APPENDIX 3

LANDSCAPE AND VISUAL IMPACT ASSESSMENT RESPONSE

Planning and Environmental Consultants

Landscape and Visual Impact Assessment (LVIA) Response

Croagh Wind Farm
Section 131 Response

Table of Contents

1. LVIA RESPONSE: CROAGH WIND FARM SECTION 131 RESPONSE 2

1.1 Introduction 2
1.2 LVIA in the Original Granted Decision 3
1.3 LVIA in the Appeals & Recommended Refusal Point 3 3
1.4 LVIA and the County Development Plans 4
1.4.1 Alignment with Policy Objectives in the Updated County Development Plans for Leitrim and Sligo 4
1.4.1.1 Leitrim CDP 2023-2029 4
1.4.1.2 Sligo CDP 2024-2030 5
1.4.2 Good Alignment with New Wind Energy Strategy for Co. Leitrim 7
1.4.3 Spatial Analysis of "Available Area" for Wind Energy and Protected Landscapes in Co. Leitrim 9
1.4.4 Mitigation of Landscape and Visual Effects by Good Wind Farm Design 10
1.4.5 Proposed Development alignment with WEDGs Design Recommendations for Landscape Character Type 11
1.4.6 Recommended Refusal Reason No. 3 12
1.4.6.1 Height, Scale, Siting on Ridgelines and Skyline Nature of the Proposed Turbines 12
1.4.6.2 Physical Extent of the Visual Influence of the Proposed Turbines 13
1.4.6.3 Impact on Landscape Character 14
1.4.6.4 Proximity to Natural Heritage Areas 14
1.4.6.5 Effects on Tourism Resource of the Area 15
1.4.6.6 Visibility from Co. Leitrim AHVAs and AONBs 15
1.4.6.7 Visibility from Co. Sligo Sensitive Rural Landscapes and Visually Vulnerable Areas 16
1.4.6.8 Visibility from Carrowkeele Passage Tomb Landscape 16
1.4.6.9 Impact on Lough Gill AONB, Co. Leitrim 16
1.4.6.10 Impact on Designated Scenic Routes and Protected Views 16
1.4.6.11 Cumulative Impact with Other Existing, Permitted and Proposed Wind Farms 17
1.5 Conclusion 18

TABLE OF TABLES

Table 1-1 Designations within Previous Leitrim CDP v. LCDP 2023-2029 5

Table 1-2 Designations within Previous Sligo CDP v. SCDP 2024-2030 6

TABLE OF FIGURES

Figure 1-1: Location of Proposed Development in "Available Area" of "Low Risk" with "Viable Wind Speed >7.6m/s" within a "target" LCA of the newly published Leitrim County Renewable Energy Strategy (modified from Figs. 6.3, 6.4, 6.5 of that strategy) 8

Figure 1-2 Spatial analysis of Co. Leitrim "Available Area" (LCDP 2023-2029 RES) versus landscape designations AONB/AHVAs 9

Figure 1-3 Location of proposed turbines within "Available Area" which does not overlap with AONB/AHVAs ..10

Figure 1-5 Extraction of VP16 from the EIAR Volume 2 Photomontage Booklet accompanying Chapter 12 of the submitted EIAR, showing naturally undulating height, profile and skyline of the proposed turbines 13

Figure 1-6 Effect of Distance on the Visibility of Wind Turbines (illustrative purposes only) – Included as Figure 1-1 of Appendix 12-1 of submitted EIAR. 14

1. LVIA RESPONSE: CROAGH WIND FARM SECTION 131 RESPONSE

1.1 Introduction

Chapter 12 of the submitted EIAR for Croagh Wind Farm in Co. Leitrim & Co. Sligo contains the comprehensive Landscape and Visual Impact Assessment (LVIA) for the Proposed Development conducted in 2019-2020 by MKO.

The five documents comprising the originally submitted LVIA include:

- EIAR Ch.12 Landscape & Visual (main chapter),
- EIAR Volume 2: Photomontage Booklet, presenting visualisations of the proposed turbines and other existing, permitted and proposed wind energy developments from selected viewpoints,
- Appendix 12-1: LVIA Methodology,
- Appendix 12-2: Landscape Character Assessment Tables, assessing landscape, visual and cumulative effects of designated Landscape Character Areas (LCAs),
- Appendix 12-3: Photomontage Visual Impact Assessment Tables, assessing landscape, visual and cumulative effects of 17 no. selected viewpoints presented in the Photomontage Booklet.

This response document makes reference to LVIA inputs into responses to the Sligo County Council (SCC) and Leitrim County Council (LCC) Further Information (FI) requests submitted in 2021; see below in Section 0 LVIA in the Original Granted Decision.

This report demonstrates how the Proposed Development and Chapter 12 of the submitted EIAR complies with planning objectives related to Landscape and Visual impact in the current County Development Plans (CDPs) of Leitrim and Sligo. Chapter 12 of the submitted EIAR was prepared using the Leitrim CDP 2015-2021 and the Sligo CDP 2017-2023; both CDPs have since been updated to the current documents hereafter referred in this report as set out below.

Current CDPs for Leitrim and Sligo cited in this report:

- Leitrim County Development Plan (LCDP) 2023-2029,
- Sligo County Development Plan (SCDP) 2024-2030.

This report also demonstrates how the Proposed Development adheres to best practice guidelines for good siting and design of wind farms in terms of landscape and visual impact.

Best practice guidance for LVIA in Ireland and UK:

- Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) published by Landscape Institute & Institute of Environmental Management and Assessment (2013),
- Wind Energy Development Guidelines for Planning Authorities published by Department of the Environment, Heritage, and Local Government (2006) (hereafter, 2006 WEDGs),
- Draft Revised WEDGs published by Department of Housing, Local Government and Heritage (2019) (hereafter, 2019 Draft Revised WEDGs).

1.2 LVIA in the Original Granted Decision

The June 2022 Inspector's Report ABP-310788/789-21 (hereafter, ACP Inspector's Report) by An Bord Pleanála (now An Coimisiún Pleanála) summarises the previous decisions by planning authorities in Co. Leitrim and Co. Sligo, noting that **no major issues with Landscape and Visual impact were raised** by LCC or SCC.

Both of the relevant planning authorities, LCC and SCC, granted permission following Further Information responses received in 2021. The ACP Inspector's Report states the following to this effect:

Regarding LCC's granted decision (p.8, Section 3.1.2):

> *"Concerns were expressed about visual impact from sensitive tourism landscapes and viewpoints but it was concluded that generally **the proposed development would not have an adverse impact** on any sensitive landscape identified in the County Development Plan."*

Regarding SCC's granted decision (p.12, Section 3.2.2):

> *"The **proposal was seen to have an acceptable impact** on the rural character and visual amenities of the area."*

Regarding the Further Information response following third-party submissions in 2021 (p.11, Section 3.1.4; p.15, Section 3.2.4):

> For both LCC and SCC:
>
> "*With regard to EIA, **the Planner was satisfied that potential effects would be avoided, managed and mitigated** by the measures which form part of the proposed scheme, the proposed mitigation measures and best practice measures and he was further satisfied that the proposal would not have any unacceptable direct, indirect or cumulative effects."*
>
> For LCC:
>
> "*It was considered that **the proposal would not seriously injure residential amenity** by way of shadow flicker, dust, noise, and visual intrusion."*
>
> For SCC:
>
> *"The previous planning assessment on the principle of the development, impact on the rural character and visual amenities of the area, on noise and shadow flicker, and on traffic was repeated."*

