

Draft IWEA Best Practice Guidelines for the Irish Wind Energy Industry

submission of the

Irish Landscape Institute

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IRISH LANDSCAPE INSTITUTE
Institiúid Tírdhreacha na hÉireann



The comments below have been prepared by the Irish Landscape Institute in response to the issue for consultation of the Draft IWEA Best Practice Guidelines for the Irish Wind Energy Industry prepared by Fehily Timoney (2011). Our comments as landscape professionals reflects our experience working in the area of landscape policy development, landscape and visual impact assessment of wind energy projects and general landscape planning and heritage areas.

The comments are set out below with reference to corresponding sections of the Draft Guidelines.

In general, we welcome the production of these Guidelines. However, our comments are critical of the understanding of landscape and visual issues set out in the Guidelines. We believe that these sections of the Guidelines require further objective analysis of these issues, as they are important considerations in planning policy, siting and design, and decision-making in relation to wind farms.

3.1 Typical Scope of Feasibility Study, p.6:

Listed under the matters to be examined in feasibility are:

Planning

- *County Development Plan (CDP) zoning of site, wind energy strategy, impact on scenic views and amenity areas, local heritage designations and relevant policies*
- *Local Area Plans and local area policies*

Visual Impact

- *ZTV map and wireframes/photomontages from key locations*
- *tourism impact, landscape sensitivity, protected views, scenic routes, etc. (see also CDP)*

Proximity to existing land use constraints

- *residences (existing and permitted but not yet constructed)*
- *neighbouring wind farms (existing and permitted but not yet constructed)*
- *forestry (assess proposed felling plans if possible)*
- *telecommunications*

Outline wind turbine layout - based on known constraints, including the form and extent of existing development on the site and in its proximity



We suggest the inclusion of specific mention of ‘routes’ (e.g. Waymarked Ways, other walking/cycling routes), as these are often affected. Therefore, we suggest:

Planning

- *County Development Plan (CDP) zoning of site, wind energy strategy, impact on scenic views and amenity areas/routes, local heritage designations and relevant policies*

Areas of local biodiversity importance should be considered, not just designated sites. The Second National Biodiversity Action Plan (2011-2016) requires that each local authority produces a County Biodiversity Action Plan, so we suggest:

Environment

- *County Biodiversity Action Plan*

3.3 Pre-Planning Meeting, p.7:

It is recommended that a pre-planning meeting be arranged with the Planning Department of the local authority... The pre-planning meeting is also an opportunity to discuss aspects of the proposed scope of the environmental impact statement (EIS), including, for example, potential photomontage viewpoint locations.

This is viewed by the ILI as a welcome and crucial recommendation. The experience of our members is that landscape design considerations are often not addressed early enough in the project, and this leads to less than optimum solutions, and often increased costs and delays. Wind farm developers should engage landscape architects and ecological consultants at project outset, to inform siting and design and to allow for lead-in time required for collection and analysis of baseline data.

5.2 Environmental Legislation

We suggest the inclusion of the European Landscape Convention as a reference for practitioners. The Convention has been ratified by the Irish government and is particularly useful in its definitions of landscape – Landscape “*means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors*”. Section 4 of the Planning and Development (and Amendment) Act 2010 includes a legal definition of landscape under Irish law – “‘landscape’ has the same meaning as it has in Article 1 of the European Landscape Convention which was prepared at Florence on 20 October 2000”.



6.3.7 Landscape Impact Assessment, p.31

- The relevant guidelines are correctly cited as follows: '*Guidelines for Landscape and Visual Impact Assessment*' published by *The Landscape Institute and IEMA, 2nd Edition, 2002*'.

The Landscape Institute and IEMA are currently working on a revised edition of this document, which is to be published in 2012. It is recommended that this be noted in the IWEA Draft Guidelines, as it may require revision of the IWEA publication.

- It is recommended that this chapter (6.3.7) be titled 'Landscape and Visual Impact Assessment', and that this term be used throughout the document (e.g. Table 3.1). This would recognise the fact that the relevant guidance (Landscape Institute and IEMA) prescribes separate but linked assessments of landscape and visual impacts.

It is noted that some text and references in the IWEA Draft Guidelines reflect the EPA *Guidelines and Advice notes on EIA*. These are generally weak on the subject of landscape and visual impact, but do refer to best practice for individual disciplines, which in this case is the Landscape Institute (UK) and IEMA document. We recommend that this document (as opposed to the EPA document) be used as the basis of the IWEA Guidelines content on Landscape and Visual Impact Assessment.

