



3.9 LANDSCAPE AND VISUAL ASSESSMENT

3.9.1 Introduction

This section of the EIS describes the existing landscape and includes a visual assessment of the existing landscape and provides a restoration plan of how the final restored site will appear. This section of the EIS identifies potential impacts upon landscape and visual amenity and examined mitigation measures (if required).

It should be noted that landscape includes other elements apart from the visual element and these have already been discussed and addressed in detail within this EIS. Natural heritage has been reviewed and discussed in and Section 3.2 of this EIS. Cultural Heritage including Architectural, Archaeological and Historical elements of the landscape has been discussed in Section 3.7 of this EIS. Section 2 of the EIS provides a detailed assessment and description of the site layout and character and Section 3.8 outlines the local settlement pattern and potential impacts upon Human Beings.

A full review and assessment has been made with regards to Landscape Protection in the Draft Mayo County Development Plan 2014 – 2020.

The existing licensed facility, as per licence W0256-01, is a soil recovery facility, which is licensed for a final topographic level of a 1m Land Raise and with the acceptance of 24,900 tonnes per annum of soil and stone and its recovery, by spreading material over the deposition site area, with a consequential benefit for improving the land for agricultural use.

The application for the licence review is for the continued operation per the existing waste licence, with no change to the licensed final topographic level of a 1m Land Raise and with the acceptance of up to a maximum of 90,000 tonnes per annum of soil and stone for recovery as described above – this is to allow for the acceptance of the currently available suitable material from a nearby large infrastructural project, which is to provide for material from a well monitored source of incoming soil and stone.

The licence review creates no proposed change to the content, nature, composition or volume of materials intended for recovery by deposition at the site, and the overall tonnage of 265,000 tonnes for which the existing license was issued remains unaffected. The activity will just take a shorter time span to complete and fully restore to beneficial agricultural use.

The activities carried out under the existing Waste Licence are exempt from Planning Permission, as per the 2009 Waste Licence application. The EPA Technical Committee report dated 27th April 2011 relating to the existing Waste Licence acknowledges the development to be exempt from planning permission.

The letter of 8th May 2012 received from Mayo County Council confirms that the proposed alterations to the scheduling of the materials recovery at the site (i.e. the subject matter of the technical review of the waste licence) does not affect the planning status of the works as exempted development.



It is therefore safe to assume that matters relating to landscape and visual assessment have been considered by Mayo County Council in making their assertion that the subject matter of the technical review of the waste licence does not affect the planning status of the works as exempted development. This is in particular with regards to visual impact and landscape protection matters.

3.9.2 Existing Environment

The existing soil recovery facility is located within a landscape setting consisting of a sparsely populated rural area with surrounding land uses comprising of sheep farming; peat extraction; GAA pitches; former Mushroom Farm and dispersed one-off housing developments and old farmsteads (see **Photo 3.9.2.1** and **Figure 3.9.2**). There nearest densely populated area close to the site is Belmullet some 2 ½ km to the south. The site is far removed from the public road from which the site is accessed.



Photo 3.9.2.1: Aerial Photo of Existing Soil Recovery Site at Tallagh

The existing licensed soil recovery site operating under WP0256-01 has a total area of 27.22ha, which includes the site access road, the proposed area of deposition (20.48ha) and a proposed buffer zone in the northern section of the site (4.46ha), which separates the area of deposition from the Clooneen River, which flows in an easterly direction, along the northern boundary of the site.

Figure 3.9.2 shows the general features of the site and surrounding area. The existing soil recovery site which has been in operation since 2006 is located with a typical rugged County Mayo agricultural landscape. Many of the fields in the area have been amalgamated into larger field units and farming is the principal land use in the area, mainly sheep rearing. In addition there is a former Mushroom Farm to the south-east of the site. This consists of plastic tunnels on a hardstanding area for the former growing of mushrooms.

There is evidence locally of peat cutting for domestic use for fuel. There is little if any forestry of tree cover in the area due to the exposed nature of this part of North Mayo.