1.3 LVIA in the Appeals & Recommended Refusal Point 3

The ACP Inspector's Report summarises the first-party appeals submitted, which prompted the conducting of the report and led to the previous (now quashed) refusal by ACP. The key issues raised by the previous Inspector related to Landscape and Visual impact are summarised in Section 7.11.1 of the ACP Inspector's Report as follows:

- "*Physical extent of the visual influence of the proposed turbines;*
- *Impact on landscape character;*
- *Effects on tourism of the area;*
- *Proposed turbine's prominence from scenic routes and amenity areas.*"

These are reflected in detail in Recommended Refusal Point 3 of Section 10 (p.122) of the ACP Inspector's Report which gives regard to the following aspects of the Proposed Development which constitute it as "*highly obtrusive*":

- "*The height and scale of the proposed wind turbines,*
- *The siting on elevated ridgelines,*
- *The highly prominent skyline nature of the wind turbines,*
- *The proximity to Carrane Hill Bog and Corry Mountain Bog Natural Heritage Areas,*
- *The encroachment northwards towards, and the prominent visual and landscape impact on, the Lough Gill Area of Outstanding Natural Beauty,*
- *The high level of visibility of the proposed turbines over an expansive area, inclusive of Areas of High Visually Amenity, Sensitive Rural Landscapes, Visually Vulnerable Areas, and Carrowkeel Passage Tombs,*
- *The prominence of the proposed turbines from designated scenic routes and the protected views, which form an integral part of the tourism resource of the area, and*
- *The cumulative impact with extensive wind farm development in the immediate vicinity.*"

Refusal Point 3 of the ACP Inspector's Reports identifies multiple landscape sensitivity designations in the Sligo CDP:

- "*A designated Sensitive Rural Landscape immediately adjoins the site to the west and the ridgeline of Carrane Hill within this Sensitive Rural Landscape is designated a Visually Vulnerable Area.*
- *The shorelines of Lough Gill to the north are designated Sensitive Rural Landscapes and Visually Vulnerable Areas in the Plan, as are the areas west of Lough Arrow, inclusive of Carrowkeel Passage Tombs.*
- *There are designated scenic routes to the west/south-west of the site (Scenic Route 66) and in the vicinity of Lough Gill to the north (Scenic Route 13) from which the views and prospects to Visually Vulnerable features are to be preserved.*"

The broad topics which are relevant to refuting the above points are discussed below in Section 1.4 and the specific refusal topics are elaborated below in Section 1.4.6.

It is noted that this recommended refusal reason was not assimilated into ACP's quashed decisions. In the Board Directions (BD-014111-23 and BD-014130-23), the Board stated that it shared the conclusions of the local authorities in relation to the potential for landscape and visual effects. Having had full regard to the documentation and submissions before it, the Board, ultimately determined that issue of visual impact would not warrant a refusal of permission for the Proposed Development (see list of conclusions in Section 1.5 below).

1.4 LVIA and the County Development Plans

1.4.1 Alignment with Policy Objectives in the Updated County Development Plans for Leitrim and Sligo

This section reports how the Proposed Development demonstrates alignment with planning policies and objectives related to Landscape and Visual impact in the current LCDP 2023-2029 and SCDP 2024-2030, as well as adheres to best-practice guidance for good wind farm design and addresses LVIA topics in the previous (now quashed) ACP refusal decision.

1.4.1.1 Leitrim CDP 2023-2029

A comparative review of the previous Leitrim CDP 2015-2021 and the current LCDP 2023-209 reveals that there is no change in terms of the landscape designations affecting the Proposed Development with

respect to Areas of Outstanding Natural Beauty (AONBs), Areas of High Visual Amenity (AHVAs) and protected Scenic Views & Prospects. This is outlined below in Table 1-1.

Table 1-1 Designations within Previous Leitrim CDP v. LCDP 2023-2029

Assessment in Ch.12 of the EIAR as per Leitrim CDP 2015-2021	Current Review of Proposed Development as per the updated LCDP 2023-2029
The Leitrim CDP outlines designated AONBs. No designations fall within the site boundary.	No change.
Outlines designated AHVAs. No designations fall within the site boundary.	No change.
Outlines protected Scenic Views & Prospects. No designations fall within the site boundary.	No change.
Protected Scenic Views & Prospects within the 20km LVIA Study Area: › 12 no. with no view towards the site or no established potential visibility; › 1 no. within ZTV and with established potential visibility (Scenic View V15).	No change – the 1 no. view with theoretical visibility according to ZTV mapping is represented by VP8 in Chapter 12 of the submitted EIAR, found to have a "Not Significant" effect.
No wind energy strategy at the time.	***Publication of Appendix X, Part A: Leitrim County Renewable Energy Strategy*** *as part of the current LCDP 2023-2029. Analysis indicates that the Proposed Development is in good alignment with the RES; see Section 1.4.2 for discussions.*

Newly published Wind Energy Strategy for Co. Leitrim

With respect to landscape designations in terms of wind energy strategy, the previous Leitrim CDP 2015-2021 did not have a published wind energy strategy or any associated mapping of wind energy zoning. In contrast, the current LCDP 2023-2029 has published a renewable energy strategy with wind energy zoning landscape designations: *Appendix X, Part A: Leitrim County Renewable Energy Strategy (RES)*; see Section 1.4.2 for discussions on how the Proposed Development is in good alignment with the RES.

1.4.1.2 Sligo CDP 2024-2030

Overall, there is no change in designations, within the current CDP, affecting the Proposed Development with respect to the landscape areas of "Normal Rural Landscape" and "Sensitive Rural Landscape"– the site is located in the former, which has a higher capacity to absorb development. Similarly, there is no change in designations affecting the Proposed Development with regard to protected Scenic Views & Prospects, except that the closest Scenic Route to the site, SR66 has been renumbered as SR79, with no change to the description of the view. One viewpoint (VP15) representing SR-66 was assessed in Chapter 12 of the submitted EIAR; all details of landscape designations are outlined below in Table 1-2.

In terms of wind energy strategy, Co. Sligo currently has none, as was the case during the time of conducting the LVIA. Instead, in the new SCDP 2024-2030, Volume 3 Ch.31 Energy & Telecommunications Section 3.1 Wind Energy states the intention to produce a renewable energy strategy in the future (p.122):

> *"Sligo County Council will prepare a Renewable Energy Strategy in accordance with the forthcoming Regional Renewable Electricity Strategy and the revised Methodology for Local Authority Renewable Energy Strategies (a measure contained in Section 12.3.1 of CAP23), when published."*

The section goes on to indicate that the 2006 WEDGs will be the main guidance to consider for all current development proposals:

> *"In the interim period, the Planning Authority will continue to assess all wind energy development proposal using the criteria set out in the DECLG's Wind Energy Guidelines (2006)."*

Consideration of how the Proposed Development aligns with the 2006 WEDGs and 2019 Draft Revised WEDGs is detailed below in Section 1.4.5.

