoidance and Design

The principal mitigation measure in this instance was the siting of the proposed project in a relatively discrete contained valley, offset from some of Donegal's most sensitive landscape areas, such as the distinctive coastline and some of its most elevated uplands. In this regard, the proposed wind farm was sited within a contained valley context that has the potential to heavily diminish the proposed turbines' visual influence over the more sensitive areas of wider Donegal. In addition, the site of the proposed wind farm is a modified part of Donegal's

landscape that comprises extensive conifer forest plantations and existing overhead cable infrastructure and, thus, will not contribute to a fundamental change in the character of this landscape area.

Macro Works have been involved with the proposed project since 2020, when early-stage constraints studies took place to assess the potential impacts of the full scale and extent of the proposed wind farm project. Several early stage layouts were presented, and initial wireframe montages were generated to understand the potential visual impact of the proposed project at the nearest and most sensitive receptors. Some of the initial layouts presented included up to 27 turbines and extended c. 7km in length along the rolling lands south of the Gweebarra River corridor (see Figure 13-11 below). Some of the principal mitigation by design measures employed relating to landscape and visual impacts at this early stage are outlined below;

- Reduce scale and extent of the proposed wind farm project.
- Remove the proposed turbines from the highly sensitive and susceptible EHSA designation along the Gweebarra River corridor and along the most elevated southern parts of the site.
- Remove/relocate the proposed turbines visible to the south of Cleengort Hill. These turbines have the potential to generate negative aesthetic impacts, especially from the Gweebarra Bridge designated scenic view.
- Remove turbines from the immediate context of Gweebarra River Valley and offset the proposed project further from the Gweebarra Bridge designated view to reduce its visual presence.

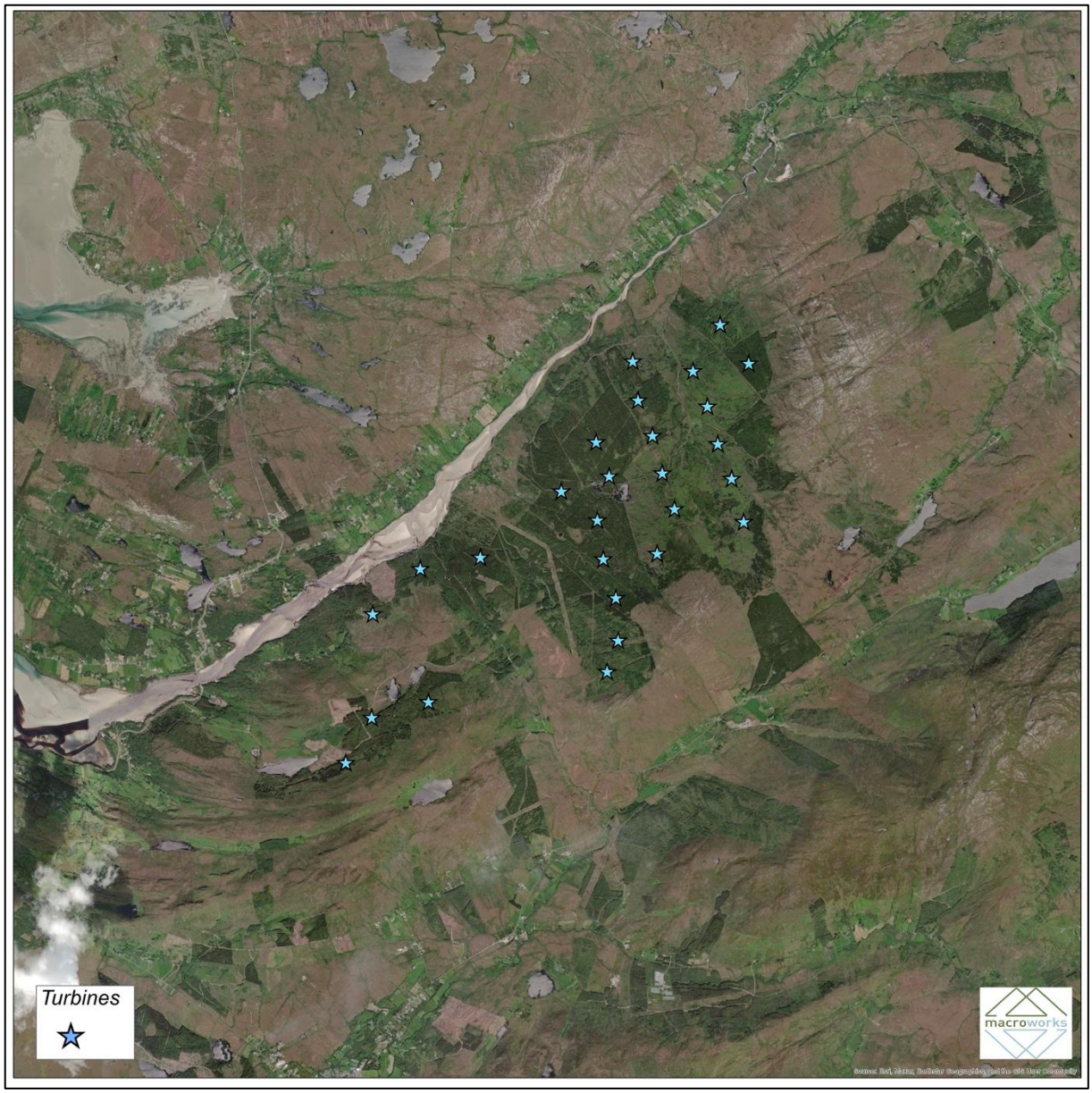

Figure 13-11: Early stage 27 turbine layout stretching over c. 7km

A series of design refinements resulted in DI1, a more consolidated layout that was notably reduced in scale and extent comprising of 23 turbines. This layout also removed the proposed turbines from the EHSA designation along the Gweebarra River and along the upland ridge in the eastern/south-eastern extents of the site. The removal of turbines from the most elevated parts of the site generated a reduction in the visual presence and potential for visibility of the turbine along the neighbouring valley to the west. Nonetheless, whilst the removal of turbines from the EHSA designation along the Gweebarra River corridor was viewed as a positive step, the proposed turbines were still visible in the immediate context of the river corridor and had the potential to notably detract from its naturalistic character and qualities.

Figure 13-12: DI1 Layout comprising 23 turbines

At DI2 stage, some further notable design refinements were included to further reduce the proposed projects' visual presence at the local receptors north of the Gweebarra River along the L1783 local road. These residential receptors were deemed some of the most sensitive visual receptors in respect of the proposed project, as most are afforded broad views across the Gweebarra River valley in the direction of the proposed project site. Due to the relatively broad scale of the project, additional turbine offsets from residential dwellings to the north of the Gweebarra River were deemed necessary to eliminate the potential for significant visual impacts. The updated layout reduced the lateral extent of the proposed project by nearly 50% compared to some of the early-stage layouts and was almost entirely contained within the conifer forestry that cloaked much of the northern parts of the proposed site. The turbines in the south-western extents of the site were removed, which further reduced the visual presence of the proposed project from the sensitive Gweebarra Bridge scenic view and from the central parts of the dispersed settlement of Lettermacaward. These design refinements also reduced the visual presence of the proposed turbines from the nearest sections of the Wild Atlantic Way route (N56) to the site and from some isolated local residential dwellings located in the townland of Derryloaghan south of the Gweebarra River corridor.