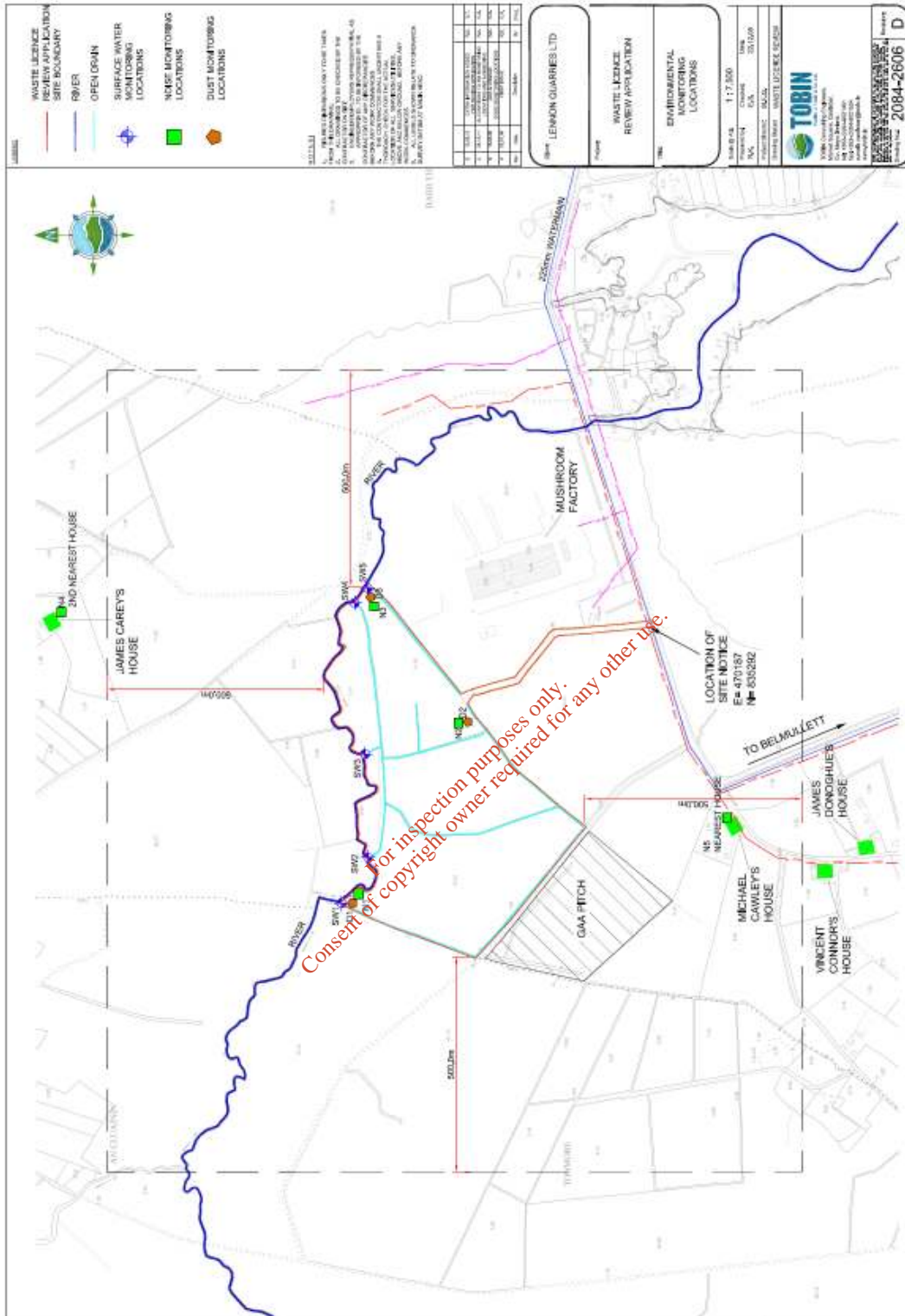


Figure 3.9.2: Map of Site Showing Main Features Relating to Landscape Features

To the south of the site along the entrance road there is a former chapel, now derelict and used for sheltering animals. The local GAA club and playing pitches is located to the south-west of the existing site. The club has provided a letter of support for the licence review.