- Section 6.3.7 does not accurately reflect the guidance contained in the Landscape Institute and IEMA guidelines. For example, the Draft IWEA Guidelines state:

Landscape character is derived from the appearance of the land, and takes account of natural and man made features such as topography, landform, vegetation, land use and built environment and their interaction to create specific patterns that are distinctive to particular localities. (own emphasis)

It is stated in the Introduction to Part 2 of the Landscape Institute and IEMA Guidelines, that *Landscapes are considerably more than just the visual perception of a combination of landform, vegetation cover and buildings – they embody the history, land use, human culture, wildlife and seasonal changes of an area.*

There is a discrepancy between the understanding of landscape as expressed in the IWEA Draft Guidelines and that of the Landscape Institute and IEMA guidelines. We would strongly contend that Landscape Impact Assessment is not confined to solely



Landscape Character Assessment. For example, impacts on microclimate can be a landscape impact, yet this is not cited anywhere in the guidance document.

- In general, throughout Section 6.3.7 we find the issues of landscape and visual impacts to be somewhat blurred.

The Draft IWEA Guidelines state: *'Landscape impacts are subjective, however a methodology has been developed whereby they can be assessed objectively. This involves an assessment of the sensitivity of potential views...'*

This describes the methodology for the assessment of visual impact, not landscape impact.

Landscape impact assessment does not involve an assessment of the impacts on viewpoints. It is rather concerned with the effects of development on the elements, characteristics and the character of the landscape. This is separate to the question of the development's impact on views or visual amenity.

In summary, there is little attention given to the question of landscape impact in Section 6.3.7, and this is contrary to the relevant guidelines. The IWEA Draft Guidelines seem to blur the distinction between landscape and visual impacts. As landscape change and visual impacts are such a fundamental aspect of planning for wind energy this is a significant weakness in the guidelines and could lead to inconsistent assessments, planning applications and decision making.

We would suggest that IWEA consider the engagement of a qualified Landscape Architect to contribute to the writing of this section.



6.3.8 Impacts on Cultural Heritage, p.32:

The Draft Guidelines identify that the most significant potential impacts on cultural heritage includes the visual impact on sites of significant archaeological interest, and sites of architectural heritage or cultural significance.

Regarding current best practice the Draft Guidelines state that an archaeologist will carry out field surveys and prepare an archaeological report, and that other aspects of cultural heritage should also be assessed in the EIS. This does not adequately deal with the potential impacts identified above.

We recommend that the Guidelines encourage interaction between the Archaeologist/cultural heritage specialist and the Landscape Architect during the Environmental Impact Assessment, as well as cross referencing between the two EIS chapters. This would ensure that the potential visual impact on cultural sites is adequately addressed in the EIS (by including views to/from cultural heritage sites among the viewpoints in the LVIA, along with commentary from the archaeologist).

We would also recommend reference to the ICOMOS publication dealing specifically with Heritage Impact Assessment. Although it is focused on significant sites (World Heritage Sites), the methodology is appropriate as an addition to the landscape and visual assessment. The document 'Guidance on Heritage Impact Assessments for Cultural World Heritage Properties. January 2011 should be cited.

7.1 and Table 7.1 re. Turbine Layout

We acknowledge the statement in **1.3, p.2** that the aim of IWEA Draft Guidelines was to be complementary to the DoEHLG's Wind Energy Guidelines, to avoid re-stating the subject matter of the DoEHLG document.

However, we feel that Section 7.1 does not give sufficient attention to the requirement of a wind farm layout to respond to the context landscape, particularly the topography and landcover patterns. We recommend that Table 7.1 be amended as follows (additions underlined):



Constraint	Aim of Application of Constraint	Typical Application
<u>Landscape</u> and visual impact including potential impact on cultural heritage	<u>Have regard to the site and context topography to ensure harmony between layout and landscape</u> Have regard to potential for significant visual impact at sensitive viewpoints	<u>Use topographic profile to inform spatial extent and layout, and landcover patterns to inform spacing (see DoEHLG Wind Energy Guidelines 2006 Chapter 6 for detailed guidance).</u> Advice of a landscape architect to prepare site layout plans, integrated services and habitat management plans with landscape ecologist. Consultation with local authority is important (e.g. at pre-planning meeting).

We trust the above comments and observations are of use to you and confirm again our willingness to assist in the development of these Guidelines from a landscape perspective.

On behalf of the Irish Landscape Institute,

Yours sincerely



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