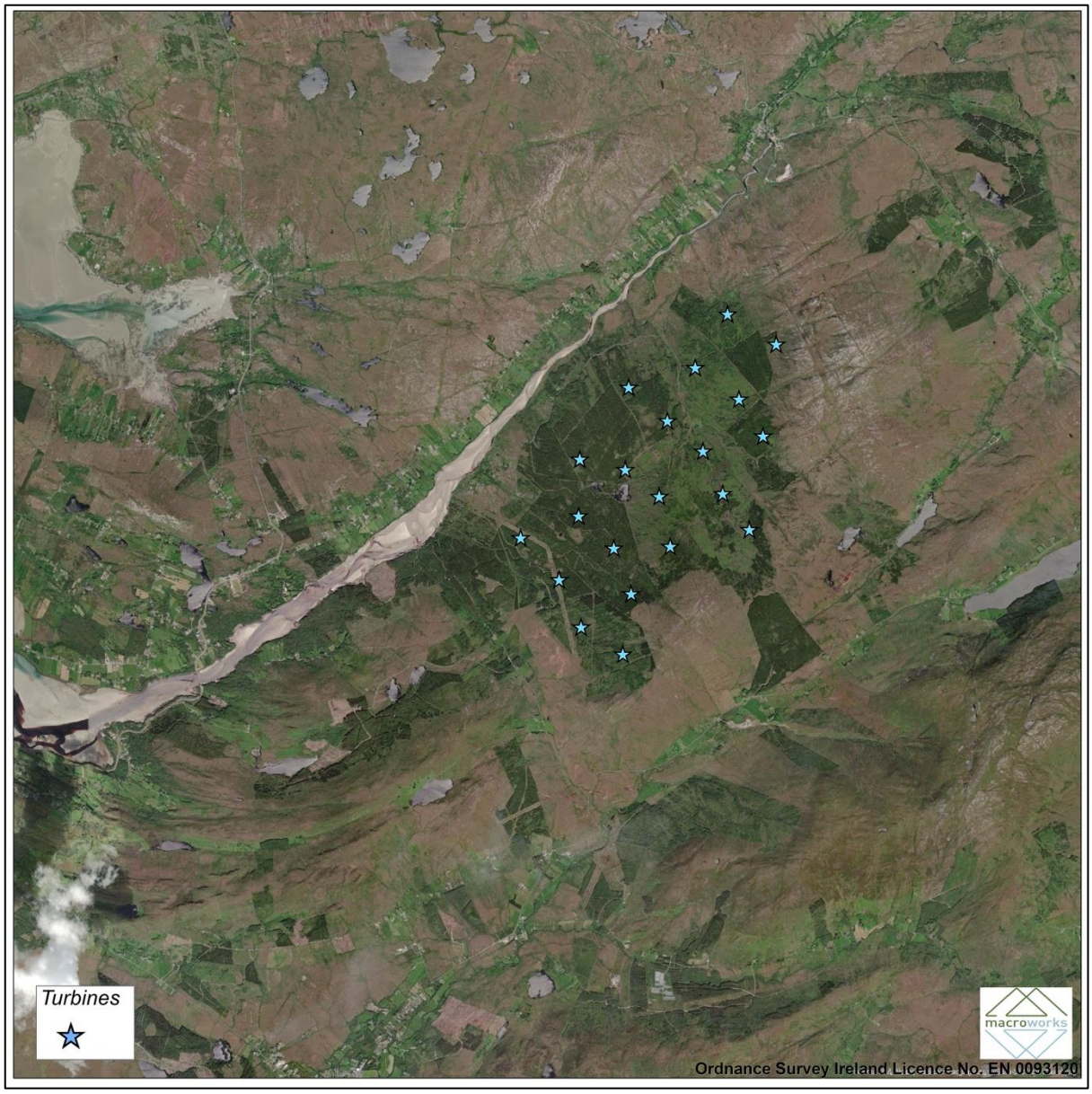

Figure 13-13: DI2 layout comprising 21 turbines

A subsequent and final turbine layout with additional offsets from residential dwellings north of the Gweebarra River was generated and comprised 19 turbines (refer to Figure 13-14 below). The nearest residential receptors on the north-western banks of the Gweebarra River are c. 1.4km from the nearest turbines, which is considerably more than the Wind Energy Development Guidelines (draft revised 2019) 'Setback' distance of 800m for the proposed turbines. A staggered turbine layout was also implemented to reduce the potential for any strong negative aesthetic effects at the nearest local receptors, such as visually stacked turbines generating a sense of visual clutter. In comparison to the early-stage initial turbine layouts, the final refined layout represents a much more site specific response to the landscape and visual receptors within the immediate study area.

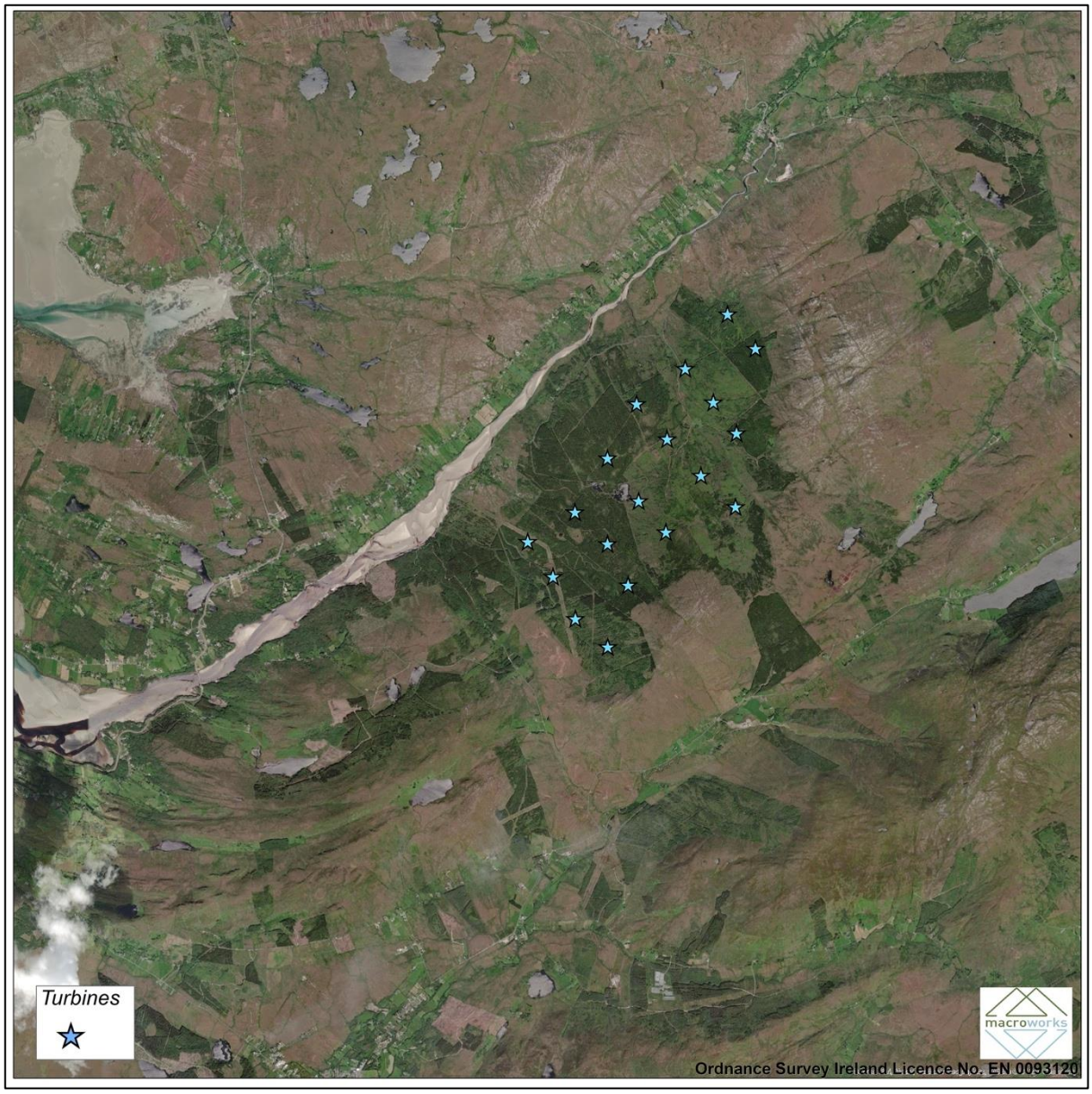

Figure 13-14: DI3 layout comprising 19 turbines

13.5.2 Buffering of Residential Receptors

For the proposed project, the minimum distance of any turbine from the nearest residential receptor is 925m (approximately 880m from the curtilage of the property), which is in excess of the draft Wind Energy Development Guidelines (2019) minimum set back of 500m and greater than the setback distance of 4 times the tip height of the proposed turbines. In this instance the setback distance for visual amenity purposes would be 800m from residential receptors on the basis of the 200m high turbines (this represents the greatest potential setback distance with regard to all potential turbines ranges). As noted above, due to the orientation and elevated nature of the nearest dwelling receptors on the south-facing sloping hills north of the Gweebarra River corridor, additional turbine offsets were considered necessary to reduce the visual presence of the turbines. The nearest turbine to dwellings on the north-western side of the Gweebarra River is c. 1.4km.

Variation in residential buffer distances within the nearest kilometre has a much more noticeable effect on perceived turbine scale than when it occurs in the context of more distant

views. This is due to the law of perspective – that doubling the distance to an object halves its perceived height. The reduction factor is even more pronounced when considered in the context of the 'swept area' of turbine blades and not just their tip height. This exponential 'scale in relation to distance scenario is illustrated in figure 13-15 below.

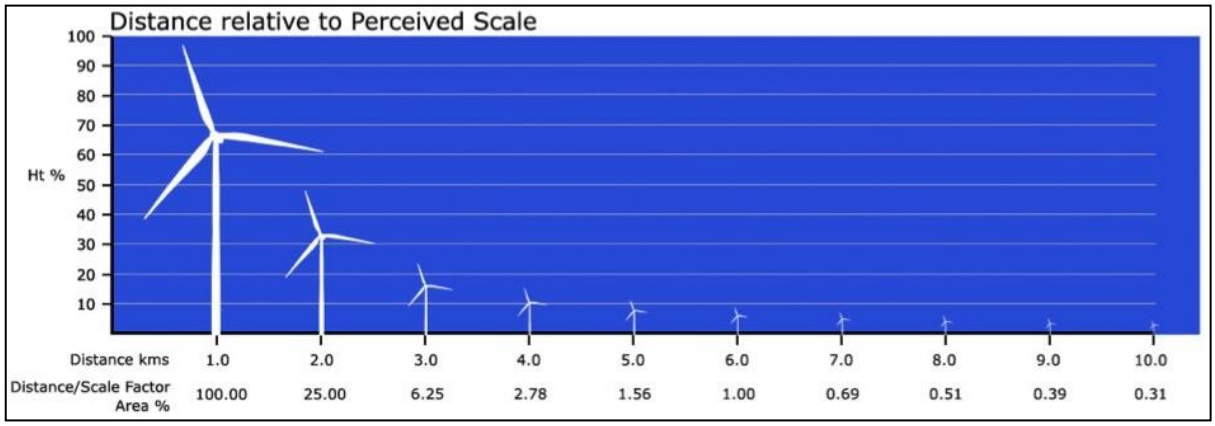

Figure 13-15: Turbine 'scale in relation to distance' relationship

13.6 LANDSCAPE EFFECTS

13.6.1 Landscape Character, Value and Sensitivity

Effects on landscape character will be considered at both the localised scale of the site and its immediately surrounding landscape as well as the broader scale of the Study Area.