Table 1-2 Designations within Previous Sligo CDP v. SCDP 2024-2030

Assessment in Ch.12 of the EIAR as per Sligo CDP 2017-2023	Current Review of Proposed Development as per the updated SCDP 2024-2030
Proposed Development falls within a designation of "Normal Rural Landscape" which has the capacity to "absorb development".	No change.
Designations of "Visually Vulnerable Areas" and "Sensitive Rural Landscape" occur within 1km of the site, with sensitivity based on the area/landscape's capacity to "absorb development".	No change – the Proposed Development would not be absorbed into these landscapes, only into the "Normal Rural Landscape" as indicated above.
Outlines protected Scenic Routes. No designations fall within the site boundary.	No change.
Within 5km: 1 No. protected Scenic Route within ZTV and with established potential visibility: SR66 – Views of Carran Hill.	Route number changed from SR66 to SR79—no change to description of view. View is represented by VP15 in Chapter 12 of the submitted EIAR, found to have "Slight" effect.
Remaining protected Scenic Routes within the 20km LVIA Study Area: › 29 No. with no view towards the site, no established potential visibility, or found to have "Imperceptible" effect.	No change.
Wind energy policy is set out in Ch.11 with five objectives relating to landscape: SP-EN-1, SP-EN-2, SP-EN-5, SP-EN-7 and SO-EN-2.	Wind energy policy in the SCDP 2024-2030 is set out in Volume 3 Ch.31.3.1, listing only three objectives, instead of five. Objectives SP-EN-1, SP-EN-2 and SP-EN-5 are the same, renamed with the prefix P-EN—these pertain to protecting landscape, facilitating sustainable onshore renewable energy

Assessment in Ch.12 of the EIAR as per Sligo CDP 2017-2023	Current Review of Proposed Development as per the updated SCDP 2024-2030
	development and collaborating with local/rural communities. Objective SO-EN-2 is no longer included: *"Undertake an analysis of suitable areas for wind energy and prepare a map showing County Sligo's Landscape Suitability for Wind Energy Developments, in accordance with Section 3.5 of the Wind Energy Guidelines (2006) and any subsequent revisions."* ***Objective SP-EN-7 is no longer included:** Protect significant landscapes from the visual intrusion of large-scale energy infrastructure.*

CDPs Excluded - Note that, while the 20km LVIA Study Area for the Proposed Development encompasses small areas of Co. Roscommon and Co. Cavan, Chapter 12 of the submitted EIAR determined that landscape policies and designations in these counties were either found to be not relevant, or were scoped out of assessment, thus the CDPs for these counties are not considered here.

*Removal of Landscape/Visual Intrusion Objective SP-EN-7 from Sligo CDP 2024-2030

It is important to highlight that, in the context of renewable energy policy, the updated SCDP 2024-2030 has removed the "Strategic Energy Policy" objective from Section 11.1.9 Energy Efficiency of the previous Sligo CDP 2017-2023 (p.199) which deals with the protection of landscape in relation to large-scale energy infrastructure such as wind farms:

- [Removed from current SCDP 2024-2030:] "***SP-EN-7** Protect significant landscapes from the visual intrusion of large-scale energy infrastructure.*

The Proposed Development constitutes "large-scale energy infrastructure" and it is therefore indicated that the protection of "significant landscapes" from "visual intrusion" is no longer designated under local policy. Regardless of this, the concern of potential visual intrusion as a result of the Proposed Development was at the forefront of the project design; this is discussed as follows.

The reduction or mitigation of effects related to visual intrusion, as well as other landscape and visual effects, as a result of the Proposed Development was achieved through the iterative project site selection and design process, informed by early-stage impact assessment work, landscape modelling, ZTV mapping and photomontage preparation; this is reported in Chapter 12 of the submitted EIAR (Section 12.2.1.1, p.2 and Section 12.4.2.1, p.13). Therefore, the design of the Proposed Development incorporates elements to reduce or mitigate effects relating to visual intrusion, including alignment with the 2006 WEDGs and 2019 Draft Revised WEDGs; these elements are detailed below in Section 1.4.4 and Section 1.4.5.

1.4.2 Good Alignment with New Wind Energy Strategy for Co. Leitrim

As reported above in Table 1-1 of Section 1.4.1.1, no wind energy strategy for Co. Leitrim was published at the time of writing Chapter 12 of the submitted EIAR. With the newly updated LCDP 2023-2029, Co. Leitrim has now published *Appendix X, Part A: Leitrim County Renewable Energy Strategy* (hereafter, the RES), which presents the wind energy strategy analysis for the county and maps several factors regarding wind energy development; these include:

- Fig.6.3 Wind Opportunities & Constraints (RES, p.40);
- Fig.6.4 Risk Rating of the Available Areas (RES, p.41);
- Fig.6.5 Landscape Capacity for Wind Turbines (RES, p.42).

Analysis indicates that the Proposed Development is in good alignment with the new RES with regard to the above factors, as illustrated in Figure 1-1 below, followed by discussion.

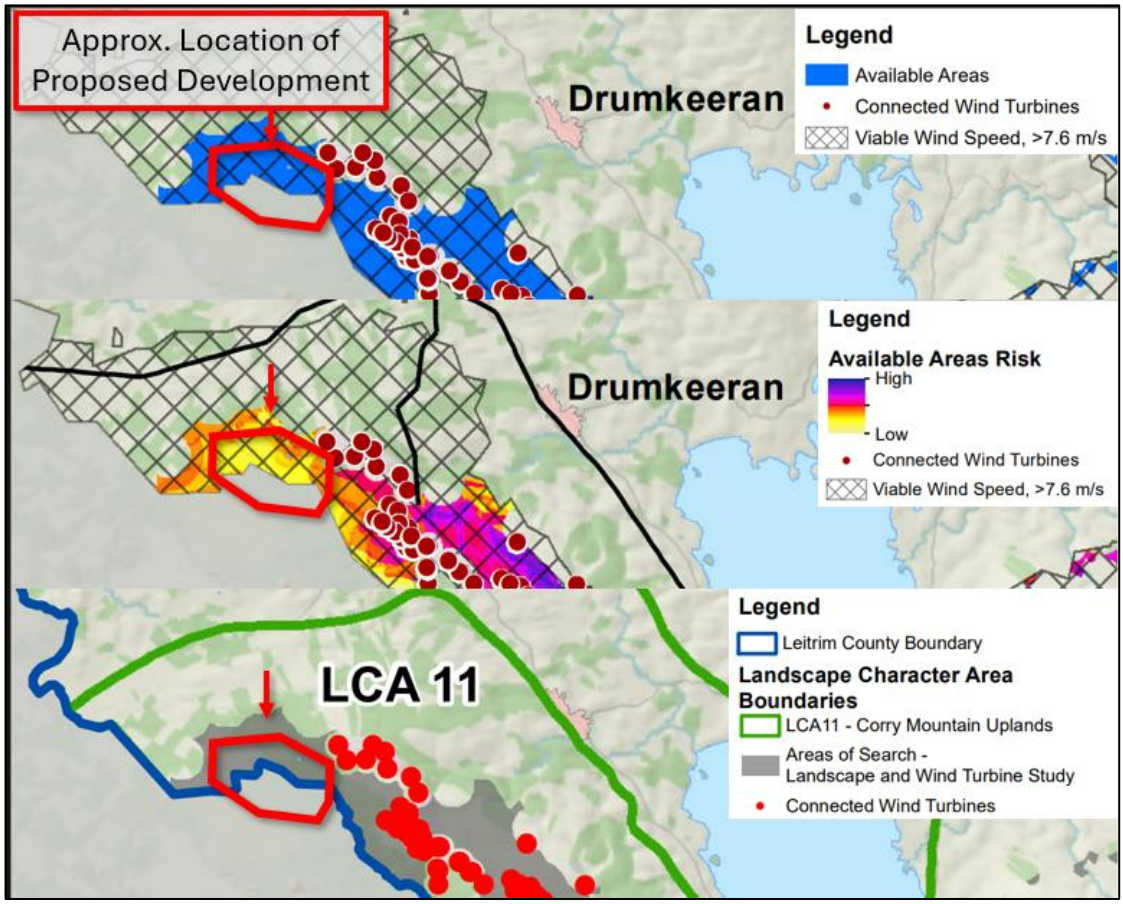


Figure 1-1: Location of Proposed Development in "Available Area" of "Low Risk" with "Viable Wind Speed >7.6m/s" within a "target" LCA of the newly published Leitrim County Renewable Energy Strategy (modified from Figs. 6.3, 6.4, 6.5 of that strategy)

The Proposed Development falls within an "Available Area" of "Low Risk" (see definition below) and "Viable Wind Speed >7.6m/s" as designated by the LCDP 2023-2029 RES and also lies within a "target" search area boundary of *Landscape Character Area (LCA) 11 Corry Mountain Uplands* for the Landscape and Wind Turbine Study of the LCDP 2023-2029 RES. This is demonstrated in Figure 1-1 above, extracted from the above listed figures of the RES and modified with the approximate location of the Proposed Development marked relative to the different designation zones.