Housing settlement is dispersed with only 1 dwelling within 500 metres of the site boundary, with three others outside 500 metres. All the occupants have been consulted with regards to the review of Waste Licence W0256-01 and all have provided letters of support for the review.

Photo 3.9.2.2 is a view into the site looking from the west towards the north and shows that the lands are marginal agricultural grassland used for grazing sheep. The land would be considered poor agricultural land due to the undulating topography, poor drainage and removal of much of the top soil layers due to peat cutting. There is also widescale evidence that the area has been cut-over for peat in the past but that this has ceased.



Photo 3.9.2.2: View of Existing Site – Marginal Agricultural Land



Photo 3.9.2.3: Sheep Grazing on the Existing Soil Recovery Site with Adjacent Reclaimed Land in the Distance



Photo 3.9.2.3 and **Photo 3.9.2.3** show that lands immediately adjacent to the existing land reclamation site have been reclaimed to form productive agricultural land. Therefore there are clearly precedents in the area for land reclamation activities including the local GGA pitches.



Photo 3.9.2.4: View of Site in Foreground looking towards Adjacent Land in a north-easterly direction which has been reclaimed to Productive Agricultural Land.

It is important to stress that were it not for the forefathers in this area and their hard work on the land, there would be little if any productive grassland in North Mayo suitable for livestock grazing.

Agriculture, particularly livestock grazing is a fundamental part of the economy and culture of the local community and this recovery project will further assist in providing productive agricultural land in the area for future generations without having any detrimental impact upon the local environment. In the general vicinity of the site at Tallagh there are many fields which have been reclaimed successfully for agriculture.

Photo 3.9.2.5 and **Photo 3.9.2.6** show the area of the site already reclaimed under. **Photo 3.9.2.5** clearly demonstrates that the land is used for agricultural purposes at present with sheep grazing in the foreground and within the un-reclaimed part of the site in the distance. The site would appear to be being farmed on a continuing basis as the land reclamation works progress.



Photo 3.9.2.5: View of Sheep Grazing within the land reclamation site and congregating on the area which has already been reclaimed



Photo 3.9.2.6: View of the area of the site reclaimed for agricultural purposes

Photo 3.9.2.7 shows the view from the portion of site already reclaimed towards the lower portion of the site towards the river. Note the reclaimed land under separate ownership on the far side of the river.



Photo 3.9.2.7: View from the portion of site reclaimed towards the lower portion of the site towards the river (which is excluded from filling). Note the reclaimed land under separate ownership on the far side of the river.

The lands are currently in use for agricultural purposes, but are low lying and of poor quality as evidenced from the site vegetation, drainage channels and watercourses.

□The works proposed under the existing waste licence and under the technical review are for the purpose of land reclamation so as to enable the lands to be effectively used for agricultural purposes. The word 'reclamation' implies claiming back from some unsuitable state. The definition might imply an unsuitable state arising from topography, drainage, poor-quality soils, damage to soils, presence of rock or vegetation etc. □The reclamation works will raise the lands by approximately 1 metres.

In regard to the above factors, it is quite clear that the primary objective in carrying out the work is to improve existing agricultural land; having inspected the site numerous times, it is our professional opinion that the field unit which it is proposed to fill may be rendered more productive by providing a terrain conducive to improved drainage ; we also consider that the field unit itself is of a moderate area in terms of modern agricultural practice, and that the depth of fill and duration of operation are reasonable; we consider therefore that the primary objective of the development to be carried out by the licensee is land reclamation; recovery and not waste disposal.

