

# TOBIN

BUILT ON KNOWLEDGE

## Bord na Móna

Derryadd, Derryaroge and Lough Bannow Bogs –  
Application for Substitute Consent

Remedial Environmental Impact Assessment Report

Chapter 12 – Landscape and Visual

March 2025



TOBIN

## Table of Contents

<b>12.0 LANDSCAPE AND VISUAL IMPACTS.....</b>	<b>12-1</b>
<b>12.1 Introduction .....</b>	<b>12-1</b>
<i>12.1.1 Statement of Authority.....</i>	<i>12-1</i>
<i>12.1.2 Description of Development.....</i>	<i>12-2</i>
<b>12.2 Methodology .....</b>	<b>12-2</b>
<i>12.2.1 Guidance and Legislative Review.....</i>	<i>12-2</i>
<i>12.2.2 Desk Review.....</i>	<i>12-3</i>
<i>12.2.3 Field Survey.....</i>	<i>12-3</i>
<i>12.2.4 Impact Assessment Methodology.....</i>	<i>12-3</i>
<b>12.3 Receiving Environment (Baseline Year 1988) .....</b>	<b>12-8</b>
<i>12.3.1 Study Area .....</i>	<i>12-8</i>
<i>12.3.2 Landform and Drainage.....</i>	<i>12-9</i>
<i>12.3.3 Vegetation and Land Use.....</i>	<i>12-10</i>
<i>12.3.4 Centres of Population and Houses .....</i>	<i>12-10</i>
<i>12.3.5 Transport Routes.....</i>	<i>12-10</i>
<i>12.3.6 Recreation, Tourism and Heritage Amenities .....</i>	<i>12-11</i>
<b>12.4 Landscape and Visual Policy Context .....</b>	<b>12-11</b>
<b>12.5 Assessment of Significant Landscape and Visual Effects .....</b>	<b>12-13</b>
<i>12.5.1 Do-Nothing Scenario.....</i>	<i>12-13</i>
<i>12.5.2 Landscape and Visual Sensitivity (Baseline Year 1988).....</i>	<i>12-14</i>
<i>12.5.3 Peat Extraction Phase (1988 – 2019) Landscape and Visual Effects</i>	<i>12-14</i>
<i>12.5.4 Current Phase (2019 – Present Day).....</i>	<i>12-15</i>
<i>12.5.5 Remedial Phase.....</i>	<i>12-16</i>
<i>12.5.6 Risk of Major Accidents and Natural Disasters.....</i>	<i>12-16</i>
<i>12.5.7 Cumulative and Indirect Impacts.....</i>	<i>12-16</i>
<i>12.5.8 Ongoing and Future Enhanced Rehabilitation Measures (PCAS)</i>	<i>12-17</i>
<i>12.5.9 Potential Future Use – Proposed Derryadd Wind Farm.....</i>	<i>12-18</i>
<b>12.6 Mitigation and Monitoring Measures.....</b>	<b>12-18</b>
<b>12.7 Residual Effects .....</b>	<b>12-18</b>
<b>12.8 References.....</b>	<b>12-19</b>



## 12.0 LANDSCAPE AND VISUAL IMPACTS

### 12.1 INTRODUCTION

This chapter reports on the results of assessment of any significant effects on Landscape as a result of peat extraction and all ancillary works at the Application Site (Derryaroge, Derryadd and Lough Bannow Bogs) during the Peat Extraction Phase, the Current Phase, and the Remedial Phase. The assessments in this chapter will determine the landscape and visual effects that have occurred (or are likely to occur) during three differing timeframes termed 'phases' (as described in Chapter 4):

- 'Peat Extraction Phase': peat extraction activities and all ancillary works at the Application Site from July 1988 to the cessation of peat extraction in July of 2019 (July 1988 – July 2019). The Peat Extraction Phase is described in detail in Chapter 4 Section 4.7.
- 'Current Phase': the management of the Application Site since July 2019 (July 2019 to present). The Current Phase is described in detail in Chapter 4 Section 4.8.
- 'Remedial Phase': the activities intended to be carried out at the Application Site into the future. The Remedial Phase is described in detail in Chapter 4 Section 4.9.

Although closely linked, landscape and visual impacts are assessed separately;

**Landscape assessment** relates to changes in the physical environment, brought about by a development, which may alter its character. This requires a detailed analysis of the individual elements and characteristics of a landscape that go together to make up the overall character of that area. By understanding the aspects that contribute to this 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 how the landscape in question accommodated the type and scale of change associated with the project and to consider whether the project caused unacceptable adverse changes to its character.

**Visual Impact Assessment** relates to changes in the composition of views as a result of changes to the landscape, how these are perceived and the effects on visual amenity. Such impacts are population-based, rather than resource-based, as is the case of landscape impacts.

A description of the mitigation measures proposed to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and where appropriate, of any monitoring arrangements, are then discussed. This chapter will focus on existing or pre-existing measures used in order to mitigate the likely significant effects of peat extraction and ancillary works. A full description of the development is provided in Chapter 4.

#### *12.1.1 Statement of Authority*

This Landscape and Visual Assessment chapter was prepared by Richard Barker (MLA, PG Dip Forestry, BA Env, MILI), Principal Landscape Architect at Macro Works Ltd of Cherrywood Business Park, Loughlinstown, Dublin 18; a consultancy firm specialising in Landscape and Visual Assessment and associated maps and graphics. Relevant experience includes a vast range of infrastructural, industrial and commercial projects since 1999. The experience of the author also specifically includes the assessment of Derryadd Wind Farm and the conversion of the Lough Ree Power Station to Biomass fuel.

### *12.1.2 Description of Development*

This chapter of rEIAR is prepared in support of an application for Substitute Consent for peat extraction activities and all ancillary works carried out by Bord na Móna on lands at the Application Site since July 1988. The Application Site is located approximately 1 km east of Lanesborough in County Longford as outlined in Chapter 1 Figure 1-1.

