

12.

LANDSCAPE AND VISUAL IMPACT

12.1

Introduction

This chapter of the rEIAR addresses the landscape and visual effects of the peat extraction and ancillary activities that took place by Bord na Móna Biomass Ltd. (BnM) (hereafter referred to as the Applicant) at the Application Site which is the subject of this Substitute Consent Application submitted to An Coimisiún Pleanála (hereafter referred to as ‘ACP’), in accordance with Section 177E (Application for Substitute Consent) of the Planning and Development Act 2000 (as amended) and under Part 19 of the Planning and Development Regulations, 2001 (as amended).

As reported in Chapter 4: Project Description, the assessments in this rEIAR address the environmental impacts of peat extraction and ancillary activities carried out by BnM on lands at the Application Site since July 1988. The Application Site is comprised of 5,448 hectares across 14 no. bogs located within Counties Offaly and Kildare.

Peat extraction and ancillary activities undertaken at the Application Site, which comprise the Project for which substitute consent is being sought and for which this rEIAR is prepared, consist of the following:

- Industrial scale peat extraction (milled peat, sod peat, sod moss and bin sod) at the Application Site from 1988 to June 2020;
- Installation, use and maintenance of surface water drainage infrastructure (drains, silt ponds, pumps) at the Application Site to facilitate peat extraction activity from 1988 to present day;
- Vegetation clearance to facilitate peat extraction activity from 1988 to June 2020;
- Provision of 1 no. welfare building, 1 no. handwashing facility, a toilet cubical building and an associated septic tank, 19 no. containers, 2 no. sheds, 8 no. vehicular bridges and 7 no. rail bridges;
- Use and maintenance of pre-existing railway infrastructure to facilitate peat extraction from 1988 to present day;
- Control Measures associated with the above, inclusive of the IPC Licence for the Allen Bog Group (Reg. No. P0503-01) measures which commenced from 2000 onwards to the present day; and,
- All associated site development and ancillary works.

The assessments in this chapter will determine the landscape and visual effects that occurred (or are likely to occur) for the Project, which is defined under three differing timeframes termed ‘phases’ (as described in Chapter 4: Project Description):

- **Peat Extraction Phase:** peat extraction activities and all ancillary works at the Application Site from July 1988 to the cessation of peat extraction in June of 2020 (July 1988 – June 2020). The Peat Extraction Phase is described in detail in Sections 4.4 to Section 4.7 in Chapter 4: Project Description;
- **Current Phase** the management of the Application Site since the termination of peat extraction in June 2020 to present day. The Current Phase is described in detail in Section 4.7 and Section 4.8 of Chapter 4: Project Description;
- **Remedial Phase:** the activities intended to be carried out at the Application Site. The Remedial Phase is described in detail in Section 4.9 of Chapter 4: Project Description.

The emphasis in this chapter is on the (likely) significant direct and indirect landscape and visual effects during each of the Project phases reported above, as well as the potential for cumulative landscape and visual effects. This chapter includes the following:

- **Introduction** – Includes a description of the Application Site, its location and essential aspects of the peat extraction and ancillary activities during various phases requiring the most consideration from a Landscape and Visual Impact Assessment (LVIA) perspective.
- **Methodology and Assessment Criteria** – An outline of the methodology and guidance used to conduct the LVIA.
- **Landscape Baseline and Landscape Evolution** - Establishment of the conditions and character of the landscape at the Application Site and its wider landscape setting in 1988 and throughout both the Peat Extraction Phase and Current Phase. This includes a review of the landscape policy context and landscape designations pertinent to the Application Site from 1988 to present day.
- **Visibility Appraisal** – An appraisal of likely visibility of the Application Site from prominent visual receptors in proximity to the Application Site from sensitive visual receptors in the wider landscape.
- **Cumulative Baseline** – Identification and description of other sites of peat extraction in the wider landscape where the cumulative or in combination landscape and visual effects may potentially exist.
- **Landscape and Visual Effects** - A determination of the significance of landscape and visual effects during the three differing phases (Peat Extraction Phase; Current Phase; Remedial Phase), including an assessment of likely cumulative and in-combination effects. Assessment of effects is informed by site visits, review of historic satellite imagery and photography.

12.1.1

Statement of Authority

MKO has developed extensive expertise and experience over the last 20 years in the LVIA of large-scale infrastructure developments for Environmental Impact Assessment Reports (EIAR). The MKO Landscape and Visual team have produced LVIA across a diverse range of project types, including: renewable energy and grid infrastructure; residential developments; transport infrastructure; extraction infrastructure; and a range of other projects requiring EIAR.

This LVIA was written by Dija Mazonaitė and Jack Workman with oversight by Michael Watson. Daniel Mulpeter provided technical support for the production of the LVIA including fieldwork and GIS with oversight from Jack and Dija.

Jack Workman MSc., TMLI, is the Landscape & Visual Project Director at MKO and is chartered as a Technician Member of the British Landscape Institute. Jack is an environmental scientist and an LVIA specialist with an academic background in the field of Environmental Science and Geography. Jack's primary role at MKO is scoping and writing LVIA for EIARs with over 5 years' experience managing all aspects of LVIA for a broad range of commercial infrastructure developments. Jack holds a BSc. in Psychology, and an MSc. in Coastal and Marine Environments (Physical Processes, Policy & Practice). Jack is an active participant in the National Landscape Forum, presenting in 2023 and 2024 on the topic of LVIA, he also regularly delivers guest lectures for students on the topic of LVIA at top third level institutions in Ireland including University of Galway, Trinity College Dublin, University College Dublin and University College Cork. Jack holds a membership with the Chartered Institute of Water and Environmental Management and is also a member of the Landscape Research Group.

Michael Watson is the Environment Division Director in MKO who has over 25 years' experience in the environmental sector. Following the completion of his master's degree in environmental resource

management, Geography, from National University of Ireland, Maynooth he worked for the Geological Survey of Ireland and then a prominent private environmental consultancy prior to joining MKO in 2014. Michael's professional experience includes managing Environmental Impact Assessments and Landscape & Visual Impact Assessments on behalf of clients in the wind farm, waste management, commercial and industrial sectors nationally. Michael worked on the capture and development of photomontages as well as compiling the Landscape & Visual Impact Assessments for some of the first wind turbines being proposed in Ireland in the early 2000's and has been compiling and reviewing LVIA chapters for multiple wind farm projects each year since 2014. Michael is a key member of the MKO senior management team and as head of the Environment Division has responsibilities to mentor various grades of team members, foster a positive and promote continuous professional development for employees. Michael also has a Bachelor of Arts Degree in Geography and Economics from NUI Maynooth, is a Member of IEMA, a Chartered Environmentalist (CEnv).

Dija Mazonaite is a Project Environmental Scientist - LVIA Specialist at MKO. Dija has a BSc (Hons) in Geography & Geosystems, PGCert in Marine Spatial Planning, and was recognised as a University Scholar at the University of Galway. Dija's primary role at MKO is producing and reviewing the LVIA chapter of EIA reports for large-scale infrastructure developments. Since joining MKO, Dija has conducted and project managed all aspects of LVIA for a broad range of commercial infrastructure developments including wind and solar energy projects, grid infrastructure, extraction industry and Strategic Housing Developments. Dija's key strengths include proficiency in GIS tools such as ArcGIS and QGIS, conducting landscape and visual impact assessments and capturing image data through drone surveys and photomontages. Dija is an affiliate member with the Landscape Institute and is an active participant of the Irish National Landscape Forum. Dija also regularly delivers guest lectures for students on the topic of LVIA at top third level institutions in Ireland.

Daniel Mulpeter is an Affiliate Member of the Landscape Institute and an LVIA Specialist with MKO with experience engaging in LVIA assessments for wind energy and public infrastructure. Daniel holds an MSc in Environmental Science from Trinity College Dublin, where he completed his thesis on "Estimating Peat Depth using Gamma-ray Spectrometry and Photogrammetry". Furthermore, he received a BSc (Hons) in General Science, finishing with Applied Maths and Biology. Daniel's key strengths include proficiency in GIS tools such as QGIS and ArcGIS, conducting landscape and visual impact assessments, and capturing data through drone surveys and photomontages.

12.1.2 Application Site Description

This rEIAR is prepared in support of an application for substitute consent for peat extraction and ancillary activities carried out by BnM at the Application Site since July 1988.

The Application Site comprises of 14 no. bogs, forming part of the Allen Bog Group, located within Counties Offaly and Kildare. The Application Site is located approximately 2.2km southeast of Edenderry and approximately 3.3km west of Allenwood, 2.4km north of Rathangan, and 1.7km east of Clonbullogue Village, in Co. Offaly and Co. Kildare. Elevations within the Application Site range from 68m-84mOD (metres above Ordnance Datum). The Application Site measures approximately 10km in length from north to south, and approximately 10.7km from east to west, at its widest point.

The Application Site is accessible via many routes. The L-3001 local road passes through the Application Site, in a north-south orientation, connecting Edenderry and Rathangan. The east part of the Application Site is accessible by the R414 Regional Road which divides Killina bog, Lodge bog and Barnaran bog. The Application Site is comprised of 14 no. bogs (Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge bogs) which are referred to within this Chapter.

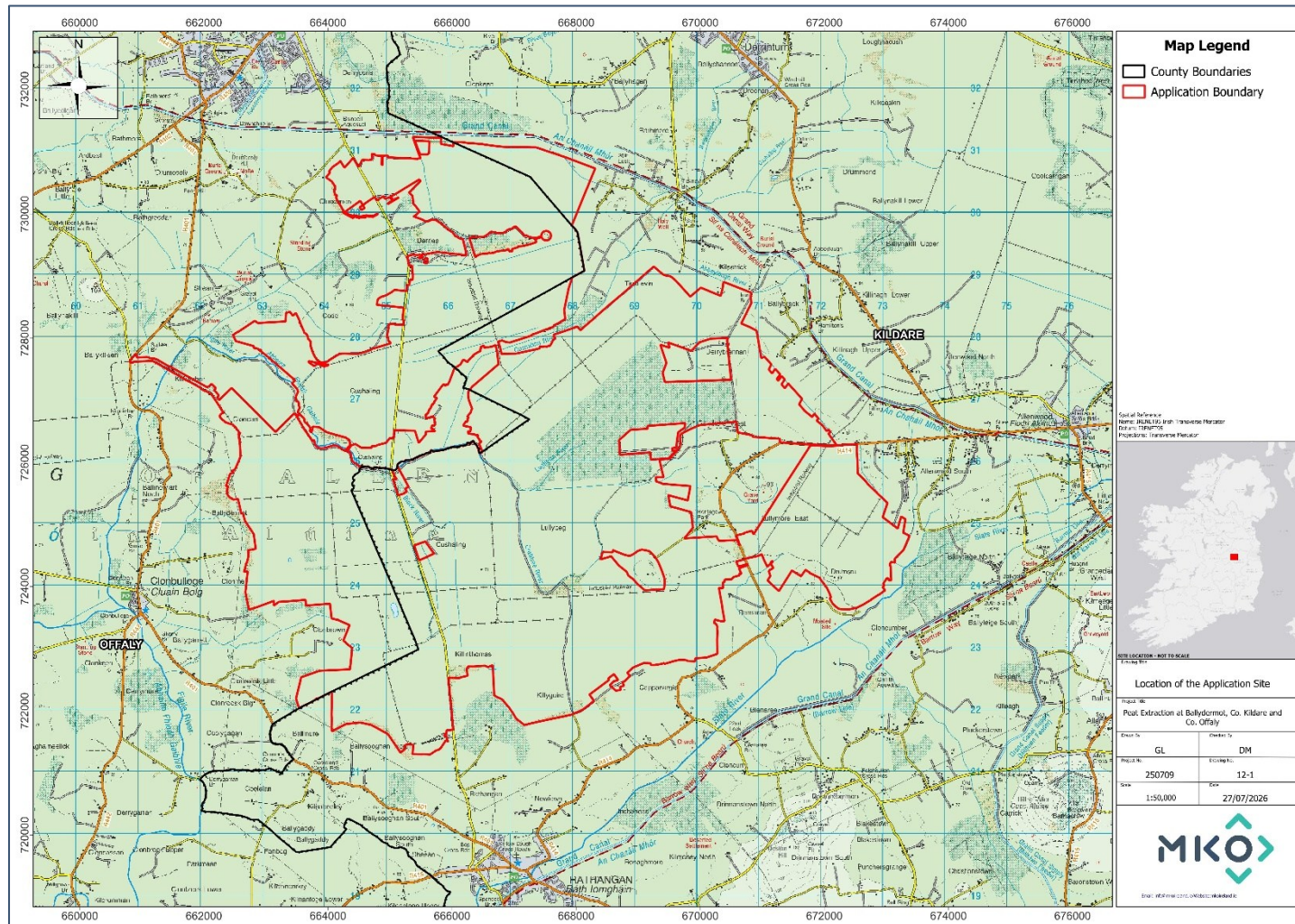


Figure 12-1 Location of Application Site

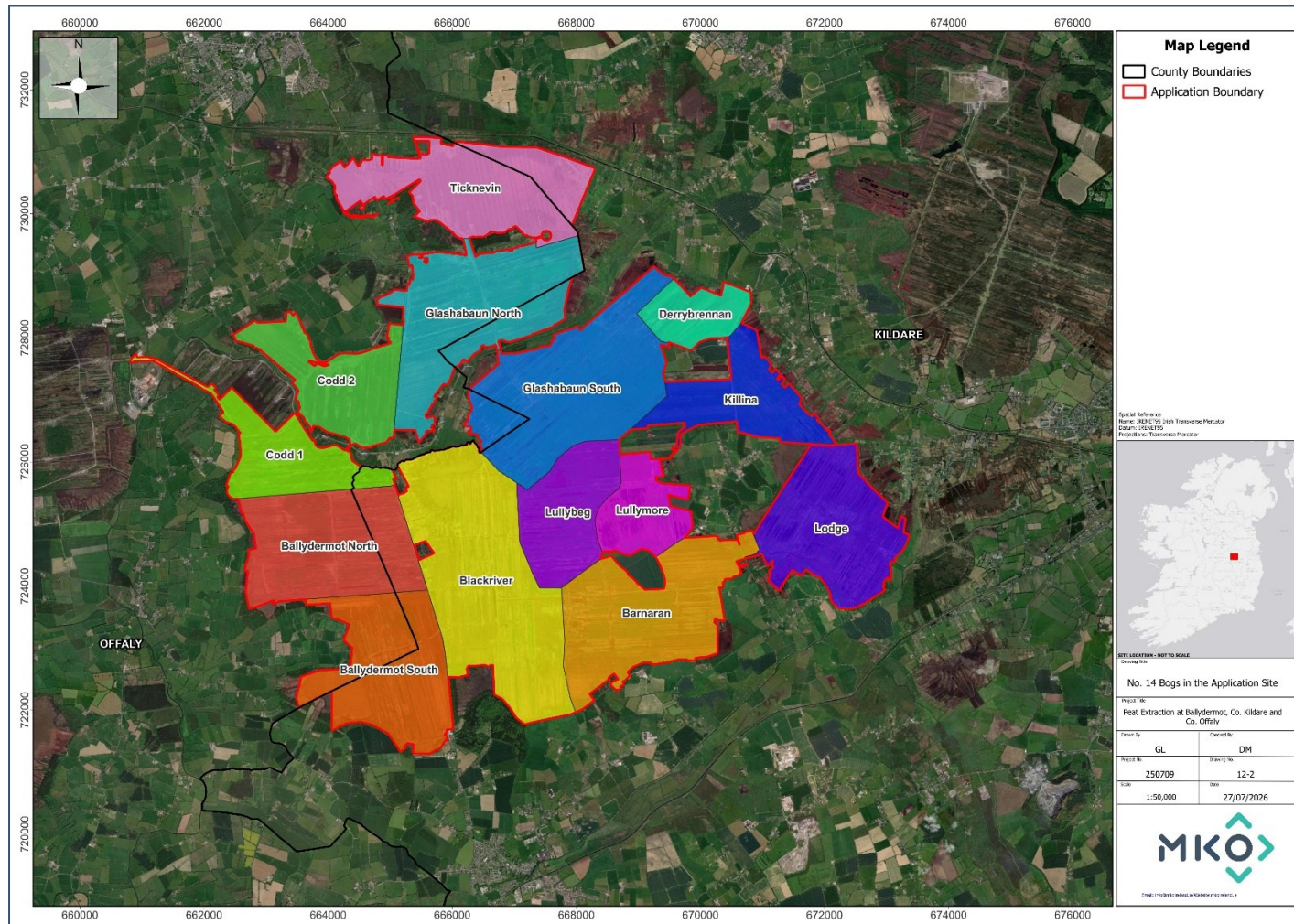


Figure 12-2 Map illustrating the 14 no. bogs that comprise the Application Site

The following sections give an overview of the activities occurring at the Application Site throughout the various Project phases under assessment in this chapter. A comprehensive description of these phases and historic activities are reported in Chapter 4: Project Description of the rEIAR.

12.1.2.1 The Baseline Assessment Year (1988)

The Peat Extraction Phase includes all peat extraction and ancillary activities occurring at the Application Site between 1988 and 2020. Chapter 4: Project Description provides a timeline of peat extraction and ancillary activities throughout the Peat Extraction Phase. The baseline conditions of the landscape of the Application Site in the year of 1988 are illustrated in Figure 12-3 below, which shows the baseline status and extent of peat extraction and ancillary activities at the Application Site in 1988. Figure 12-3 shows areas ‘subject to peat extraction’ (represented as pink cross hatching on the map), which were areas actively subject to peat extraction in 1988. Areas that had drainage installed but which weren’t subject to peat extraction in 1988 area mapped as ‘drained - not subject to peat extraction’ (represented as shaded purple on the map), and areas ‘neither drained nor subject to peat extraction’ (represented with shaded orange on the map).

As illustrated by Figure 12-3, the majority of the Application Site was subject to peat extraction in 1988. There is a large area between the Killina bog, Glashabaun South bog, Lullybeg bog, and Lullymore bog that had been drained in 1988, but not subject to peat extraction, this area is marked as ‘drained - not subject to peat extraction’ in Figure 12-3 below. A smaller area of drained but not subject to peat extraction is seen in west of the Application Site, in Codd 1 bog. There are several small pockets within the bog which were neither drained nor subject to peat extraction.

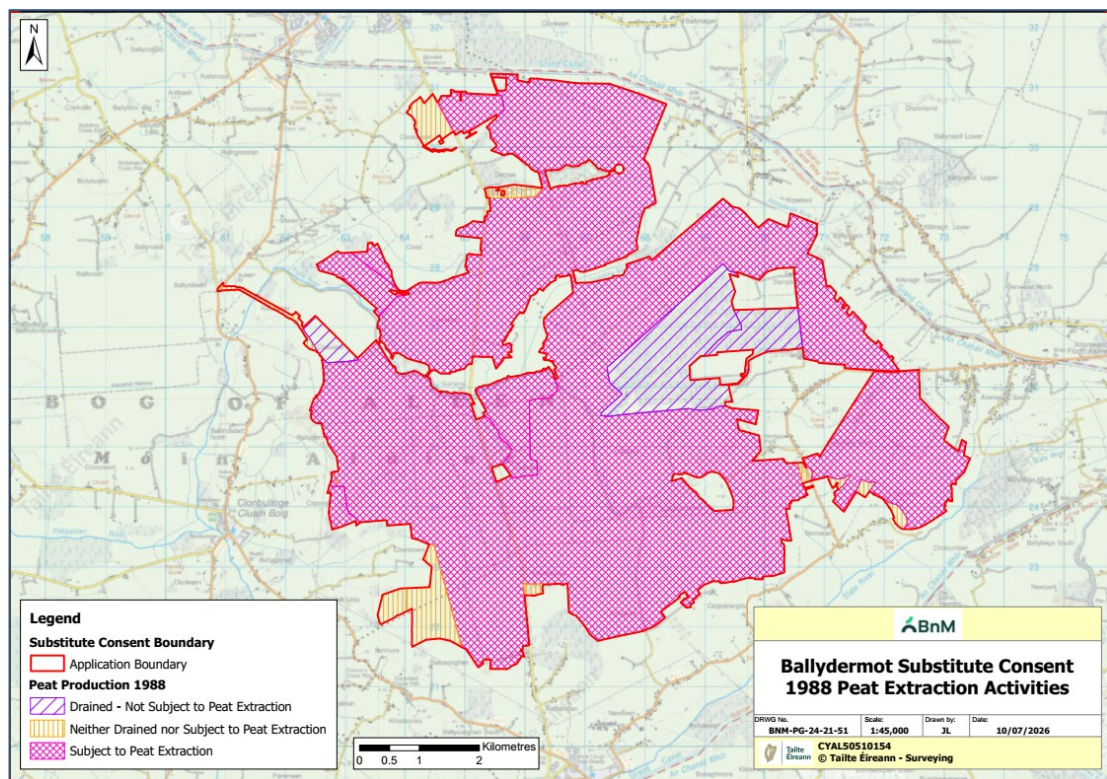


Figure 12-3 Peat Extraction Activities at the Application Site in 1988 (Source: Bord na Móna, 2026)

12.1.2.2 Peat Extraction Phase (July 1988 – June 2020)

1988 - Peat Extraction Activities

As shown previously in Figure 12-3, most of the Application Site was subject to peat extraction by 1988, and it would have been a landscape of cut-over peatland. There are areas within the Application Site that had been drained in 1988, but not subject to peat extraction, particularly notable between Killina and Glashabaun South bogs.

1995 - Peat Extraction Activities

As seen in Figure 12-4 below, by 1995, the area to the east of the Application Site, in Lullymore bog, started to come out of production by 1995, where it has transitioned to an area drained but not subject to peat extraction. The majority of the Application Site was still subject to peat extraction in 1995.

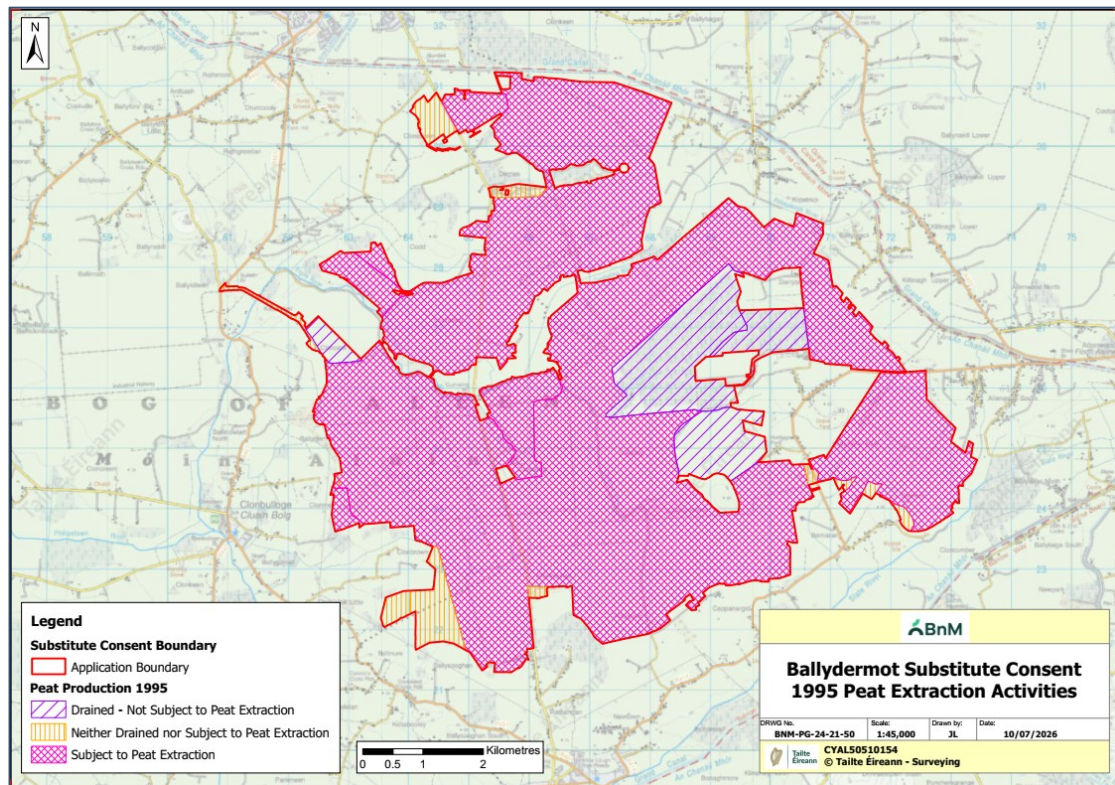


Figure 12-4 Peat Extraction Activities at the Application Site in 1995 (Source: Bord na Móna, 2026)

2004 – Peat Extraction Activities

As shown in Figure 12-5, the area drained but not subject to peat extraction to the east of the Application Site increased in size, encompassing all of Lullybeg bog. The majority of the remaining area of the Application Site was subject to peat extraction in 2004.