3.9.3 Phasing, Remediation, Decommissioning, Restoration and Aftercare

The site is currently licensed, per licence W0256-01, for soil recovery and deposition with a 1m Land Raise at the site. The Application for a Licence Review proposes no change to the final topographic level licensed under W0256-01; it is proposed that the same 1m Land Raise, as currently licensed, is maintained. The site will be phased as per the phasing drawing shown as **Figure 3.9.3.1**.



Figure 3.9.3.1: Phasing Plan

The site drawings with existing and proposed levels and cross sections provided in Section 2.11 clearly show the Land Raise by 1m, with a slope of 3:1 down to all existing perimeter surface water drains, which will remain untouched. The existing open surface water drains that cut through the Area of Waste Deposition, will also be raised by 1m, as shown on the Cross Section Drawings.

Following completion of the recovery activity in a particular section, topsoil will be spread evenly over the site to a minimum depth, after firming, of at least 300 mm. Any topsoil which is delivered to the site during the recovery activity will be stockpiled separately for this purpose. The site will then be prepared for seeding by raking or harrowing, and by rolling. The site will then be restored for agricultural purposes. All temporary fences will be removed. The land will be returned to productive agricultural land to be used for grazing probably for sheep or cattle and will be subject to standard agricultural practises.

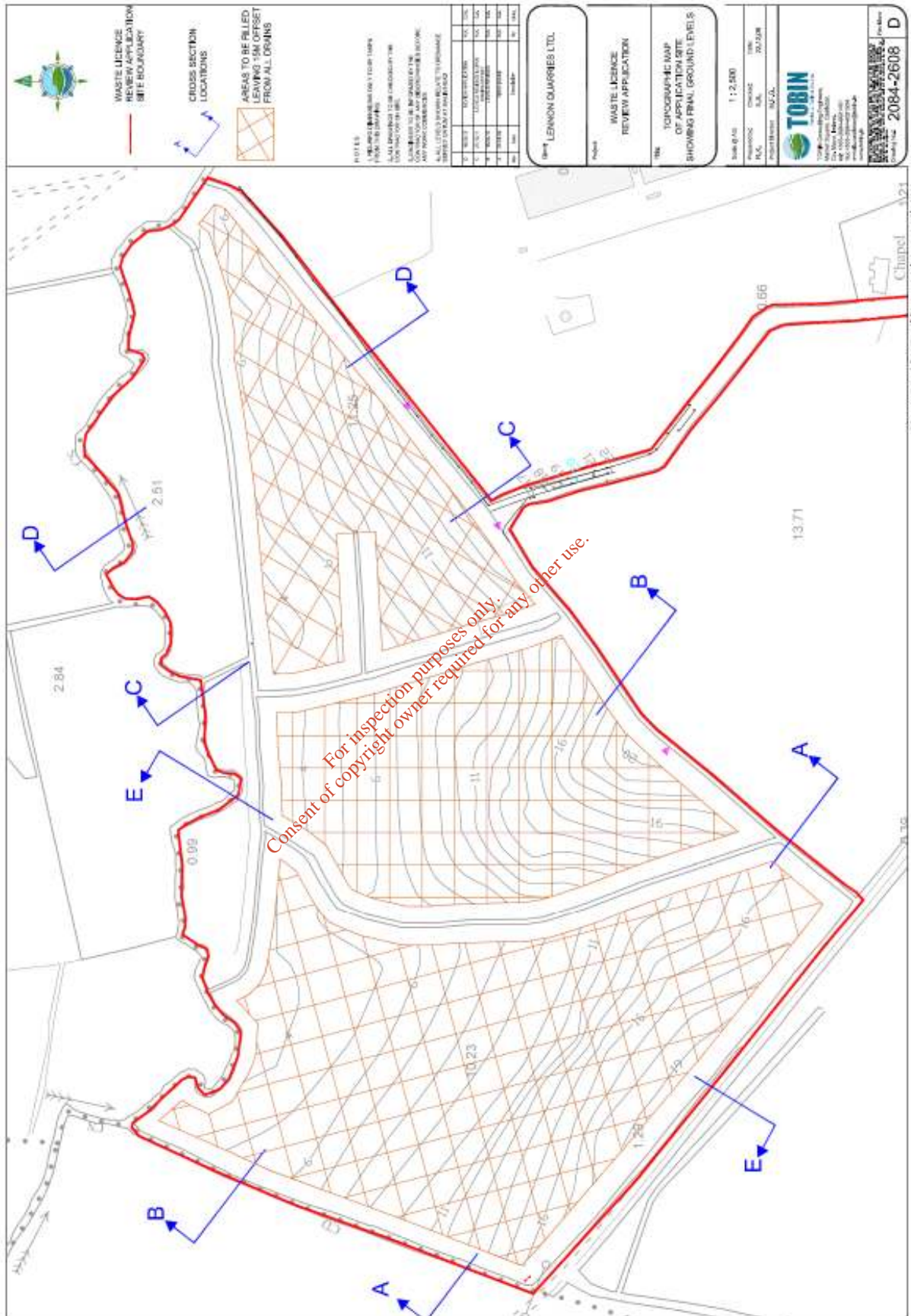


Figure 3.9.3.3: Proposed Topographic Map of Application Site, Showing Final Ground Levels



Figure 3.9.3.3 shows the 'Proposed Topographic Map of Application Site, Showing Final Ground Levels', with 1m Land Raise shown.

3.9.4 Assessment of Impacts upon Landscape

When considering the potential impacts of the existing soil recovery facility at Tallagh may have on the landscape, the established use of the lands for land reclamation purposes since 2006 must be taken into consideration and the fact that the works have been deemed to be exempt from planning permission by Mayo County Council.

The Draft Mayo County Development Plan 2014 – 2020 sets out policy relating to landscape and landscape protection. This is outlined below:

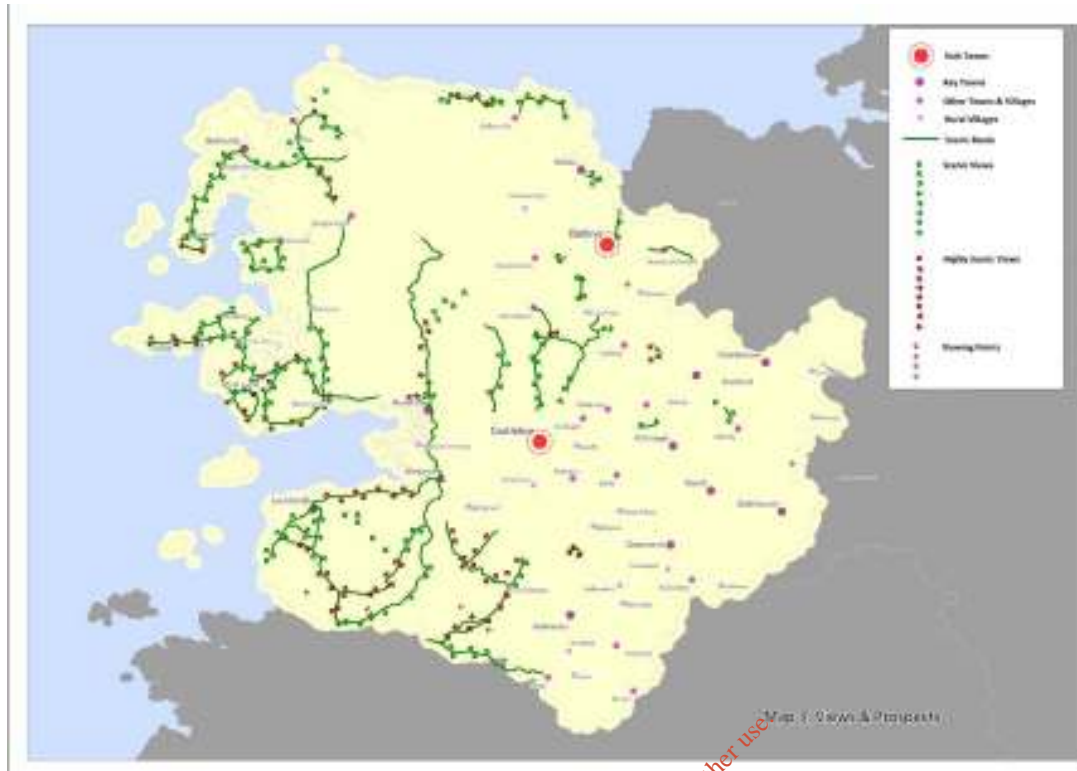
Landscape Protection

LP-01 It is an objective of the Council, through the Landscape Appraisal of County Mayo, to recognise and facilitate appropriate development in a manner that has regard to the character and sensitivity of the landscape and to ensure that development will not have a disproportionate effect on the existing or future character of a landscape in terms of location, design and visual prominence.

Views and Prospects

VP-01 It is an objective of the Council to ensure that development does not adversely interfere with views and prospects worthy of preservation and protection as outlined on Map 3, or on the views to and from places and features of natural beauty or interest (e.g. coastline, lakeshores, protected structures, important historic sites) when viewed from the public realm.

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The existing land reclamation activity at Tallagh does not have a disproportionate effect on the existing or future character of a landscape, in terms of location, design and visual prominence. Furthermore the activity subject to the review of the existing Waste Licence W0256-01 does not adversely interfere with views and prospects worthy of preservation and protection as outlined on Map 3 (shown above) or on the views to and from places and features of natural beauty or interest (e.g. coastline, lakeshores, protected structures, important historic sites).

The existing soil recovery at Tallagh does not contain, nor is close to, nor abuts any protected archaeological site or monument. The activity will therefore have no impact upon archaeology.

The entrance road abuts a former disused and derelict Roman Catholic Chapel but as this is not in use as a place of worship and the activity does not impact directly upon this building, there will be no impact upon historical buildings.

The landscape where the site is located does not have specific historical, cultural or archaeological significance.

The Ecological Assessment Report carried out in January 2009 and included in **Appendix 3.2**, concluded that:

In conclusion the habitats on site are considered to be of low ecological value. Mitigation measures have been suggested to avoid impacts on the Broadhaven Bay complex (pNHA & SAC) which is the nearest designated site located at a distance of 0.2km from the site. Suggested mitigation measures will also minimise any impacts on local fauna, particularly as a number of Birds of Conservation Concern in Ireland including snipe, skylark and stonechat have been recorded utilising the site.



The proposal to increase the annual tonnage from 24,900 tonnes to 90,000 tonnes poses no change in the scope of the activity, the nature of the activity or potential emissions from the activity (as presently licensed). There will therefore be no negative impact upon ecology and flora and fauna in granting the review of Waste Licence W0256-01.

The proposal has therefore no potential negative impacts upon Landscape and Visual Assessment but rather the licensee has demonstrated to the Agency that the licence review is supported by the local community as being a positive and pro-active step with environmental gains and benefits. This is because:

- The development sequence will still be to fill the site progressively (as presently licensed).
- The lands are presently marginal agricultural land and will be restored using imported soil and stones to more productive agricultural land thereby having a consequential benefit to agriculture (as presently licensed).
- The exact same proposed activity will occur as licensed i.e. a total of 265,000 tonnes of soil and stones but over a shorter time span (i.e. ca. 2.5 – 3 years). The activity will just take a shorter time span to complete and fully restore to beneficial agricultural use.
- The site survey drawings submitted with the Waste Licence Review remain unaltered as there will be no change whatsoever in the proposed topographical levels based on the reclamation of the site occurring over a shorter time period. Therefore, there is no change to finished site survey drawings.
- Therefore, the licence review creates no proposed change to the content, nature, composition or volume of materials intended for recovery by deposition at the site, and the overall tonnage of 265,000 tonnes for which the existing license was issued remains unaffected.