The peat extraction activities and all ancillary works undertaken at the Application Site, which comprise the development for which Substitute Consent is being sought and the Project for which this rEIAR is prepared, consist of the following:

- Installation of surface water drainage infrastructure at Mountdillion Bog Group, specifically at Derryadd, Derryaroge and Lough Bannow Bogs to facilitate peat extraction activities from 1988 to July 2019;
- Vegetation clearance to facilitate peat extraction activity from 1988 to July 2019;
- Industrial scale peat extraction (milled peat);
- Use and maintenance of pre-existing ancillary supporting infrastructure and services to facilitate peat extraction (e.g., railway infrastructure, fixed fuel tanks, drainage (drains, silt ponds, pumps), machine passes etc.), from 1988 to July 2019;
- Control Measures associated with the above, inclusive of the IPC Licence measures (Ref. P0504-01) which commenced from 2000 onwards to the present day; and,
- All associated site development and ancillary works.

## **12.2 METHODOLOGY**

Production of this Landscape and Visual Impact Assessment involved:

- A desktop study and review of relevant landscape and visual characterisation / designations in Longford County Development Plan iterations;
- Fieldwork undertaken over six years for various projects associated with and in the vicinity of the Mountdillion Bog Group and nearby Lough Ree Power station;
- Retrospective assessment of the significance of the landscape impact from peat extraction and ancillary works as a function of landscape sensitivity weighed against the magnitude of the landscape impact; and
- Retrospective assessment of the significance of the visual impacts from peat extraction and ancillary works as a function of visual receptor sensitivity weighed against the magnitude of the visual impact.

### *12.2.1 Guidance and Legislative Review*

This chapter has been prepared having regard to the following guidelines and policy documents:

- Institute of Environmental Management and Assessment (IEMA) and landscape Institute (UK) 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3-2013); and
- EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIA Reports) (2022) and draft revised Guidelines on information to be contained in Environmental Impact Statements; and Advice Notes for preparing EIS (2015).
- Directive 2011/92/EU as amended by Directive 2014/52/EU
- Longford County Development Plans (1990, 2003-2009, 2015-2021)

### 12.2.2 Desk Review

A desk study was undertaken in order to collate and review background information of the development during the assessment. The information obtained is referenced in Table 12.1.

*Table 12.1: Data Sources*

Source	Data	Date
Longford County Council	Longford County Development Plans (historic and available online)	1990, 2003-2009, 2009-2015 and 2015-2021
Bord na Móna	Appendix 4.5 Aerial Photography	1973 - 2020
Bord na Móna	Peat Extraction area maps	1973 - 2019

### 12.2.3 Field Survey

Fieldwork was not specifically undertaken in respect of this retrospective landscape and visual assessment but has been undertaken by the author within and around the Mountdillon Bog Group for other surrounding projects over the past six years. Previous fieldwork carried out in this area includes, but is not limited to;

- 2016-2019 Derryadd Wind Farm;
- 2017-2019 Project Gemini (Lough Ree Power Station upgrade);
- 2018-2019 Middleton House Solar Farm (Longford Co. Co. Ref. PL-18/135)
- 2021 Middleton House Solar Farm Extension (Longford Co. Co. Ref. PL-21/225)
- 2022 to Present Day: Proposed Derryadd Wind Farm Project

The fieldwork above involved the capturing of photography for representative viewpoint photomontages from publicly accessible roads and amenity areas within a 30km radius study area of proposed wind farms. There was also a proportional focus on the central study area, which encompasses Mountdillon Bog Group. The fieldwork also informed project-specific landscape character assessment for those developments for which the fieldwork was undertaken. The study areas for the Middleton House Solar developments and Project Gemini were 5km radius and 2km radius of the sites of those developments, respectively.

### 12.2.4 Impact Assessment Methodology

#### 12.2.4.1 Landscape Impact Assessment Criteria

In accordance with GLVIA3, when assessing the potential impacts on the landscape resulting from a proposed 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 setting can accommodate changes or new elements without unacceptable detrimental effects to its essential characteristics. Landscape Value and Sensitivity is classified using the following criteria set out in Table 12.2, which is derived from a combination of non-prescriptive relevant guidance (GLVIA3) and industry best practice.

*Table 12.2: 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 (e.g. World Heritage Site), 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, 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 management objectives include, enhancement, repair and restoration.
Negligible	Areas of landscape character that include derelict sites and degradation 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.

The magnitude of a landscape impact is a product of the scale, extent or degree of change that is likely to be experienced as a result of the development. 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 immediate setting that may have an effect on the landscape character (see Table 12.3).

*Table 12.3: Magnitude of Landscape Impacts*

Sensitivity	Description
<b>Very High</b>	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 overall change of the landscape in terms of character, value and quality.
<b>High</b>	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 an overall change of the landscape in terms of character, value and quality.
<b>Medium</b>	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 changes in landscape character, and quality.
<b>Low</b>	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.
<b>Negligible</b>	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.
<b>Positive</b>	Changes that restore a degraded landscape or reinforce characteristic landscape elements.

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 12.4.

Table 12.4: Impact Significance Matrix

	Sensitivity of Receptor				
Scale/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: The significance matrix provides an indicative framework from which the significance of impact is derived. The significance judgement is ultimately determined by the assessor using professional judgement. Due to nuances within the constituent sensitivity and magnitude judgements, this may be up to one category higher or lower than indicated by the matrix. Judgements indicated in orange are considered to be 'significant impacts' in EIA terms. Those impacts of Substantial and above are deemed to be Significant and those of Substantial-moderate and below are deemed Non-significant in EIA terms.

#### 12.2.4.2 Visual Impact Assessment Criteria

As with the landscape impact, and in accordance with GLVIA3, the visual impact of the project will be assessed as a function of sensitivity versus magnitude. In this instance the sensitivity of the visual receptor, weighed against the magnitude of the visual effect.

#### Sensitivity of Visual Receptors

Unlike landscape sensitivity, the sensitivity of visual receptors has an anthropocentric (human) basis. It considers factors such as the perceived quality and values associated with the view, the landscape context of the viewer, the likely activity they are engaged in and whether this heightens their awareness of the surrounding landscape. A list of the factors considered by the assessor in estimating the level of sensitivity for a particular visual receptor is outlined below to establish visual receptor sensitivity at each representative viewpoint.