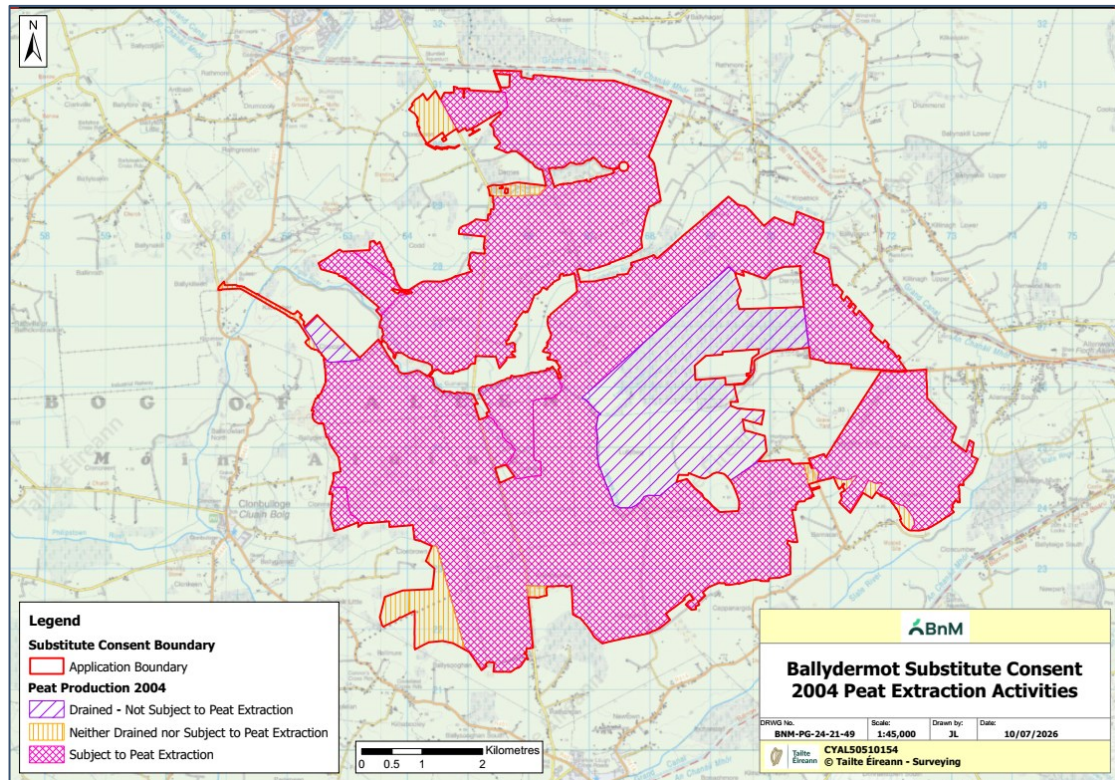


Figure 12-5 Peat Extraction Activities at the Application Site in 2004 (Source: Bord na Móna, 2026)

2020 – Peat Extraction Activities

As shown in Figure 12-6, in 2020, the vast majority of the Application Site has transitioned from areas subject to peat extraction and neither drained nor subject to peat extraction to areas which have been drained but not subject to peat extraction. The small area of drained but not subject to peat extraction on the western extent of the Application Site, in Codd 1 bog, has transitioned into an area subject to peat extraction.

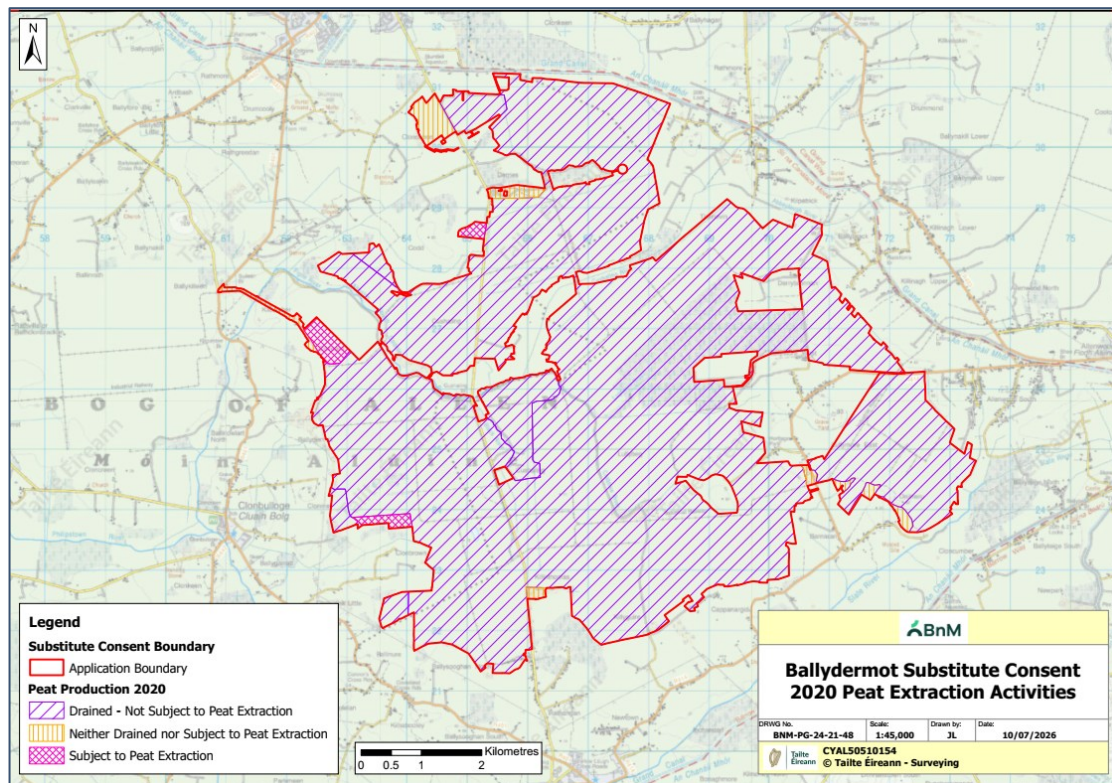


Figure 12-6 Peat Extraction Activities at the Application Site in 2020 (Source: Bord na Móna, 2026)

12.1.2.3 Essential Aspects of Landscape & Visual Change during the Peat Extraction Phase

As described above and shown in the mapping figures, majority of the Application Site remained subject to peat extraction until extraction ceased in June 2020. Peat extraction ceased in other areas of the Application Site prior to June 2020, as those areas became commercially unviable for continued peat extraction. A description of the changes in the landscape of the Application Site throughout the Peat Extraction Phase based upon a review of historic satellite imagery, in combination with the mapping figures above, is included in Section 12.3.

Best practice guidance for LVIA (para 3.14, GLVIA3, 2013, p31) states that *“it is important to make sure that the project description provides all the information needed to identify its effects on particular aspects of the environment. For LVIA it is important to understand, from the project description, the essential aspects of the scheme that will potentially give rise to its effects on the landscape and visual amenity”*.

From a landscape and visual perspective, the essential aspects of activity and landscape change under assessment for the Peat Extraction Phase are the direct effects on the landscape, most notably:

- The stripping of natural vegetated ground cover;
- Change to the landform from the extraction of material from the ground for both peat extraction, as well as creation of drainage channels; and,
- Fragmentation of former areas of intact raised bog due to further establishment of drainage.

Other elements of the Peat Extraction Phase likely to have caused landscape and visual effects include:

- Alterations to the visual aesthetic of the Application Site as it changes from a mosaic of bog habitat to a visually homogenous landscape of bare cutaway peat;
- Minor modification of ancillary extraction infrastructure such as peat stockpiles;
- Use of industrial extraction machinery and vehicles; and,
- Indirect effects resulting from the change in drainage regimes.

12.1.2.4 Current Phase (June 2020 – Present Day)

Peat extraction and ancillary activities at the Application Site ceased in June 2020. Since June 2020, the Application Site has been part of an on-going decommissioning programme in accordance with the IPC (Integrated Pollution Control) Licence conditions, although minor non-extractive activities have occurred on site, such as the following:

- Removal of peat stockpiles from the bog (completed in October 2021);
- Cleaning of silt ponds;
- Removal of buildings and compounds;
- Decommissioning of fuel tanks and associated facilities;
- Decommissioning and removal of bog pump sites; and
- Decommissioning or removal of septic tanks.

The potential Landscape and Visual impact associated with above works is inherently minor, particularly in comparison with activities occurring during the Peat Extraction Phase. Other landscape and visual change has occurred at the Application Site since 2020 as the landscape has started to revegetate since peat extraction ceased. A comprehensive description of the landscape of the Application Site in its current state is presented in Section 12.3.

12.1.2.5 Remedial Phase

BnM have produced a Cutaway Bog Decommissioning and Rehabilitation Plans for the Application Site, and it is the intention of the Applicant to rehabilitate the bogs in a phased approach under condition 10 of the IPC Licence for the Allen Bog Group (Reg. No. P0503-01). Please see Appendix 4-2 for details.

Decommissioning activities include removing/disposing/recovering, equipment, waste, etc. from the Application Site. From a landscape and visual perspective, the essential aspect of these activities will be the removal of infrastructure such as equipment and facilities.

The Cutaway Bog Decommissioning and Rehabilitation Plans involve the re-wetting of parts of the cutover peatlands of the Application Site as appropriate with an aim of achieving environmental stabilisation and biodiversity colonisation. Re-wetted areas will require low level, intermittent groundworks for activities such as drain blocking. The Cutaway Bog Decommissioning and Rehabilitation Plans also include targeted revegetation where appropriate. It is anticipated it will take up to 30 years for naturally functioning wetland and peatland ecosystems to fully re-establish.

12.1.2.6 Potential Future Use – Proposed Ballydermot Wind Farm

As detailed in Section 4.10 in Chapter 4: Project Description, the Applicant are proposing a wind energy development consisting of 47 no. wind turbines with 20 no. turbines having a maximum blade tip height of 200m and 27 no. turbines having a maximum blade tip height of 220m and associated works at the Application Site, known as Ballydermot Wind Farm (<https://www.ballydermotwindfarm.ie/>). The proposed Ballydermot Wind Farm will be located within the Application Site

The likely significant landscape and visual effects of the proposed Ballydermot Wind Farm will be comprehensively assessed and reported within the EIAR accompanying the submitted planning application. The assessments in this chapter of the rEIAR are cognisant of the likely significant landscape and visual effects of the future proposed Ballydermot Wind Farm in the context of potential for cumulative interactions between the works and activities required for implementation of the Remedial Phase and the likely effects resulting from the construction and operation of a wind farm at the Application Site.

12.2 Methodology & Assessment Criteria

This section broadly outlines the methodology used to undertake the landscape and visual impact assessment of the activities (outlined in the previous section under the three differing phases) including a description of the following:

- Guidance and Reference material used to conduct the LVIA;
- Methods for determining the Landscape Baseline and Landscape Evolution; and,
- Methods for Assessing Landscape & Visual Effects.

12.2.1 Guidance and Reference Materials

In 2000, the Department of the Environment and Local Government (DoEHLG) published ‘*Landscape and Landscape Assessment: Consultation Draft of Guidelines for Planning Authorities*’, which recommended that all local authorities adopt a standardised approach to landscape assessment for incorporation into development plans and consideration as part of the planning process. This document remains in Draft.

In 2002, Ireland signed and ratified the European Landscape Convention (ELC). This introduced a pan-European concept that centres on the quality of landscape protection, management and planning. The Department of Arts, Heritage and the Gaeltacht published a National Landscape Strategy for Ireland in 2015. The strategy aims to ensure compliance with the ELC and contains six main objectives, including undertaking a National Landscape Character Assessment and developing landscape policies.

Although the DoEHLG 2000 guidance remains in draft form, this section of the LVIA has been informed by the landscape assessment guidelines presented in the DoEHLG document as well as other guidance, such as the following:

- Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) (The Landscape Institute/Institute of Environmental Management and Assessment, UK, 2013) - also referred to as GLVIA3 (LI & IEMA, 2013);
- ‘Notes and Clarifications on Aspects of GLVIA3: Landscape Institute Technical Guidance Note 2024-01’ (hereafter, LI TGN 24-01) published by the Landscape Institute (LI) (2024);

- Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA 2022);
- An Coimisiún Pleanála (2025), Guidance for Substitute Consent and Section 37L Applications (ACP 2025)
- Offaly County Development Plan 2021–2027, including historic versions (where accessible):
 - Partial access to Offaly County Development Plan 2014–2020,
 - Offaly County Development Plan 2009–2015,
 - Offaly County Development Plan 2003–2009,
 - Offaly County Development Plan 1995,
 - Offaly County Development Plan 1987–1997,
 - Offaly County Development Plan 1967.
- Kildare County Development Plan 2023–2029, including historic versions:
 - Kildare County Development Plan 2017–2023,
 - Kildare County Development Plan 2011–2017,
 - Kildare County Development Plan 2005–2011,
 - Kildare County Development Plan 1999–2005,
 - Kildare County Development Plan 1985–1991,
 - Kildare County Development Plan 1984,
 - Kildare County Development Plan 1977–1984,
 - Kildare County Development Plan 1972–1977,
 - Kildare County Development Plan 1967–1972.

12.2.2 Methods for Establishing the Landscape Baseline & Landscape Evolution

In order to establish the landscape and visual conditions at the Application Site throughout the Project phases under assessment in this rEiAR, a desk study was undertaken which identified relevant landscape policy relating to the Application Site. This comprises a review of current and previous county development plans for County Offaly and County Kildare with regards to landscape character areas, designated landscapes, protected viewpoints and scenic routes.

It should be noted that several older county development plans were either not publicly available or only partial copies were available at the time of writing this chapter. As such, a review of these documents has not been included in this chapter. However, where relevant county development plans were accessible, they have been reviewed and incorporated into the assessment to provide a comprehensive overview of the evolution of landscape designations over time.

A review of historic aerial imagery and mapping, BnM Annual Reports, and all publicly available information on land use were also used to establish the baseline characteristics of the landscape of the Application Site and its evolution between 1988 and present day. Site visits for both the proposed Ballydermot Wind Farm and the Project were conducted concurrently in the years 2025 and 2026 which determined the condition and characteristics of the landscape in the Current Phase, as well as determining the likely visibility of the Application Site (and likely visibility of peat extraction and ancillary activities) from visual receptors in the wider landscape setting.

These investigations (i.e. review of policy, aerial imagery, mapping, reporting, site visit and visibility appraisal) informed the assessment of landscape and visual effects.

12.2.3 Methods for Assessing Landscape & Visual Effects

The LVIA methodology used in this chapter utilises clearly documented methods based on the GLVIA3 (LI & IEMA, 2013), Guidelines and Clarifications in LI TGN 24-01 (LI, 2024). Due to the nature of activities under assessment across differing timelines (i.e. the Project phases), qualitative methods have been employed based upon the information gathered and presented in the Section 12.2. As part of the assessment, landscape and visual sensitivity is balanced with the magnitude of the change to assess the significance of landscape and visual effects. Residual landscape and visual effects are graded upon an ‘impact assessment classification of significance’ scale, as defined by the Environmental Protection Agency of Ireland (EPA, 2022).

12.2.3.1 Assessing Landscape Effects

The methodology uses qualitative methods in order to arrive at an assessment, which is based on the Landscape and Landscape Assessment: Consultation Draft of Guidelines for Planning Authorities (DoEHLG, 2000) as well as the GLVIA3 (LI & IEMA, 2013) Guidelines and Clarifications in LI TGN 24-01 (LI, 2024).

Landscape effects can be described as changes which affect the landscape as a resource. This includes how activities affect the elements that make up the landscape, the aesthetic and perceptual aspects and its landscape character. Landscape effects also relate to changes in the structure of the landscape. Under the GLVIA3 (LI & IEMA, 2013) and the Guidelines and Clarifications in LI TGN 24-01 (LI, 2024), the assessment of likely significant effects on landscape receptors includes a judgement on both the sensitivity of the receptor as well as magnitude of the change.

Assessing Landscape Sensitivity

Landscape Sensitivity, which is described in the GLVIA3 (LI & IEMA, 2013), and within the Notes and Clarifications on Aspects of GLVIA3 in LI TGN 24-01 (LI, 2024), as a combination of the landscape’s susceptibility to change as well as the value attached to the landscape. Susceptibility to change can be described as the ability of the landscape receptor (either the overall character, quality of the landscape or a particular landscape feature) to accommodate the development without undue consequences for the maintenance of the baseline (existing) landscape and/or the aims of landscape planning policies and strategies. Landscape value is the importance attributed to a specific landscape receptor or feature. Landscape value is determined through baseline assessments considering a combination of criteria such as designations and local characteristics.

For the purposes of this chapter and the assessment of landscape sensitivity, the following landscape sensitivity ratings are assigned to receptors based upon investigations determined by the investigations included in Section 12.3:

- High,
- Medium,
- Low.

Assessing Magnitude of Change in the Landscape

The magnitude of change occurring within a landscape is a combination of the visual presence - size and scale - of the change, the extent of the area to be affected, and the duration and reversibility of the effect. The magnitude of change for differing landscape receptors was assessed using the definitions outlined in Table 12-1 below.

Table 12-1 Magnitude of Landscape Change Assessment Criteria

Magnitude of Change	Description
Substantial	Where a landscape will experience the loss of key landscape features or the introduction of uncharacteristic additions over a large area. The changes to the landscape are prominent and large in scale. The level of change has an effect on the overall landscape character. The effects are likely long term and may be irreversible.
Moderate	A more limited loss of or change to landscape features over a medium extent which will result in some change to landscape features and aesthetics. Could include the addition of some new uncharacteristic features or elements that would lead to the potential for change in landscape character in a localised area or part of a landscape character area. Would include moderate effects on the overall landscape character that do not affect key characteristics. The effects could be long to medium term and/or partially reversible.
Slight	The loss of or change to landscape features of limited extent, or changes to landscape character in smaller areas. Changes would not affect key characteristics. The addition of any new features or elements to the landscape would only result in low-level changes to the overall aesthetics of the landscapes. Changes to the landscape are more evident at a local level and not over a wide geographical area. The effects could potentially be medium to short term and/or reversible.
Negligible	A change affecting smaller areas of landscape character including the loss of some landscape elements or the addition of features or elements which are either of low value or hardly noticeable. The effects could be short term and/or reversible.

Landscape Effects Assessment Matrix

The significance of landscape effects was arrived at by combining the magnitude and sensitivity classifications, using the assessment matrix in Table 12-2 below, where landscape sensitivity is shown in the left-hand first column and magnitude of change is shown in the first row at the top of the table.

Table 12-2 Landscape effects significance assessment matrix

	Substantial	Moderate	Slight	Negligible
Very High	Major	Major/Moderate	Moderate	Moderate/Minor
High	Major/Moderate	Moderate	Moderate/Minor	Minor
Medium	Moderate	Moderate/Minor	Minor	Minor/Negligible
Low	Moderate/Minor	Minor	Minor/Negligible	Negligible

The determination of significance uses a seven-point scale, ranging from Major to Negligible. This seven-point scale is translated to the EPA (2022) impact assessment classifications of significance, as outlined in Table 12-6 in Section 12.2.3.2.

12.2.3.2 Assessing Visual Effects

Visual effects relate to changes in views and visual amenity of the surroundings of individuals or groups of people – termed ‘visual receptors’. These may result from changes in content and character of views as a result of changes to the landscape. The significance of the effect on visual amenity is a combination of the sensitivity of the receptor balanced with the magnitude of the change occurring within a view.

Visual Receptor Sensitivity

Visual sensitivity balances the sensitivity and susceptibility of the receptor (people or groups of people) as well as the amenity value of the view on offer at a particular location. Visual receptor sensitivity depends on the occupation or activity of the people, as well the extent to which the attention is focused on views and visual amenity, according to the GLVIA3 (LI & IEMA, 2013) Guidelines and Clarifications in LI TGN 24-01 (LI, 2024) clarifications. Visual receptor sensitivity is assessed as either being Very High, High, Medium or Low, based on the definition of descriptions and examples set out in Table 12-3 below.

Table 12-3 Visual Receptor Sensitivity Assessment Criteria

Sensitivity of Visual Receptor(s)	Description
Very High	Included in this category are viewers that are primarily focused on views from this particular location, such as visitors to popular destinations identified for their outstanding views. Residents in close proximity who have primary views of a scenic quality in the direction of the Application Site.
High	Includes viewers at designated views or landscapes. Viewers such as residents in close proximity to the viewpoint who have primary views that will be in the direction of the Application Site that may not necessarily be of a particularly scenic quality; viewers at well-known heritage or popular tourist or recreational areas, viewers along scenic or tourist routes.
Medium	Includes viewers who may have some susceptibility to a change in view. Viewers such as residents in medium proximity but who do not have views focused in the direction of the Application Site or whose views are not of a particularly scenic quality; those from views which are not designated but may have local recreational uses or those travelling along routes or at view which are considered moderately scenic.
Low	Includes viewers engaged in activities where the focus is not on the landscape or view. These including those travelling along a busy route, viewers at work or engaged in sport not related to views or experience of the landscape.

Magnitude of Visual Change

The magnitude of the visual change considers a combination of scale of the change, the extent of the area to be affected and the duration and reversibility of the effect, determined by review of the activities conducted at the Application Site, desk studies, and the visibility appraisal conducted for the proposed Ballydermot Wind Farm between 2025 and 2026. The magnitude of change is determined in accordance with the definitions and descriptions included in Table 12-4 below.

Table 12-4 Magnitude of Visual Change Assessment Criteria

Magnitude of Change	Description
Substantial	Substantial change, where activities (or proposals) result in large-scale, prominent or very prominent change, leading to substantial obstruction of existing view or complete change in character and composition of the baseline through removal of key elements or addition of uncharacteristic elements which may or may not be visually discordant. This includes instances where activities under assessment (e.g. Peat extraction and ancillary activities at the Application Site) are fully or almost fully visible over a wide extent, at close proximity to the viewer. This change could be long term or of a long duration.
Moderate	The change in the view may involve partial obstruction of existing view or partial change in character and composition of the baseline through the introduction of new elements or removal of existing elements. Likely to occur at locations where activities under assessment (e.g. Peat extraction and ancillary activities at the Application Site) is partially visible over a moderate or medium extent, and which are not in close proximity to the Application Site. Change may be readily noticeable but not substantially different in scale and character from the surroundings and wider setting.
Slight	The activities under assessment (e.g. Peat extraction and ancillary activities at the Application Site) 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. This change could be short term or of a short duration.
Negligible	Any change would only be barely distinguishable from the status quo “do-nothing scenario” in the surroundings. The composition and character of the view would be substantially unaltered, approximating to little or no change.