The reclamation of this site will have positive and beneficial impacts upon agriculture and agronomy and will provide additional grazing area for stock in the Belmullet area. Local auctioneers have confirmed the strong demand for grazing land for rental in the area, particularly for improved reseeded land (this is outlined in letters contained within the Agronomy Report included as **Figure 2.20.1**).

A number of field units in the surrounding area have been reclaimed and improved in the past as evidenced on the ground. The use range of these soils depends largely on slope and altitude but generally they are most suitable for grazing stock and production of hay and silage. The existing and proposed land reclamation works will blend in with the existing local landscape.

The existing licensed site at Tallagh, Belmullet, Co. Mayo, formerly operated as an authorised waste permitted facility for the purpose of the consequential benefit to agriculture under a Waste Permit No. Per 144 06/07/2005.



This Waste Permit was granted in January 2006, under the Waste Management (Permit) Regulations, 1998 and authorised the activity under Class 10 of the Fourth Class 10 of the Fourth Schedule of the Waste Management Act 1996 (as amended): “*The treatment of any waste on land with a consequential benefit for an agricultural activity or ecological system*”

During the decision process on Waste Licence W0256-01, Carton Rural Consultants were engaged to comment on the soil recovery activity and to determine whether the site met the necessary criteria of having a beneficial impact upon agriculture as a consequence of the land reclamation works.

The conclusion was that the existing and proposed land reclamation works will have a three fold beneficial impact upon agriculture:

- Firstly, the lands will be reclaimed to more productive agricultural lands which will result in a higher potential stocking rate of livestock; greater grass yields and therefore greater potential agricultural benefit.
- Secondly, the rental value of the land will increase as a consequence of the improvements to the terrain, soils and drainage which will therefore have a consequential benefit to agriculture.
- Thirdly, the value of the reclaimed land as good agricultural grazing lands will increase as a consequence of the recovery activity which will have a long term agricultural benefit.

They conclude: “*I am satisfied that the works carried out to date are recovery works for the benefit to agriculture and that the proposed works (i.e. the filling of the rest of the site as proposed in the waste licence application) will in my professional opinion have a consequential benefit to agriculture by virtue of the improved land and its increased agronomic value, as it is progressively reclaimed*”. **Figure 2.20.1** Contains a copy of the Carton Rural Consultants report.

Lennons Quarries Ltd. has the support of the local community with regards to the review of their existing Waste Licence W0256-01.

This is in the form of letters of support for the review from all the nearest residential dwellings (which would be considered the nearest potential noise and dust sensitive receptors). See **Figures 1.13.2** (letters) and associated map **Figure 1.13.1** and **Figure 3.5.3.2** in this EIS. Furthermore, there is the full support of the local GAA Club (see **Figure 1.13.3**), an adjoining land-use and a major part of the local rural community.

Therefore the licensee has demonstrated to the Agency that the licence review is supported by the local community as being a positive and pro-active step with environmental gains and benefits.

3.9.5 Mitigation Measures

As it is concluded that there will be no direct or indirect negative impacts upon landscape or Visual Assessment no mitigation measures outside those already set out in the EIS concerning the day to day operation of the site are required or are proposed.



Rather there will be positive impacts as a consequence of the Review of the existing Waste Licence W0256-01 such as provision of additional reclaimed and productive agricultural land; increased agricultural productivity; and increased land values. All of which is supported by the local community to the existing activity. Furthermore, the activity will occur as already licensed but over a much shorter time period which is a win-win scenario for the site operator; the local community; and the regulatory authorities (i.e. EPA)

Furthermore, the site has been up and running for the past ca. 2 years under a Waste Licence W0256-01 and since 2006 under a Waste Permit without any complaints or enforcement issues relating to landscape intrusion or impacts upon the landscape as proven by Agency records. Furthermore, the compliance monitoring is all up to date and is all compliant with the license requirements. All in all it is considered that Lennon Quarries Ltd. operate an extremely well run and well-monitored licensed soil recovery facility.

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