Central Study Area (<c.5km from the nearest turbine)

Whilst there is some localised sense of the naturalistic in the immediate Gweedore River environs, the sloping valley terrain that contains the site is cloaked in extensive commercial conifer forest plantations and traversed by corridors of overhead electricity lines and has a notable utilitarian character despite its low population density (see Figure 13-2 and Figure 13-3). The terrain of the central study area represents a transitional part of Donegal's landscape, where the rugged coastal areas begin to transition to the more remote elevated uplands further inland from the coastline. The central study area is heavily influenced by the landforms and landscape features associated with the Gweebarra River corridor and estuary. The proposed turbines are located along the southern extents of the Gweebarra River Valley on sloping terrain cloaked in extensive commercial conifer forest plantations. The southern flank of the Gweebarra River valley within the study area generates a much stronger sense of enclosure than the terrain on the northern side of the valleys as its rises to a max elevation of c. 385m (Croaghleheen Hill). A broad ridge comprising various hilltops summits contains the valley to the south, whilst the lower hills of Croaghleconnell and Galwolie Hill contain the northern extents of the valley context.

Further north of the Gweebarra River valley, the terrain begins to level out and comprises a low rolling plateau intersected by small streams and numerous inland lakes. In contrast, in the eastern, southern and south-western parts of the central study area, the terrain comprises rugged elevated ridges and hilltops and the distinctive Finntown Valley, which is overlooked to the south by Aghla and Scriags Mountains. Lough Finn is the largest inland waterbody within the central study areas and is over four kilometres long. The landscape surrounding Lough Finn and in the southern extents of the central study area is highly distinctive and dramatic and presents a strong degree of scenic amenity.

The land cover of the central study area is varied but principally comprises more typical upland land uses such as large-scale commercial conifer forests and broad areas of mountain moorland intersected by rocky outcrops. Further highlighting the transitional nature of the study area, small linear areas of pastoral farmland tend to occupy the corridors of local and regional roads in the study area along less elevated parts of the study area, whilst the dispersed rural Gaeltacht settlements of Lettermacaward and Doocary are located along the corridor of the Gweedore River. The scenic Gaeltacht settlement of Finntown is also located on the southeast periphery of the central study area and is mainly focused around the northern banks of the lake. Despite the remote nature of some parts of the study area, several highly anthropogenic landscape features also influence the landscape character of the central study area. For example, vast commercial conifer plantations cloak a considerable section of the terrain on the southern flank of the Gweedore River valley in the central study area, whilst corridors of 110kV overhead electricity cables and their associated steel pylon structures intersect the site and surrounding landscape context. In addition, the Lettermacaward Water Treatment Plant and the N56 national secondary route are also located in the western half of the central study area.

The principle landscape character area that contains the site and much of the central study area is 'LCA 30 – Finntown Valley', which is "*a distinctive inland LCA defined by a chain of mountains in the North West and framed by Aghla and Screig Mountains along the south east*". The LCA comprises a varied mix of landscape types including '0-200m Atlantic Blanket Bog', 'Forest/Woodland' and '200-300m Highland Blanket Bog' and includes a section of Seascape Unit 12 in the surrounds of the Gweebarra River Estuary. Numerous other LCAs are located within the periphery of the central study area and include 'LCA 28 – The Rosses, Knock & Lochan, Islands & Coast', 'LCA – Derryveagh Mountains', 'LCA 38 – Bluestack' and 'LCA 30 – Ardara Bays & Coast An Gaeltacht' and further reinforce the transitional nature of this landscape context.

The site of the proposed project is predominately contained within a 'Moderate Scenic Amenity' (MSA) designation – the lowest of three scenic amenity classifications within the current CDP. Nonetheless, an 'Especially High Scenic Amenity' (EHSA) designation occurs along the northern and western boundary of the site and principally relates to the corridor of the Gweebarra River, whilst an EHSA designation occurs along the eastern and southern periphery of the site and is associated with the upland ridge that contains the Gweebarra River valley to the south. In addition, three protected view designations are also located within the central study area. Two of these are located in the surrounds of the settlements of Doochary and Fintown (scenic views 6 and 10 – see Figure 13-9) and are oriented in the opposite direction to the proposed project, whilst another scenic designation is located at the Gweebarra Bridge (scenic view 9 – see Figure 13-9) to the west of the site and is oriented in the direction of the proposed project. Several ecological designations, which include a number of Nature 2000 sites, are also located within the central study area. This indicates landscape ecology value and areas where a sense of the naturalistic is likely to be stronger.

The is also strong landscape values associated with tourism and recreational amenity within the central study area due to the near distance of the site to the coastal environs of Donegal. The Wild Atlantic Way is a prominent tourism feature within Donegal and the west coast of Ireland, and traverses the western extents of the central study area. The Eurovelo cycling route and Dongeal Cycle route also pass along the N56 to the west of the site and afford views across the rugged coastline and out to sea, whilst a section of the Donegal Way traverses the rolling terrain east and north of the site. This part of Donegal also has a rich cultural heritage as much of the central study area forms part of Donegal's Gaeltacht, which has strong associations with Irish culture and the image of 'old Ireland'.

While the central study area comprises some highly susceptible landscape areas and features such as Lough Finn and its surrounding landscape and the corridor of the Gweebarra River, this is a highly transitional and complex landscape with similar varied values and sensitivities. On balance of the reasons outlined above, the central study area is considered to have an overriding **Medium** landscape sensitivity due to its working transitional character, albeit some localised parts of the central study area are much more susceptible to change and are considered to have High and even Very High landscape sensitivity.

Wider Study Area (c.5-20km)

Whilst the landscape of some of the wider study area is similar with regard to its transitional nature, it can generally be divided into two areas; the coastline and the uplands. These are highly distinctive, diverse and unique parts of Donegal and possess a wider array of localised sensitivities and landscape values. This is identified within the Donegal County Development Plan, where almost the entirety of the immediate coastline in Donegal and a large extent of the uplands in the wider study area are identified with an EHSA designation.

The coastline of Donegal is renowned nationally and internationally for its rugged cliffs, coastal inlets, golden beaches and numerous islands. It encompasses the Wild Atlantic Way tourist driving route, various cycling trails and walking routes and numerous coastal villages that have strong tourism values. These coastal areas are typically the most settled parts of the study area and have a strong association with 'old Ireland' as they are primarily Gaeltacht areas with a strong historical and cultural significance and are often be described as the beating heart of Irish culture. The largest settlements within the wider northwest quadrant of the study area include Dungloe, whilst the populous Gaeltacht area of Gweedore is located along the northwest periphery of the study area. The coastline throughout the western half of the study area is a haven for outdoor recreational activities, amenity and heritage features and broad sweeping views across the rugged coastline and seascape.

Further inland to the east, the upland areas, including the Derryveagh Mountains, Glendowan Mountains and Bluestack Mountains, are the principal landscape features of the wider eastern half of the study area and possess similar scenic and recreational values as the coastal parts of the study area. The eastern half of the study area and many of the most elevated mountainous regions encompass some of the largest blocks of EHSA designations in County Donegal. These remote parts of the study area also possess a notable sense of tranquillity and the naturalistic and have very low population densities. The elevated uplands are intersected by broad river valleys and an array of lakes, the largest of which include Lough Nacung and Dunlewy Lough in the northeast quadrant of the study area, whilst the Lough Eske is located along the southwest periphery of the 20km study area. Due to the highly scenic and varied nature of this landscape area, the eastern half of the study area is littered with walking and hiking trails, the most prominent of which include sections of the Donegal Way and the Bluestacks Way. The northeast quadrant of the study area also encompasses Glenveagh National Park, where dramatic views across lakes backdropped by steep upland cliffs and rolling ridges contained in mountain moorland are often afforded. One of the most prominent landscape features within the study area and in the wider Donegal context is Mount Errigal, which creates a dramatic skyline when viewed from the surrounding landscape.

The highly scenic nature of the wider study area is further reflected within the Donegal County Development Plan, where a variety of designated scenic views are located throughout remote uplands and along the immediate coastline.

Nonetheless, whilst the wider study area possesses numerous highly susceptible landscape areas and features, it is also heavily influenced by numerous highly anthropogenic land uses

and features. The wider study area encompasses a high degree of existing wind energy development, the nearest of which is located along a coastal plateau some 9km southwest of the site. A large majority of the wind energy development within the wider study area is situated in its southern half, where wind energy development is a characteristic feature of upland areas in the surrounds of the Bluestacks Mountains. Working land uses such as pastoral farmland, and commercial forest plantations are also prominent throughout the wider study area. Much of these agricultural lands are located in transitional or lowland areas adjacent to the coastline or along river corridors. The N56 national secondary route, in addition to a network of regional roads, also traverse the wider study area, connecting the small to medium-sized settlements in the wider landscape.

For the reasons outlined above, it is considered the wider study area is richly diverse in terms of its landscape values and sensitivities. Whilst some typical rural landscape values are evident, the landscape of the wider study area is considered to have considerable susceptible landscape values relating to recreation and heritage, scenic amenity, tourism and the naturalistic. As a result, the landscape sensitivity of the wider study area is generally considered to be **High**, with occasional areas of lower sensitivity, especially in the less remarkable and more typical low rolling landscape settings in the near vicinity of some of the larger settlements where there is a more notable human influence.

13.6.2 Magnitude of Landscape Impacts

The physical landscape as well as the character of the proposed project and its central study area (<5km) is affected by the proposed wind turbines as well as ancillary development such as access and circulation roads, areas of hard standing for the turbines, grid connection, works along the TDR route and the substation compound. By contrast, for the wider landscape of the study area, landscape impacts relate exclusively to the influence of the proposed turbines on landscape character. The aspects of the proposed project that are likely to have an impact on the physical landscape and landscape character are described in Chapter 2 (Description of Proposed Project) with construction processes described in the Construction and Environmental Management Plan (CEMP) in Appendix 2-2.