In the LCDP 2023-2029 RES, the "Risk Level" of designated "Available Areas" for wind energy development in Co. Leitrim was determined in order to provide (p.36) "*a tool which flags areas of having a higher or lower concentration/distance from various sensitive receptors*." The scale is continuous with 5 for High, 3 for Medium and 1 for Low, and considers relevant factors including distance to "sensitive receptors" and distance to "natural physical attributes such as groundwater vulnerability, geological heritage sites, soil drainage, landslide and flooding susceptibility." The portion of Available Area in which the Proposed Development is sited is ranked as "Low Risk" which is the lowest category.

1.4.3 Spatial Analysis of "Available Area" for Wind Energy and Protected Landscapes in Co. Leitrim

GIS analysis shows that the proposed turbines are located within a very small percentage of "Available Area" in the Leitrim RES that does not overlap with LCDP 2023-2029 landscape designation areas (i.e. AONB/AHVAs), thereby avoiding wind energy development directly within protected landscapes. The analysis is explained as follows.

The total "Available Area" for wind energy development as designated by the LCDP 2023-2029 RES amounts to 5.82% of the total land area of the county, which is a low amount of the total land area. Of this "Available Area," a high proportion (79% of the Available Area or 4.58% of total county land) overlaps with designated protected landscapes, i.e. AONBs and AHVAs, thereby leaving only a very small proportion of Available Area (21% of the Available Area or 1.24% of total county land) within Co. Leitrim available for wind energy development without compromising the protected landscapes. The proposed turbines are located within this very small percentage of 1.24% of total county land which does not overlap with AONBs and AHVAs, thereby demonstrating that the Proposed Development avoids direct development within AONBs and AHVAs and is in compliance with the planning objectives and strategy of the LCDP 2023-2029 RES.

Figure 1-2 below presents the spatial analysis of the entire Co. Leitrim and Figure 1-3 presents the enlargement of the Proposed Wind Farm site where the turbines are located, showing that the proposed turbines are sited within "Available Area" which does not overlap with AONBs or AHVAs.

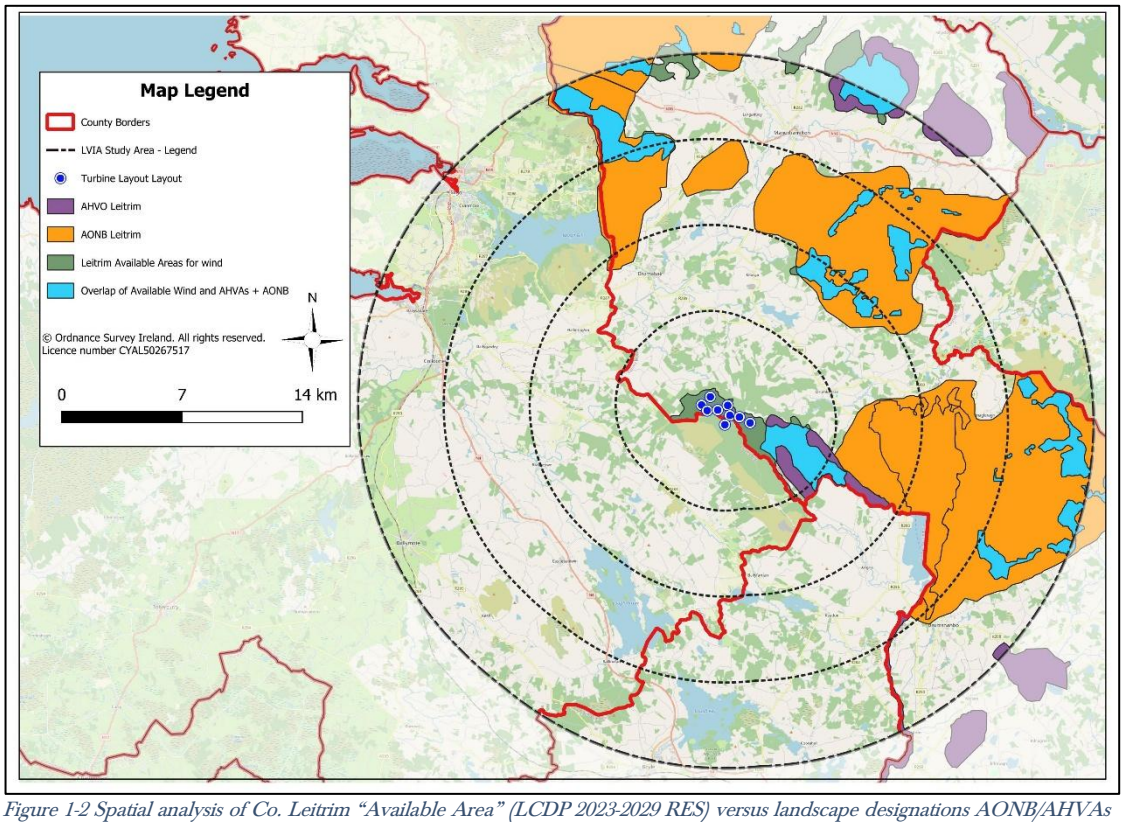


Figure 1-2 Spatial analysis of Co. Leitrim "Available Area" (LCDP 2023-2029 RES) versus landscape designations AONB/AHVAs