#### Susceptibility of Receptors

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;*
- *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;*
- *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”.*

### Values Typically Associated with Views

**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 Developments Plans, for example, a public consultation process is required;

**Views from within highly sensitive landscape areas.** These are likely to be in the form of Architectural Conservation Areas, which are incorporated within the Development Plan and therefore subject to the public consultation process. Viewers within such areas are likely to be highly attuned to the landscape around them;

**Primary views from residential receptors.** Views from residential properties are an important consideration in respect of residential amenity;

**Intensity of use, popularity.** This relates to the number of viewers likely to experience a view on a regular basis and whether this is significant at a national or regional scale;

**Viewer 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 roads versus tourists focussed on the character and detail of the landscape;

**Provision of vast, 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.** Receptors taking in a remote and tranquil scene, which is likely to be fairly static, are likely to be more receptive to changes in the view than those taking in the view of 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 distinctly manmade features;

**Presence of striking or noteworthy features.** A view might be strongly valued because it contains a distinctive and memorable landscape feature;

**Historical, cultural and / or spiritual significance.** Such attributes may be evident or sensed by receptors at certain viewing locations, which may 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 the receptor could take in similar views anywhere in the broader region or the country;

**Integrity of the landscape character.** This looks at 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 considers whether there is special sense of wholeness and harmony at the viewing location;

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

Those locations which are deemed to satisfy many of the above criteria are likely to be of higher sensitivity. No relative importance is inferred by the order of listing. Overall sensitivity may be a result of a number of these factors or, alternatively, a strong association with one or two in particular.

### 12.3 RECEIVING ENVIRONMENT (BASELINE YEAR 1988)

The landscape description below relates to the landscape condition as it existed in the baseline year of 1988. This is the scenario against which changes to the existing landscape context will be assessed in terms of direct physical impacts on landform and land cover and also impacts on landscape character. The visual baseline identifies locations where people engaged in particular activities or where residents in particular settings were likely to have been afforded views of peat extraction and ancillary works and outcomes and which may have had their visual amenity impacted.

A description of the landscape context of the Application Site and wider study area is provided below covering landform and drainage, vegetation and land use, centres of population and houses, transport routes and public amenities and facilities. Many of the landscape elements identified also relate to visual receptors i.e. places and transport routes from which viewers can potentially see the project.

#### 12.3.1 Study Area

Given the flat and low-lying nature of the Application Site, visibility of areas subject to peat extraction areas and ancillary activities would have been most apparent from aspects of the public realm and private residences within close proximity to those areas. Long distance visibility of the Application Site within a vast and productive midlands context would also have been afforded from elevated ground to the northwest, west and east of the Application Site. However, the potential for significant effects to arise within broad distant views is limited. On balance of these factors, the Study Area for this rLVIA extends to a 5km buffer around the site.