13.6.2.1 Construction Stage Effects on the Physical Landscape

It is considered that the proposed wind farm project will have a modest physical impact on the landscape within the site as none of the proposed project features have a large 'footprint' and land disturbance/vegetation clearing will be relatively limited. The topography and land cover of the proposed site will remain largely unaltered with construction being limited to tracks, areas of hard standing for the turbines, the on-site substation compound, temporary site construction compound, proposed met mast, works along the TDR route and grid connection. Excavations will tie into existing ground levels and will be the minimum required for efficient working. Any temporary excavations or stockpiles of material will be re-graded to marry into existing site levels and reseeded appropriately in conjunction with advice from the project ecologist.

The finalised internal road layout has been designed to avoid environmental constraints, and every effort has been made to minimise the length of necessary roadway by utilising and upgrading existing tracks. Furthermore, the road layout has been designed to follow the natural contours of the land wherever possible reducing potential for areas of excessive 'cut and fill'. There will be an intensity of construction stage activity associated with the access tracks and turbine hardstands consisting of the movement of heavy machinery and materials, but this will be temporary/short term in duration and transient in location. There will also be construction stage landscape effects along the surrounding road networks, which relate to the

improvements and temporary modifications to sections of the R262 and N56 routes to facilitate turbine deliveries. The construction stage effects on landscape character from these familiar and dispersed surface activities will be minor.

There will be one 110kV on-site substation compound constructed to collect the generated power from the proposed project. The 110kV on-site substation will be located in an area of existing conifer woodland, which will be cleared to facilitate the full footprint of the proposed substation development. The dimensions of the proposed substation compound will be up to 202m in length by 125m in width and will comprise one control building with a pitched roof and will have a concrete render finish (18m x 25m and 8.3m in height) and electrical components necessary to export generated power from the wind to the transmission system. A second smaller switchgear building will also be constructed within the substation compound, whilst the compound of the proposed substation will be surrounded by steel palisade fencing which will be approximately 2.6m in height. The most notable construction stage landscape impacts resulting from the proposed on-site substation relate to the construction of concrete foundations to facilitate that substation building. Overall, these construction stage effects are relatively minor and compare to the construction of an industrial farm shed.

All internal site cabling will be underground and will be run in cable ducts up to 1.5 metres below the ground surface within the proposed internal roads and/or their verges. Indeed, the land cover of the site will only be interrupted as necessary to build the structures of the proposed wind farm and to provide access. Impacts from land disturbance and vegetation loss at the site are considered to be modest in the context of this broad landscape setting which is cloaked in extensive areas of conifer forest. As part of the proposed project, there will be a requirement to fell some of this forestry in the areas immediately around the footprint of the wind farm infrastructure. The total area of forestry to be felled is estimated to be between approximately 69.8ha and 90.9ha, of which approximately 12.6ha will be replanted on site at the end of the construction phase (at the temporary construction compounds and reinstated borrow pits). As a commercial crop, this forestry is scheduled to be felled in the future regardless of the proposed wind farm being constructed or not. Whilst the removal of small areas of forestry will generate some landscape impacts, these are not considered to be significant. All forestry that is removed will be subject to forest replanting provisions.

One permanent meteorological (Met) masts will be erected on site and will comprise of a 100m high lattice steel mast with a shallow concrete foundation. The proposed mast will be a slender, free-standing structure and will be constructed on a hardstanding area of approx. 25m x 25m. The most notable construction stage effects here relate to the minor amount of ground excavation required to facilitate the shallow foundations for the steel mast structures.

Site activity will be at its greatest during the construction phase due to the operation of machinery on site and movement of heavy vehicles to and from site. This phase will have a more significant impact on the character of the site than the operational phase, but it is a 'short-term' impact that will cease as soon as the proposed project is constructed and becomes operational (approximately 24 months from the commencement of construction).

There will be some long term/permanent construction stage effects on the physical landscape in the form of turbine foundations and hardstands, access tracks and a substation, but only the on-site substation and grid connection is likely to remain in perpetuity as part of the national grid network. It is likely that with the exception of some residually useful access tracks, all other development features will be removed from the project site, and it will be reinstated to upland heath and forestry use upon decommissioning. Thus, the construction stage landscape effects of the proposed project are largely reversible.

Overall, the magnitude of construction stage landscape impacts within the site and its immediately surrounding context is deemed to be **High-medium** and of a **Negative** quality, but of a **Short-term** duration.

13.6.2.2 Operational Stage Effects on Landscape Character

For most commercial wind energy developments, the greatest potential for landscape impacts to occur is as a result of the change in character of the immediate area due to the introduction of tall structures with moving components. Thus, wind turbines that may not have been a characteristic feature of the area become a new defining element of that landscape character. In this instance, wind turbines are a relatively unfamiliar feature within the central study area, albeit, wind energy development is a characteristic feature of the wider study area and is synonymous with the landscape of Donegal. County Donegal currently contains the highest number of wind farms within the Republic of Ireland. There are over 10 existing wind farm developments within the wider study area, the nearest of which is situated c.4.5km southwest of the site along a broad plateau contained in extensive areas of moorland in the townland of Loughderryduff. Thus, whilst the proposed wind farm represents a new form of development within the central study area, on a broader scale, it represents the intensification of an established land use in this part of Donegal.

In terms of scale and function, the proposed wind farm is well assimilated within the context of the central study area. This is due to the broad scale of the landform, landscape elements and land use patterns. These attributes prevent the proposed turbine height and overall wind farm extent from causing the type of scale conflict that can occur in more intricate landscape areas. Whilst there is some localised sense of the naturalistic in the immediate Gweedore River environs, the plateau terrace that contains the site is cloaked in extensive commercial conifer forest plantations, is traversed by corridors of overhead electricity lines and has a notable utilitarian character despite its low population density. Although the proposed project represents a stronger human presence and an increased level of built development than currently exists on the site, it will not detract significantly from the upland productive character of this transitional setting.

It is important to note that in terms of duration, this development proposal represents a long term, but not permanent impact on the landscape and is reversible. The lifespan of the project is 35 years, after which time it will be substantially dismantled and the landscape reinstated to prevailing conditions. Within 2-3 years of decommissioning there will be little evidence that a wind farm ever existed on the site, albeit the proposed on-site substation and grid connection will remain in perpetuity as part of the national grid infrastructure, in addition to residually useful access tracks.

In summary, there will be physical impacts on the land cover of the site as a result of the proposed project during the operational phase, but these will be relatively minor in the context of this transitional working landscape that comprises extensive areas of commercial conifer forestry and overhead electricity infrastructure. The scale of the proposed project will be well assimilated within its landscape context without undue conflicts of scale with underlying land form and land use patterns. For these reasons the magnitude of the landscape impact is deemed to be **Medium** within the Central Study Area. Beyond 5km from the site, the magnitude of landscape impact is deemed to reduce to **Low** and **Negligible** at increasing distances as the wind farm becomes a proportionately smaller component of the overall landscape fabric.

13.6.2.3 Decommissioning and Restoration Stage Effects on Landscape Character

The decommissioning phase will have similar temporary impacts as the construction phase with the movement of large turbine components away from the site. There may be a minor loss of roadside and trackside vegetation that has grown during the operation phase of the project, but this can be reinstated upon completion of decommissioning. Areas of hard standing that are of no further use will be reinstated to blend with the prevailing surrounding land cover of the time. It is expected that the decommissioning phase would be completed within a period of approximately 6 months.

Overall, the magnitude of decommissioning stage landscape impacts within the site and its immediately surrounding context is deemed to be **High-medium** and of a **Negative** quality, but of a **Short-term** duration.

13.6.2.4 Significance of Potential Landscape Impacts

The significance of landscape impacts is a function of landscape sensitivity weighed against the magnitude of landscape impact. This is derived from the significance matrix (Table 13-3) used in combination with professional judgement.

Based on a Medium sensitivity judgement and a High-medium magnitude of construction and decommissioning stage landscape impact, the significance of impact is considered to be **Substantial-moderate / Negative / Short-term** within and immediately around the site during construction and decommissioning, but reducing quickly with distance and broader context.

Based on a Medium sensitivity judgement and a Medium magnitude of operational stage landscape impact, the significance of impact is considered to be **Moderate / Negative / Long-term** within and immediately around the site. Thereafter, significance will reduce to Slight and Imperceptible at increasing distances as the development becomes a progressively smaller component of the wider landscape fabric even in the context of higher sensitivity landscape units / features.

13.7 RESIDUAL VISUAL EFFECTS

Table 13-7 below summarises the full textual assessment of visual effects for each Viewshed Reference Point (VRP) contained in Appendix 13.1. Whilst the 'receptor sensitivity analysis table' and full textual assessment for each VRP is normally contained within the landscape and visual chapter, in this instance, given the considerable number of VRPs, it is considered more prudent to place this material in a separate appendix and focus herein on the significance of the findings. The left hand side of the table incorporates statistical data associated with the view of turbines, whilst the right hand side contains professional judgements in respect of the view. It is important to note that the professional judgements are based on the effects experienced in relation to the view and are not directly influenced by the statistical data. These aspects are only combined within Table 13-7 in order to identify patterns of effect to better inform the conclusions of this assessment.