Visual Effects Assessment

Table 12-5 below shows the significance of visual effects, arrived at by combining the visual receptor sensitivity and the magnitude of change classifications. Visual receptor sensitivity is shown in the left-hand first column and magnitude of visual change is shown in the first row at the top of the table. This table is used as an indicative tool to assist in determining the significance of visual effects. The significance of visual effect is arrived at using a combination of the matrix shown in Table 12-5.

Table 12-5 Visual effects significance assessment matrix

	Substantial	Moderate	Slight	Negligible
Very High	Major	Major/Moderate	Moderate	Moderate/Minor
High	Major/Moderate	Moderate	Moderate/Minor	Minor
Medium	Moderate	Moderate/Minor	Minor	Minor/Negligible
Low	Moderate/Minor	Minor	Minor/Negligible	Negligible

The determination of significance uses a seven-point scale, ranging from Major to Negligible. This seven-point scale is translated to the EPA impact assessment classifications of significance (EPA, 2022), as outlined in Table 12-6.

Table 12-6 EPA Impact Assessment Significance Classification for Landscape and Visual Effects

Matrix Classification Significance	EPA Significance Classification	EPA (2022) Definition of Significance
Major	Profound	An effect which obliterates sensitive characteristics
Major/Moderate	Very significant	An effect, which by its character, magnitude, duration or intensity alters most of a sensitive aspect of the environment
Moderate	Significant	An effect, which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.
Moderate/Minor	Moderate	An effect that alters the character of the environment in a manner consistent with existing and emerging baseline trends
Minor	Slight	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities
Minor/Negligible	Not significant	An effect which causes noticeable changes in the character of the environment but without significant consequences.
Negligible	Imperceptible	An effect capable of measurement but without significant consequences

After determining the significance of the visual effect using the above visual effects assessment matrix, mitigating factors are taken into consideration to arrive at the final residual effect.

12.2.3.3 Determination of Residual Landscape and Visual Effects

After determining the ‘Significance’ of landscape and visual effects using the above assessment matrices (and significance graph in the case of visual effects), mitigating factors and measures are then taken into

consideration to arrive at the final ‘Residual’ effect rating, translated to the EPA classification scheme. In some cases, mitigating factors merit a reduction in classification. In a landscape and visual assessment, a mitigating factor is a pre-existing characteristic of the site or its surroundings that naturally helps to reduce potential negative impacts, while a mitigation measure is a proactive action or design change taken to avoid, reduce, or offset these negative impacts. For example, existing natural screening from a hill is a mitigating factor, whereas planting new trees or choosing a different site layout is a mitigation measure.

The matrices and tables above are excellent tools to aid professional judgement in the determination of the significance of an effect. They are useful in that they provide a transparent, objective structure to the process of balancing ‘Sensitivity’ and ‘Magnitude of Change’.

Particularly for determining residual visual effects, the formulaic process created by the use of the above matrices (Table 12-5) does provide an indicative initial assessment, which can be seen clearly in the assessment of photomontages in viewpoint assessment tables in the LVIA.

However, over-reliance on the formulaic process, which is heavily influenced by the definitions of ‘Sensitivity’ and ‘Magnitude of Change’ contained in the matrices can lead to a failure of properly accounting for the full range of circumstances and factors at play in the determination of the final significance rating of a visual effect (see sub-section 3.35 in ‘Step 3: Judging the Overall Significance of the Effects’ of the GLVIA3 (LI & IEMA, 2013)).

In actuality, a wide range of factors, mitigating or otherwise, can factor into the final determination, and it is not possible to capture the complexity involved in balancing all considerations within the necessarily limited definitions contained in the matrices. This then naturally results in circumstances whereby the process of the determination of significance using the formulaic method involved with the matrix shown above in Table 12-6 can result in misrepresentations of the overall significance of visual effects. It is only by applying professional judgement and composing narrative descriptions of the effect, that such complexity can be integrated into the final determination of significance.

Therefore, the formulaic methods based upon the matrices presented above are combined with professional judgement in the determination of significance. This is shown by the ‘Visual Effects Significance Graph’ below in Figure 12-7 (adapted from the EPA, 2022) which illustrates how the professional judgement of the competent expert is used to properly determine the significance of an effect taking all considerations into account.

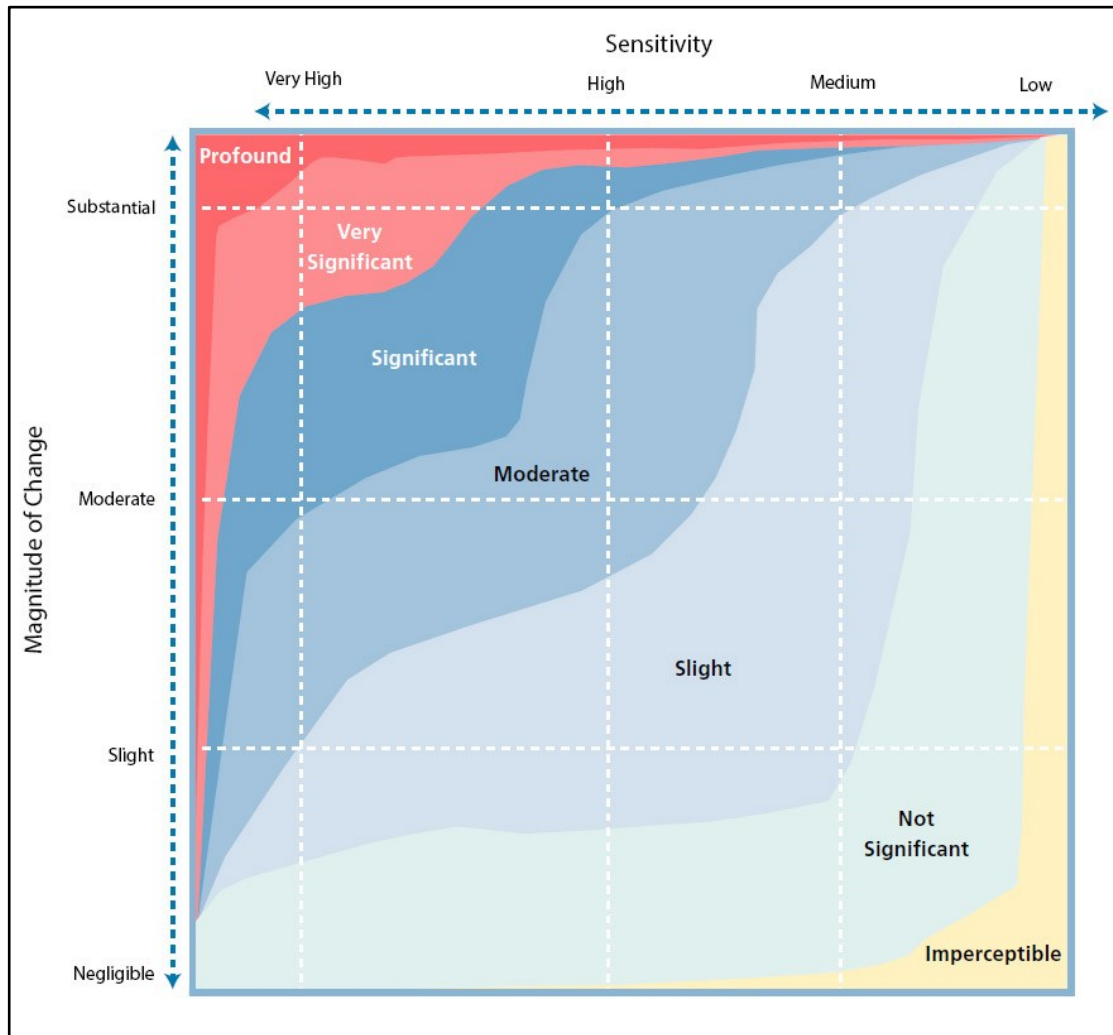


Figure 12-7 Visual Effects Significance Graph (EPA, 2022)

Accordingly, in this LVIA, focus is placed upon the narrative description of effects (see sub-section 3.36 of the GLVIA3 (LI & IEMA, 2013)) given the naturally subjective nature of the significance determination process, particularly in relation to visual effects, ensuring that the rationale for the overall judgement is clear (see sub-sections 3.28 and 3.29 in ‘Step 2: Combining the Judgments’, GLVIA3 (LI & IEMA, 2013)). The comprehensive assessment of photomontages included the LVIA aims to provide a transparent and robust determination of residual visual effects utilising the graph in Figure 12-7 in combination with a clear and logical narrative.

12.3 Landscape Baseline & Landscape Evolution

This section establishes the conditions and character of the landscape at the Application Site and its wider landscape setting in 1988 and throughout both the Peat Extraction Phase and Current Phase. This includes a review of the landscape policy context and landscape designations pertinent to the Application Site from 1988 to present day.

12.3.1 Pre-1988 Landscape Character (1935-1987)

The greatest landscape and visual effects arising from the areas subject to peat extraction had already occurred prior to the baseline of 1988, where initial peat extraction commenced in the year 1935.

Vegetation clearance and drainage commenced at the Application Site in the early 1930s, with railway infrastructure being laid in the bog around 1947, all prior to the 1988 Baseline.

In this regard, it is deemed that by 1988, the areas subject to peat extraction within the Application Site were degraded and modified landscapes owing to the peat extraction activities, making them of Low landscape value and of Low landscape sensitivity.

Aerial imagery from 1973 confirms that, by this period, drains were installed across the majority of the Application Site, as seen in Figure 12-8 below. As seen in Figure 12-9, the majority of the Application Site was subject to peat extraction. Ticknevin bog and Codd 2 bog were drained but not subject to peat extraction.

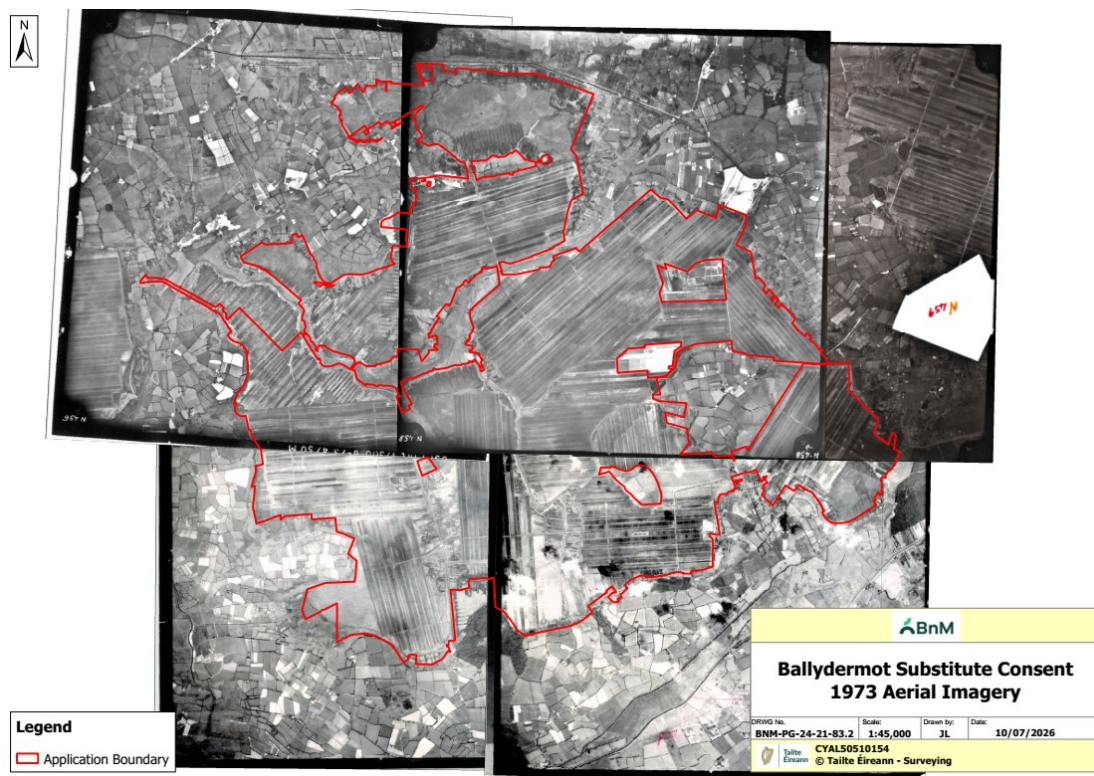


Figure 12-8 Aerial image of the Application Site 1973 – Osi (Source: Bord na Móna, 2026)

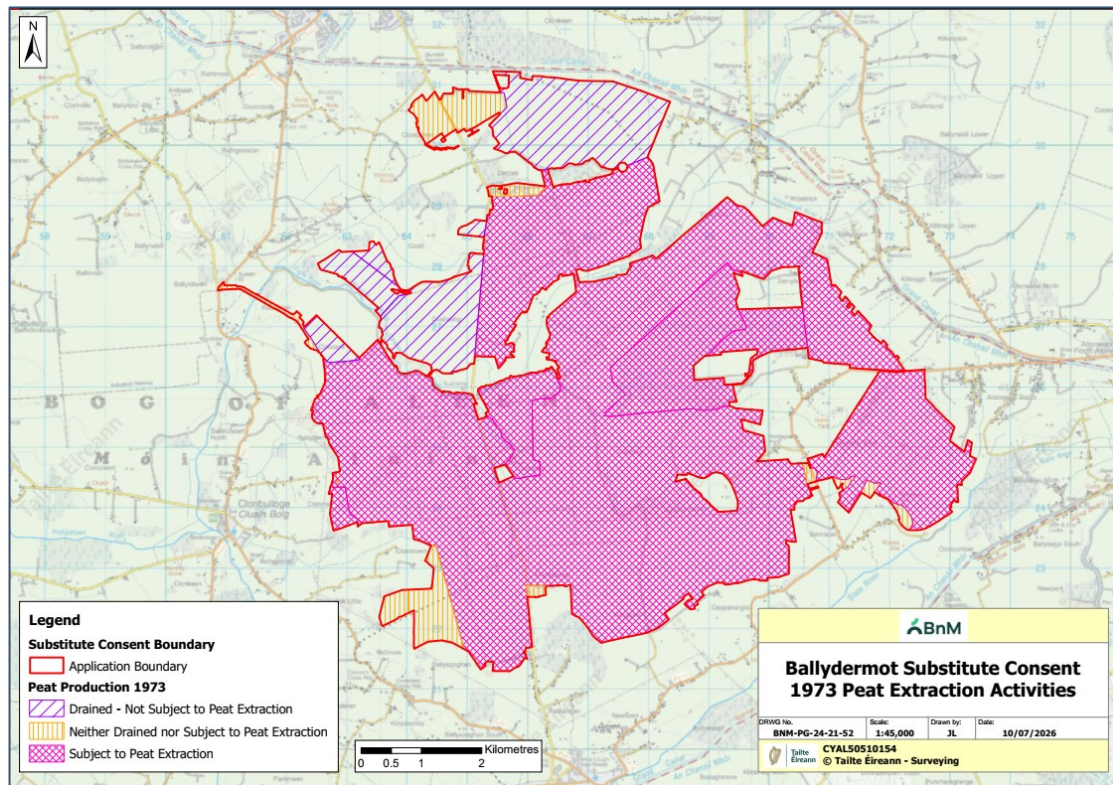


Figure 12-9 Peat Extraction Activities at the Application Site in 1973 (Source: Bord na Móna, 2026)

The drainage ditches are deep, viewed as linear topographical grooves cutting across the landscape of the Application Site. The insertion of these drainage ditches, such as those within the Application Site pictured in Plate 12-1 below, would have slightly altered the physical characteristics of the landscape which was previously a raised bog. Altering the drainage regime via insertion of a drainage ditch dries the topsoil and reduces the capacity of the surface to support vegetation cover, bringing about further minor and localised change in the appearance of the bog and a slight change (although potentially imperceptible) to the landscape character.



Plate 12-1 View of existing drainage ditch existent within the Application Site (present day)

Overall, the Application Site would have experienced a relatively abrupt change in land cover over time with the commencement of peat extraction in 1935. BnM records indicate that approximately 12,595,201 tonnes (milled from 1935, sod from 1950, sod moss from 1976 and bin sode from 2000

combined tonnes) were extracted from the Application Site for the period from 1935 to July 1988. Aerial imagery (seen in Figure 12-8 previously) indicates that by July 1988, approximately 4,828 hectares of the Application Site were subject to peat extraction. Thus, the main landcover type at this time was cutover peat.

In 1960, areas of Killina bog, Derrybrennan bog and Glashabaun South bog were transferred to An Foras Talúntais to experiment to develop a nursery for growing ornamental shrubs and trees on cutaway peatland. This has been described further in Section 4.3.3 in Chapter 4: Project Description of this rEiAR. Then in the 1980's parts of these bogs, and also Lullymore bog and Lullybeg bog, were developed as conifer plantations by Coillte.

On balance, the landscape value and landscape sensitivity of the areas subject to peat extraction is deemed to be 'Low'.

12.3.2 1988 Landscape Baseline – Landscape Character

A description of the baseline condition and extraction occurring at the Application Site in 1988 is included in Section 4.4 of Chapter 4: Project Description as well as an overview in Section 12.1.2.2. The following text establishes the landscape conditions of the Application Site in 1988 and the factors that contribute to the landscape character, landscape value and landscape sensitivity at that time. Figure 12-10 below shows aerial imagery of the Application Site in 1988.

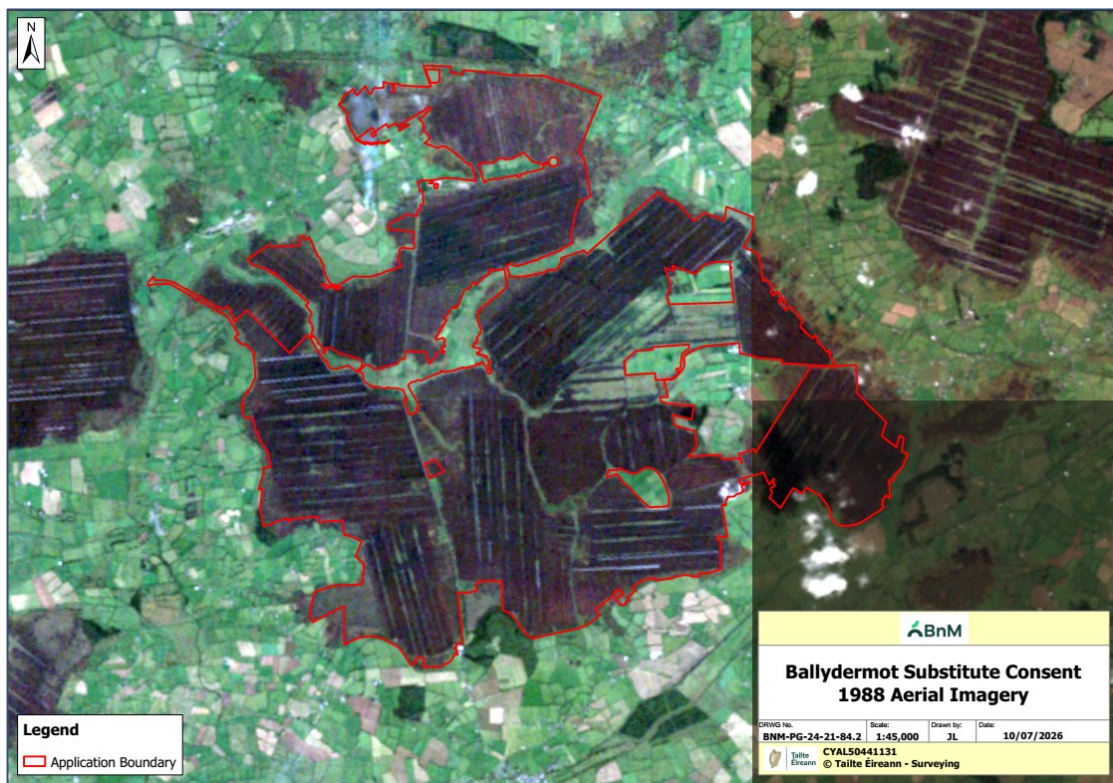


Figure 12-10 Aerial imagery over the Application Site captured in 1988 (Source: Bord na Móna, 2026)

In 1988, all of the areas subject to peat extraction within the Application Site included stripped and drained peatland where peat extraction was well-established. The groundcover of the areas subject to peat extraction comprised bare cutover peat and it is likely that the character of the landscape in these areas was similar to that shown below in Plate 12-2 below (captured during a site visit in 2025).



Plate 12-2 Drone image (for Landscape Context only) from the centre of the Application Site showing a view facing south over Barnaran bog of the Application Site – imagery taken in December 2025

As discussed in Section 4.3.1 of Chapter 4: Project Description and Chapter 7: Land, Soils and Geology, the topographical elevation of the bare cutaway peat landscape was at a greater elevation in 1988 than it is currently. The material extracted throughout the Peat Extraction Phase (July 1988 – June 2020) has lowered the landform relative to the surrounding landscape and relative to the baseline profile in 1988. Pre-development topographies would have been at higher elevation (in the range of 75m-88m AOD) than those observed today, with the remnant areas of higher-elevation bog located around the perimeter of the Application Site, resembling more closely the pre-development surface elevation.



Plate 12-3 View captured from Glashabaun North bog overlooking the areas of bare cutover peat character of the Application Site

In a general sense, the Application Site in 1988 was a highly managed landscape utilised for industrial peat extraction, making them of Low landscape value and of Low landscape sensitivity. The character of landscape was heavily influenced by this industry with expansive areas of bare cutover peat across the Application Site.

Aerial imagery and reports from 1988 indicate that the perimeter of the Application Site was likely bounded in some areas by mature vegetation such as hedgerows, woodland and pockets of forestry as it is today, as well as remnant uncut bog around the edges of the areas subject to peat extraction. The aerial imagery also indicates that the surrounding landscape setting in 1988 comprised of an agricultural landscape. In this regard, it is anticipated that the nature and extent of visual screening surrounding the Application Site, comprising boundary vegetation, as well as the nature of the visual receptors present in 1988 would have been very similar to those existing today. An appraisal of the visibility of the Application Site from surrounding visual receptors is reported in Section 12.4 - Visibility Appraisal.

12.3.3

Landscape Evolution – Landscape Character of the Application Site During the Peat Extraction Phase (July 1988 – June 2020)

As described above, the majority of the Application Site was a managed system in 1988 for peat extraction, of Low landscape value and Low landscape sensitivity. The management continued throughout the Peat Extraction Phase until peat extraction ceased across the Application Site, with extraction ending at different times across individual bog units, the last of which ceased in June 2020. Table 4-2 of Chapter 4: Project Description outlines the Operational History of the Application Site. Those areas subject to peat extraction up until June 2020 had limited opportunity to revegetate or re-wet prior to cessation, and thus limited opportunity to experience mitigation of the accumulated landscape and visual impacts of peat extraction and ancillary activities over time. As detailed in Section 4.6.1 of Chapter 4: Project Description, the total volume of peat extracted from July 1988 to June 2020 is estimated to be 11,174,206 tonnes. The physical removal of such a high volume of material caused a substantial direct change on the landscape throughout the Peat Extraction Phase, because the physical

landform was materially altered and the surface of the landscape was gradually reduced to a lower elevation year on year.

As detailed previously in Section 12.1.2.2, one of the greatest changes to the landscape occurred in a portion of Codd 1 bog and Ballydermot North bog between 2004 and 2020 where an area previously drained but not subject to peat extraction became subject to peat extraction. There had also been changes in an area of Ballydermot South bog, where an area previously neither drained nor subject to peat extraction became drained but not subject to peat extraction.

Between 1988 and 2020, large areas of the Application Site underwent landscape change as they transitioned out of active peat extraction. These areas, previously categorised as subject to peat extraction, remained drained, with existing drainage infrastructure retained. Over time, the cessation of extraction allowed these areas which were drained but not subject to peat extraction to gradually revegetate, restoring it from the character of the bare cutover peatland landscape. The Application Site had a slightly higher landscape value than the bare cutaway peatland that was subject to peat extraction. However, the landscape of the Application Site at the time could not have been considered a wetland or peatland habitat of high biodiversity value, and therefore, would have remained a landscape of Low landscape value and Low landscape sensitivity.