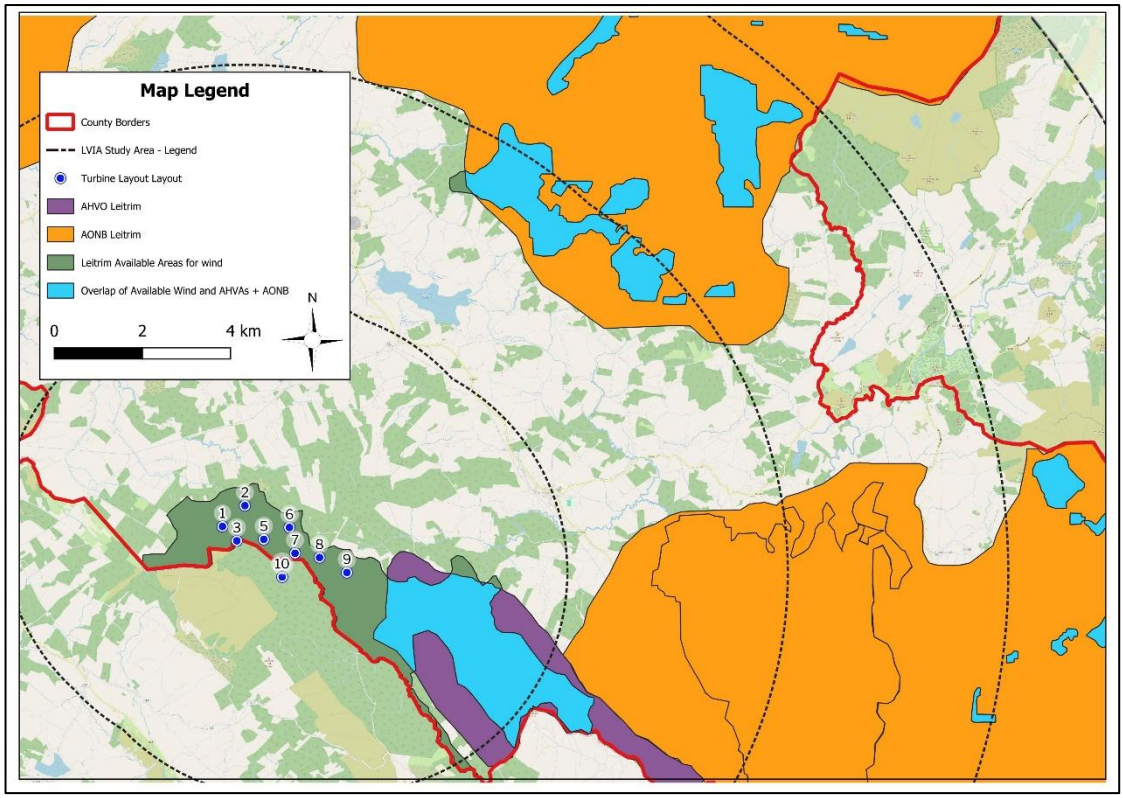


Figure 1-3 Location of proposed turbines within "Available Area" which does not overlap with AONB/AHVAs

1.4.4 Mitigation of Landscape and Visual Effects by Good Wind Farm Design

Chapter 12 of the submitted EIAR (Section 12.2.1.1, p.2) reports that the Proposed Development incorporates landscape and visual design considerations for good wind farm design, including the following:

- "***Limited Visibility within Enclosed Topography****: The turbines have been located within an area surrounded by lands of high elevations which limits open views of the project, particularly from potentially sensitive receptors such as settlements.*
- ***Coherent Layout****: The turbine layout has been designed to create a coherent cluster, contiguous and connected to each other visually and with consistent spacing.*
- ***Appropriate Scale to Existing Turbines****: The turbine layout and scale has been designed to fit with the existing turbines located in the vicinity of the development which are at a higher elevation to the proposed development.*
- ***Adherence with WEDGs Set-back Distance****: All turbines have been located greater than 4-times-tip-height from the nearest point of the curtilage of any residential property in order to protect residential visual amenity.*"

During the initial site selection process, landscape sensitivity was identified as a key constraint and so landscapes considered to be less sensitive are preferred over sites with more sensitivity to change. During site design process, the potential visibility of the project was reduced by removing two turbines located to the north west of the site which would have extended the spatial extent of the project and the number of visual receptors. The site location and current layout minimises the theoretical potential for visibility and the site visits and assessment tools show that the actual visibility is far less than the theory due to varying degrees of visual screening by vegetation and localised topography. Where visibility does occur, the design is in accordance with best practice and a coherent project, sympathetic to its neighbouring wind turbines, is evident.

1.4.5 Proposed Development alignment with WEDGs Design Recommendations for Landscape Character Type

Chapter 12 of the submitted EIAR (Section 12.4.2.1, p.13) reports that the Proposed Development is located in a landscape that closely aligns with the "Mountain Moorland" landscape character type identified in the 2006 WEDGs and 2019 Draft Revised WEDGs, and the project design aligns with the recommendations of these guidelines, as follows..

Key characteristics of landscape character type (DoEHLG 2006, p.47; DoHPLG 2019, p.101):

- *"**Mountain Moorland Landscape**: Peaked, ridged or rolling mountains and upland with steep slopes or gently formed valleys;*
- *Generally unenclosed;*
- *Landcover comprising of blanket bog, a mottling of heather, wild grasses and some rush in wet flushes;*
- *A landscape type of relative remoteness and often comprising pristine, unspoilt and remote landscapes."*

The siting and design guidance for wind energy developments within Mountain Moorland Landscape are recommended as follows in the WEDGs (DoEHLG 2006, p.59; DoHPLG 2019, p.110) (see italicised quotations followed by analysis of the Proposed Development):

- *"**Location:** It may be acceptable to locate wind energy developments on ridges and peaks. They may also be appropriate, in certain instances, in a saddle between two peaks where they will be partially contained or "framed". A third acceptable location is lower down on sweeping mountainsides."*

In terms of location, the proposed turbines are located in a saddle between two peaks, thereby providing a degree of visual containment from vast areas around the site.

- *"**Spatial Extent:** Given the typical extensive areas of continuous unenclosed ground, larger wind energy developments can generally be accommodated because they correspond in terms of scale. However, the spatial extent of a wind energy development would need to be reduced where a suggestion of smaller scale is provided by nearby landscape features."*

Spatial extent is the area covered by a wind energy development within the view or landscape, reflecting the number of turbines involved and their spacing. In terms of spatial extent, the proposed turbines occupy a moderate extent and are well within keeping of the surrounding landscape scale.

- *"**Spacing**: All spacing options are usually acceptable. Where a wind energy development is clearly visible on a crest or ridge there is considerable scope to vary the rhythm, though on simple ridges, regular spacing may be more appropriate. On sweeping and continuously even areas of mountain moorland or upland plateaux regular spacing may be most desirable."*

In terms of spacing, the proposed turbines are regularly spaced on a simple ridge; therefore, the spacing is appropriate and acceptable.

- *"**Layout**: All layout options are usually acceptable. However, the best solutions would either be a random layout, and clustered where located on hills and ridges, or a grid layout on sweeping and continuously even areas of moorland or plateaux. Where a wind*

energy development is close to a linear element, such as a river, road or long escarpment, a corresponding linear layout or staggered line might be most desirable."

In terms of layout, the proposed turbines are largely clustered within the saddle of the upland peaks, which is appropriate for the position of the proposed turbines along the simple ridge.

- ***"Height:** There would generally be no height restrictions on mountain moorlands as the scale of landscape is so great. However, shorter turbines may be more appropriate where they are located on small peaks and outcrops in order to maintain an appropriate scale. Profile, whether even or uneven, is dependent on topography: the more rugged and undulating (e.g., knolls and crags) the more uneven it will be. The profile of the wind energy development should not necessarily run in parallel to that of the topography."*

In terms of height, the proposed turbines are of a scale that is in keeping with the landscape, meaning that the height of the proposed turbines can be effectively absorbed into the broad landscape. In addition, the profile is appropriately uneven following the rugged terrain.

- ***Cumulative Effect:** The open expanse of such landscapes can absorb a number of wind energy developments, depending on their proximity. The cumulative impact will also depend on the actual visual complexity of landform, whether steeply rolling, undulating or gently sweeping. The more varied and undulating an area is topographically, the greater its ability to absorb and screen wind energy developments. The aesthetic effect of wind energy developments in these landscapes is acceptable where each one is discrete, standing in relative isolation."*

With regards to cumulative effect, the Proposed Development is located within varied and undulating topography, and therefore, with the exception of Garvagh Glebe all other existing and permitted wind farms are not in visual proximity with the Proposed Development.

1.4.6 Recommended Refusal Reason No. 3

This section provides further discussion on the issues raised by the previous Inspector in Recommended Refusal Reason No.3 of the ACP Inspector's Report (detailed above in Section 1.3).