Table 13-7: Summary of Visual Effects at Viewshed Reference Points (VRP's)

VRP No.	Distance to nearest turbine km	Visual receptor Sensitivity (see appendix 13.1)	Visual Impact Magnitude	Significance of Visual effect
VP1	13.2km (T1)	High-medium	Negligible	Imperceptible
VP2	12.5km (T1)	High	Low-negligible	Moderate-Slight
VP3	12.1km (T1)	Medium	Low-negligible	Slight-imperceptible
VP4	7.5km (T1)	Medium	Low-negligible	Slight-Imperceptible
VP5	2.6km (T1)	High-medium	Medium	Moderate
VP6	2.2km (T1)	High-medium	Medium-low	Moderate-Slight
VP7	1.6km (T1)	Medium	High-medium	Substantial-Moderate
VP8	5.4km (T16)	Medium	Medium-low	Moderate-Slight
VP9	1.5km (T3)	Medium	High-medium	Substantial-Moderate
VP10	733m (T3)	Medium	High	Substantial-Moderate
VP11	1.6km (T10)	Medium	High-medium	Substation-Moderate
VP12	3.6km (T16)	Medium	Medium	Moderate
VP13	937m (T13)	Medium	Medium	Moderate
VP14	6.4km (T2)	High-medium	Low-negligible	Slight-Imperceptible
VP15	1.9km (T16)	Medium	High-medium	Substantial-moderate
VP16	3.7km (T16)	Medium	Medium	Moderate
VP17	6.0km (T16)	High-medium	Negligible	Imperceptible
VP18	4.8km (T16)	Medium	Medium-low	Moderate-slight
VP19	1.0km (T18)	Medium-low	High-medium	Moderate
VP20	4.4km (T16)	High-medium	Medium	Moderate
VP21	13.8km (T16)	High-medium	Low	Slight
VP22	12.1km (T19)	High-medium	High-Medium	Substantial-Moderate
VP23	2.3km (T9)	Medium	Low	Slight
VP24	7.5km (T16)	High-medium	Medium-low	Moderate-Slight
VP25	1.7km (T19)	Medium	Low	Slight
VP26	3.9km (T19)	Medium	Low	Slight
VP27	5.8km (T19)	Medium	Low-negligible	Slight-Imperceptible
VP28	6.4km (T19)	Medium	Negligible	Imperceptible
VP29	14.1km (T18)	Medium-low	Negligible	Imperceptible

13.7.1 Impacts on Designated Views

Due to the highly scenic nature of Donegal's landscape, several scenic view designations are located within the study area. Nonetheless, many of these views are typically oriented across the coastline or toward some of the more distinctive landscape features in the study area, such as the uplands, river corridors and lakes. Views representative of scenic designations within the study area include VP1, VP2, VP5, VP20, VP21 and VP24. Only two of these scenic view designations are located within the central study area, one of which is oriented in the opposite direction to the proposed project.

The nearest and most relevant scenic designation to the proposed wind farm is the Gweebarra Bridge protected view, located some 4.4km west of the site and is represented by VP20. The scenic designation encompasses views east and west from the Gwebarra Bridge across the Gweebarra River corridor, estuary and surrounding rolling landscape. The proposed turbines are viewed to the east and will be visible some 4.4km upstream to the south of the river corridor. Nonetheless, the proposed turbines will not have a highly prominent visual presence from this scenic view designation, and furthermore, wind turbines are partially visible in the distance in the western aspect of this scenic designation. Thus, this scenic view is already influenced by views of wind energy development, and therefore the proposed turbine will not appear as new and uncharacteristic features. Whilst the proposed turbines are likely to catch the eye of the casual observer in this view, they will not contribute to a strong detraction in scenic amenity from this scenic view designation. A similar scenic designation is located to the south of the Gweebarra River Estuary and affords views across the wider coastline out to sea. This scenic designation is represented by VP24 and is located some 7.6km from the proposed turbines. It is important to note that this scenic designation relates to views to the northwest, in the opposite direction to the proposed project. Nonetheless, a similar view of the proposed turbines to VP20 will be afforded from this elevated location, albeit the visual presence of the proposed turbines is notably reduced here due to the greater viewing distances. It is not considered that significant visual impacts will occur at either viewpoint VP20 or VP24, and instead, the visual impact significance was deemed Moderate at VP20 and Moderate-slight at VP24, which is principally driven by the sensitivity of these sensitive visual receptors.

In similar circumstances to VP24, VP5 is representative of a scenic view designation where the protected view is oriented in the opposite direction to the proposed wind farm project. VP5 is located at an elevated scenic viewing point along the R252 regional road north of Doochary that affords broad sweeping panoramic views to the east across the Gweebarra River valley towards distant upland rolling rugged terrain (see Figure 13-16 below). The proposed turbines will be visible at a notable scale to the south and will be a prominent feature of the southerly and south-westerly view, albeit they will only occupy a visual envelope of approximately 20 degrees in this sweeping panoramic view. The proposed turbines present in a legible manner, do not intrude on the main aspect of scenic amenity and do not appear overscaled or inappropriate in this landscape that comprises broad landscape features and land use patterns. As a result, the proposed wind farm will not generate significant visual impacts at this scenic designation, and instead, the visual impact significance was deemed Moderate.

Figure 13-16: Views afforded to the east from VP5 – orientation of Donegal CDP scenic designation.

A cluster of designated scenic views is also located in the northeast quadrant of the wider study area, where distant views of the proposed project will be afforded. VP2 represents the designated scenic views along the R252 regional road northeast of Lough Barra. A highly scenic elevated view is channelled along the broad valley that contains Lough Barra and the Owenwee River. The proposed turbines are partially visible, rotating along a distant ridge some 12km

from this scenic designation. Whilst the proposed project will increase the intensity of built development in this remote setting that comprises few other forms of built development, the proposed turbines will not generate a significant visual impact due to the considerable viewing distances involved. The significance of visual impact was deemed Moderate-slight at this visual receptor, which is heavily influenced by the high sensitivity of this visual receptor as opposed to the visual impact magnitude, which was deemed Low-negligible.

Other scenic designations in the wider study area that afford views of the proposed wind farm include VP21. The scenic designation here relates to views to the north towards Inishkeel Island and the surrounding coastline, whereas the proposed wind farm is visible in the distance to the west. Whilst a clear view of the proposed wind farm will be afforded from here, the proposed turbines will present as distant background features, and thus, the significance of visual impact was deemed Slight.

13.7.2 Impacts on Local Community Views

Local Community views are considered to be those experienced by people who live, work and move around the area within approximately 5km of the site. These are generally the people that are most likely to have their visual amenity affected by a wind energy proposal due to proximity to the turbines, a greater potential to view turbines in various directions, or having turbines as a familiar feature of their daily views.

Over 15 of the representative viewpoints (VP6, VP7, VP8, VP9, VP10, VP11, VP12, VP13, VP15, VP16, VP19, VP22, VP23, VP25 & VP26) were chosen to represent the local community as they were deemed to be some of the most sensitive visual receptors in relation to the proposed project. It is important to note that some of these views were also selected to represent centres of population, amenity and heritage views and major route receptors. Of the 15 local community views, 13 of these were designated with a visual receptor sensitivity of either Medium-low or Medium, whilst the remaining two views were classified with a High-medium receptor sensitivity. Those views with higher receptors sensitivity classifications typically relate to elevated views or views from highly scenic areas such as the immediate corridor of the Gweebarra River. Of the 15 views, the highest significance of visual impact was 'Substantial-Moderate', which typically relates to views in the immediate vicinity of the proposed project or views from the residential receptors along the L1783 local road north of the Gweebarra River.

Viewpoints VP7, VP9, VP10, VP11, VP15 and VP22 were all classified with a visual impact significance of 'Substantial-Moderate'. The nearest of these views to the proposed turbines is VP10, which is situated just over 700m, slightly downslope from the nearest turbine. Whilst the turbines will present in a highly-dominant manner from this near distance, they do not generate any strong sense of overbearing, nor do they appear over-scaled. This is principally a consequence of the broad-scale landscape features and extensive areas of commercial conifer forestry, which are the predominant land use here. Despite their scale, the proposed turbines are viewed in a highly legible manner and do not appear out of place in this working transitional landscape context.

In contrast to VP10, VP22 affords a slightly downhill view of the proposed wind farm. Whilst the turbines have a dominant visual presence in this elevated view, they present with a strong sense of visual permeability and do not block the distant views of the rolling uplands in the background. Viewpoints VP7, VP9, VP11 and VP15 represent local residential receptors north of the Gweebarra River corridor. Broad panoramic views are typically afforded from residential receptors along the L1783 local road. The proposed turbines will be clearly visible from these representative viewpoints and present at a considerable scale, often with a dominant visual

presence. Whilst the turbines will be a distinctive feature of these views, they are notably offset from the immediate context of the scenic Gweebarra River corridor and do not appear over-scaled or with any sense of overbearing. The proposed turbines will notably increase the intensity of built development in this enclosed valley context. Nonetheless, they are considered appropriately sited in this modified landscape comprising other anthropogenic land uses such as overhead electricity cable infrastructure on a broad terraced plateau that they will share with commercial forestry.

The significance of visual impact at the remaining local community views ranged between 'Slight' and 'Moderate', with those views within the valley context and its periphery often incurring a visual impact significance of 'Moderate'. Those local community views classified with a 'Slight' visual impact significance are associated with views south of the site in a neighbouring valley. Whilst glimpses and partial views of the proposed turbines will be afforded from here, the visual presence of the development typically ranges between sub-dominant and minimal as the majority of the turbines will be heavily screened by the elevated rolling ridge immediately south of the site.

Overall, the proposed project will be viewed in a highly dominant manner in its immediate surrounds, with the turbines also presenting in a prominent but not overbearing scale from the nearest residential receptors on the south-facing slopes of the Gweebarra River valley. The turbines will be a distinctive feature within the local valley context, however, beyond this, the visual presence of the wind farm tends to diminish rapidly, especially to the south, where the proposed wind farm project is heavily screened. It is not considered that the proposed wind farm project will appear out of place in this broad transitional context influenced by other anthropogenic land uses. Consequently, it is not considered significant visual impacts will occur in respect of local community views.