Aerial Imagery 1995 (Source – Bord na Móna, 2026)

The following shows selection of aerial imagery of the Application Site indicating the morphology of the Application Site throughout the operational lifecycle of these peatlands as managed, working landscapes for the industrial production of peat.

Aerial imagery of the Application Site captured in 1995 is shown in Figure 12-11 below, showing that the Application Site is located within an ordered working landscape with well-established extraction areas and visible drainage networks. The imagery shows that the surface area of peat extraction in 1995 included almost all available areas of the peatlands within the Application Site, peat extraction had ceased on Lullymore bog in 1992.

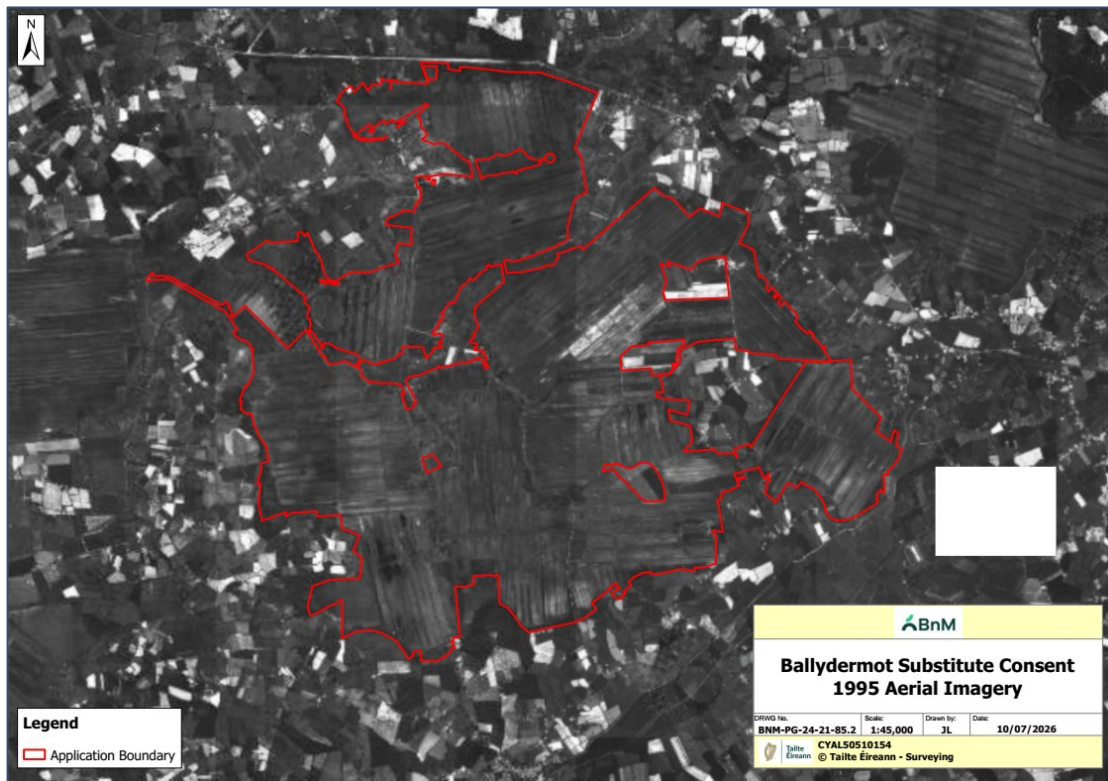


Figure 12-11 Aerial imagery over the Application Site captured in 1995 (Source: Bord na Móna, 2026)

Aerial Imagery 2004 (Source – Bord na Móna, 2026)

Aerial imagery of the Application Site captured in 2004 is shown in Figure 12-12 below. The areas of the Application Site shown in a light brown colour can be identified as areas subject to peat extraction during that year, in which the upper layers of peat were being extracted. In contrast, areas which were drained but not subject to peat extraction appear greener, indicating that vegetation had started to re-establish where work had ceased. It is noted that not all vegetative recovery in these areas represents natural revegetation. As stated in Section 12.3.1, areas to the west of Killina and to the southeast of Glashabaun South were subject to an afforestation experiment by An Foras Talúntais between 1988 and 1995, by which time an established conifer plantation had developed and ownership of these lands had transferred to Coillte. For more detail on this see Chapter 4: Project Description of this EIAR.

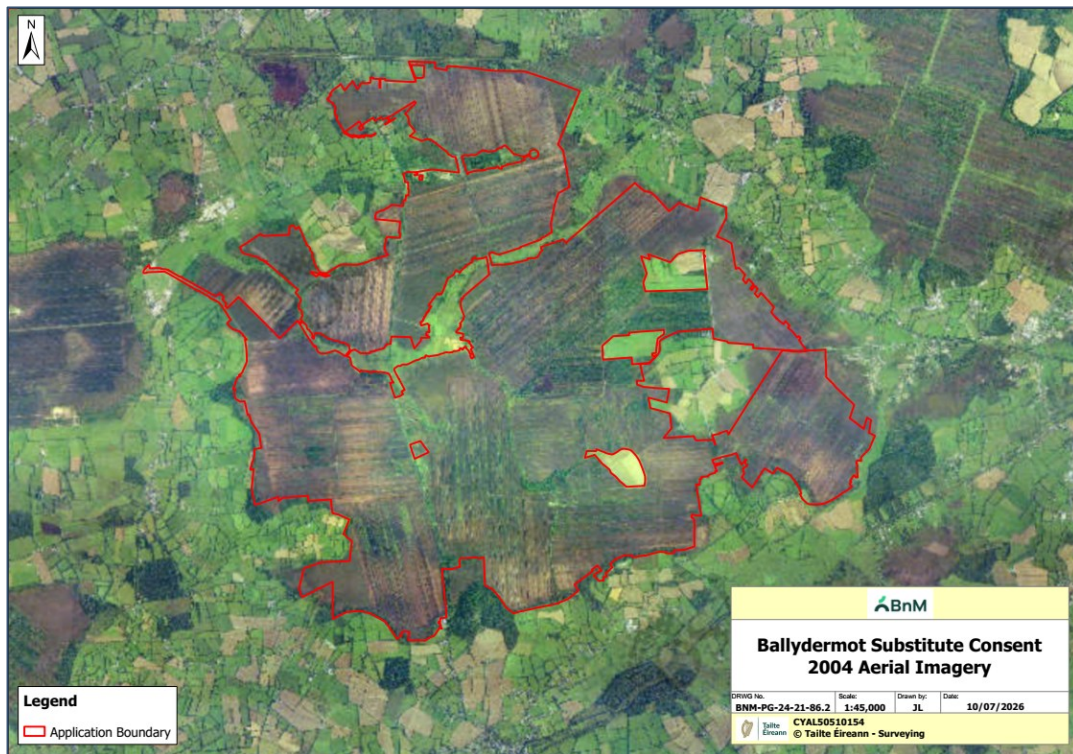


Figure 12-12 Aerial imagery over the Application Site captured in 2004 (Source: Bord na Móna, 2026)

The aerial imagery of 2004 is of higher resolution with colour, as such, it is difficult to directly compare this image with the imagery captured in 1995. However, the imagery indicates that vegetation colonisation is evident across the boglands particularly along drainage corridors or areas where peat extraction has ceased.

12.3.4 Landscape Character of the Application Site - Current Phase (June 2020 – Present Day)

Site visits for the proposed Ballydermot Wind Farm and the Project were conducted in 2025 and 2026 to ascertain the landscape character and condition of the Application Site in the Current Phase. Landscape character refers to the distinct and recognisable pattern of elements that occurs consistently in a particular type of landscape, and how people perceive this. It reflects particular combinations of geology, landform, soils, vegetation, land use and human settlement, and creates the particular sense of place found in different areas.

This section includes aerial images captured by a drone which are useful tools to illustrate the character, scale, context, and constituent parts of the landscape of the site. Figure 12-14 below shows present-day aerial imagery of the Application Site.

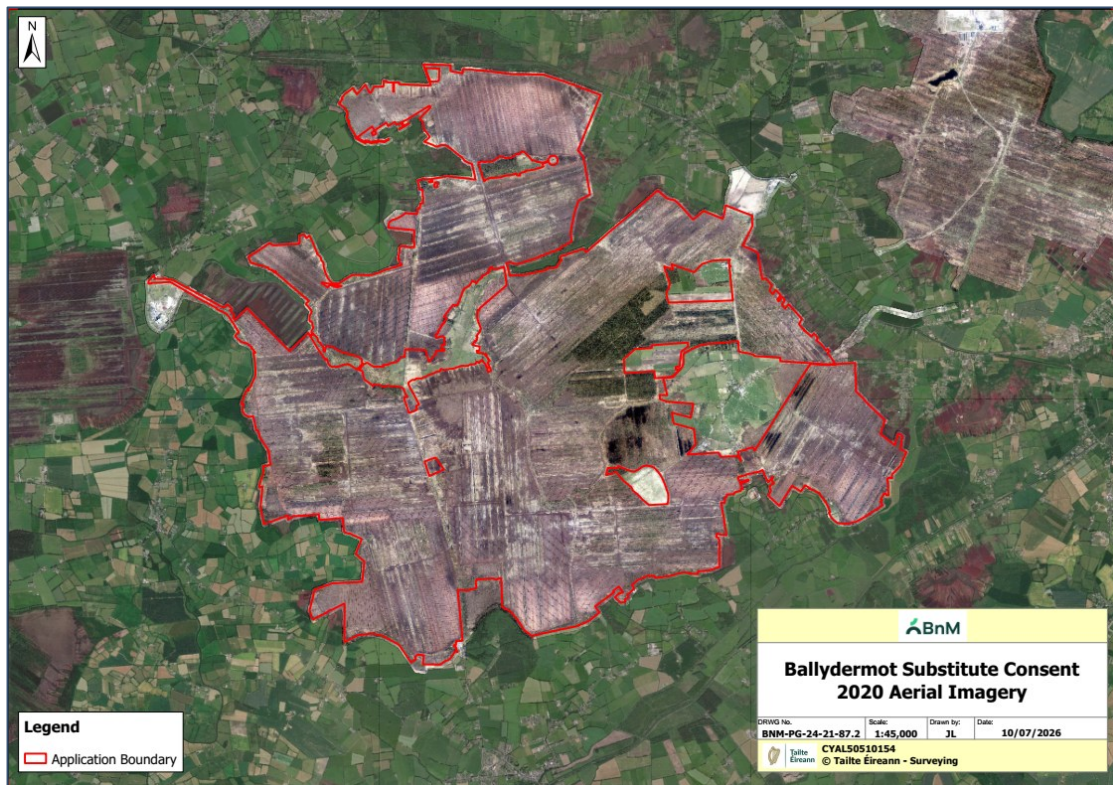


Figure 12-13 Aerial imagery over the Application Site captured in 2020 (Source: Bord na Móna, 2026)

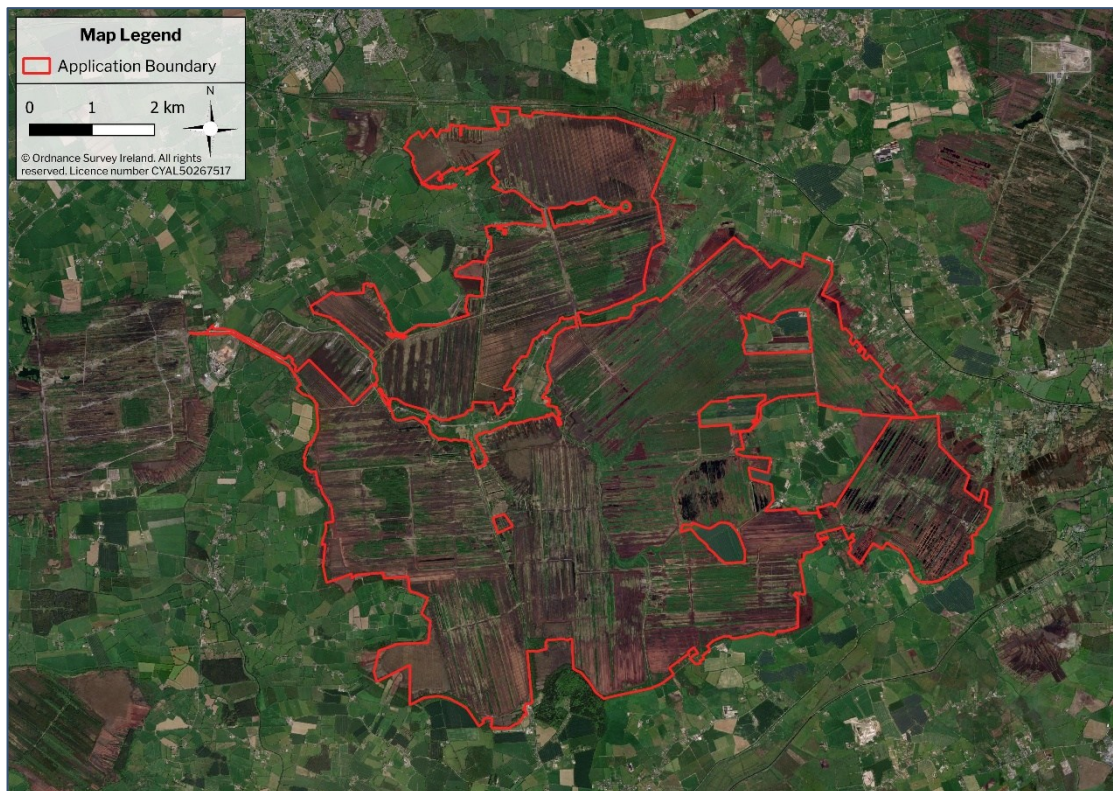


Figure 12-14 Aerial Imagery of the Current Phase of the Application Site (present day – Source: ESRI 2026)

Due to peat extraction and ancillary activities during the Peat Extraction Phase, the topography and landform have been substantially altered and modified. In most areas of the Application Site, the

landform is very flat (see Plate 12-4 below) and is often at a lower elevation than the surrounding landscape due to the large quantity of material that was removed during the extraction of peat.



Plate 12-4 View southeast from Glashabaun bog in the north of the Application Site, overlooking the flat landscape of the Application Site (Present Day) and the degraded cutover peat landcover, a treeline on the perimeter of the Application Site, and the existing Cushaling turbines

Landcover

Landcover is the term used to describe the combinations of vegetation and land-use that cover the land surface. It comprises the more detailed constituent parts of the landscape and encompasses both natural and man-made features.

Landcover within the Application Site comprises a mix of bare cutaway peat, re-vegetated peat, degraded bog, and scrub vegetation. Industrial features that facilitated peat extraction and ancillary activities are still evident throughout the Application Site. Remnants of previous industrial work such as gravel beds for railways and level crossings contribute to the industrialised landcover and character of the landscape.

The images below show a variety of vegetation establishment that have occurred in areas of the Application Site where peat extraction has ceased. A variety of ground cover types such as scrub vegetation commonly occur along corridors where infrastructure such as gravel beds for previous rail lines (seen in Plate 12-5 below), drains, and access roads exist, as well as along extraction plot boundaries where the peat banks form elevated berms.



Plate 12-5 Existing conditions at the Application Site, showing the gravel bed of a previous railway track traversing a drained area of partially cutover bog and naturally re-vegetated bog

Plate 12-4 previously and Plate 12-6 below illustrate typical landcover of the Application Site, showing large expanses of historically cutover peatland where there are patches of natural re-vegetation. This is also evident in Plate 12-7 which shows landcover of degraded cutover peat with drainage ditches running in parallel lines. Large areas of shrub and tree colonisation are prevalent throughout the Application Site in areas that went out of production before peat extraction ceased in June 2020, such as the west of Killina bog and Lullymore bog. Vegetation and tree cover is prevalent along the perimeter of the Application Site, preserved by BnM to minimise dust travelling off-site.



Plate 12-6 Shrub and tree colonisation in the Ballydermot South bog of the Application Site



Plate 12-7 Drone image (for Landscape Context only) from the centre of the Application Site showing a view facing southeast over Blackriver bog and Barnaran bog of the Application Site – imagery taken in December 2025

Plate 12-8 below shows landcover crossing the R414 regional road in the east of the Application Site. This is an example of a disused level crossing point where natural re-vegetation has occurred.



Plate 12-8 View from a historic level-crossing at the R414 regional road, looking west over Barnaran bog in the east of the Application Site showing a shrubby and forested landcover along the perimeter of the Application Site

Plate 12-9 below is a drone image looking over the eastern extent of the Application Site that shows existing boundary vegetation along the Application Site perimeter. This vegetation provides visual screening in views looking towards the Application Site from the surrounding landscape.

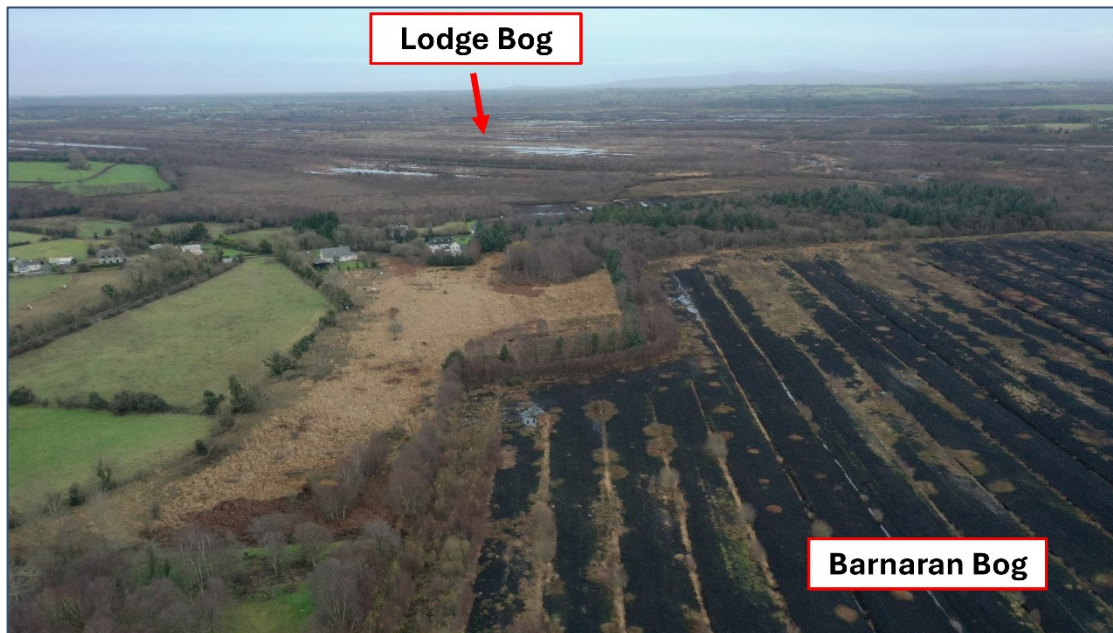


Plate 12-9 Drone image showing a view facing east over Barnaran bog (bottom of image) and Lodge bog (top of image) of the Application Site and the residences along the R414 regional road – imagery taken in December 2025

There is a part of the Lullymore Heritage & Discovery Park located in the very east extent of Lullymore bog. The part of this heritage park that lies within the Application Site is 'Peatland Biodiversity Area', in which there is a Science and Biodiversity Observation Cabin, as seen in the centre of Plate 12-10 below. The main infrastructure of this heritage park, the car park and buildings are not located with the Application Site.

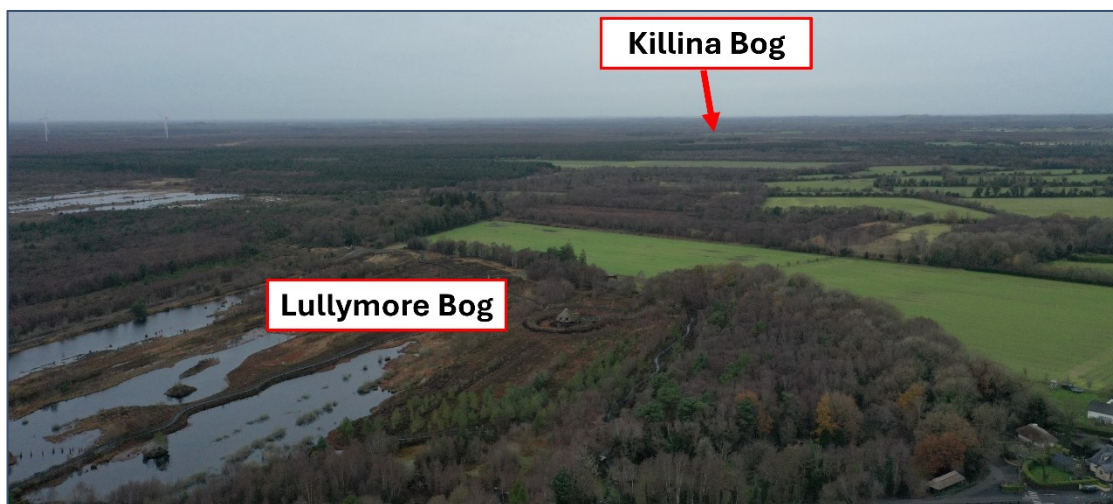


Plate 12-10 Drone image showing a view facing north over Lullymore bog of the Application Site, with portions of the Lullymore Heritage & Discovery Park seen in the bottom right of the image - imagery taken in December 2025

Historic Landscape Character

The Application Site and its immediate surrounds form part of a landscape of significant historic and cultural depth, reflecting millennia of human interaction with the midland peatlands of Ireland. The historic peat cutting practices at the Application Site have strongly influenced this landscape and the people who have inhabited the surrounding area throughout history. Cutting turf was historically a culturally important tradition and the bogs of the Application Site have sustained the local population

for generations in terms of fuel for their homes and as a reliable source of employment. In this regard, the landscape of the Application Site is culturally valuable to the local communities who have this historic connection to the peatlands.

Evidence of toghers (ancient wooden trackways) have been identified within the Project Site. These features historically served as important routes across peatland areas. Such features are a common characteristic of peatland landscapes in Ireland and are considered of archaeological and cultural heritage value. See Chapter 13: Archaeology and Cultural Heritage for more information on toghers within the Application Site boundary. The following two sites are historic and culturally important features of the landscape surrounding the Application Site:

- The Lullymore Ecclesiastic Site: A monastic site located within the townland of Lullymore and is approximately 100m outside of the Application Site boundary.
- The Grand Canal: A historic transport and trade route which contributes character to the wider historic landscape setting of the area. It is now a designated AHA in both the KCDP and OCDP and provides recreational amenity. It is located approximately 80m north of the Application Site boundary.

Eskers nearby the Application Site

Eskers are glacially-formed ridges of sand and gravel deposited beneath the ice sheet during the last glaciation, approximately 10,000 years ago. The OCDP 2023-2029 identifies esker systems as Areas of High Amenity, recognising their geomorphological, scientific, historical, cultural and amenity value.

A linear AHA ('AHA 11 – Other Eskers' in the OCDP) partially enters the Application Site boundary, bisecting Tickenvin bog and Glashabaun bog in the townland of Derries at the north of the Application Site. It is assumed this designation is on account of these lands forming part of an esker that extends into farmland to the north-west of the Application Site. Analysis of topographic data, aerial imagery and on-site verification determined that the portion of the AHA adjacent to the Application Site comprises private lands of scrub, residential houses, and is also used as a motorcross track, the remnants of the esker does not comprise a landscape receptor of any distinctive notoriety or sensitivity.

The Eiscir Riada, the most nationally significant esker system in Ireland, extends east to west across the Irish midlands through County Offaly, running broadly from Shannonbridge through Clara and eastward toward Rahugh in County Westmeath. In Irish, "eiscir" means divide and "riada" means road, reflecting the historic significance of these elevated landforms as natural pathways and territorial boundaries across the otherwise flat and boggy midland landscape. While the Eiscir Riada does not pass through the Application Site, esker ridges are a characteristic feature of the wider Bog of Allen landscape, and localised esker formations are located within the east Offaly and north Kildare area. These locally occurring esker ridges represent elevated features within an otherwise flat peatland landscape and historically served as natural overland routes across the boglands.