1.4.6.1 Height, Scale, Siting on Ridgelines and Skyline Nature of the Proposed Turbines

As reported in Chapter 12 of the submitted EIAR (Sections 12.2.1.1 and 12.4.2.1), the proposed turbines are of a height (Maximum height 170m, Minimum height 165m) that is in keeping with the scale of the surrounding landscape and the proposed turbines are sited on or near ridgelines such that the infrastructure is viewed partially in the skyline. As discussed above in this document in Section 1.4.4 and Section 1.4.5, these aspects of the design are in alignment with guidance set out in the 2006 WEDGs and 2019 Draft Revised WEDGs.

The height and profile of the proposed turbines follows the natural topographic undulations of the upland mountain moorland landscape creating a slightly uneven profile which is preferred in the WEDGs for Mountain Moorland landscape types. In addition, from several viewpoints (VP3, VP4, VP7, VP9, VP10, VP11, VP13, VP14 and VP16 of the Chapter 12 Photomontage Booklet) the proposed turbines are viewed amongst existing features in the foreground of landscape views such as utility poles, fencing, visible buildings, etc. and do not contribute to substantially or at all to raising the existing skyline. These aspects of the design are demonstrated below in Figure 1-4 depicting Photomontage VP16 and its accompanying wireline, extracted from the EIAR Volume 2 Photomontage Booklet accompanying Chapter 12 of the submitted EIAR. VP16 was captured 1.4km from the nearest proposed turbine.



Figure 1-4 Extraction of VP16 from the EIAR Volume 2 Photomontage Booklet accompanying Chapter 12 of the submitted EIAR, showing naturally undulating height, profile and skyline of the proposed turbines

1.4.6.2 Physical Extent of the Visual Influence of the Proposed Turbines

The ACP Inspector's Report (p.62) expresses that:

> *"The applicant's own modelling shows that the visibility of the turbines would be very expansive. The proposed development would have a distinctive visual influence from the north, west and east. Some clarity is required on the applicant's illustrations when referring to this."*

Clarity was provided in Chapter 12 of the submitted EIAR, *Appendix 12-1 LVIA Methodology* and is explained again here, as follows. The "*modelling*" referenced refers to the Zone Theoretical Visibility (ZTV) mapping conducted in the LVIA (Fig.12.6 of Chapter 12 of the submitted EIAR), which depicts all areas within the LVIA Study Area where there is potential for visibility of the proposed turbines in a bare-ground scenario, calculated using the half-blade tip height, rotor diameter and hub height of the proposed turbines following best-practice guidance.

Crucially, as noted in the LVIA *Appendix 12-1*, because the ZTV is calculated assuming a bare-ground scenario (i.e. not accounting for trees, vegetation, or built infrastructure), the potential for actual visibility of the proposed turbines on the ground is *significantly less* than the theoretical visibility predicted by the ZTV mapping. Other factors contributing to reduced potential for visibility of the proposed turbines include the disproportionate screening effect (i.e. the perception of turbines appearing smaller with increased distance from the turbine) and atmospheric weather, both of which obscure visibility. In addition, the generation of the ZTV utilises large scale topographical data (interpolation across 10m OSi contour data) and does not account for topographical variation of smaller scale (e.g., less than 10m). Therefore, on the ground, modest and localised undulations in topography that may not be represented in the ZTV map are likely to further inhibit visibility of the proposed turbines.

All limitations of ZTV mapping are outlined in the LVIA Appendix 12-1. For example, while the ZTV indicates areas from which a wind farm may be visible, it cannot show how the proposed turbines will actually look, nor can it indicate the nature or magnitude of visual impacts. The visibility of turbines naturally decreases with the distance from which they are viewed, yet this is not accounted for in the ZTV. The figure below provides an illustration of the differences in view relative to the distance of the viewer from the turbine:



Figure 1-5 Effect of Distance on the Visibility of Wind Turbines (illustrative purposes only) – Included as Figure 1-1 of Appendix 12-1 of submitted EIAR.

To the north, west and east, the ZTV Map (Fig.12.6 of the Chapter 12 of the submitted EIAR) indicates large areas of theoretical visibility which helped inform the selection of sensitive receptors; however, as demonstrated above, the indication of theoretical visibility is not necessarily an indication of actual potential for visibility. The ZTV discussion of potential visibility of the proposed turbines is provided in Chapter 12, Section 12.7.3.3 Visual Effects, of the submitted EIAR. The onsite visibility appraisal and viewpoint assessment of receptors indicate that the highest residual visual effect in the entire LVIA Study Area is "Moderate," arising at one out of 17 viewpoints. The remaining residual effect ratings range from "Imperceptible" to "Slight" which are not significant in the context of EIAR.

1.4.6.3 Impact on Landscape Character

In terms of landscape character, only Leitrim's LCA 11 Corry Mountain and the provisional LCA for Sligo LCA1 Carrane Hill, in which the proposed turbines are located, would experience direct effects on landscape character as a result of the proposed development. Any other effects on other LCAs would be moderate, indirect and a slight increase in visible turbines additional to the existing and permitted turbines, as the proposed development might be visible within the LCAs but located outside those other LCAs and thus be a landscape element seen in the distance.

1.4.6.4 Proximity to Natural Heritage Areas

No Natural Heritage Areas occur within the Proposed Wind Farm site itself. Effects on the proximity of the proposed turbines to Natural Heritage Areas including Carrane Hill Bog and Corry Mountain Bog are assessed and reported in Chapter 6 Biodiversity, Flora and Fauna of the submitted EIAR.

The Carrane Hill Bog NHA is 280m outside the Proposed Wind Farm site and is adjacent to existing wind energy infrastructure (Carrownyclowan Wind Farm). The Corry Mountain Bog NHA is adjacent to the Proposed Wind Farm site and contains existing wind energy infrastructure (Arigna Wind Farm) and is also adjacent to existing wind energy infrastructure (Black Banks Wind Farm).

Carrane Hill Bog NHA is located within the provisional *LCA 1 Carrane Hill* and Corry Mountain Bog NHA is located within the *LCA-11 Corry Mountain* as well as the designated *AHVA B7 Corry Mountain*. These three landscape receptors were assessed for effects on landscape character in Chapter 12 of the submitted EIAR. Section 12.8.1 of the LVIA reports that:

- "*In County Leitrim the Areas of Outstanding Natural Beauty and High Visual Amenity Areas have theoretical visibility indicated in some areas, but distance and screening mean that the effects will be very minor.*
- *In terms of landscape character only Leitrim's LCA 11 Corry Mountain and the provisional LCA for Sligo LCA1 Carrane Hill, in which the proposed turbines are located, would experience direct effects on landscape character as a result of the proposed development.*"

"Mitigating factors" which are considered to help offset the effects on landscape character in the LCAs are reported in the LVIA Appendix 12-2 and include:

- "*Siting and design were developed in accordance with the DoEHLG guidelines (2006) for Mountain Moorland landscape character types,*
- *Limited theoretical visibility,*
- *Most of the areas of Sensitive Rural Landscapes will have no visibility of the proposed turbines,*
- *The focus of the scenic routes in this LCA is generally not in the direction of the proposed turbines.*
- *Due to forestation and roadside vegetation actual visibility will be significantly reduced.*"

1.4.6.5 Effects on Tourism Resource of the Area

In the LCDP 2023-2029, Appendix VIII County Leitrim Landscape Designations (p.13), the following is noted with respect to the role of tourism in the rationale for landscape designations:

> *"Designation can influence the promotion of some of the most important places for recreation and tourism within a local authority area."*

As detailed below in Section 1.4.6.6, no landscape designations from the LCDP 2023-2029 fall within the boundary of the Proposed Wind Farm site. In terms of the wider landscape within the 20km LVIA Study Area, effects on relevant tourism sites were considered in the LVIA as follows.