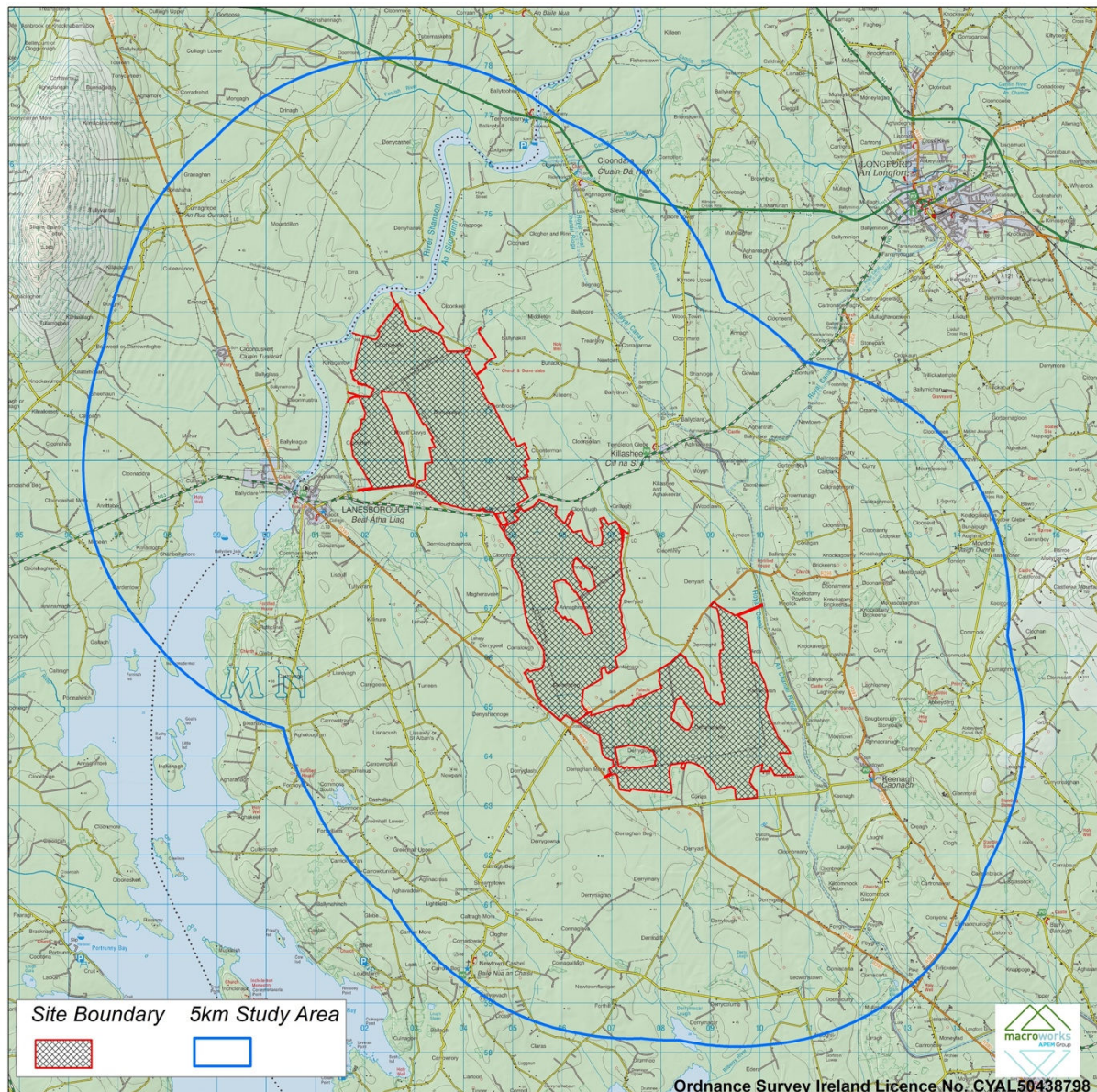


Figure 12-1 - rLVIA Study Area

### 12.3.2 Landform and Drainage

The Application Site at present day consists of mainly flat cutaway peatland across a series of almost contiguous bogs, which stretch around 12km in an elongated band in a northwest – southeast orientation. Thus, the Application Site and central study area is a vast flat plain with few notable watercourses. To the east of the Application Site, the Royal Canal marks a transition into slightly more elevated undulating ground. The terrain also inclines gently to the west of the site to form low hills that separate the site from the substantial sized Lough Ree on the River Shannon. Notwithstanding occasional spines of more elevated ground, the study area can be described in general terms as a relatively flat lowland landscape. Given that peat extraction had been long established and was underway across the expanse of the Application Site by 1988, the landform and drainage would have appeared much the same at the baseline date as at present day.



### *12.3.3 Vegetation and Land Use*

The predominant land use of the Application Site at 1988 was industrial scale peat extraction for the purposes of energy generation, with the substantial Lanesborough peat-fired power station at the settlement of Lanesborough near the north-western periphery of the Application Site. Other nearby bogs within the Mountdillon Group are frequently interspersed with slightly elevated islands of free draining soils that are used for agriculture, whilst the transitional bog margins tend to be contained in peatland scrub or occasional commercial conifer plantations. Beyond the Application Site and its transitional margins of forestry and scrub, agriculture is the predominant land use consisting of a matrix of fields and hedgerow boundaries. Again, the landcover at present day appears much the same as it would have in the baseline year of 1988, albeit with a greater proportion of naturally regenerating cutaway areas at present day based on historic aerial imagery.



*Figure 12-2 – View north from the N63 across Derryaroge Bog towards Slieve Bawn Wind Farm in the distance*

### *12.3.4 Centres of Population and Houses*

The most populous settlement in relation to the Application Site as of 1988, on the basis of its size and proximity, was (and still is at present day) Lanesborough, which is approximately 1km west of the northwesternmost bog of the Application Site (Derryaroge Bog). The smaller villages of Keenagh and Killashee are situated approximately 2km southeast and east of the site respectively and Cloondara is approximately 4km to the northeast.

There was in 1988, as at present day, a frequent, but dispersed rural population contained within the agricultural fringes of the bogs.

### *12.3.5 Transport Routes*

The N63 and N55 national secondary routes pass through the study area. Indeed, the N63, which is oriented in an east-west direction, passes directly between the subject Derryaroge and Derryadd Bogs to the east of Lanesborough. Other notable roads in the immediate vicinity of the site include the R394 and the R397 regional roads, whilst the R398 links between the R394 and the R397 passing through the southern section of the site. Several local roads are also situated in the immediate vicinity of the site.

### 12.3.6 Recreation, Tourism and Heritage Amenities

Lough Ree and the River Shannon were popular for fishing and boating and there were local walks around parts of the shoreline.

## 12.4 LANDSCAPE AND VISUAL POLICY CONTEXT

### 12.4.1 Longford County Development Plans iterations since 1988

#### Landscape Designations

The current Longford County Development Plan includes a Landscape Character Assessment that divides the County into seven geographically distinct Landscape Character Units (LCUs). The Application Site is contained within 'LCU 6 – Peatlands' which is identified as a Low sensitivity landscape, however, the corridor of the Royal Canal, which passes through this LCU, has been given a 'high' sensitivity designation. It should be noted that the Landscape Character Assessment for County Longford has been carried over from the previous iteration of the County Development Plan (2015 – 2021) unchanged in terms of designation and sensitivity ratings. Indeed, it appears that this Longford Landscape Character Assessment is the same as the first produced for the County, which was also included in the 2009 – 2015 iteration of the Longford County Development Plan as it references 2009 Ordinance Survey map data for its associated mapping. Although the Longford County Development Plan from 1988 was not available for review, it did not contain a Landscape Character Assessment and consequently, it is highly likely that it contained more restrictive / protective landscape and visual policies than the 2009-2015 County Development Plan (the oldest CDP available for review).

Landscape Unit 6 – Peatlands is described within Chapter 14 of the Longford County Development Plan in the following manner;

*"This area is located in the west of the County and includes the settlements of Lanesborough and Clondra and extends towards Ballymahon in the south. Located in the western half of the County, this area is dominated by extensive tracts of raised bog interspersed with mixed forestry and areas of scrubby vegetation. The topography is notably flat, with the majority of the land lying below the 50m contour line. This, when combined with the limited vegetation cover and extensive peat land cover mean that views are available across wide areas throughout the unit.*

*Drainage patterns in the area are heavily influenced by artificial means employed to retain water levels and prevent inundation of commercial peatlands. The Shannon system is the main natural influence, draining the area via the Camlin, Fallan and Bilberry rivers. Seasonal flooding persists in the northern sector, particularly in the vicinity of the Camlin River.*

*"... The Royal Canal is an important landscape feature, not only due to its heritage associations but also its wider influence on the landscape including features that were built to support it, such as the bridges, towpaths, lock keeper cottages and lock gates. Works are ongoing on the opening up of the canal, which will have a considerable impact on how the landscape is perceived throughout the area.*