Landscape Value and Sensitivity – Existing Conditions

As noted previously in Section 12.1.2.4, decommissioning activities are on-going and will continue into the Remedial Phase. Such non-extractive activities continue to influence the character of the landscape during the Current Phase and the Application Site is still to some degree a working landscape.

The site investigations for the proposed Ballydermot Wind Farm, conducted on the site between 2025 and 2026 determined that re-vegetation is prevalent throughout the Application Site since all peat extraction ceased in 2020. The Application Site has a slightly higher landscape value than the bare cutaway peatland that existed throughout the Application Site during the Peat Extraction Phase.

However, the overall Application Site cannot currently be considered a wetland or peatland habitat of high biodiversity value considering its degraded state it is still deemed to be a landscape of Low landscape value and Low landscape sensitivity.

There are ongoing rehabilitation processes at the Application Site under Bord na Móna's Peatland Climate Action Scheme (PCAS). As previously mentioned, Lodge bog is subject to a decommissioning and rehabilitation plan, which includes, inter alia, managing water levels at the bog with the aim of restoring it to a naturally functioning peatland and wetland habitat. Rehabilitation plans for the remaining bog units within the Application Site will be implemented per Condition 10 of the IPC Licence for the Allen Bog Group (Reg. No. P0503-01). It is anticipated that, over time, the implementation of these rehabilitation measures will result in a gradual improvement in the landscape value and ecological condition of the wider bogland setting, though the timescale for meaningful landscape-scale recovery remains uncertain.

12.3.5 **Landscape Policy Context – Designated Landscape Character Areas, Scenic Routes and Views**

In order to provide a comprehensive description of the historic and existing landscape conditions throughout the various project phases, this section provides an overview of the landscape policy pertaining to the location of the Application Site within current and previous county development plans. Provision of the landscape policy context enables assessment of the likely impact of the activities under assessment at the Application Site on landscape policy and designated landscape and visual receptors.

The Application Site is located in Counties Offaly and Kildare. Multiple mapping figures presented throughout this section demonstrate the separation distances between the Application Site and sensitive landscape designations within Counties Offaly and Kildare.

Kildare County Development Plan (KCDP) 2023-2029 (as varied)¹ and Offaly County Development Plan (OCDP) 2021-2027 have been reviewed. Consideration was also given to the historic county development plans (CDP) detailed in Section 2.2.3 in Chapter 2: Background of this rEiAR. These historic CDPs were not considered material to the assessment of effects in this rEiAR as the landscape policy and designations within each CDP in more recent years is more articulate and defined and has evolved to be so over time. As the European Landscape Convention was only adopted in 2000 and ratified in Ireland in 2002, local landscape policy pre-dating 2002 is less defined.

12.3.5.1 **Offaly County Development Plans**

Offaly County Development Plan (OCDP) 1987-1997

There are no records of landscape character areas or scenic routes or views for the OCDP 1987-1997. It was an objective of the OCDP 1987-1997 to protect and preserve the county's Areas of High Amenity, such as the Grand Canal and Croghan Hill.

These Areas of High Amenity to be protected and preserved by Offaly County Council are shown in Map No. 6 of the OCDP 1987-1997. The OCDP 1987-1997 stated the following in relating to policy to conserve and develop the area Areas of High Amenity;

¹ <https://kildarecoco.ie/AllServices/Planning/DevelopmentPlans/KildareCountyDevelopmentPlan2023-2029/VariationNo4LandscapeCharacterAssessment/>

“The overall policy of the Council towards the Areas of High Amenity will be to co-operate with other bodies in encouraging development of the amenity and recreational potential of the areas while at the same time ensuring conservation and the special control of development.”

In relation to Views and Prospects, the OCDP 1987-1997 stated that *“There are a number of views and prospects in the County which are of special amenity value and which the Council will protect”* (p.66). The OCDP 1987-1997 listed 8 no. *“Views and Prospects to be protected by Development Control”* in Table 36 (pages 67 and 68). No designated Areas of High Amenity or designated scenic views as set out in the OCDP 1987-1997 were located at the Application Site.

Offaly County Development Plan (OCDP) 2003-2009

There are no records of landscape character areas or scenic routes or views for the OCDP 2003-2009. Associated mapping for this county development plan was not available online.

The OCDP 2003-2009 had an objective on the preservation of landscape character, stating:

“The preservation of the character of the landscape where, and to the extent that, in the opinion of the planning authority, the proper planning and sustainable development of the area requires it, including the preservation of views and prospects and the amenities of places and features of natural beauty or interest”(p.18).

The OCDP 2003-2009 included an objective for amenity areas for *“the preservation, improvement and extension of amenities and recreational amenities”* with a provision for *“landscape protection; preservation of public rights of way, provision of public open space; provision of recreation space”*(p.19).

It was also an objective of the OCDP 2003-2009 to protect and preserve the county’s primary Areas of High Amenity, such as:

- The Grand Canal,
- Croghan Hill, and
- Clara Bog and Eskers.

There are small areas designated as Areas of High Amenity that fall within the Application Site, at and/or near Ticknevin bog, and Glashabaun bog, in the north section of the Application Site as shown in Figure 12-15 below. These AHAs are small eskers.

Section 2.6.1 of the OCDP 2003–2009 *“recognises the importance of raised bogland as a major natural and archaeological resource”*. It goes on to state that *“the development of the County’s peat resources will be promoted and facilitated”* (p.48).

Section 2.6.3 of the OCDP 2003-2009 relates to the protection and rehabilitation of peatland landscapes such as the Application Site:

“The Council will seek the formulation of a comprehensive integrated land use plan for the future development and utilisation of the large areas of cutaway bog, which now exists in the county. In addition, the plan should cater for development of further areas of cutaway bog.” (p.48).

Offaly County Development Plan (OCDP) 2009-2015

The OCDP 2009-2015 set out the Landscape and Amenities policies and objectives in Chapter 16: Interaction of the Foregoing . Within Table 16.1 the council list out the Areas of High Amenity, similar to the OCDP 2003-2009. Under Section 16.1 the OCDP 2009-2015 provided Landscape Classifications for landscape areas in County Offaly to describe their “*degree of sensitivity to various kinds of development*”. The area in which the Application Site is located was designated to be of ‘Moderate Sensitivity’ as per Map No. 16.1 of the OCDP 2009-2015, which “*Areas which are generally ‘open’ in character with intrinsic quality and moderate capacity to absorb new development.*” The OCDP 2009-2015 also designate areas of ‘High Sensitivity’ which include the Grand Canal Corridor and the Esker Landscape. As previously identified in the OCDP 2003-2009, there is a portion of an AHA (esker) which falls within the Application Site.

Under Section 16.3, the OCDP 2009-2015 outlined its general landscape policies, some of which included the following:

***P16-02** It is Council policy to control development as per the county’s landscape classification listed in Tables 16.2-16.5.*

***P16-03** It is Council policy to protect and preserve the county’s Areas of High Amenity, ... , from development(s) which would be visually obtrusive or which would detract from the intrinsic character and environmental quality of the landscape.”*

Under Section 16.4, the OCDP listed its objectives which included:

***O16-01** It is an objective of the Council to preserve and enhance the character of the county’s landscape where, and to the extent that in the opinion of Offaly County Council, the proper planning and sustainable of the area requires it.*

***O16-02** It is an objective of the Council to preserve scenic views and prospects throughout the county which will be assessed on a case-by-case basis, as part of the development management process. (Views are listed in Table 16.6 and shown on Map 16.10.*

***O16-04** It is an objective of the Council to evaluate the need for Landscape Character Analysis in the county.”*

No designated scenic views or prospects were identified within or in proximity to the Application Site.

Offaly County Development Plan (OCDP) 2014-2020 (partial access only)

Chapter 7 of the OCDP 2014-2020 discussed Heritage and Landscape. Similar to previous versions of the OCDP, Section 7.8 of the OCDP 2014-2020 outlines Areas of High Amenities, including the Grand Canal, eskers and boglands. With respect to boglands, the OCDP recognised the Application Site as one of the “*Cutaway Bogs, or worked out bogs which were harvested since the 1940s by Bord na Móna*”.

The policies and objectives for Areas of High Amenity, seen in Section 7.9 and 7.10 of the OCDP have remained similar to those identified in the OCDP 2009-2015.

Section 7.11 discussed the sensitivities of landscapes within the county. Table 7.11.3 within this section identified ‘Cutway Bog’ as a Moderate Sensitivity Area, which is described as follows:

“some of these cutaway bogs may be appropriate for other sensitively designed and located developments including renewable energy (wind farms, biomass crops) and/or industrial use.”

On review, views and prospects, and policies and objectives surrounding landscape and amenity are similar to those identified in the OCDP 2009-2015.

Offaly County Development Plan (OCDP) 2021-2027

The current development plan for County Offaly is the OCDP 2021-2027. Chapter 4: Biodiversity and Landscape sets out policies on landscape. General landscape policy from the OCDP that is pertinent to the Application Site are reported below:

“BLP-38 - It is Council policy to protect and enhance the county’s landscape, by ensuring that development retains, protects and where necessary, enhances the appearance and character of the county’s existing landscape.

BLP-41 - It is Council policy to require a Landscape/Visual Impact Assessment to accompany significant proposals, located within or adjacent to sensitive landscapes. This assessment will provide details of proposed mitigation measures to address likely negative impacts.”

BLP-14 - It is Council policy to protect the county’s designated peatland areas and landscapes, including any historical walkways through bogs and to conserve their ecological, archaeological, and cultural heritage and to develop educational heritage.”

Section 4.14.1 of the OCDP describes landscape sensitivity as *“the measure of its ability to accommodate change or intervention without suffering unacceptable effects to its character and values.”* The sensitivity of the landscapes of County Offaly varies and is thereby classified within the following sensitivity classes: Low, Moderate and High Sensitivity and are shown in Figure 4.22 of the OCDP - Landscape Classification Areas in County Offaly.

Within County Offaly, the Application Site is primarily located within an area designated with Moderate sensitivity, as shown in Figure 12-15 below. Table 4-19 of the OCDP describes moderately sensitive areas as *“areas can accommodate development pressure but with limitations in the scale and magnitude. In this category of sensitivity, elements of the landscape can accept some changes while others are more vulnerable to change.”* The OCDP continues to note the following sensitivities in relation to Moderate Sensitive Areas:

“However, some of these cutaway bogs may be appropriate for other sensitively designed and located developments including renewable energy (wind farms, biomass crops) and/or industrial use.”

There are small areas designated as High sensitivity and Low sensitivity that fall within the Application Site, at and/or near Ticknevin bog, Codd 1 bog, and Glashabaun bog, in the northwestern section of the Application Site as shown in Figure 12-15 below.

Table 4-20 of the OCDP identify High Sensitivity Areas as *“features or areas of natural beauty or interest which have extremely low capacity to absorb new development.”* These include designated ‘Areas of High Amenity’, which are discussed further below.

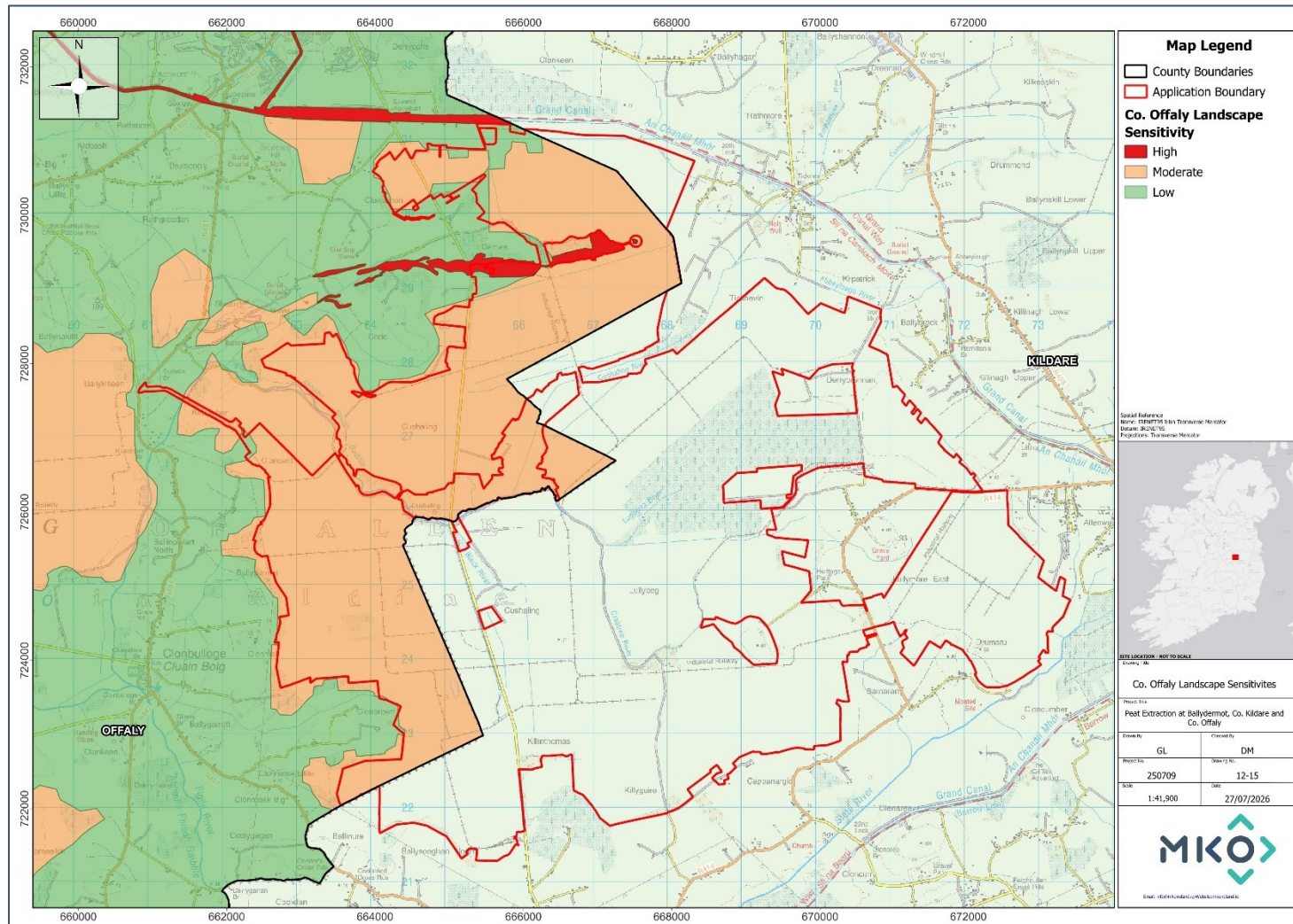


Figure 12-15 Landscape Sensitivity Designations of the OCDP 2021-2027 within the Application Site

The OCDP defines ‘Areas of High Amenity’ (AHAs) as “*areas worthy of special protection / enhancement due to their uniqueness and scenic / amenity value.*” Table 4.17 in Section 4.13 in the OCDP designates 13 AHAs within the County; these are listed below. The OCDP states that “*it is a priority of the Council to protect and preserve the AHAs in Table 4.17*”. There are 5 no. main categories of AHAs: Waterways and Wetlands, Upland Areas, Peatlands, Eskers, and Archaeological and Historical. As mentioned in the OCDP 2003-2009, some of these AHAs include the Grand Canal, Croghan Hill, and Other Eskers.

Section 4.16 and Section 4.17 of the OCDP 2021-2027 sets out the county’s policy objectives for preservation and enhancement for AHAs:

“BLP-35 - It is Council policy to protect and preserve the county’s Areas of High Amenity namely the Slieve Bloom Mountains, Clonmacnoise Heritage Zone, Durrow High Cross, Abbey and surrounding area, the River Shannon, Lough Boora Discovery Park, Grand Canal, Croghan Hill, Raheenmore Bog, Pallas Lake, Clara Bog, Clara eskers, Eiscir Riada and other eskers. Notwithstanding the location of certain settlements, or parts of, for which there are settlement plans (Towns, Villages, Sráids), within the Areas of High Amenity, it is not the intention of this policy to hinder appropriate sustainable levels of development (as set out in the plans and subject to proper planning).

“BLO-22 It is an objective of the Council to ensure that new development, whether individually or cumulatively, does not impinge in any significant way on the character, integrity, and distinctiveness of or the scenic value of the Areas of High Amenity listed in Table 4.17. New development in Areas of High Amenity shall not be permitted if it:

- *Causes unacceptable visual harm;*
- *introduces incongruous landscape elements; and*
- *Causes the disturbance or loss of (i) landscape elements that contribute to local distinctiveness; (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns; (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements.”*

The designated AHAs are mapped in *Figure 4.18* of the OCDP 2021-2027. A part of a designated AHA falls within the Application Site, identified as an esker, which is mapped in *Figure 4-7* of the OCDP 2021-2027.

In the OCDP 2021-2027, “esker systems” are protected landscape receptors due to their high geological value and sensitivity. Eskers are glacial landforms that also hold historic value as elevated pathways across the flat, boggy midland landscape. Thus, whilst esker systems are considered as High Amenity Areas in the OCDP, their key sensitivities are not derived from their visual appearance; moreover, they are not generally considered landscape features of high tourism or recreational value. Esker systems provide elevated vantage points permitting open views across the flat landscape. There is an esker identified between Ticknevin bog and Glashabaun bog, where a very small portion falls within the Application Site.

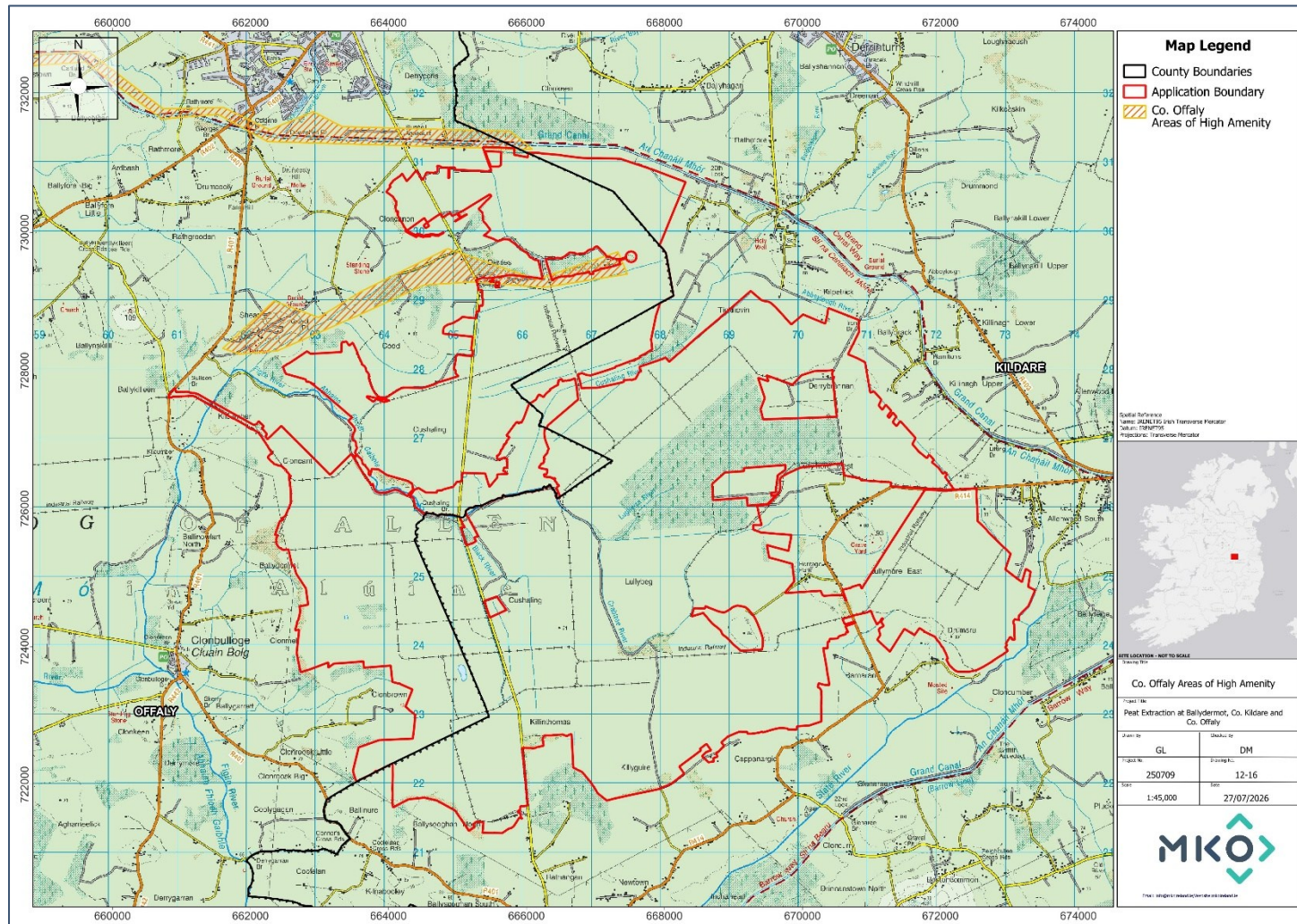


Figure 12-16 Areas of High Amenity of the OCDP 2021-2027 within the Application Site

Section 4.14.2 of the OCDP 2021-2027 notes that there a “number of valuable views and prospects which offer a very attractive cross-sectional view and overall impression of differing landscapes”, to which the Council recognises the need to “protect the character of the county by protecting Key Scenic Views, Prospects and Key Amenity Routes within the county”. These Key Scenic Views, Prospects and Key Amenity Routes are listed in Table 4.21 and Table 4.22 and in Figure 4.24 of the OCDP. Policies and objectives related to the Key Scenic Views and Key Amenity Routes in the OCDP are as follows:

“BLP-43 - It is Council policy to require a Landscape/Visual Impact Assessment to accompany significant proposals that are likely to significantly affect Key Scenic Views and Prospects as listed in Table 4.21 and Key Amenity Routes as listed in Table 4.22.

BLO-26 - It is an objective of the Council to protect Key Scenic Views and Key Prospects contained in Table 4.21, and Key Amenity Routes as listed in Table 4.22 from inappropriate development.

BLO-27 - It is an objective of the Council to ensure that Proposed Developments take into consideration their effects on views from Key Scenic Views and Prospects and Key Amenity Routes and are designed and located to minimise their impact on this views and prospects.”

12.3.5.2 Kildare County Development Plans

Kildare County Development Plan (KCDP) 1985-1991

In Section 1.6 of the KCDP 1985-1991, Kildare County Council had divided the county into the following 3 no. ‘distinctive landscape areas’:

- The East Kildare Uplands,
- The Plainlands of Kildare,
- The Chair and Newtown Hills.

The KCDP further divided ‘The Plainlands of Kildare’ into three categories, where the Application Site fell within ‘The West Central Boglands’. As described in Section 1.6.2(b):

“This area of badly drained bog and alluvial land has remained unattractive to agricultural settlement. The area is thinly populated, but the recreation and tourism potential is recognised. A study “The Recreational Resources of the Robertstown Area and their Potential Development” (An Foras Forbartha 1978) outlined the potential uses of the Robertstown Countryside Area. The agricultural and forestry potential of the cut-away bogs is also under active investigation.”

Section 1.25 of the KCDP 1985-1997 recognised Areas of High Amenity, such as the Curragh and Environs and Pollardstown Fen Area. No Areas of High Amenity were recognised within or near the Application Site.