In the LVIA methodology, tourism is one of several considerations used in determining the sensitivity of a specific receptor, destination site or landscape area. With respect to popular tourism destination sites, no sites were identified within 5km of the proposed turbines. Chapter 12 of the submitted EIAR (Section 12.7.3.3.4, p.56) reports that 3 no. amenity destinations will have visibility of the proposed turbines. All three are located greater than 10km from the proposed turbines and are represented by viewpoints:

- Parkes Castle Viewpoint 6.
- Corry Strand Viewpoint 12.
- Carrowkeele Megalithic Cemetery Viewpoint 1.

The residual visual effect in each case was deemed "Not Significant" due to mitigation factors such as significant intervening distance, significant screening by landform and vegetation, no residential visual receptors and limited spatial extent of the proposed turbines within the views. Furthermore, at these three locations, views looking towards the proposed turbines will not be the primary focus of the amenities at these destinations and visual receptors will be seasonal and limited by weather conditions to a greater or lesser extent.

1.4.6.6 Visibility from Co. Leitrim AHVAs and AONBs

No landscape designations of High Visual Amenity Areas (AHVAs) or Areas of Outstanding Natural Beauty (AONBs) in the LCDP 2023-2029 fall within the Proposed Wind Farm site.

Within the wider 20km LVIA Study Area, identified areas of landscape designation from the LCDP 2023-2029 include AONBs and AHVAs. No AONBs are within 5km of the proposed turbines. 1 no. AHVA (*B7 Corry Mountain*) is within 1km at its closest point to the nearest proposed turbine, to the southwest of the proposed wind farm site. Chapter 12 of the submitted EIAR Section 12.8.1 Landscape Effects (p.59) reports that in County Leitrim, while certain AONBs and AHVAs have theoretical visibility indicated in some areas, distance and visual screening mean that the effects will be very minor.

Chapter 12 of the submitted EIAR demonstrates that the Proposed Development will not significantly impact key visual receptors. Regarding AHVAs and AONBs, as detailed above in Section 1.4.5, the visual effects within these designated landscape areas will be very minor owing to the reduced impact by distance and visual screening. Regarding effects on tourist amenities, also as detailed above in Section 1.4.5, few tourist destinations are in the LVIA Study Area and all had "Not Significant" residual effects.

1.4.6.7 Visibility from Co. Sligo Sensitive Rural Landscapes and Visually Vulnerable Areas

No landscape designations of Sensitive Rural Areas or Visually Vulnerable Areas in SCDP 2024-2030 fall within the Proposed Wind Farm site. Designations of Sensitive Rural Landscape and Visually Vulnerable Areas occur within 1km of the site, as depicted in the LVIA *Appendix 12-4 - ZTV Viewpoints Landscape Designations & Cumulative Baseline Map*. According to the SCDP 2024-2030, the sensitivity of these designated areas is based primarily on the area/landscape's capacity to "absorb development." Because the Proposed Development is not physically located within the landscape areas it would not be absorbed into these landscapes, therefore the potential for impacts on these designated areas is limited. The Proposed Development is located within an area designated as "Normal Rural Landscape." As the turbines and proposed development site itself are outside an area of Sensitive Rural Landscape and away from Visually Vulnerable Areas the proposal aligns with the policy objectives of the SCDP 2024-2030.

1.4.6.8 Visibility from Carrowkeele Passage Tomb Landscape

With regard to the Carrowkeele Passage Tomb Landscape, which is not a landscape designation in local policy, as reported above in Section , the Carrowkeele Megalithic Cemetery is located greater than 14km from the proposed turbines and was assessed in Chapter 12 of the submitted EIAR *Appendix 12-3 Viewpoint Assessment* and found to have "Not Significant" landscape and visual effects.

1.4.6.9 Impact on Lough Gill AONB, Co. Leitrim

Chapter 12 of the submitted EIAR Section 12.7.3.1.1 (p.43, Table 12-18) reports that the AONB A4 The Doons, Lough Gill and environs has "*patchy theoretical visibility throughout this AONB*" which is located greater than 5km from the proposed turbines at its nearest point. As shown in the LVIA *Appendix 12-4 - ZTV Viewpoints Landscape Designations & Cumulative Baseline Map*, a great proportion of the AONB is located greater than 10km from the proposed turbines and has no theoretical visibility. Photomontage Viewpoints VP5 and VP6 were captured from within this AONB within areas of "Full" theoretical visibility and were assessed in detail in the LVIA *Appendix 12-3 Viewpoint Assessment*. The sensitivity of both viewpoints is given as "High" and the magnitude of change is predicted to be "Slight," with the rationale that the proposed turbines would be "partially visible or visible at sufficient distance to be perceptible and result in a low level of change in the view and its composition and a low degree of contrast. The character of the view may be altered but will remain similar to the baseline existing situation." As a result, the residual effects in terms of visual impact for both Viewpoints V5 and V6 in the Lough Gill AONB are reported as "Not Significant."

1.4.6.10 Impact on Designated Scenic Routes and Protected Views

Regarding designated scenic routes and protected views, Chapter 12 of the submitted EIAR (Section 12.7.3.3.4, p.55) reports that the vast majority of scenic routes and views designated in Counties Leitrim, Sligo and Roscommon will be unaffected by the Proposed Development owing to limited or no visibility determined by the on-site visibility appraisal; screening factors include distance, roadside vegetation and built structure and intervening topography, and protected views being directed away from the proposed turbines. Potential visibility could only be established at 1 no. protected view in Co. Leitrim, V15 and was represented by photomontage viewpoint V08 which found "Not Significant"

residual effects owing to screening, intervening distance, the small number of receptors and limited spatial extent of the proposed development as well as the view being focused on the lake in the foreground. 2 no. scenic routes in Sligo (SR-3, SR-66) had open visibility in the direction of the proposed turbines and were assessed using VP2 and VP15; see details on SR-66 in the next paragraph. The LVIA found that the residual visual effects were "Slight" at both viewpoints owing to substantial levels of screening and the focus of the protected views being in the opposite direction of the proposed turbines.

Co. Sligo Designated Scenic Route 66

Viewpoint V15 was captured to show the view from the local road in the townland of Ballynashee designated as SR-66 in the SCDP, located 5km from the nearest proposed turbine. According to the LVIA *Appendix 12-3 Viewpoint Assessment*, the view looks out over the Arigna River Valley to the south-western slopes of Corry Mountain and its ridgeline extending to the north-west and many existing and permitted wind turbines can be seen in the medium distance along the Corry Mountain ridge. Four of the proposed turbines will be visible from this viewpoint with the remaining turbines being screened by landform and vegetation. Hence, the spatial extent of the proposed turbines within the view is not significant. The sensitivity of VP15 was given as "Medium" and the magnitude of change was given as "Slight" thereby resulting in a residual visual effect of "Slight." Factors which mitigate the visual effects are reported as:

- "*Siting and design were developed in accordance with the DoEHLG guidelines (2006) for Mountain Moorland landscape character types.*
- *No nearby residential visual receptors and road users are infrequent.*
- *Large proportion of the proposed development is screened by the Carrane Hill ridgeline to the left of the image.*
- *This screening effect continues as you travel along the roadway towards the site. Limited spatial extent of the proposed development within the view.*
- *Designated view is focused on Carrane Hill, which is to the left of the proposed turbines.*"

Co. Sligo Designated Scenic Route 13

SR-13 is located greater than 10km from the nearest proposed turbine and is defined as "R286 from Sligo to Leitrim County boundary, with views of Lough Gill and Colgagh Lough." Chapter 12 of the submitted EIAR Section 12.5.1.1.2 (p.29, Table 12-6) reports that SR-13 has theoretical visibility in the direction of the proposed turbines. On-site visibility appraisal conducted for the LVIA found that "*no significant visibility was found on site*" and therefore SR-13 was scoped out of the assessment.