13.7.3 Impacts on Centres of Population

Seven viewpoints (VP1, VP3, VP6, VP16, VP21, VP28 & VP29) were chosen to represent population centres within the study area. Centres of population are generally considered to be in the mid to low range of visual receptor sensitivity because they tend to be busy built environments where visual change is relatively commonplace, however, in this instance, some of the centres of population throughout the study area are often backdropped by upland terrain or are located along highly scenic lakes or distinctive sections of the coastline.

Visual impact significance at centres of population ranges from 'Moderate' to 'Imperceptible', with settlements classified with an 'Imperceptible' visual impact significance including Glenties, Ardara and Loughanure. These settlements will have no, or extremely limited, turbine visibility. It is important to note that other settlements within the study area, such as Finntown are also considered to have an 'Imperceptible' visual impact significance, but were scoped out as viewpoints for assessment on the basis that the ZTV map showed extremely limited or no potential for turbine visibility.

The highest impact significance of 'Moderate' occurs at VP16 at the dispersed Gaeltacht settlement of Lettermacaward, located along locally elevated terrain to the north of the Gweebarra River. The proposed turbines are viewed here at a noticeable, but not overbearing scale and are offset some 3km from the settlement on the opposite side of the Gweebarra River valley. The nearest settlement to the site, Doochary, will afford partial visibility of the proposed turbines and is represented at VP6. Whilst the proposed turbines will likely be heavily screened from the central areas of the small village, clearer views of the proposed wind farm will be afforded from the surrounding local roads.

Outside of the central study area, the coastal settlements of Dungloe and Portnoo will also afford turbine visibility. Whilst the central areas of Dungloe, one of the larger population centres within the study area, will have limited opportunity for turbine visibility, the proposed turbines will be briefly and intermittently visible on the outskirts of the town and along its approach roads. VP3 represents the potential visibility of the proposed wind farm from Dungloe, where clear views of the distant turbines will be afforded and are backdropped by the elevated upland terrain south of the site. Nonetheless, the turbines are viewed as distant background features and have limited potential to notably impact the visual amenity of views afforded from the surrounds of Dungloe.

The small coastal village of Portnoo is located some 13km from the proposed wind farm, but despite its notable distance from the site, relatively clear visibility of the proposed wind farm will be afforded from here. VP21 represents this small coastal settlement where the turbines will present as distant background features, albeit they present with a notable degree of contrast against the rolling upland terrain further in the distance. Nonetheless, the proposed wind farm will have a limited impact on this coastal view due to its limited visual presence combined with the broad nature of coastal views afforded from here.

As a result of the reasons outlined above, it is not considered that the proposed wind farm will result in significant visual impacts at centres of population within the study area.

13.7.4 Impacts on Major Routes

The N56 national secondary route, which connects many of the main settlements within the study area, is the most notable major route in relation to the proposed project. The N56 national secondary route is located in the western half of the study area and often flanks the coastal parts of the study area. The N56 also forms part of the Wild Atlantic Way tourist driving route and the Eurovelo cycling route. Viewpoints VP1, VP3, VP12, VP16, VP20, VP24 & VP28 were all chosen as representative viewpoints from the N56, many of which are also representative views for designated scenic views, centres of population and amenity and heritage features. Due to its broad extent throughout the study area and the varied nature of the terrain the N56 traverses, visual receptor sensitivity at representative viewpoints ranged from High-medium to Medium, with 'High-medium' sensitivity classifications typically relating to scenic views afforded across the coastline or coastal features. Visual impact significance along the N56 ranged between 'Moderate' and 'Imperceptible'.

The highest visual impact significance classifications typically relate to the nearest sections of the N56 national secondary route to the proposed wind farm. VP12 and VP16 are both located a similar distance to the nearest turbines and afford clear views of the proposed project from just under 4km. VP12 affords a broad view of the proposed project where the turbines present with good spacing characteristics and do not appear over-scaled in this broad transitional landscape. VP20 is also classified with a visual impact significance of 'Moderate', however, this is principally driven by the visual receptor sensitivity as VP20 is also a designated scenic view.

It is important to note that large sections of the N56 route in the northern and south-western parts of the study area will have no turbine visibility, as highlighted on the ZTV maps (see Figure 13-8 and Appendix 13.2). Furthermore, some of the most highly scenic aspects along the N56 national secondary route within the study area relate to views across the coastline in the opposite direction to the proposed wind farm. Other major route receptors within the study area include the many regional roads that connect the more remote settlements within the study area. In similar circumstances to the N56, the significance of visual impact at these receptors ranges from 'Moderate' to 'Slight-imperceptible', with the highest impact

classifications relating to nearer views of the proposed project that often overlap with designated scenic views or centres of population.

Overall, it is not considered that any significant visual impact will occur in respect of major route receptors.

13.7.5 Impacts on Heritage and Amenity Features

As a result of the varied nature and often highly scenic landscape within the study area, a wide variety of amenity features, which include way-marked walking trails, cycling routes and driving routes are contained within the 20km study area. Heritage and amenity features within the study area are represented by an array of representative viewpoints, including VP1, VP3, VP6, VP7, VP12, VP14, VP15, VP16, VP17, VP20, VP24, VP28 & VP29. The significance of visual impacts a heritage and amenity features within the study area ranges from 'Substantial-moderate' to 'Imperceptible'.

One of the more notable amenity features within the central study area is the Donegal Way – Slí na Rosann, which traverses the low rolling terrain interspersed by numerous loughs to the north of the site before veering southeast from Doochary towards Fintown Valley, is located some 1.6km north of the nearest turbine at its nearest point. Whilst the turbines will present in a prominent manner from this near section of the waymarked walking trail, this section of the waymarked trail is one of the less remarkable parts of the trail, with other parts of the route boasting broad panoramic views towards the elevated upland areas in the Derryveagh and Glendowan Mountains.

In terms of heritage features within the central study area, a local cemetery is represented at VP15 and affords broad views across the Gweebarra River and Estuary. The proposed turbines will be visible here, present with a dominant visual presence from this valley-side cemetery and are deemed to have a visual impact significance of Substantial-moderate.

The Wild Atlantic Way and Eurovelo Cycling route also traverse the central and wider study area and will afford clear views of the proposed project from areas such as Lettermacaward and the Gweebarra Bridge. Nonetheless, the most notable aspect of scenic amenity along these routes typically relates to views across the coastline to the west in the opposite direction to the proposed project. Furthermore, views of wind energy development along many of these linear recreational routes are commonplace, and therefore the proposed project will not appear as an incongruous built feature in this part of northwest Donegal. Overall, it is not considered that the proposed wind farm will notably detract from the scenic or recreational amenity of the waymarked walking trails, cycling routes, local walking trails and driving routes within the central or wider study area. On balance of the reasons outlined above, it is not considered that the proposed wind farm will result in significant visual impacts at amenity and heritage features within the study area.

13.7.6 Summary of Visual Impacts

Based on the visual impact assessment outlined in Section 13.7.1 - 13.7.5 above it is considered the most notable visual impacts in relation to the proposed wind farm will occur within the partially contained section of the Gweebarra River valley that extends northeast by southwest from the surrounds of Lettermacaward to the small riverside settlement of Doochary. The highest significance of visual impacts are typically associated with local community views, some of which overlap with amenity and heritage features such as Donegal Way and a local cemetery.

The most notable visual impacts of 'Substantial-moderate' are all contained within the valley setting and principally relate to views from the nearest local roads to the site, in addition to direct cross-valley views from L1783 local road to the north of the Gweebarra river corridor. Despite the broad scale and extent of the development, the proposed turbines present with little if any notable sense of overbearing and do not appear over-scaled in the context of this broad valley that comprises large-scale landscape features and land uses. The proposed project will be one of the most distinctive features when viewed from its near surrounds and when viewed from residential receptors on the south-facing slopes of the river valley. However, when viewed from the opposite side of the river valley to the proposed project, the turbines present in a highly legible manner and are loosely arranged in a staggered layout allowing for a notable degree of visual permeability through the scheme. Furthermore, in the context of this already modified valley setting that comprises extensive commercial conifer forestry, the proposed project is not considered an incongruous addition. Indeed, it suitably occupies a broad forested plateau terrace that occurs midway between the more sensitive river corridor and skyline ridge.

In relation to susceptible scenic designations in the surrounds of the proposed project, the turbines are most often located in the opposite direction to protected views identified in the current Donegal CDP, many of which are oriented across the coastal parts of the study area. The only scenic view oriented in the direction of the site within the central study area is the Gweebarra Bridge scenic view. Whilst the proposed turbines will be clearly visible from the northeast aspect of this scenic view, the view to the west/southwest will remain unaffected by the proposed project and is considered the more scenic aspect of this dual aspect scenic view.

Overall, the most notable visual impacts generated from the proposed project are principally contained within the broad valley context that encompasses the site. The high degree of containment provided by the elevated surroundings is also highlighted in the ZTV for the proposed project (see Figure 13-8), which shows that more than half of the study area will afford no turbine visibility at all. In conclusion, it is considered that this site is an appropriate location for commercial-scale wind energy development. The proposed project site, located along the southern extent of the Gweebarra River Valley, is contained by broad-scale landscape features and land use, which help assimilate the scale of the proposed wind energy project. The site is also heavily enclosed from the coastal areas of Donegal, which are renowned for their high degree of scenic amenity. Furthermore, the site itself is located within the MSA designation in County Donegal. These areas are described as having *"the capacity to absorb additional development that is suitably located, sited and designed"*.

13.8 TURBINE ENVELOPE CONSIDERATION

For the landscape and visual assessment, the pertinent aspect of the design envelope relates to the turbine dimensions used to prepare the photomontages, upon which, the visual impact assessment is based.