*Agricultural potential in the area is limited given the nature of the dominant landcover, however, some reclaimed sections of land support large pastoral farming enterprises, particularly in the northern sector. The area has a strong industrial history in terms of the historical harvesting of peat and the transport of the finished*

*product along the Royal Canal. The landscape impacts of this history are manifested in the industrial architecture and archaeology that abounds throughout the area. The ESB power station at Lanesborough dominates the landscape of the area for a considerable distance, particularly at night time. Much of the industrial development in this unit is planned adjacent to the power station where it is anticipated that the landscape impact will be limited. The Corlea Visitor Centre interprets an Iron-age bog road built across the boglands to the south of the unit..."*

There are three County Policy Objectives for Landscape Unit 6 – Peatlands, which include;

**CPO14.32**- Identify appropriate areas for development.

**CPO14.33** - Develop guidelines for screening and siting measures to facilitate development.

**CPO14.34**- Seek to identify opportunity to collaborate and/or partner with Bord na Mona.

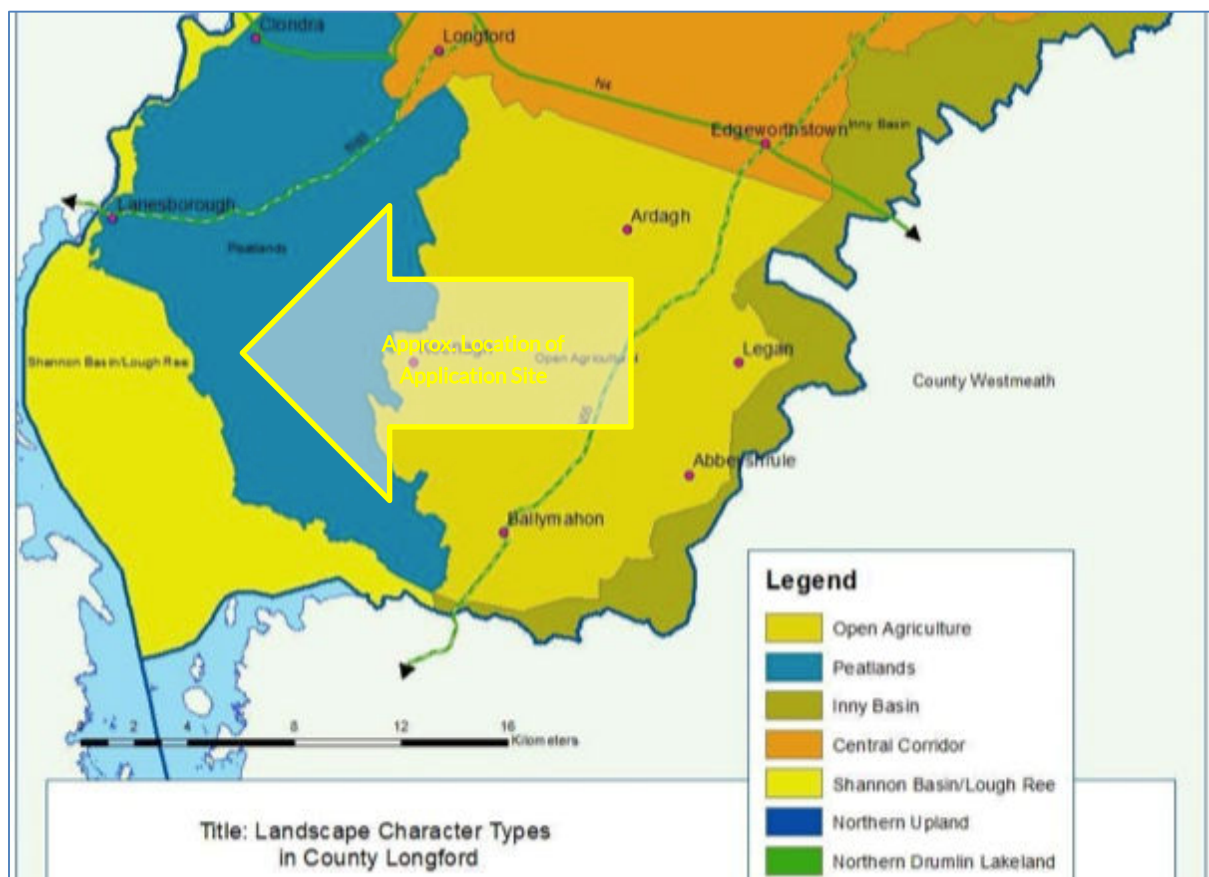


Figure 12-2 – Longford CDP Landscape Character Units (2009 – present)

### Scenic Designations

The Protected View Maps from the Longford County Development Plans 2009-2015 and 2015-2021 carry over the same selection of scenic designations. These identify that there are three 'Full Scenic Routes' and one 'Intermittent Scenic Route' within the 5km radius study area. These include;



**F.S-17** - Druming, Cartrongarrow, Lisduff (Montgomery), Bawn Mountain, Barroe, Castlerea Mountain, Castlerea, Keeloge, Commock, Curraghmore, Abbeyderg, Loughan, Glenmore (Moydow By), Lislea (Moydow By), Cartronbrac.

**F.S-18**- Rathcline, Carrowroe, Bleanavoher, Agharanagh (Rathcline Ed)

**F.S-19**- Cullentrath, Fortwilliam, Carrickmoran

**I.S-19**- Collum, Derrydarragh, Carrowrory, Ballagh (Rathcline By)

Except for F.S-17 which affords elevated westerly views towards the site from a nearest distance of approximately 4km, the remainder are all to the west of the site where they are principally focussed on Lough Ree in the opposite direction.