1.4.6.11 Cumulative Impact with Other Existing, Permitted and Proposed Wind Farms

With regard to cumulative landscape and visual effects, Chapter 12 of the submitted EIAR Section 12.8 concludes that:

> *"Although it was found that the proposed turbines will add to the cumulative landscape status, they will not change the character of the individual LCAs in terms of wind energy and therefore the cumulative landscape effects are considered "Low." The cumulative visual effects are considered acceptable, in terms of increase in spatial extent, visual separation and difference in scale."*

These conclusions on cumulative effects are discussed as follows.

After identifying the cumulative baseline and cumulative status for each LCA it was assessed whether the additional proposed turbines would change the status of the individual LCAs. Although, it was

found that the proposed turbines would add to the cumulative landscape status, it would not change the character of any of the individual LCAs in terms of wind energy and therefore the cumulative landscape effects are considered Low.

When viewed from the majority of selected viewpoints, the proposed development does not extend or only slightly extends the vertical or horizontal spatial extent of wind farms in the landscape, due to it being framed by other existing or permitted wind farm developments on both sides. There are no cumulative effects at two viewpoints. At four viewpoints the spatial extent of wind turbines in the view will not increase and at nine viewpoints there will be a slight increase in the spatial extent. At Viewpoints 17 (Killarga) and 21 (townland of Beagh) the spatial extent will increase moderately and significantly, respectively. Hence overall the cumulative landscape effects are not significant.

In terms of cumulative visual impacts, an assessment was made whether there was visual separation between existing turbines and the proposed turbines as well as if the difference in scale of existing turbines contrasted adversely to that of the proposed turbines. These two factors were then applied to a matrix to arrive at the cumulative visual effects ratings reported in the LVIA Table 12-23. The spatial extent was predominantly “Slight” to “Moderate” with one viewpoint (16) exhibiting a significant increase in spatial extent of turbines in the view. The assessment of the perceived difference of scale was also predominantly “Slight” to “Moderate” with one viewpoint showing a “Negligible” difference in scale. At no viewpoint was the difference in scale perceived as “Substantial”. Furthermore, when compared to the nearest existing turbines, the proposed development is at a lower level, thus there is no great difference in terms of tip height between the existing and proposed turbines when seen alongside each other.

A comparative ZTV (Figure 12-10 of Chapter 12 of the submitted EIAR) shows that the cumulative visibility over that of the existing and permitted turbines will only increase in a small number of tiny pockets due to the addition of the proposed Croagh turbines. Currently 80.7% of the study area has theoretical visibility of permitted or existing turbines. The proposed turbines will theoretically be visible in 0.3% of the study area where at present no existing or permitted wind turbines are seen. Therefore, it is considered that the proposed turbines will not have a significant impact on the extent of cumulative visibility of wind turbines over the existing visibility.

Furthermore, the landscape character of the study area is of a large scale which contains open, expansive views, and these assist in allowing the landscape to accommodate a large number of turbines. Considering the sizable amount of wind farm development that has already occurred, the proposed Croagh development will add a limited number of additional turbines.

1.5 Conclusion

This response document outlines the compliance of the Proposed Development with the updated Leitrim CDP 2023-2029 and Sligo CDP 2024-2030 in terms of landscape and visual policies and objectives, and reports that the location of the Proposed Development is favourable in terms of wind strategy zoning published in the Leitrim CDP 2023-2029 RES, which was not published at the time of writing the original LVIA, or Chapter 12 of the submitted EIAR. This document reports on the alignment of the Proposed Development with siting and design guidance of the 2006 WEDGs (DoEHLG 2006) and 2019 Draft Revised WEDGs (DoHPLG 2019). This document also lists the factors of the Proposed Development design which help to mitigate potential landscape and visual effects and provides detailed discussion on specific topics in the ACP Inspector’s Report of June 2022 which raised issues on landscape and visual effects.

The following conclusions are discussed in this document:

- The Proposed Development aligns with all relevant landscape policy objectives in the LCDP 2023-2029 and SCDP 2024-2030.

- The Proposed Development falls within an "Available Area" of "Low Risk" and "Viable Wind Speed >7.6m/s" as designated by the LCDP 2023-2029 RES and also lies within a "target" search area boundary of *Landscape Character Area (LCA) 11 Corry Mountain Uplands* for the Landscape and Wind Turbine Study of the LCDP 2023-2029 RES.
- The proposed turbines are located within a very small percentage of "Available Area" in the Leitrim RES that does not overlap with LCDP 2023-2029 high-sensitivity landscape designation areas, thereby avoiding wind energy development directly within AONBs and AHVAs and maintaining good compliance with the strategy and objectives of the LCDP 2023-2029 RES.
- In the context of wind energy policy, the SCDP 2024-2030 has removed the "Strategic Energy Policy" objective SP-EN-7 (p.199 of Sligo CDP 2017-2023), which deals with the protection of landscape from visual intrusion in relation to large-scale energy infrastructure such as wind farms.
- The Proposed Development exhibits good wind farm design in accordance with the 2006 WEDGs and 2019 Draft Revised WEDGs, including; limited visibility within enclosed topography, coherent layout, appropriate scale to existing turbines, and exceeding the recommended 500m and 4-times-tip-height set-back distances for visual amenity, all of which help to mitigate potential landscape and visual effects.
- The physical extent of visual influence of the proposed turbines is limited throughout the vast majority of the 20km LVIA Study Area owing to visual screening factors such as topography, vegetation, built structure and undulations in topography, as well as limited by diminishing perceived scale of the turbines with distance.
- The Proposed Development will not significantly impact on landscape character, tourist destination sites, landscape designations or scenic routes and protected views.
- The cumulative landscape effects are predicted to be "Low" because the proposed turbines will not change the character of individual LCAs throughout the LVIA Study Area and the cumulative visual effects are considered acceptable, in terms of the increase in spatial extent, visual separation and difference in scale.

This document demonstrates that, overall, the Proposed Development is located in favorable landscape for wind energy development and exhibits good wind farm design with limited visual influence. The Proposed Development will not significantly impact on landscape character, tourist destination sites, landscape designations or scenic routes and protected views, and the cumulative effects are predicted to be low in terms of landscape impact and will be acceptable in terms of visual impact.

Finally, this document highlights that "Note 1" of the Board Directions document (ABP-310788-21, p.4) acknowledges the Inspector's recommended refusal reason related to visual impact set out in the ACP Inspector's Report, as well as the granted decisions of the planning authority, and states the following conclusions in favour of the Proposed Development:

- "*The Board agreed with the assessment and determination of the planning authority that the Proposed Development would not have unacceptable direct, indirect or cumulative effects on landscape.*
- *The Board considered that the introduction of a wind farm into a landscape which already has a considerable number of windfarms could be readily assimilated without causing an adverse cumulative effect.*
- *The overall absorption capacity of the landscape along with the significant distance to key views of the Proposed Development, would present a visual change which would not of itself constitute a significant negative or adverse impact.*
- *The Board determined that the issue of visual impact would not warrant a refusal of permission in this instance.*"

END OF DOCUMENT