In all previous wind energy projects, Macro Works have taken the approach of using the highest possible tip height and hub height combination. This is on the basis that a viewer who can see a hub rising above a skyline ridge is likely to feel they are seeing more of the turbine than when the hub is screened from view (i.e. in the case of a lower hub / longer blade combination). That premise is based on the hub being perceived as the key and central component of a turbine in a figurative sense. In this instance, the photomontages were prepared using a turbine envelope of 164m rotor diameter, 118m hub height and 200m tip height which represents a worst-case scenario in terms of the maximum potential turbine envelope for the proposed project.

An alternative set of turbine dimensions is also being considered by the Applicant to achieve a turbine tip height in the range of 185m – 200m. The comparative scenarios and range of turbine types considered are included below:

- Base-case Scenario – 118m Hub Height, 164m Rotor Diameter, 200m Tip Height (used and assessed in the LVIA)
- Alternative Scenario 1 – 107.5m Hub Height, 155m Rotor Diameter, 185m Tip Height
- Alternative Scenario 2 – 112m Hub Height, 164m Rotor Diameter, 194m Tip Height

As can be seen from the comparative photomontages (included in Appendix 13.1) there is a relatively subtle difference in the perceived scale of the proposed turbines in all three scenarios. The most notable variation relates to alternative scenario 1, where there will be a 15m variation in the tip height in comparison to the base-case scenario assessed in the visual impact appraisal in Appendix 13.1. There will also be little discernible difference in the perceived scale of the turbines from beyond 1-2km from the site in all three scenarios.

Regardless of whether the difference between the alternative turbine dimensions can be discerned or not, there will be no material difference in the level of visual impact between them, and certainly not a higher impact than the base-case outlined in the visual impact appraisal highlighted above. Thus, the submitted LVIA is deemed to comfortably cover the range of potential turbine dimension options proposed and it is not considered necessary to prepare separate photomontages / assessments at all viewpoints for all possible turbine dimensions highlighted above.

13.9 DO NOTHING SCENARIO

In a Do-Nothing scenario the existing conifer plantation at the site would continue to be managed through rotations of commercial conifer planting and harvesting, whilst the areas of moorland and heath would continue to naturally evolve.

13.10 CUMULATIVE EFFECTS

The NatureScot Guidance relating to 'Assessing the Cumulative Landscape and Visual Impact of Onshore Wind Energy Developments (2021) identify that cumulative effects on visual amenity consist of combined visibility and sequential effects. The same categories have also been subsequently adopted in the Landscape Institute's 2013 revision of the Landscape and Visual Impact Assessment Guidelines. The principal focus of wind energy cumulative impact assessment guidance relates to other wind farms - as opposed to other forms of development. This will also be the main focus herein, albeit with a subsequent consideration of cumulative effects with other forms of notable development (existing or permitted), particularly within the Central Study Area.

'Combined visibility occurs where the observer is able to see two or more developments from one viewpoint. Combined visibility may either be in combination (where several wind farms are within the observer's arc of vision at the same time) or in succession (where the observer has to turn to see the various wind farms).

Sequential effects occur when the observer has to move to another viewpoint to see different developments. The occurrence of sequential effects may range from frequently sequential (the features appear regularly and with short time lapses between, depending on speed of travel and distance between the viewpoints) to occasionally sequential (long time lapses between appearances, because the observer is moving very slowly and / or there are large distances between the viewpoints.)'

Cumulative effects of wind farms tend to be adverse rather than positive as they relate to the addition of moving manmade structures into a landscape and viewing context that already contains such development. Based on guidance contained within the SNH Guidelines relating to the Cumulative Effects of Wind Farms (2012) and the DoEHLG Wind Energy Guidelines (2006/2019 draft), cumulative effects can be experienced in a variety of ways. In terms of landscape character, additional wind energy developments might contribute to an increasing sense of proliferation. A new wind farm might also contribute to a sense of being surrounded by turbines with little relief from the view of them.

In terms of visual amenity, there is a range of ways in which an additional wind farm might generate visual conflict and disharmony in relation to other wind energy developments. Some of the most common include visual tension caused by disparate extent, scale or layout of neighbouring developments. A sense of visual ambivalence might also be caused by adjacent developments traversing different landscape types. Turbines from a proposed development that are seen stacked in perspective against the turbines of nearer or further developments tend to cause visual clutter and confusion. Such effects are exacerbated when, for example, the more distant turbines are larger than the nearer ones and the sense of distance is distorted.

Table 13-8 below provides Macro Works' criteria for assessing the magnitude of cumulative effects, which are based on the SNH Guidelines (2012).

Table 13-8: Magnitude of Cumulative Impact

Magnitude of Impact	Description
Very High	• The proposed wind farm will strongly contribute to wind energy development being the defining element of the surrounding landscape. • It will strongly contribute to a sense of wind farm proliferation and being surrounded by wind energy development. • Strongly adverse visual effects will be generated by the proposed turbines in relation to other turbines.
High	• The proposed wind farm will contribute significantly to wind energy development being a defining element of the surrounding landscape. • It will significantly contribute to a sense of wind farm proliferation and being surrounded by wind energy development. • Significant adverse visual effects will be generated by the proposed turbines in relation to other turbines.
Medium	• The proposed wind farm will contribute to wind energy development being a characteristic element of the surrounding landscape. • It will contribute to a sense of wind farm accumulation and dissemination within the surrounding landscape. • Adverse visual effects might be generated by the proposed turbines in relation to other turbines.
Low	• The proposed wind farm will be one of only a few wind farms in the surrounding area and will be viewed in isolation from most receptors.

	• It might contribute to wind farm development becoming a familiar feature within the surrounding landscape. • The design characteristics of the proposed wind farm accord with other schemes within the surrounding landscape and adverse visual effects are not likely to occur in relation to these.
Negligible	• The proposed wind farm will most often be viewed in isolation or occasionally in conjunction with other distant wind energy developments. • Wind energy development will remain an uncommon landscape feature in the surrounding landscape. • No adverse visual effects will be generated by the proposed turbines in relation to other turbines.

13.10.1 Cumulative Impact Assessment

There are 9 operational wind farms and 4 permitted wind farms contained within the study area. There are also two proposed wind farm development within the study area. These are set out in Table 13-9 below.

Table 13-9 : Cumulative Wind Farms within the study area

Wind Farm Name	Number of turbines	Distance and Direction from proposed turbine to the nearest cumulative turbine	Status
Maas Wind Farm	3	8.7km Southwest of site	Proposed
Graffy Wind Farm*	13	5km Southeast of site	Consented
Graffy Wind Farm*	8	5km Southeast of site	Proposed
Loughderryduff Wind Farm	9	9.0km Southwest of site	Operational
Anarget Wind Farm	6	10.8km South of site	Operational
Cloghervaddy Wind Farm	7	15.4km South of site	Operational
Meenybradden Wind Farm	1	15.8km South of site	Consented
Corkermore Wind Farm	4+5	16.3km Southwest of site	Operational & Consented
Huntstown Wind Farm	2	16.3km South of site	Operational
Burtonport Turbine	1	17.7km Northwest of site	Operational
Drumnahough Wind Farm	12	19km East of site	Consented
Culliagh Wind Farm	3	19.3km East of site	Operational
Cronalaght Wind Farm	12	19.7km North of site	Operational
Cark Wind Farm	6	19.7km East of site	Operational

*Eight (8) turbines are now proposed for Graffy Wind Farm in lieu of the thirteen (13) permitted turbines and are sited generally at locations previously permitted.

The appraisal of cumulative effects with other wind energy developments is based on the cumulative ZTV maps and wireframes provided in Appendix 13.1 and Appendix 13.2. A further discussion on potential cumulative effects is included in section 13.10.1.1 below.

13.10.1.1 Nature of Cumulative Visibility

The nature of cumulative visibility within the study area is analysed in Table 13-10 below using the same viewpoints that are used for the main visual impact assessment.

Table 13-10: Nature of cumulative visibility

VRP Ref.	Number of other wind farms potentially visible	Nearer or further than the Proposed Project	Combined View (within a single viewing arc - 90°)	Succession View (within a series of viewing arcs from the same location)	Sequential View (view of different developments moving along a linear receptor)
VP1	1	Nearer	-	Yes	Yes
VP2	1	Further	Yes	-	Yes
VP3	1	Further	Yes	-	Yes
VP4	2	Further	Yes	-	-
VP5	-	-	-	-	-
VP6	2	Further	Yes	-	-
VP7	-	-	-	-	-
VP8	-	-	-	-	-
VP9	-	-	-	-	-
V10	-	-	-	-	-
VP11	3	Further	-	Yes	-
VP12	-	-	-	-	Yes
VP13	3	Further	-	Yes	-
VP14	-	-	-	-	Yes
VP15	3	Further	-	Yes	-
VP16	3	Further	-	Yes	Yes
VP17	2	Nearer	-	Yes	-
VP18	3	Similar distances	-	Yes	-
VP19	2	Further	-	Yes	-
VP20	2	Similar distances	-	Yes	Yes
VP21	3	Nearer	Yes	-	-
VP22	1	Further	-	Yes	-
VP23	1	Similar distances	-	Yes	-
VP24	3	Nearer	-	Yes	Yes
VP25	-	-	-	-	-

VP26	1	Further	-	Yes	-
VP27	2	Further	-	Yes	-
VP28	4	Nearer & Further	-	Yes	Yes
VP29	4	Nearer	-	Yes	Yes