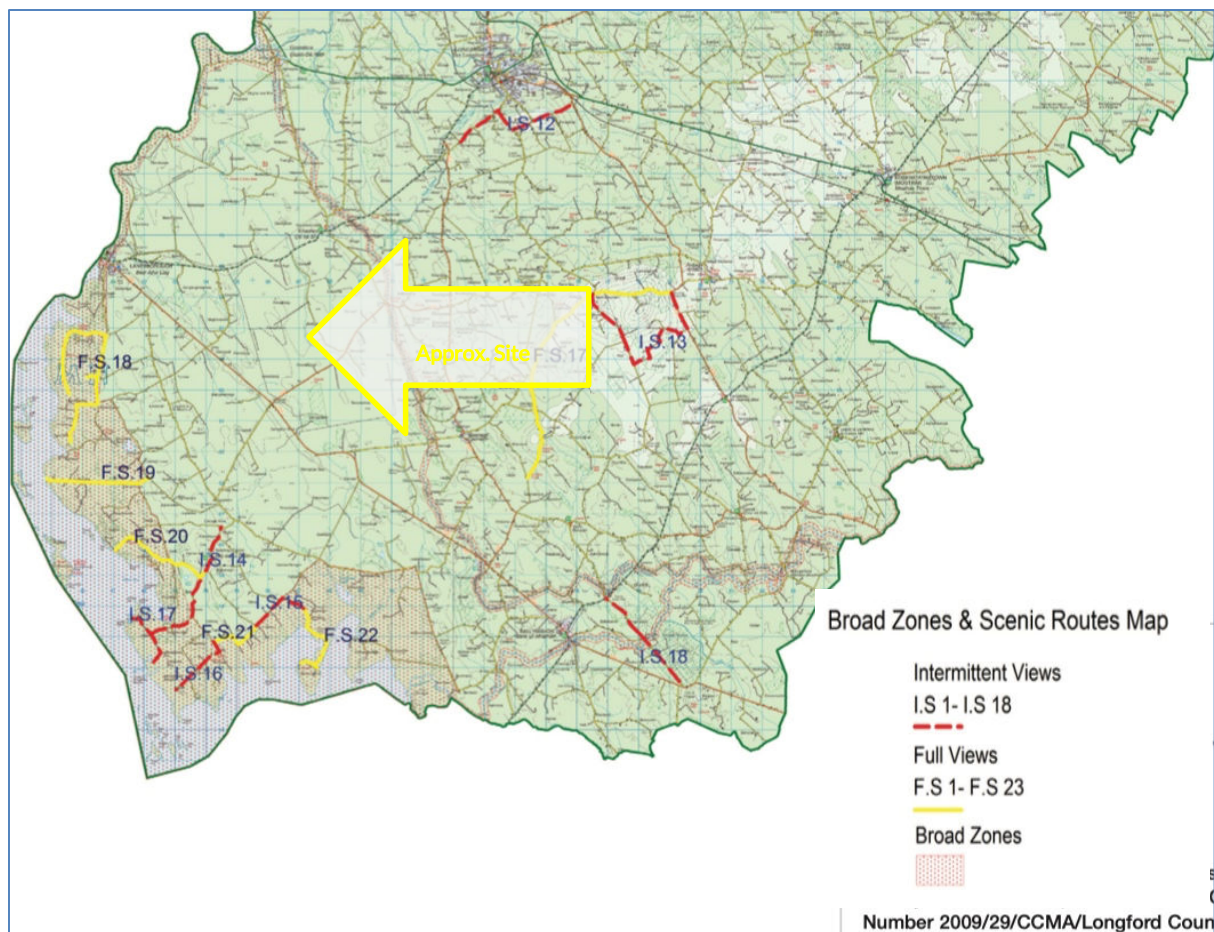


Figure 12-3 – Longford CDP Scenic Designations (2009-2015)

## 12.5 ASSESSMENT OF SIGNIFICANT LANDSCAPE AND VISUAL EFFECTS

This assessment will consider landscape and visual effects that occurred during peat extraction activities since 1988, which might persist today. The assessment will therefore be divided into Peat Extraction Phase and Current Phase as outlined in Section 12.1.

### 12.5.1 Do-Nothing Scenario

As outlined in the EPA Guidelines (May 2022), the description of ‘Do-Nothing Effects’ relates to the environment as it would be in the future should the proposed project not be carried out. In the context of this rEIAR and the temporal scope as described in Chapter 2 Section 2.5, the peat

extraction activities under consideration have occurred since the baseline assessment year of 1988. As outlined in Chapter 2 section 2.5 peat harvesting activities commenced in 1949.

However, in order to address the requirements of the EIA Directive, the 'Do-Nothing Scenario' is assessed on the basis that the peat extraction and ancillary activities ceased at the Application Site in 1988 and did not continue beyond that point. In the Do-Nothing Scenario, it is assumed that following the cessation of peat extraction and associated works, that the bog lands were allowed to naturally revegetate, with scrub and bog woodland more widespread across the site as is evident from areas of the Application Site which have been out of extraction for long periods of time.

Accordingly, there would not have been peat extraction machinery active at the Application Site and there would have been no further transport of peat from the bogs to Lanesboro Power Station.

### *12.5.2 Landscape and Visual Sensitivity (Baseline Year 1988)*

In the case of the baseline year of 1988, the key consideration with regard to the sensitivity of both the receiving landscape and also surrounding visual receptors, is that industrial scale peat extraction had already been ongoing for several decades and much of the modification of the site's terrain profile had already occurred. Consequently, the landscape character was already strongly influenced by prior peat extraction and ancillary activities. The same is true of the visual setting experienced by those people that lived in the area and moved around the local roads. For this reason the sensitivity of the landscape to further already characteristic change is deemed to be **Low**, as is the visual receptor sensitivity.

### *12.5.3 Peat Extraction Phase (1988 – 2019) Landscape and Visual Effects*

#### *12.5.3.1 Peat Extraction Activities*

Peat extraction activities within the Application Site had already been underway for around four decades by the temporal baseline date of 1988 Drainage works commenced in Derryaroge Bog in 1949 and in the Derryadd and Lough Bannow Bogs from 1960. With peat extraction commencing in 1952 and 1964 respectively.

Peat extraction initially consisted of sod peat extraction which was undertaken from the commencement of peat extraction in 1952 in Derryaroge Bog and continued there until the mid-1980s. Milled peat extraction commenced in Derryadd and Lough Bannow bogs in 1964. A full description of peat extraction activities is provided in Chapter 4 – Description of Development.