Section 1.26 - Boglands of the KCDP 1985-1997 recognised Ballydermot and Lullymore as locations where Bord na Móna were extracting peat. Section 2.24 of the KCDP 1985-1997 discussed policies of Boglands, recognising “the vast amenity and productive potential of the bog areas of the county”. It was said that Kildare County Council would consult with “Bord na Móna, An Foras Taluntais and other appropriate bodies to ensure that the productive development of the bogland is carried out in such a way as not to prejudice the amenity potential.”

In Section 2.23, the KCDP recognised ‘Views and Prospects’, where they stated that it is a policy to “preserve, improve and open up places or areas from which views or prospects of high amenity value

may be enjoyed.” They listed the 34 no. ‘Views to be Preserved or Improved’ in Table 27 in the KCDP 1985-1997. In this table, they described VP08 as “*Views of bogland plains from road at Boston Hill*”. This viewpoint is located approximately 3.3km southeast of the Application Site.

Kildare County Development Plan (KCDP) 1999-2005

The KCDP 1999-2005 outlined the same landscape and visual policies as recorded above in the KCDP 1985-1991. In Section 1.6 of the KCDP 1999-2005, Kildare County Council have retained the same descriptors of the 3 no. ‘distinctive landscape areas’ as had been shown in the KCDP 1985-1999. However, the KCDP 1999-2005 refers to the area in which the Application Site as ‘The Central West Lowlands’.

Section 1.8 of the KCDP 1999-2005 discusses the ‘Agricultural Land Use’ of the county, stating that “*Agricultural land use in County Kildare closely follows the suitability and use range of the soils*”. With regard to areas such as the Application Site, they state that “*There is very little agricultural production on the boglands, and the production of peat based products predominates.*”(p.12).

Kildare County Development Plan (KCDP) 2005-2011

In the KCDP 2005-2011, Kildare County Council identified and discussed Landscape Character Areas in Chapter 18. The Application Site is located in the Landscape Unit the ‘Western Boglands’. This Landscape Unit is recognised as being part of the Landscape Character Area the ‘Lowland Areas’.

Under Section 18.4 of the KCDP 2005-2011, in relation to Lowland Areas it was a policy of the council to:

LA 1: *To recognise that the lowlands are made up of a variety of working landscapes, that are critical resources for sustaining the economic and social well-being of the County.*

LA 3: *To continue to permit development that can utilise existing infrastructure, whilst taking account of local absorption opportunities provided by the landscape, landform and prevailing vegetation.*

LA 7: *To recognise that cutaway and cut-over boglands represent degraded landscapes and/or brownfield sites and thus are potentially robust to absorb a wide variety of developments. This development however shall be carried out in such a way as not to prejudice the amenity potential.*”

Chapter 11 of the KCDP 2005-2011 discusses policies and objectives with regard to forests and boglands. In Section 11.2, the council recognise that boglands comprise approximately “*14% of the total land coverage of the county*”, with the objective to “*encourage a balanced approach to the re-development of cutaway bogs*”. Some of the policies of the KCDP with regards to boglands are:

BL 1: *That in assessing bogland coverage and peat extraction activities within County Kildare, the Council shall seek to identify bogland areas currently under extraction and remnant bogland areas, so as to maximise the peat extraction potential of the county whilst ensuring the protection and conservation of bogland habitats. Limiting extraction to those areas currently under development will help to minimise impacts by localising effects and to protect the bog landscape character areas within the County.*

BL 4: *To recognise that cutaway boglands represent degraded landscapes and/or brownfield sites and thus are potentially robust to absorb a wide variety of sympathetic developments. It*

should be noted that they have potential for grass and forestry, however difficulties can arise with crop production.”

Kildare County Development Plan (KCDP) 2011-2017

The KCDP 2011-2017 sets out the Landscape, Recreation and Amenities policies and objectives in Chapter 14. Under Section 14.4.1 the KCDP recognise that Western Boglands, the location of the Application Site, as a ‘Medium Sensitivity Landscape’ which “*can accommodate development pressure but with limitations in the scale and magnitude.*”

Under Section 14.6, the KCDP recognises 40 no. Scenic Routes within Table 14.2 and has also designated views to and from waterways in Tables 14.3 to 14.7, and views to and from hills identified in Section 14.6.2. Section 14.9.1 of the KCDP discusses the policy for Scenic Route, one of which is to:

“SR 1: To protect views from designated scenic routes by avoiding any development that could disrupt the vistas or disproportionately impact on the landscape character of the area thereby affecting the scenic and amenity value of the views.”

The KCDP 2011-2017 also discuss policies regarding Water Courses and Canal Corridor Views in Section 14.9.2, and policies for Hill Views in Section 14.9.3.

Kildare County Development Plan (KCDP) 2017-2023

On review of the KCDP 2017-2023, landscape and visual items, policies and objectives that have been updated here are similar to those identified in the KCDP 2023-2029. All updates relevant to this KCDP to the KCDP have been mentioned in the following section on the KCDP 2023-2029.

Kildare County Development Plan 2023-2029 (KCDP as varied)

The KCDP sets out the relevant landscape and visual policies and objectives for County Kildare within Chapter 13 (Landscape, Recreation and Amenity), as amended by Variation No. 4 (hereafter ‘KCDP’), which is to be read in conjunction with Chapter 13. Section 13.3.2 of the KCDP reports on the general landscape policy that is pertinent to the Application Site, and are reported below:

“It is the policy of the Council to:

LR P1: Protect and enhance the county’s landscape, by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the local landscape.

It is the objective of the Council to:

LR O1: Ensure that consideration of landscape sensitivity is an important factor in determining development uses. In areas of high landscape sensitivity, the design, type and the choice of location of proposed development in the landscape will also be critical considerations.

LR O2: Require a Landscape and Visual Impact Assessment (LVIA) to accompany significant development proposals in areas of High landscape character sensitivity. A LVIA should also accompany applications for:

- *significant development proposals in other parts of the county, on a case-by-case basis (e.g., housing development, wind turbine and solar array developments, extractive*

industry, telecommunications infrastructure, afforestation and replanting of commercial forestry proposals); and

- *smaller scale developments taking account of the landscape sensitivity of an area and/or concerns regarding potential negative landscape or visual impacts*

LR O4: *Ensure that local landscape features, including historic features and buildings, hedgerows, shelter belts and stone walls, are retained, protected and enhanced where appropriate, so as to preserve the local landscape and character of an area.*

LR O11: *Support collaboration between Kildare County Council, the Midlands Regional Transition Team and all other relevant stakeholders and the development of partnership approaches to integrated peatland management for a just transition that incorporates the management, rehabilitation and restoration / re-wetting of significant tracts of peatlands in conjunction with appropriate developed after uses, in accordance with the guidance and recommendations for peatlands contained in Appendix 13 Landscape Character Assessment (2025) for the county.*

LR O12: *Recognise that boglands, including cutaway and cut-over bogs, are critical natural resources for ecological and environmental reasons, particularly for climate mitigation and adaptation. Have regard to relevant peatland landscape character areas (LCAs) and sensitivity classes in evaluating all project proposals. Development proposals for boglands that reduce biodiversity and increase greenhouse gas emissions will not be considered. Appropriate environmental assessment should be carried out for any development proposals which impact on boglands.*

LR O13: *Recognise that some cutaway and cut-over boglands may represent degraded landscapes and/or brownfield sites and thus may potentially be fit to absorb a variety of development provided that the development proposals do not increase Green House Gas emissions or damage protected habitats or species. Refer to peatland landscape character areas (LCAs) and sensitivity classes in evaluating all project proposals. Projects which result in increases in ammonia emissions to watercourses will not be considered."*

A Landscape Character Assessment (LCA) was carried out for County Kildare in 2004 and was incorporated into the Kildare County Development Plan 2005-2011. In 2025, an updated Landscape Character Assessment (hereafter KLCA) was prepared and, in 2026, was adopted as Appendix 13 to the KCDP 2023-2029 by way of Variation No. 4. The KLCA identifies 10 no. Landscape Character Areas (LCAs) and 8 Landscape Character Types (LCTs) for the county.

The KCDP includes an assessment of sensitivity for each LCA, evaluated across four classes from 'High' to 'Medium to Low' as set out in Map V1-13.2A of the KCDP. Section 13.3.1 of the KCDP states, in relation to landscape sensitivity, that:

"Landscape character sensitivity refers to the inherent sensitivity of the landscape irrespective of the type of change being considered. Assessment of sensitivity takes account of the overall landscape character, quality and condition of the landscape and considers its potential ability to change without losing its intrinsic character. Sensitivity is evaluated using criteria that consider topography, landscape pattern, historical landscape, relationships to existing settlements and presence of natural habitats."

Within County Kildare, the Application Site is located within LCA 4 – Bog of Allen. For LCA 4 – Bog of Allen, Annex C 'Landscape Character Sensitivity Assessment' of the KLCA, assigned an overall "Medium/High" Landscape Character Sensitivity rating, an overall "Medium" Visual Sensitivity, a "Medium to Medium/High" Landscape Sensitivity, and a "High" Landscape Value, all of which

corresponds to a Landscape Character Capacity of “*Medium to Low*”. The KLCA continues to note that this LCA includes:

“important areas of bog that are of great historical, cultural and ecological importance. Recognising and retaining these values whilst supporting climate change adaptation and mitigation measures, including Just Transition initiatives is key to retaining the character of this LCA”.

The KCDP defines ‘Areas of High Amenity/Areas Protected under International, European and National legislation’ (AHAs) as “*certain special landscape areas within the county, some of which overlap with sensitive landscapes*” and are “*classified because of their outstanding natural beauty and/or unique interest value*”. Section 13.4 on the KCDP identifies these AHAs within the County; some of which are listed below.

- Dun Ailinne,
- The Curragh and Environs,
- The Grand and Royal Canal Corridors,
- Pollardstown Fen.

The KCDP identifies 3 types of Scenic Routes and Protected Views in Section 13.5: Scenic Routes in County Kildare, Hilltop Views in County Kildare, and Views to and from bridges, identified in Tables 13.5, 13.6, and 13.7, respectively, within the KCDP. Policies and objectives related to the Scenic Routes and Protected Views in the KCDP are as follows:

LR O32: *Avoid any development that could disrupt the vistas or have a disproportionate impact on the landscape character of the area, particularly upland views, river views, canal views, views across the Curragh, views of historical or cultural significance (including buildings and townscapes), views of natural beauty and specifically those views listed in Tables 13.5 – 13.7 of this plan.*

LR O33: *Ensure developments (due to excessive bulk, scale, inappropriate siting or siting on steep slopes i.e. >10%) do not have a disproportionate visual impact or significantly interfere with or detract from scenic upland vistas when viewed from nearby areas, scenic routes, viewpoints and settlements.*

LR O34: *Control development that will adversely affect the visual integrity of distinctive linear sections of water corridors and river valleys and open floodplains.*

LR O35: *Encourage appropriate landscaping and screen planting of developments along scenic routes. Where scenic routes run through settlements, street trees and ornamental landscaping may be required.*

LR O38:

a. *To protect designated views of special amenity value identified in the Plan [see Tables 13.5/ Scenic Routes, Table 13.6: Hilltop Views, Views from Bridges/ Table 13.7 Views from Bridges or other land use plans and ensure that development proposals do not have an undue detrimental impact on these views.*

b. *Development proposals will be assessed against their impact on the designated view if it falls within the foreground, middle ground or background of that view. New development should*

not harm, and where possible, should make a positive contribution to, the characteristics and composition of the designated views and their landmark elements.

c. Development proposals that could affect a designated view should be accompanied by an assessment that explains, evaluates and justifies any visual impact on the view affected. The scoping process for determining whether a development proposal is likely to affect a designated view should be completed in consultation with Kildare County Council. The assessment should demonstrate that the proposal is consistent with the relevant objectives of this Plan. The assessment should form part of a landscape and visual impact assessment, design statement or townscape and visual impact assessment submitted with a planning application.

d. Development in the foreground and middle ground of a designated view should not be overly intrusive, unsightly or prominent to the detriment of the view. Most designated views are seen in a 120-degree field of view. It is not expected that the view outside of this field of vision should be assessed unless specified by Kildare County Council.

Designated views of special amenity value and views of local landmark buildings / other local views of significance will need to be considered in the scoping of views to identify the potential impacts of development proposals.”

KCDP Scenic Route 34 is described as following the R414 regional road. This scenic route passes between Barnaran bog and Lodge bog, intersecting through a part of the Application Site.

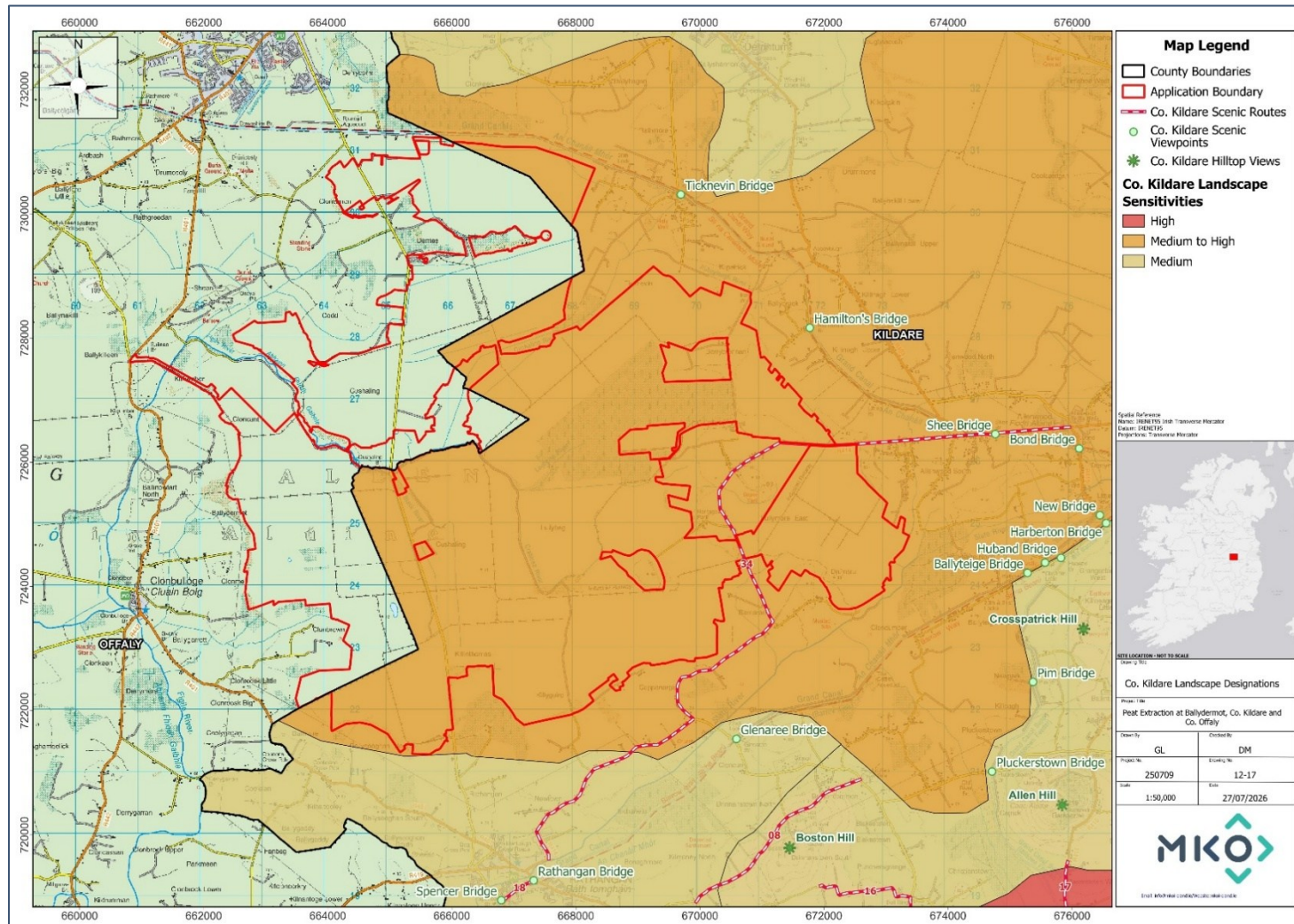


Figure 12-17 Landscape Sensitivity Designations of the KCDP 2023-2029 (as varied) within the Application Site

12.3.6 Overview of Landscape Characterisation & Landscape Policy

The Application Site is currently a flat cutaway peatland landscape with a character heavily influenced by the industrial peat extraction historically conducted at the Application Site. The character of the wider landscape surrounding the site is typical of flat, lowland landscapes located in the midlands of Ireland. The peatlands are located within a rural agricultural landscape comprising fields of pasture, occasional forestry plantations and rural settlement. The Application Site is located approximately 2.2km southeast of Edenderry, 3.3km west of Allenwood, 2.4km north of Rathangan and 1.7km east of Clonbullogue Village.

The landscape surrounding the Application Site is a rural agricultural landscape. It is a working, settled landscape with clusters and linear arrays of residential receptors scattered along the surrounding local road network and agricultural field system, which dominates visually, providing a sense of order to the landscape. These agricultural fields are defined by field boundaries comprised of hedgerows and treelines, which generally restrict long-range visibility within a flat landscape, typical of the Irish midlands.

After agricultural land, raised bogs constitute a significant portion of the landcover in the wider area. Cut-over bogs located immediately west of the Application Site are now the locations of wind farms. Within the wider landscape, there are areas that also have a history of turf-cutting activities. Other characteristics of the wider landscape include tracts of commercial forestry.

There are a network of roads extending around the Application Site connecting settlements to one another. The R414 regional road connects Allenwood to the east to Rathangan to the south of the Application Site. The R401 regional road extends south from Edenderry, passing east of the Application Site and connects to Clonbullogue and to Rathangan. Linear patterns of settlements are seen along these routes, with numerous individual residential houses scattered throughout the landscape.

The Application Site itself is located within an area designated with Moderate sensitivity and a small portion of Low and High sensitivity in the OCDP 2021-2027. The Application Site is located within areas designated as Medium to High sensitivity under LCA 4 – Bog of Allen in the KCDP 2023-2029. These landscapes do not comprise any notable landscape features of national or county importance. The OCDPs designation is based primarily on the area's capacity to accommodate development, as outlined in Table 4-19 of the OCDP which states that moderately sensitive areas "can accommodate development pressure but with limitations in the scale and magnitude. In this category of sensitivity, elements of the landscape can accept some changes while others are more vulnerable to change." Landscape sensitivity across County Kildare is assessed by reference to a range of criteria under the updated Landscape Character Assessment (2025), now forming Appendix 13 to the KCDP 2023-2029. As set out in Section 13.3.1 of the KCDP: "Landscape character sensitivity refers to the inherent sensitivity of the landscape irrespective of the type of change being considered. Assessment of sensitivity takes account of the overall landscape character, quality and condition of the landscape and considers its potential ability to change without losing its intrinsic character. Sensitivity is evaluated using criteria that consider topography, landscape pattern, historical landscape, relationships to existing settlements and presence of natural habitats." However, the Application Site itself is considered to be a modified, degraded landscape. As such, the Application Site is considered to be of Low Landscape Value and Low Landscape Sensitivity.

12.4

Visibility Appraisal

Due to the large surface area of the Application Site, the peatlands and peat extraction and ancillary activities will have been visible across an extensive portion of the local landscape. In most instances, the cutover peatlands are only visible from localised receptors in the immediate vicinity of the Application Site. The abundance of mature vegetation surrounding the perimeter and margins of the peatlands, as shown in Section 12.3.4 previously, visually screen the site from view within the wider landscape which is very flat in nature. Visibility of the Application Site was appraised during site visits, to inform the Ballydermot Wind Farm project, in the years 2025 and 2026. Plate 12-11 below shows drone imagery of the present-day Application Site.

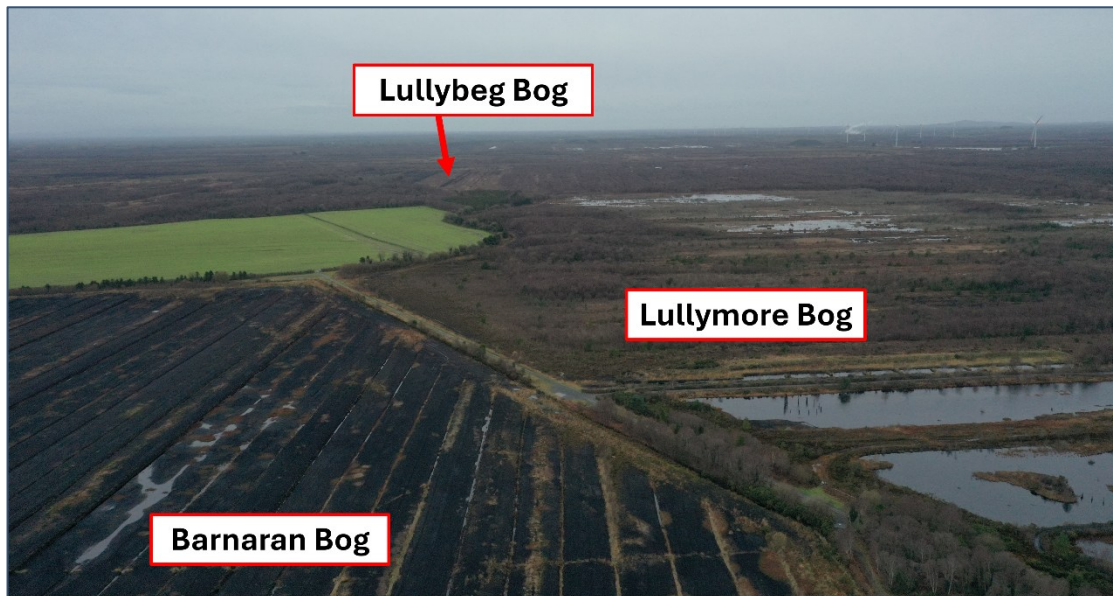


Plate 12-11 Drone image showing a view facing west over Barnaran bog (exposed cutover bog in the bottom left) and Lullymore bog (wetter and more vegetated to the top right) – imagery taken in December 2025

12.4.1

Views to and from the Application Site

As shown by Plate 12-5, Plate 12-6, and Plate 12-7 previously in Section 12.3.4, from some locations on the Application Site, there are long-ranging and unrestricted views across the open and flat peatland of the site, particularly where ground cover comprises bare cutaway peat. Excepting entrance routes, the Application Site is predominantly surrounded by mature vegetation in the form of hedgerows and treelines, as shown in Plate 12-8 previously. The relatively dense woodland enclosing the Application Site acts as a physical barrier, restricting views (as well as buffering noise and dust) both into and out of the site. Figure 12-18 below identifies visual receptors in the wider landscape, such as designated scenic routes and views, canal corridors, and settlements.