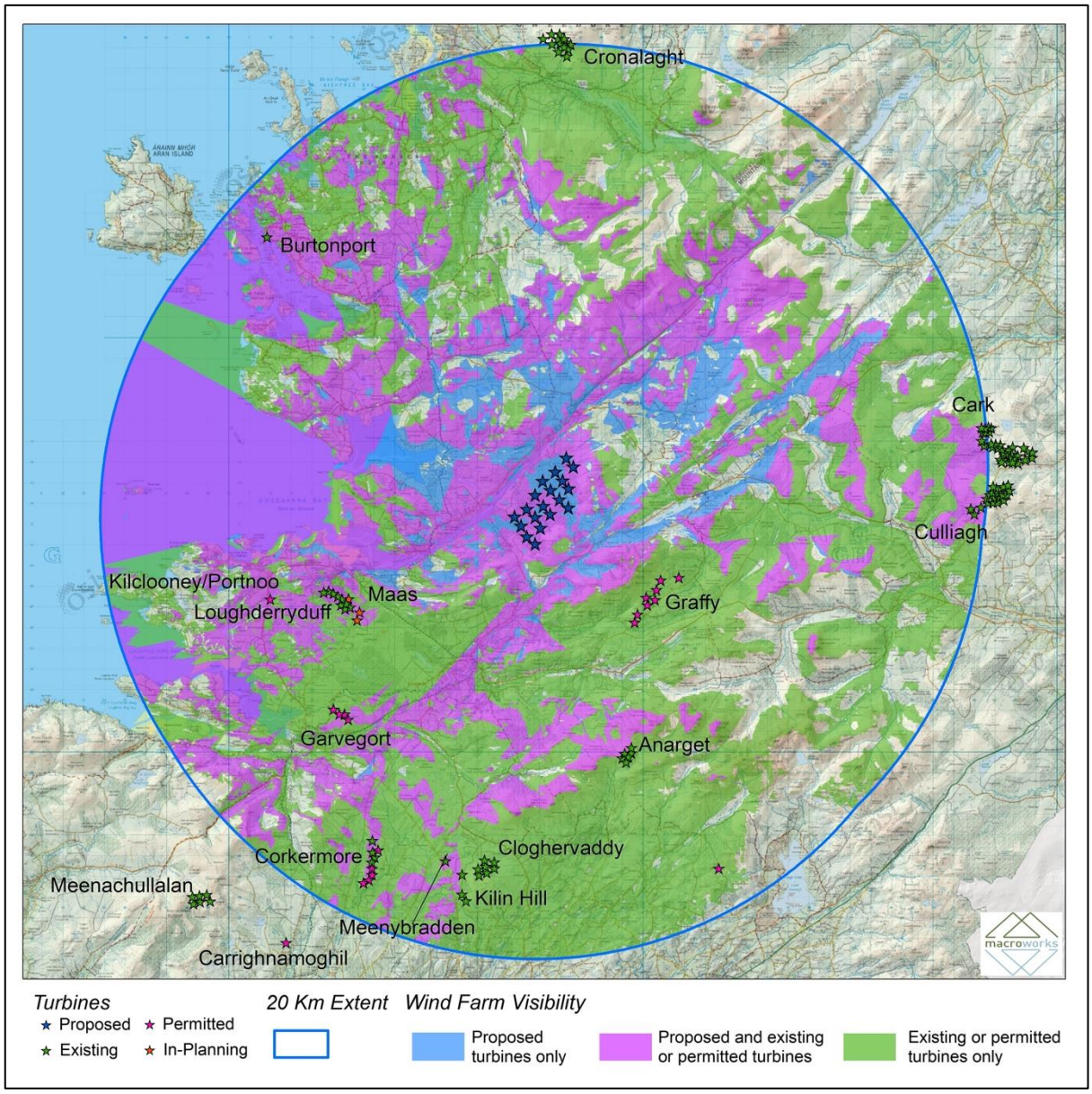

Figure 13-17:Cumulative ZTV Map (Tip Height (200m) – represents a worst case scenario in terms of potential turbine visibility with regard to the variation in turbine dimensions) for Cloghercor Wind Farm identifying the potential intervisibility of the proposed Cloghercor Wind Farm and all other existing and permitted wind farms within the study area (See Appendix 13.2 for larger version)

Although the analysis contained in Table 13-10 and consideration of the Cumulative ZTV map in Appendix 13.2 relates principally to cumulative visual effects (i.e. utilising the selected VP set), it also informs the closely related assessment of cumulative landscape effects, particularly those relating to cumulative effects on the overall landscape character of the study area. The

assessment below, therefore, relates to both cumulative visual effects and cumulative landscape effects.

The cumulative ZTV map shows the potential for cumulative visibility between the proposed turbines and all other existing wind farm developments within the 20km study area. At present there are 9 operational wind farms, 2 consented wind farm developments and 1 other proposed development within the 20km study area. The most notable cluster of cumulative wind farm development is located within the wider southern half of the study area in the Bluestack Mountains and its surrounding foothills, whilst a small cluster of operational wind farms also exists on the eastern periphery of the study area. The nearest existing wind energy development is located along a broad low-rolling coastal plateaux to the southwest of the site. The cumulative ZTV map (based on a bare-ground scenario – see Figure 13-17 above and Appendix 13.2) identifies that the proposed Cloghercor Wind Farm will be visible in isolation for 5.4% of the study area. The most notable areas where the proposed Cloghercor turbines will be viewed in isolation are located are along the neighbouring valley located to the south of the site. Nonetheless, it is important to note that the proposed turbine will only be partially visible along this valley context, highlighted in the visual impact assessment at viewpoints VP23, VP25 and VP26. Other areas where the proposed Cloghercor turbines have the potential to be viewed in isolation include sections of the L1783 local road north of the site, the sparsely populated uplands to the east and northeast of the site, and the coastal areas surrounding Trawenagh Bay to the northwest of the site. It is also important to note that this is based on a bare ground scenario, and therefore, once existing screening is taken into consideration, this is likely to be considerably less. 17.7% of the study area will have no view of turbines. These locations are principally associated with heavily contained river valley settings.

Table 13-10 above gives an analysis of the nature of cumulative visibility within the study area based on the selected VRPs. This table highlights that the proposed wind farm project will typically only ever be viewed in combination with up to four other developments, and in the majority of case 3 or less. These developments include the existing Loughderryduff Wind Farm, the consented Portnoo turbines and the proposed Maas Wind Farm, which are the nearest developments to the proposed Cloghercor Wind Farm. Furthermore, when viewed in combination, only partial views of the proposed, consented and existing developments will ever be afforded as they are separated by elevated rolling upland terrain. The principal parts of the study area where combined views of these developments will be afforded are to west and southwest of the proposed Cloghercor at the coastal areas in the surrounds of the broad Gweebarra River Estuary. It is important to note that there is extremely limited potential for clear views of these three developments to be afforded in combination. It is also important to highlight that the VRPs that afford theoretic visibility of 4 or more wind farms within the study area has no views of the proposed Cloghercor turbines (VP28 and VP29). The principal point in relation to cumulative effects is that the proposed Cloghercor Wind Farm is situated over c.5km from the nearest potential development and is afforded considerable separation distances to many of the existing and consented developments in the wider study area, thus limiting the potential for any notable cumulative visual effects to occur.

The most notable potential for cumulative visual effects to occur relates to sequential views from major routes such as the N56, designated scenic views or from amenity features such as the Wild Atlantic Way, Donegal Way and Bluestack Way, where sequential' cumulative views of the proposed wind farm and other wind farms will be afforded along different sections of each route in a journey scenario. As highlighted in the visual impact appraisal above, the proposed Cloghercor will be clearly visible from some sections of the N56, most notably between Lettermacaward and Dungloe within the study area. Nonetheless, due to the limited potential for intervisibility of other cumulative wind farm developments near the proposed

Cloghercor Wind Farm, the potential for any strong cumulative visual effects is diminished. There will also likely be intervisibility of the proposed, consented, and operational developments from some of the most elevated parts of the study area, including sections of the many surrounding walking trails and hiking routes. Nonetheless, views of wind energy development in the context of wider Donegal are not uncommon, and indeed, in some parts of the County, such as the Bluestack Mountains, wind energy development is a characteristic feature.

On balance of the reasons above and the information outlined in Table 13-10 and Appendix 13.2, it is considered that the proposed Cloghercor Wind Farm will contribute to a cumulative impact in the order of Low, which is not considered to be significant.

In respect of cumulative effects with other forms of development, there are no other large scale developments within the vicinity of the site.

The only other notable land use in relation to the proposed wind farm is forestry, a key component of which is harvesting, which has the potential to result in clearer views of the proposed turbines and the surrounding site access tracks. Nonetheless, it is not expected that the underlying sloping lands will ever be harvested entirely. Instead, they will be harvested in sections, which will subsequently be replanted once harvesting activities have concluded. It is not considered that the more exposed views of turbines as a result of potential harvesting activities will result in significant cumulative landscape or visual effects.

13.11 CONCLUSION

A key consideration in this instance is the recent 'not normally permissible' wind energy designation that contains the site, which was changed from the previous 'Open to Consideration' designation. Notwithstanding this recent designation change, the landscape context has not changed and it is considered that the site and its immediate surroundings represent a landscape area that should not be excluded from potential wind energy development based on landscape and visual constraints. This is further reinforced by the Moderate Scenic Amenity designation that contains the site and wider valley, which are described as areas with "the capacity to absorb additional development that is suitably located, sited and designed". In this instance, the subject site is a robust forested plateau in a broad landscape context that can absorb the scale and nature of wind energy development. It is contained by surrounding rolling ridges, influenced by an array of existing anthropogenic land uses and is well offset from some of the most susceptible landscape areas in County Donegal, such as the coastline and the remote, rugged uplands.

Based on the assessment herein, it is considered that the proposed Cloghercor Wind Farm is of a notable scale but appropriately sited in a broad-scale landscape context and will not give rise to any significant residual landscape effects, visual effects or cumulative effects.