#### Landscape Effects

There was a broad-scale and comprehensive physical landscape impact on the bog itself from the extraction operations. In combination with the extraction activities and associated transport infrastructure, this would have contributed to an industrialisation of the previously naturalistic bog landscape, but most of this had already occurred prior to 1988. For this reason, the landscape impacts of the extraction phase from 1988 to cessation in 2019 are considered to be of a **Medium** magnitude in terms of the criteria set out in Table 12.3. When combined with the **Low** landscape sensitivity judgement from section 12.5.2, the overall significance of effect is deemed to be **Moderate-slight**, which is not deemed to be a significant effect in EIA terms.



### Visual Effects

In terms of visual impacts, by 1988 a considerable portion of the bog had been cutaway or drained and prepared for extraction, with peat extraction having been underway across the Application Site since 1952. Visual impacts would have related to movement of workers and machinery, transport and transport infrastructure, as well as accommodation and welfare facilities. Dust plumes are also likely to have been associated with peat extraction areas. From most receptor locations in the surrounding area including roads, settlements and residences within approximately 1-2km of the Application site, it is likely that the full extent of the Application Site was not visible as there are relatively few open views across the bogs from the public realm, even from relatively short distances away due to intervening vegetation screening. Therefore, effects would have been more localised to the nearest fringes of the bog. Nonetheless, from some locations, such as sections of the N63 national secondary road that passes between Derryaroge and Derryadd bogs from Lanesborough to Longford Town, there would have been notable visual impacts. Likewise, from the R398 that runs between Derryadd Bog and Lough Bannow Bog and from the local road that runs along the southern edge of the latter. Though slightly more separated from the Application Site and generally without clear views of the ground plane where peat extraction and transportation activities took place, the R392, to the west of the Application Site, would have afforded some visibility of peat extraction works. However, given this busy baseline scenario and the fact that industrial-scale peat extraction activities were a long-established feature of predominantly the summer months, it is not likely that significant visual impacts occurred between 1988 and the cessation of peat extraction in 2019.

In many ways, peat extraction and ancillary activities at the Application Site serve to highlight the difference between landscape and visual impacts. The landscape impact, which considers the landscape as a resource in its own right was large scale, direct and physical and resulted in a distinct change to the landscape fabric and character. However, when such effects are not so apparent or viewed in the context of a vast bog basin from limited and discrete receptor locations, the visual impact significance is not directly comparable to the landscape impact. For these reasons the magnitude of visual effects is not considered to have been greater than **Low**. When combined with the **Low** visual receptor sensitivity judgement from section 12.5.2, the overall significance of effect is deemed to be **Slight**, which is not deemed to be a significant effect in EIA terms.

#### *12.5.4 Current Phase (2019 – Present Day)*

Decommissioning at the Application Site commenced following the cessation of peat extraction in 2019 in accordance with the Cutaway Bog Decommissioning and Rehabilitation Plans put in place in accordance with the IPC Licence requirements. The Cutaway Bog Decommissioning and Rehabilitation plans are included in Appendix 4.3 of the rEIAR. The main consideration was the identification of infrastructure or materials that could cause ongoing environmental issues and removing / disposing / recovering of them as deemed appropriate to limit any environmental impacts. In landscape and visual terms this is tantamount to a clean-up of the site, which included removal of unutilised buildings or features, cleaning silt ponds and removal of peat stockpiles. This results in **Low** magnitude impacts on the physical landscape and land cover and will facilitate regeneration through remedial phase measures once complete. Similarly, it has a **Low** magnitude impacts on visual amenity, especially as many of the features being removed and recovered are at a considerable remove from the public realm. The decommissioning activities are of a similar nature to construction activities, albeit in reverse and of a shorter duration. Whilst ongoing, the decommissioning activities are considered to generate a Low magnitude of landscape impact and a Low magnitude of visual impact, which is marginally Negative. When combined with the **Low** landscape sensitivity judgement from section 12.5.2, the overall

significance of Decommissioning Phase landscape effect and visual effect is deemed to be **Slight / Neutral-Negative**, which is not deemed to be significant in EIA terms. However, once fully complete, the decommissioning works will have a positive landscape and visual impact on the sites as there will be less evidence of human influence than during the baseline operational years (1988-2019).

#### *12.5.5 Remedial Phase*

Bord na Móna are required under Condition 10.2 of the IPC Licence to prepare and implement, a Cutaway Bog Rehabilitation Plan. Bord na Móna have produced a draft Cutaway Bog Decommissioning and Rehabilitation Plan for each of the three bogs within the Application Site (i.e., Derryaroge Bog, Derryadd Bog, and Lough Bannow Bog). There is a Final Cutaway Bog Decommissioning and Rehabilitation Plan for parts of Derryaroge Bog, this is included in Appendix 4.3.

The types of measures that have most relevance to the landscape and visual setting mainly relate to the rewetting of bogs through the likes of drain blocking and construction of berms and reprofiling of fields. It also included grassland establishment and the establishment of Birch dominated scrub. These are subtle physical interventions in the context of the baseline scenario of cutaway peatlands and will result in positive outcomes for biodiversity and a more naturalistic wetland appearance for the Application Site. Such effects are considered to be of a Low magnitude and a Positive quality relating in a Slight / Positive significance.

#### *12.5.6 Risk of Major Accidents and Natural Disasters*

No major accidents or natural disasters have occurred at or surrounding the Application Site during the assessment period from 1988 to 2019. Therefore, there was no potential for significant landscape or visual impacts.

The risk of major accidents and natural disasters with the potential for significant effects on the landscape environment during Current and Remedial Phases at the Application Site is considered low.