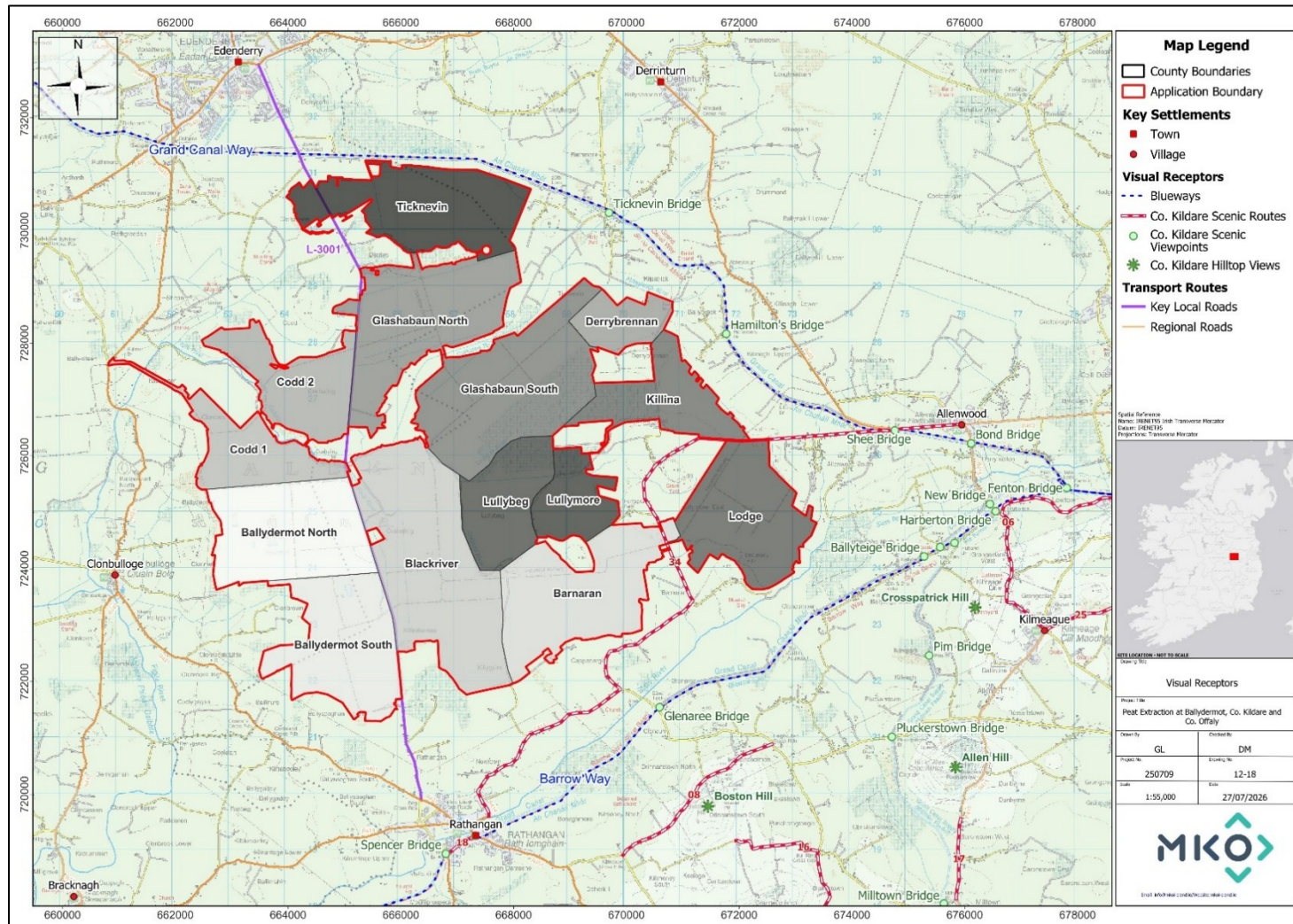


Figure 12-18 Map of Visual Receptors

The Application Site and its surrounds are located within a rural landscape setting, characterised by agricultural fields delineated by field boundaries consisting of treelines and hedgerows. Views towards the site from the road network surrounding the site are shown in the images below.

L-3001 local road

Plate 12-12 below shows the treelines that delineate the L-3001 local road, a road that bisects Glashabaun North bog and Codd 2 bog. This dense roadside vegetation limits availability of views over the excavated peatland landscape. Dense roadside visual screening is present along the stretch of the L-3001 local road in the north part of the Application Site. This dense roadside vegetative screening is also present along approximately the stretch of the L-3001 local road entering the southern part of the Application Site, along the east border of Ballydermot South bog.



Plate 12-12 View south from the L-3001 local road within the Application Site, between Codd 2 bog and Glashabaun North bog

The stretch of the L-3001 local road that passes through the centre of the Application Site (between Blackriver, Ballydermot North, and Ballydermot South bogs) has less roadside vegetation, while other stretches of road have open and unrestricted views across the Application Site, see Plate 12-13 below.



Plate 12-13 View south from the L-3001 local road within the Application Site, between Blackriver bog and Ballydermot North bog

KCDP Scenic Route 34 (R414 regional road)

The short stretches of the KCDP Scenic Route 34 (R414 regional road) that passes between the bogs east of the eastern extent of the Application Site have dense stretches of roadside vegetation, which includes pockets of forestry, that restrict visibility towards the Application Site. Where historic rail line interacted with the road network, such as at the level crossings, these areas are cleared of vegetation and as such allow visibility over the Application Site, as shown in Plate 12-8 previously.

Lodge Bog Nature Reserve

One small area of peatland habitat located northwest of Lodge bog, known as the Lodge Bog Nature Reserve, does not form part of the Application Site. In the nature reserve, there is a small boardwalk that permits open views across the flat peatland landscape of Lodge bog (including in the direction of the Application Site), as shown in Plate 12-14 below. Views west and north of the reserve, towards other areas of the Application Site, are visually screened by roadside vegetation and boundary vegetation of the Application Site.

A few areas have no visual screening, for example along the east boundaries of Lodge bog where there are sections of low boundary vegetation, permitting open views over the Application Site, as shown in Plate 12-15 below.



Plate 12-14 View southeast over Lodge bog from a boardwalk at Lodge Bog Nature Reserve



Plate 12-15 View west from a local access road to the east of Lodge bog

Lullymore Area

The Lullymore area is located between Lodge bog, Barnaran bog, Lullymore bog and Killina bog, and comprises the townlands of Lullymore East and Lullymore West. As discussed previously in Section 12.3.4, and shown in Plate 12-9 and Plate 12-10, visibility of the Application Site from receptors to the east, such as from the Lullymore area, are predominantly limited by dense treelines and hedgerows. The Lullymore Heritage & Discovery Park is located at the eastern boundary of Lullymore Bog and Barnaran Bog, as shown in Plate 12-16 below. There are open views available from parts of the Lullymore Heritage Centre & Discovery Park, such as the car park, and the peatland biodiversity area, given its location immediately beside the bog with no vegetative screening, where the attraction is of the boglands and its heritage, including the historical peat cutting activities.



Plate 12-16 View south over Barnaran Bog of the Application Site, from the Lullymore Heritage & Discovery Park

Residential Receptors

The most sensitive visual receptors likely to have most visibility of the Application Site are local residents who live in close proximity to the Application Site. Site visits, to inform the Ballydermot Wind Farm project in 2025 and 2026, determined that visibility of the Application Site, from most residential receptors was screened by well-established, mature boundary vegetation located both within the curtilage of local residents and along the site boundary and local field boundaries. This can be seen in Plate 12-17, Plate 12-18, and Plate 12-19 below, where visibility towards the Application Site is screened by dense field boundary vegetation.

Site visits found that while roadside screening limits visibility of the Application Site from the Lullymore area, residential dwellings delineating this road may have views available of the Application Site from upper storey windows.



Plate 12-17 View looking east in the direction of the Application Site from the R401 regional road in the townland of Ballydermot



Plate 12-18 View looking southwest in the direction of the Application Site from Hamilton Bridge in the townland of Killinagh Lower



Plate 12-19 View looking south in the direction of the Application Site from the L-50211 local road in the townland of Ticknevin

Residential receptors located to the southeast of the Application Site, which are arranged in a linear pattern along the local road network are situated on elevated terrain relative to the Application Site. While roadside vegetation provides some degree of visual screening, the elevated position of the local road network permits some instances of open visibility towards the Application Site along these roads.

Plate 12-20 below shows a view from an elevated vantage point along the L-3002 local road located southeast of the Application Site with views towards the Application Site. These elevated positions around the Chair of Kildare (the Six Hills) permits some instances of open visibility towards the Application Site along these roads. The low-lying shrub vegetation allows for open, unrestricted views of the Application Site. While some residents along these local roads to the north experience instances of open, unrestricted views toward the Application Site, such views are limited. Site visits, to inform the Ballydermot Wind Farm project in 2025 and 2026, determined that in most instances, roadside vegetation is present along the majority of the local road network, effectively screening views toward the Application Site.



Plate 12-20 View looking northwest in the direction of the Application Site from the L-3002 local road in the townland of Drinnanstown North

Key Blueways

Grand Canal Way

The Grand Canal Way is a trail that delineates the Grand Canal. The Grand Canal stretches from the northwest of the Application Site, along the northern boundary, and down along the northeast of the Application Site, continuing east towards the settlement of Allenwood. The Grand Canal Way is closest to the Application Site at the northern perimeter, at Ticknevin bog. Plate 12-21 below shows a view from the Blundell Aqueduct, at the Grand Canal, towards the Application Site. As seen in this image, the mature woodland vegetation along the north of the Application Site boundary limits visibility towards the peatland. From locations along the Grand Canal Way to the northeast and east visibility towards the Application Site is also predominantly limited by the mature boundary vegetation along the Grand Canal. Where there are areas of little vegetation along the Grand Canal Way, such as at Hamilton Bridge, see Plate 12-18 previously, views towards the Application Site are limited by the mature boundary vegetation around the Application Site and in the intervening fields.



Plate 12-21 View southeast from the Grand Canal towards the Application Site

Barrow Way

The Barrow Way is a trail delineating the Barrow River, that runs to the southeast of the Application Site, connecting to the Grand Canal just before the settlement of Robertstown. It is located approximately 835m at its closest to the Application Site, just southeast of Lodge Bog. Similar to the Grand Canal Way, the intervening mature boundary vegetation screens views of the Application Site.

Settlements

The surrounding settlements of Edenderry (approximately 2.2km to the northwest), Clonbullogue (approximately 1.7km to the west), Rathangan (approximately 2.4km to the south) and Allenwood (approximately 3.3km to the east) are located within the wider landscape setting of the Application Site. As established in the visibility appraisal above, the abundance of mature boundary vegetation surrounding the perimeter and margins of the Application Site, in the form of dense hedgerows, treelines and areas of woodland, provides effective visual screening of the Application Site from the wider landscape. Site visits, to inform the Ballydermot Wind Farm project in 2025 and 2026, confirmed that this vegetative screening, combined with the generally flat nature of the surrounding landscape, limits and in most instances eliminates views of the Application Site from the surrounding road network and built environment. As a result, views of peat extraction and ancillary activities at the Application Site from the settlements of Edenderry, Clonbullogue, Rathangan and Allenwood are considered negligible, with the Application Site not forming a notable component of the views available from these settlements.

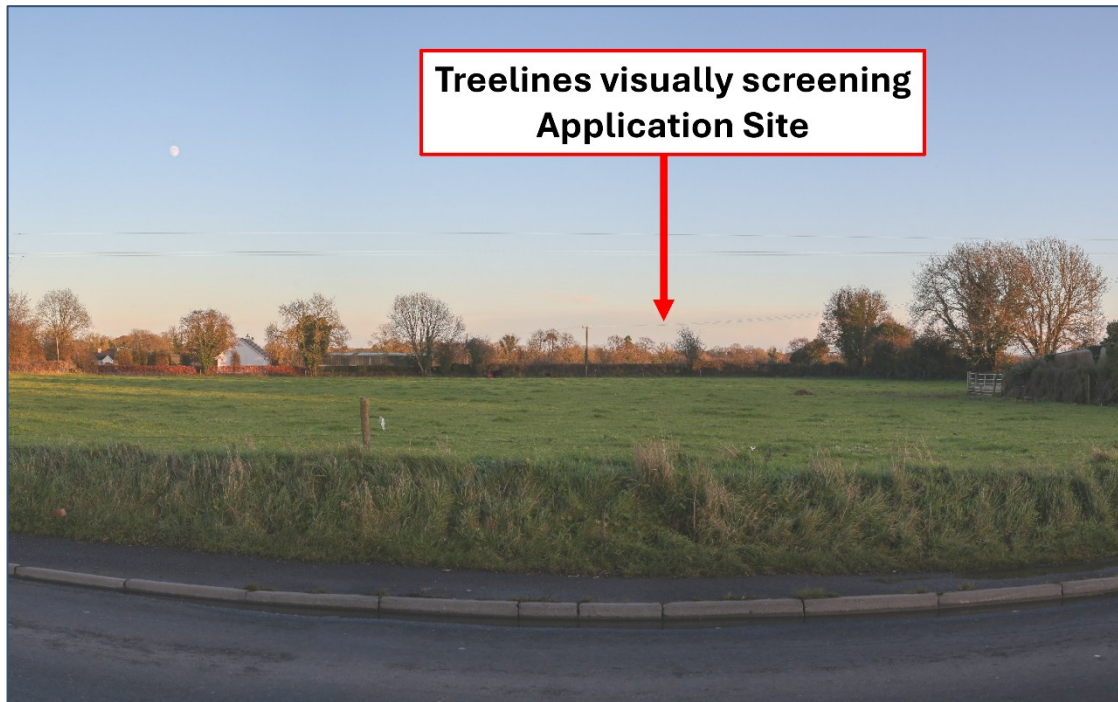


Plate 12-22 View from Clonbullogue towards Application Site visually screened by treelines



Plate 12-23 View from Edenderry towards Application Site visually screened by treelines

12.4.2 Visibility from Designated Scenic Amenity

Offaly

The peatlands within the Application Site are not the subject of any designated Key Scenic Views and Prospects or Key Amenity Routes designated by the OCDP 2021-2027. The closest designated scenic view is Scenic View 09, located approximately 12km west of the Application Site, respectively. The focus of Key Scenic View 09 is “*South to the bog lands*”, in the direction of the Application Site. However, visibility appraisals determined that the low altitude of this viewpoint location limit views to the lands in the immediate vicinity to the Key Scenic View 09. The Application Site is not visible from this viewpoint due to vegetative screening existent within the intervening landscape.

Kildare

As discussed in Section 12.3.5.2, KCDP Scenic Route 34 follows the R414 regional road between Allenwood and Rathangan, and briefly passes through the Application Site as it traverses between Barnaran bog and Lodge bog. There is intermittent visibility of the Application Site from Scenic Route 34 as it passes between Lodge bog and Killina bog where roadside vegetation partially screens views. The portion of the designated route that passes at Barnaran bog is delineated by mature treelines where views are heavily screened.

There is also KCDP Scenic Route 08 located at Boston Hill (a designated Hilltop View), approximately 3.3km southeast of the Application Site. Where roadside vegetation is limited, there are views available of the Application Site and of the surrounding landscape, as shown in Plate 12-20 above.

As discussed, the Grand Canal traverses within close proximity to the Application Site. On-site investigations, to inform the Ballydermot Wind Farm project in 2025 and 2026, found the mature boundary vegetation screens views of the Application Site from the Grand Canal. This includes bridges over the Grand Canal, which the KCDP designate as Scenic Viewpoints. For example, at Hamilton Bridge as shown in Plate 12-18 above.

12.4.3 Potential Changes in Visual Amenity – Peat Extraction Phase to Current Phase

As noted previously, review of aerial mapping data and site reports indicate that visibility into the Application Site would have been very similar throughout the Peat Extraction Phase as they are in the Current Phase.

Topographical Change

It is noted that the peat extraction and ancillary activities that occurred throughout the Peat Extraction Phase have gradually lowered the base elevation of the Application Site in comparison to the flat agricultural plains surrounding the Application Site. Therefore, the peat extraction and ancillary activities in 1988 and during earlier stages of the Peat Extraction Phase may have been conducted at a higher elevation and may have been marginally more visible during that time. There are multiple other factors (e.g. character and nature of views into the Application Site) influencing likely visibility during the Peat Extraction Phase that cannot be objectively assessed retrospectively. It is likely that the change in elevation of the Application Site is so marginal in this context and will have had a negligible influence on the likely significance of visual effects relating from views into the Application Site.

Changes to the Visual Aesthetic of the Application Site

The visual aesthetic of the Application Site has changed since cessation of peat extraction in June 2020. This is primarily attributed to the large areas of barren and bare cutover peat which have been allowed to revegetate, consequently changing the visual aesthetic to a more natural landscape with a greater degree of wildness. Whilst decommissioning activities are still ongoing in the Current Phase, the visual effects of ancillary activities, i.e. extensive operation of machinery, use of railway infrastructure and associated dust, have been reduced since peat extraction ceased.

12.5 Assessment of Significant Landscape and Visual Effects

The assessment of landscape and visual effects arising at the Application Site throughout the various phases reported below was determined using the Methodology reported previously in this Chapter – Section 12.2.

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 Project not be carried out. The assessment period of this rEiAR commenced in 1988, a time at which peat extraction was already well-established at the Application Site. In the context of this rEiAR, the Project has been ongoing since the baseline assessment year of 1988. As outlined in Section 12.3.1, peat extraction activities commenced at the Application Site in 1935. If peat extraction and ancillary activities had ceased from 1988 onwards, then consequently there would have been no further peat extraction from the Application Site and therefore no further impact on landscape.

In the event of the cessation of the Project at the Application Site in 1988, it is assumed that those lands within the Application Site, which by that point had not been subject to the installation of drainage and

peat extraction would have remained as a relatively intact raised bog with varying raised bog habitats (such as bog woodland, fen, sphagnum mosses).

For those lands which as of 1988 had been subject to the installation of drainage in preparation for peat extraction but did not experience peat extraction itself, it is assumed in the ‘do-nothing’ scenario that drainage would have remained in-situ. Maintenance works to keep established drainage channels clear would have ceased as of 1988 in the ‘do-nothing’ scenario. It is likely that these areas would have been subject to natural recolonisation of the bog surface. Minor third party turbary activities likely would have occurred along the intact bog edges as was common practise at sites such as the Application Site.

Peat extraction and ancillary activities were underway at the Application Site prior to the required date for the transposition of the EIA Directive in 1988. If peat extraction and related activities ceased from 1988 onwards, then the various residual effects, described throughout this rEiAR, would not have occurred.

However, consideration must be given to the following:

- The legislative mandate given to Bord na Móna in the form of the Turf Development Act 1946, as amended) to acquire and develop peatlands; and,
- The uncertainty with respect to the planning status of the activity did not arise until 2020 and was not evident in 1988

Therefore, this ‘Do-Nothing’ Scenario was not the chosen option. Peat extraction and ancillary works have occurred at the Application Site from July 1988 onwards. A decision to cease peat extraction at the Application Site was taken in 2020 and the Application Site needs to be considered in the context of regularising (without prejudice) the planning status of the lands to facilitate future development (subject to planning consent as required). The Application Site has and will continue to revegetate, and there will be a change from areas of cutover peatland to revegetated, as described in Section 4.8 of Chapter 4: Project Description . These are described in the individual chapters of the rEiAR.

In the event that Substitute Consent is not granted in effect, the “Do Nothing” Scenario represents the current situation as at the date of the application for Substitute Consent. As part of BnM’s statutory obligations under IPC Licence for the Allen Bog Group (Reg. No. P0503-01) requirements, a Cutaway Bog Decommissioning and Rehabilitation Plan will continue to be implemented for the Application Site separate to, and independent of, the Substitute Consent application. The implementation of this plan is included in the impact assessment below.

12.5.2 Peat Extraction Phase – Landscape and Visual Effects

As established in Section 12.3.2, the majority of the peatlands under assessment comprised of stripped, bare cutover peat. Where peat extraction and ancillary activities had been occurring prior to the 1988 baseline, the landscape was at that time considered to be degraded and of ‘Low’ sensitivity. Within the Application Site, the greatest landscape and visual effects had already occurred by 1988. The primary change to the baseline landscape conditions throughout the Peat Extraction Phase after 1988 was the continued peat extraction and ancillary activities. It is noted, however, that some areas neither drained nor subject to peat extraction within the Application Site were altered to become drained, evident in the Ballydermot South bog where drainage activity had occurred between 2004 and 2020.

Landscape Effects

In terms of direct landscape effects, the removal of peat from the Application Site throughout the Peat Extraction Phase changed the physical fabric of the landscape by removing material and altering the topographical profile of the landform year on year. The magnitude of change in these areas would have been deemed to be ‘Moderate’, this is balanced with a ‘Low’ sensitivity, resulting in negative landscape effects of ‘Slight’ significance, which is not significant in the context of EIA.

Whilst the majority of the Application Site was subject to peat extraction, parts of Lodge, Glashabaun South, Lullybeg, and Lullymore bogs were comprised of lands drained but not subject to peat extraction, where extraction had previously ceased. Within Codd 1 bog, an area in the west had been drained in advance of the Peat Extraction Phase, but extraction of peat had not yet started in this area at the time. There were small pockets of bog which were neither drained nor subject to peat extraction. On balance, the landscape value and landscape sensitivity of these portions of the bogs would have been deemed to be ‘Low’.

In the years immediately following 1988 during the Peat Extraction Phase, the area of bog in the east (north-west of Lullymore) of the Application Site that was drained but not subject to peat extraction continued to expand up until 2020. The extraction of peat would continue in the Application Site but the area subject to peat extraction decreases overtime. These areas slowly returned to a natural state as revegetation occurred. A small portion of Codd 1 bog transitioned from ‘drained but not subject to peat extraction’ to ‘subject to peat extraction’ between 2004 and 2020. Similarly, in 2013 the west portion of Ballydermot South bog transitioned from ‘neither drained nor subject to peat extraction’ to ‘drained but not subject to peat extraction’. This would result in loss of vegetated ground cover, extraction of peat and associated extraction activities in this small portion of the bog, causing ‘Significant’ magnitude of change for this small area. Overall, activities on the Application Site caused a ‘Substantial’ magnitude of change to the landscape. ‘Substantial’ change to the landscape balanced with ‘Low’ sensitivity equates to ‘Moderate’ ‘Negative,’ direct landscape effects. On balance, these effects would have been not significant in the context of EIA.

Control Measures and Mitigating Factors. Planting and retention of boundary vegetation surrounding the Application Site served to reduce visibility of operations during the Peat Extraction Phase. Once boundary vegetation had matured, this reduced and eliminated effects on the character of the wider landscape. Prior to the peat extraction on the small portion of Codd 1 bog, this area had already been drained and therefore, works had previously been carried out at this area of the bog. In addition, prior to 1988, the majority of the Application Site had already been subject to peat extraction.

Residual Effects. With the implementation of the control measures, and as the changes would only be an addition to the existing trend of peat extraction in the area, it is considered that residual landscape effects were ‘Negative’, ‘Long-term’ and ‘Slight’ for the majority of the Application Site. On balance, these effects would have been not significant in the context of EIA.

Visual Effects

The magnitude of visual change occurring on the areas already subjected to peat extraction would be 'Negligible'. As established in the visibility appraisal in Section 12.4, there is very limited visibility into the Application Site from sensitive visual receptors. For example, there are portions of KCDP Scenic Routes 34 and 08 having limited instances of open visibility into the Application Site. No significant visual effects are determined to have occurred at the Application Site during the Peat Extraction Phase.

The visibility appraisal in Section 12.4 determined that views towards the Application Site from most locations are limited due to generally flat nature of the surrounding landscape, and visual screening occurring from mature vegetation along field boundaries and roadsides existent within the agricultural landscape surrounding the Application Site.

There are some open views of the Application Site from the L-3001 local road which passes through the centre of the Application Site. There are also parts of the R414 regional road that have visibility of the Application Site as it passes through the east section of the Application Site. These receptors are local road users considered to be of 'Low' sensitivity. KCDP Scenic Routes 08 and 34 are designated scenic amenities and are of 'High' sensitivity. The transition of the small area of Codd 1 bog from lands drained but not subject to peat extraction to a cutover bog, as well as the visibility of regular peat extraction and ancillary activities, would cause a 'Moderate' magnitude of change to views from occasional instances from the L-3001 local road, R414 regional road, KCDP Scenic Route 34, and 'Slight' magnitude of change for KCDP Scenic Route 08. This amounts to 'Slight' visual effect on local road users, and 'Moderate' visual effects on KCDP Scenic Route 08, which would not have been significant in the context of EIA. There would be 'Significant' visual effects on KCDP Scenic Route 34, which would have been significant in the context of EIA.

Control Measures and Mitigating Factors.

Planting and retention of boundary vegetation surrounding the Application Site served to reduce visibility of operations during the Peat Extraction Phase. Once boundary vegetation had matured, this reduced and eliminated visual effects from large numbers of visual receptors surrounding the Application Site including KCDP Scenic Route 34, and local road users. Views of the Application Site from KCDP Scenic Route 34 would be limited and temporary as they are experienced over a short stretch of the route. KCDP Scenic Route 08 is sited at a relatively set-back distance with panoramic views over the landscape, where the activities at the Application Site would be seen as minor changes in the overall composition of the view.