#### *12.5.7 Cumulative and Indirect Impacts*

In terms of cumulative and indirect impacts, the key features that have been constructed to complement the considerable scale of peat extraction that took place within the Application Site from 1988 to present day are the Lanesboro Power Station (operational from 1958 to 2004), and Lough Ree Power Station (operational from 2004 to 2020). Given that the function of both Lanesboro and Lough Ree Power Stations was to convert the peat extracted at the Application Site into electrical energy, that they lie adjacent to the Derryaroge Bog and have internal rail and road transport links, there is a strong thematic and physical link between these uses. Whilst this adds to the scale and intensity of development within the study area in combination with peat extraction, the thematic link is an obvious and complementary one. Furthermore, many people in this area earned a living from one or both of these uses and subsistence of the local community is an important aspect of landscape value for many rural communities around Ireland. That is, there can be an acceptance or even a sense of pride from a thriving and productivity community even where that comes about as a result of the use of the natural peatland and view of the substantial power stations rising prominently at the edge of Lanesborough.

The Derraghan Ash Disposal Facility was developed in 2004 over 33ha at Derraghan Bog, west of Lough Bannow bog, and was designed to accommodate dry peat ash which was generated by

Lough Ree Power Station. Though not a particularly overt land use in a visual sense, the ash disposal site occupies a reasonable footprint and is clearly an engineered feature (raised plateau compartments of dark ash) within the rural landscape to the south of Lanesborough. Again, there is thematic link between the ash disposal site and the energy production from the extraction and combustion of peat from the Application Site, but it is a less obvious one and it is considered a negative in-combination effect as the ash is an unwanted by-product of peat combustion.

There are two existing wind farms within the wider area (Sliabh Bawn and Skrine), but other than a minor sense of increased built development within the countryside, there is little in the way of a perceptual landscape and visual link to the peat extraction within the Application Site.

In addition to the developments described above, the full list of cumulative projects in Chapter 2 of the rEIAR (Remedial EIA Methodology) has been reviewed in relation to potential landscape and visual cumulative impacts with the peat extraction during the retrospective period. Aside from those developments addressed above it is not considered that there was any potential for significant cumulative effects with any of them. This relates to both distance and scale considerations as well as the nature of those developments and whether they would even be considered cumulatively with the peat extractions in terms of development types. Based on the cumulative list, there were numerous multi-unit housing developments permitted and built within the surrounding area during the retrospective period. While many of these may have accommodated workers directly on the peat extraction site or the associated Power Station, the nature of the developments is so variant that they would not be aggregated cumulatively in the public perception.

Overall, it is considered that there are notable cumulative and indirect impacts between peat extraction within the Application Site, the associated power station/s at Lanesborough and the ash disposal site at Derraghan. However, these land uses are dispersed across a broad area and there is a strong and legible association between them that offsets the sense of accumulation of substantial scale rural/industrial development. Consequently, cumulative and indirect impacts are deemed to be of a **Low** magnitude. When combined with the **Low** landscape and visual sensitivity judgements from section 12.5.2, the overall significance of cumulative effect is deemed to be **Slight**, which is not deemed to be significant in EIA terms.

#### *12.5.8 Ongoing and Future Enhanced Rehabilitation Measures (PCAS)*

As part of Condition 10 of the IPC Licence, decommissioning and rehabilitation will be carried out as standard remedial measures associated with peat extraction activities and all ancillary works at the Application Site. In line with Bord na Móna's accelerated decarbonisation strategy, and the availability of government funding, the company has also committed to ambitious enhanced peatland decommissioning, rehabilitation and restoration measures, targeting circa 33,000 ha in over 80 no. Bord na Móna bogs.

This strategy has been developed to optimise ecosystem service benefits of peatland rehabilitation and restoration, particularly carbon storage and reducing carbon emissions. In addition, this will also benefit biodiversity and water (water quality and catchment management), as well as providing space for local communities and people to enjoy the outdoors. In landscape and visual terms the PCAS measures represent an acceleration and enhancements to those rewetting and rewilding measures outlined in section 12.5.5 – Remedial measures. Thus, the associated effects will also be Positive, but of a higher significance – Moderate-slight.

### *12.5.9 Potential Future Use – Proposed Derryadd Wind Farm*

The proposed wind farm (Derryadd Wind Farm) is contained within the Application Site itself, but it is still at preplanning stage without final design details. If this were to obtain planning permission and proceed to construction, there will be a need to modify the rehabilitation plan for the bogs contained within the Application Site. It should be noted that the wind farm footprint comprises approximately 4% of the Wind Farm Application Site and the wind farm application includes proposals to rehabilitate the site to support wetland habitats. Notwithstanding these proposals, there will be marginally less land available for rehabilitation if the wind farm proceeds so the cumulative impact is likely to be Slight-imperceptible and marginally negative in terms of value.

## **12.6 MITIGATION AND MONITORING MEASURES**

Rehabilitation works to date have been minimal within the Application Site and these are/will be primarily related to biodiversity improvements rather than specifically reducing landscape and visual effects. There is no specific landscape and visual mitigation measures proposed and therefore, there is no requirement for ongoing monitoring from a landscape and visual perspective either.

## **12.7 RESIDUAL EFFECTS**

As there are no specific mitigation measures required in relation to landscape and visual effects, residual effects are no different to those already described in section 12.5.

## 12.8 REFERENCES

Historic Longford County Development Plans (2009-2015 and 2015 – 2021)

Bord na Móna Aerial Photography (1973 – 2020)

Bord na Móna Extraction area maps (1973 – 2019)

**www.tobin.ie**



**TOBIN Consulting Engineers**



**@tobinengineers**

**Galway**

Fairgreen House,  
Fairgreen Road,  
Galway,  
H91 AXK8,  
Ireland.  
Tel: +353 (0)91 565 211

**Dublin**

Block 10-4,  
Blanchardstown Corporate Park,  
Dublin 15,  
D15 X98N,  
Ireland.  
Tel: +353 (0)1 803 0406

**Castlebar**

Market Square,  
Castlebar,  
Mayo,  
F23 Y427,  
Ireland.  
Tel: +353 (0)94 902 1401

**Limerick**

Unit 4, Crescent Court,  
St Nesson's Road, Dooradoyle,  
Limerick  
V94V298  
Ireland  
Tel: +353 (0)61 976 262

**Sligo**

First Floor,  
Carroll House,  
15/16 Stephen Street  
Co Sligo  
Tel: +353 (0)71 9318 844