Residual Effects.

With the implementation of the control measures, and as the changes would only be an addition to the existing trend of peat extraction in the area, it is considered that the overall residual visual effects were 'Negative', 'Not Significant' and 'Long-term'. For KCDP Scenic Route 34, the residual visual effects were 'Negative', 'Moderate' and 'Long-term'. For KCDP Scenic Route 08, residual visual effects were 'Negative', 'Slight' and 'Long-term'. On balance, these effects would have been not significant in the context of EIA.

Visual Effects on the Residential Receptors in the Lullymore Area and the townland of Allenwood South

Open visibility into the Application Site occurs from residential receptors within the Lullymore area and the townland of Allenwood South, located in the east of the Application Site where there are clear and open views across Lodge Bog. There may also be views available to the west from residential receptors in the Lullymore area from upper storey windows overlooking the Application Site. These

receptors are considered to be of ‘High’ sensitivity, and the magnitude of change deemed to be ‘Moderate’ as views of the landscape transitioned from areas that were drained but not subject to peat extraction to areas subject to peat extraction. Overall, the visual effects on this small number of residential receptors during the Peat Extraction Phase was ‘Significant’, although highly localised.

Control Measures and Mitigating Factors

Many of the residential properties in this area were built after the 1988 baseline and are well set back from the Application Site, with visibility in the direction of the Application Site partially restricted by boundary vegetation and localised landform undulations. The landscape change seen by the receptors would not obstruct or visually intrude upon their scenic amenity.

Residual Effects

In the few highly localised instances where the northern area of the bog was visible from a very small number of residential receptors, residual visual effects are considered to be ‘Negative’, ‘Long-term’ and ‘Moderate’, which would have been not significant in the context of EIA. This part of the bog that has changed after the 1988 baseline, is consistent and contiguous with the development that had occurred throughout the wider landscape and elsewhere at the Application Site prior to the 1988 baseline. As such, this change was considered as part of emerging trends of peat extraction within the Application Site.

Visual Effects on the Residential Receptors along the L-3002 local road (Drinnanstown North)

Open visibility towards the Application Site occurs from residential receptors at elevated vantage points along the L-3002 local road, located approximately 3.3km southeast of the Application Site where there are clear and open views of the area where most landscape change occurred. These receptors are considered to be of ‘High’ sensitivity, and the magnitude of change deemed to be ‘Slight’. Overall, effects on these residential receptors during the Peat Extraction Phase was ‘Moderate’, which is not significant in the context of EIA.

Control Measures and Mitigating Factors. Many of the residential properties in this area were built after the 1988 baseline. They are also well set back from the Application Site, with wide open views over the surrounding landscape where the Application Site would consist of a small portion of it. The landscape change seen by the receptors would not obstruct or visually intrude upon their scenic amenity.

Residual Effects. Residual visual effects are considered to be ‘Negative’, ‘Long-term’ and ‘Slight’, which would have been not significant in the context of EIA. This part of the bog that has changed after the 1988 baseline, is consistent and contiguous with the development that had occurred throughout the wider landscape and elsewhere at the Application Site prior to the 1988 baseline. As such, this change was considered as part of emerging trends of peat extraction within the Application Site.

12.5.3 Current Phase – Landscape and Visual Effects

Cessation of peat extraction in June 2020 has enabled the landscape of the Application Site to continue to re-vegetate and to some degree mitigate landscape and visual effects over time. However, the landscape is still a degraded, bare – cutover peat site of ‘Low’ sensitivity overall, and it is not a functioning wetland. Revegetation has caused both a ‘Slight’ magnitude of change to the landscape and ‘Slight’ magnitude of change to the visual aesthetic of the Application Site and surrounding visual amenity. On-going decommissioning activities cause a ‘Slight’ magnitude of change. Landscape and

visual effects during the Current Phase are deemed to be ‘Neutral’, ‘Direct’, ‘Not Significant’ and ‘Short-term’. On balance, these effects are not significant in the context of EIA.

Control Measures. Retention of boundary vegetation surrounding the Application Site helps to reduce visibility of decommissioning operations in the Application Site, reducing effects on the character of the wider landscape and effects on visual receptors in the surrounding area. Continued decommissioning activities, such as removal of man-made infrastructure will result in a positive impact as the bog is restored closer to its natural state.

Residual Effects. With the implementation of the control measures, it is considered that Residual Landscape and Visual effects are deemed to be ‘Positive’, ‘Not Significant’ and ‘Short-term’. On balance, these effects are not significant in the context of EIA.

12.5.4 Remedial Phase – Likely Landscape and Visual Effects

The primary activity of the Remedial Phase is to re-wet cutover peatland in order to re-establish a naturally functioning wetland and peatland ecosystem. This will require low level, intermittent groundworks for activities such as drain blocking. However, the landscape is still a degraded, bare cutover peat site of ‘Low’ sensitivity. The Cutaway Bog Decommissioning and Rehabilitation Plans also include targeted revegetation where appropriate, which will result in a ‘Slight’ magnitude of change to the landscape and ‘Slight’ magnitude of change to the visual aesthetic of the Application Site and surrounding visual amenity. Continued decommissioning works of existing peat extraction infrastructure is also included for in the Remedial Phase.

It is likely that the works required to decommission peat extraction infrastructure and implement the Remedial Phase will cause ‘Temporary’, ‘Negative’ and ‘Not Significant’ landscape and visual effects, which is not significant in the context of EIA.

As the bogland is re-wetted and the peatland ecosystem re-establishes as a result of works in the Remedial Phase there will be a positive change to the landscape of the Application Site. The visual aesthetic of the Application Site has changed since cessation of peat extraction in 2020. This is primarily attributed to the large areas of bare cutover peat which have been allowed to revegetate, consequently changing the visual aesthetic to a landscape of a more natural and wild nature. The intention of the Cutaway Bog Decommissioning and Rehabilitation Plan is to continue to encourage this process and ensure that it is successful. Provided the Cutaway Bog Decommissioning and Rehabilitation Plan is implemented, there will be a ‘Slight’, and ‘Positive’, landscape and visual change when compared to the 1988 baseline. Even in the absence of these plans, the natural revegetation process on the bare cutover peat areas will contribute to a positive landscape and visual impact, albeit at a slower rate. This recolonisation of vegetation is expected to gradually improve the visual aesthetics and landscape quality of the Application Site. Landscape and visual effects are ‘Positive’, ‘Long-term’ and ‘Not Significant’. On balance, these effects are not significant in the context of EIA.

Mitigation Measures. Retention of boundary vegetation surrounding the Application Site serves to reduce visibility of remedial measures occurring within the Application Site, reducing potential effects on the character of the wider landscape and effects on visual receptors in the surrounding area. Continued decommissioning activities, such as removal of man-made infrastructure will result in a positive impact as the bog is returned closer to its natural state.

Residual Effects. With the implementation of mitigation measures, residual landscape and visual effects are ‘Positive’, ‘Long-term’ and ‘Not Significant’. On balance, these effects are not significant in the context of EIA.

12.5.5 Summary

Table 12-7 details a summary of all identified landscape and visual effects for the Application Site across the Peat Extraction Phase, the Current Phase and the Remedial Phase.

Table 12-7 Assessment Classification Summary

Topic	Pre-Mitigation Effect (EPA, 2022 Classification)	Mitigation Section Reference	Residual Effect (EPA, 2022 Classification)	EIA significance Threshold
Peat Extraction Phase				
Landscape Effects	‘Negative’, ‘Long-term’, ‘Moderate’	Section 12.5.2	‘Negative’, ‘Long-term’, ‘Slight’	not significant
Visual Effects (local road users – L-3001 and R414; KCDP Scenic Routes 08 and 34)	‘Negative’, ‘Long-term’ effects, within the following range: ‘significant’ (KCDP Scenic Route 34), ‘Moderate’ (KCDP Scenic Route 08), ‘Slight’ (local road users – L-3001 and R414)	Section 12.5.2	‘Negative’, ‘Long-term’ effects, within the following range: Moderate (KCDP Scenic Route 34), Slight (KCDP Scenic Route 08), Not Significant (all other visual receptors)	not significant
Visual Effects on the Residential Receptors in the Lullymore Area and the townland of Allenwood South	‘Negative’, ‘Long-term’, ‘significant’ ‘High’ receptor sensitivity balanced against ‘Moderate’ magnitude of change; highly localised)	Section 12.5.2	‘Negative’, ‘Long-term’, Moderate’	not significant
Visual Effects on the Residential Receptors along the L-3002 local road (Drinnanstown North)	‘Negative’, ‘Long-term’, ‘significant’	Section 12.5.2	‘Negative’, ‘Long-term’, ‘Slight’	not significant
Current Phase				
Landscape and Visual Effects	‘Neutral’, ‘Short term’ ‘not significant’	12.5.3	‘Positive’, ‘Short-term’, ‘not significant’	not significant
Remedial Phase				
Likely Landscape and Visual Effects arising from decommissioning and remedial works	‘Negative’, ‘Temporary’, ‘not significant’	12.5.4	‘Negative’, ‘Temporary’, ‘not significant’	not significant
Likely Landscape and Visual Effects	‘Positive’, ‘Long-term’, ‘not significant’	12.5.4	‘Positive’, ‘Long-term’, ‘not significant’	not significant

arising from re-wetting, revegetation and rehabilitation	(‘Slight’ positive landscape and visual change relative to the 1988 baseline)			
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12.6

Cumulative Landscape and Visual Assessment

In this section, landscape and visual impacts at the Application Site are assessed in combination with other similar peat extraction areas and industry in the wider landscape area, as well as the proposal to develop a wind farm project at the Application Site.

12.6.1

Extraction Activity: 1935-1987 and Cumulative Interaction with the Peat Extraction Phase (1988-2020)

As discussed throughout this Chapter, the greatest landscape and visual effects at the Application Site occurred prior to the baseline in 1988, therefore before the Peat Extraction Phase. These landscape and visual effects occurred from 1935 when industrial peat extraction first started, up until 1988 which is the end of the period before the 1988 baseline and start of the Peat Extraction Phase which is under assessment in this rEiAR. This section discusses cumulative landscape and visual effects and interactions which would have occurred across the two time periods: pre-regulatory peat extraction (1935–1988) versus the Peat Extraction Phase (1988-2020). The focus of the discussion below is on the extent to which negative landscape and visual effects occurring in the Peat Extraction Phase (1988 – 2020) may have contributed to effects caused prior to the 1988 baseline.

As reported previously in Section 12.5.2, the removal of peat throughout the Peat Extraction Phase changed the physical fabric of the landscape by removing material and altering (lowering) the topographical profile of the landform year on year, resulting in negative direct landscape effects of ‘Moderate’ significance for most of the Application Site. ‘Moderate’ landscape effects occurred throughout most of the Application Site during the Peat Extraction Phase. Therefore, there is a cumulative direct landscape effect with peat extraction occurring in these areas prior to the 1988 baseline. With regards to landscape character, the majority of the Application Site was already subject to peat extraction prior to 1988 and the character of the landscape had already been substantially altered.

As reported previously in Section 12.5.2, the degree of visual change occurring to the majority of the Application Site that was already subjected to intensive peat extraction would be ‘Negligible’. Also as established in Section 12.5.2, there is very limited visibility into the Application Site from sensitive visual receptors or any scenic amenity designations. Therefore, no significant visual effects are determined to have occurred for the majority of visual receptors surrounding the Application Site during the Peat Extraction Phase. In this regard, there is very limited contribution to cumulative visual effects in combination with the extraction activity that occurred prior to the 1988 Baseline. Post 1988, peat extraction remained within the majority of the site, and an area in the east of the Application Site became drained but not subject to peat extraction. It is also noted, as previously mentioned, that a small portion of Ballydermot South bog remained neither drained nor subject to peat extraction until 2013, at which point it transitioned to a drained but not extracted condition, consistent with the broader drainage activity observed in that bog unit from onwards.

The residential receptors and KCDP Scenic Route 08 located at Boston Hill would have greater visibility over the landscape at their elevation. Hence, cumulative effects would have occurred in combination with historic peat extraction activities from these receptors.

12.6.2 **Peat Extraction Phase: Cumulative Interactions in the wider landscape (Post-1988)**

Other peatland landscapes within the midlands which have been subject to industrial scale peat extraction are existent in the wider landscape surrounding the Application Site. Peat extraction and ancillary activities at the Application Site have contributed to a cumulative impact on the wider landscape and its character. However, it is key to note that changes to landscape character as a result of peat extraction and ancillary activities during the Peat Extraction Phase has been minimal since the 1988 baseline. As reported previously, in this Chapter, the greatest landscape and visual effects happened prior to the 1988 baseline. There are many bogs in proximity to the Application Site, namely Carbury Bog, Timahoe Bog, Allenwood Bog and Cloncreen Bog, which do not form part of the Application Site. Cloncreen Bog is located approximately 0.33km to the west, Carbury Bog is located approximately 4.5km to the north, Allenwood Bog is located approximately 2.1km east, and Timahoe Bog is located approximately 6.2km to the northeast. Other bogs, and other cutover peatlands in the wider landscape are separated from the Application Site by a large set-back distance, as well as being buffered by further physical landscape features such as roads, agricultural land, woodland, waterbodies and settlements.

As flat features of the landscape, peatlands of the Application Site are visually separated from other sites of industrial peat extraction in the wider landscape. There may be very minor cumulative landscape and visual effects in terms of in combination visual effects when viewing expansive cutover bogs from elevated vantage points with panoramic views. However, it is unlikely that peatlands are easy to distinguish in the highly vegetated, flat landscape of the midlands.

Sequential cumulative visual effects occur when a receptor will experience effects of multiple developments/projects by moving from one location to another. At a macro scale, effects during the Peat Extraction Phase have contributed to sequential cumulative visual effects where a visual receptor travels across the landscape and experiences views of multiple cutover peatland landscapes, including the Application Site.

The Application Site is located in a rural area surrounded by agricultural lands, forestry and woodlands. While there are some residential dwellings in the vicinity of the Application Site (refer to Section 2.3 Cumulative Impact Assessment in Chapter 2: Background), these are immaterial from a cumulative landscape and visual effects perspective given the scale of the peat extraction activities and the duration of the Peat Extraction Phase under assessment. The landscape within which the Application Site is located is a working landscape consisting of agricultural fields, including pasture fields, field boundaries, and commercial forestry. The peat extraction and ancillary activities in combination with these activities has had a cumulative landscape and visual effect, but are not deemed to be significant in the context of an EIA.

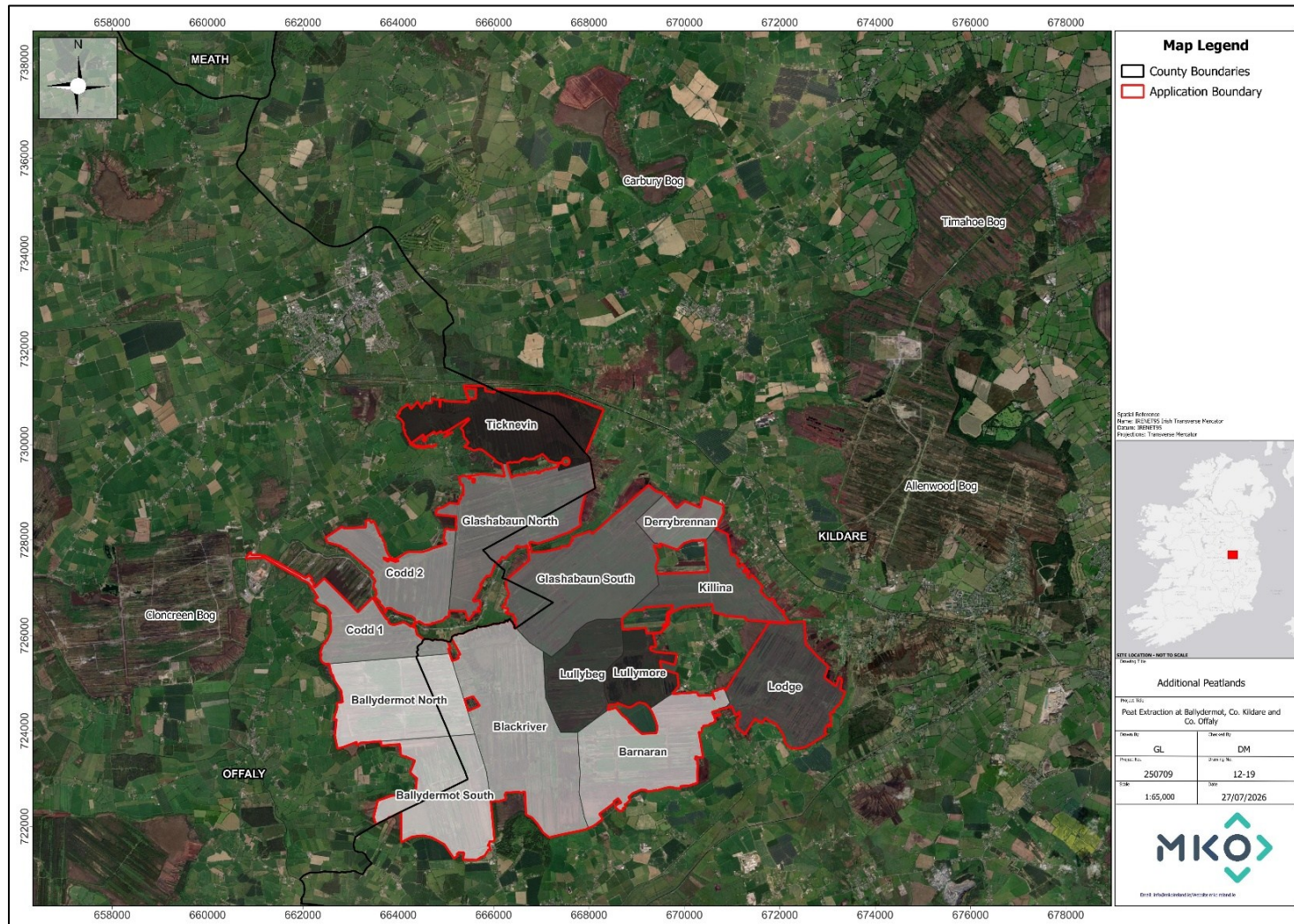


Figure 12-19 Aerial map of additional peatlands surrounding the Application Site

Summary of Cumulative Landscape Effects in the Peat Extraction Phase

In relation to the wider landscape character, the Application Site is surrounded and buffered by a working agricultural landscape, therefore, there is no physical landscape connectivity between the peatlands of the Application Site and any other peatlands in the wider landscape setting. Therefore, there is no potential for direct cumulative landscape effects to occur during the Peat Extraction Phase. With regards to cumulative effects on landscape character, it is clearly established in Section 12.5.2 and in the text above that there was limited change to the aesthetic of the majority of the landscape during the Peat Extraction Phase since the 1988 baseline.

As reported previously however, there was change to the landscape character in a localised area of the Codd 1 Bog. Considering the localised nature of these changes and landscape character and enclosure of these areas by above ground landscape features in the flat landscape, there is very limited potential for there to be cumulative effects on landscape character with other peatlands in the wider landscape setting.

Summary of Cumulative Visual Effects in the Peat Extraction Phase

As reported in Section 12.5.2, any visual effects that occurred in the Peat Extraction Phase are highly localised, with visibility into the Application Site from visual receptors being limited to a small number of residential receptors in the east and to the southeast of the Application Site. There is also limited visibility of the Application Site from KCDP Scenic Routes 08 and 34. The majority of visual change on the majority of these peatlands had occurred prior to the 1988 baseline. Therefore, most of the peat extraction and ancillary activities at the Application Site has had no significant residual visual effects during the Peat Extraction Phase and therefore does not have any contribution to negative cumulative visual effects with and modified elements of the wider landscape.

12.6.3 Current Phase: Cumulative Interactions

As reported previously in Section 12.5.3, 'Positive', 'Not Significant' and 'Short-term' landscape and visual effects will likely occur in the Current Phase, therefore there is no potential for adverse cumulative landscape and visual effects with other peat extraction or developments in the wider area.

12.6.4 Remedial Phase: Cumulative Interactions with other Planned Developments

As reported previously in Section 12.5.4, no negative landscape and visual effects are likely to occur in the Remedial Phase, therefore there is no potential for cumulative landscape and visual effects with other peat extraction or developments in the wider area. For the avoidance of doubt, potential landscape and visual effects in the Remedial Phase in combination with the proposed Ballydermot Wind Farm are considered and discussed below.

12.6.4.1 Proposed Ballydermot Wind Farm

As detailed in Section 4.10 in Chapter 4: Project Description, the Applicant is proposing a wind energy development consisting of 47 no. wind turbines. Cumulative landscape and visual effects will likely occur between the proposed Ballydermot Wind Farm development and the proposed implementation of the Cutaway Bog Decommissioning and Rehabilitation Plans as part of the Remedial Phase activities. As discussed previously, the Cutaway Bog Decommissioning and Rehabilitation Plans are a positive intervention from landscape and visual perspective. Should the wind farm be developed on this Application Site, the overall infrastructure footprint of the proposed Ballydermot Wind Farm

development will be small. Therefore, it is not likely that it will significantly or materially alter the positive landscape and visual effects of the Cutaway Bog Decommissioning and Rehabilitation Plans.

12.7

Conclusion

This chapter assessed the significance of landscape and visual effects occurring at the Application Site since the 1988 baseline. By 1988, the vast majority of the Application Site was already subject to peat extraction and therefore the greatest landscape and visual effects had already occurred prior to the 1988 baseline. No significant landscape effects occurred in these areas subject to peat extraction during the Peat Extraction Phase.

The greatest landscape and visual effects during the Peat Extraction Phase occurred in a small area of Codd 1 bog in the northwest of the Application Site where the lands were cleared of vegetation, and industrial peat extraction occurred. While a substantial physical change occurred in this localised area, the overall magnitude of change to the landscape of the entire Application Site was ‘Slight’. These areas of drained cutover peatlands would have been of ‘Low’ landscape sensitivity. Overall, landscape effects in the Peat Extraction Phase were found to be ‘Not significant’. Considering the visibility of these peat extraction and ancillary activities from ‘High’ sensitivity receptors including residential receptors in the townlands of Lullymore East and Allenwood South and from KCDP Scenic Route 34, the views were found to have a ‘Moderate’ magnitude of change. Considering the limited availability of views from these receptors, residual ‘Moderate’ visual effects occurred during peat extraction. For residential receptors along the L-3002 local road of ‘High’ sensitivity, and KCDP Scenic Route 08 also of ‘High’ sensitivity, the magnitude of change was deemed to be ‘Slight’ given the set-back distance of receptors from the Application Site. Considering the open views over the surrounding landscape with the Application Site occupying a small portion of the views, ‘Slight’ residual visual effects occurred during peat extraction. The landscape and visual effects during the Peat Extraction Phase were found to be not significant in the context of EIA.

Some areas of the Application Site have not been subject to peat extraction for considerable time, due to cessation of peat extraction at these areas, and are therefore now showing signs of revegetation. Peat extraction ceased at the Application Site in June 2020 which has further enabled the landscape of the entire Application Site to continue to re-vegetate. However, as assessed in this LVIA the landscape of the Application Site is seen as a degraded bare cutover peat site of ‘Low’ sensitivity.

During the Current Phase, the landscape and visual effects are deemed to be not significant in the context of EIA and the LVIA determined that no negative landscape and visual effects have occurred. The primary activity of the Remedial Phase is to decommission ancillary infrastructure and rewet cutover peatland in order to re-establish a naturally functioning wetland and peatland ecosystem. With the full implementation of the Cutaway Bog Decommissioning and Rehabilitation Plans, the predicted landscape and visual effects are likely to be Not significant, Positive and Long-term when compared to the landscape conditions of the 1988 baseline.