

Addendum

LA01/2023/0008/F

1.0 Update

- 1.1 Three further objections have been received. These have been circulated to Planning Committee members. That from Save Benbradagh Group raises the following main issues:
- a. Consideration of contamination and radiation from Chernobyl legacy and others. Effect on human health and Habitat Regulation Assessment incomplete.
 - b. Transboundary impacts on Ireland arising from drainage through Lough Foyle.
 - c. HRA required to be robust and complete.
 - d. Updated figures pertaining to reduction in scheme from 6 to 4 turbines not provided.
 - e. Climate Change Act (Northern Ireland) 2022, regarding renewable energy targets, does not impose a statutory duty on Councils in consideration of planning applications.
 - f. No consideration of lifecycle of emissions.
 - g. Fails to comply with SPG advice on separation distances between windfarms. Cumulative impact of proposal requires assessment, including Smulgedon Wind Farm and single turbines around Dungiven.
 - h. Visual impact of proposal on Benbradagh and extent of visibility of proposal.
 - i. Large scale of wind turbines.
 - j. Approval would create precedent for further wind farm development. Scheme has been reduced in the hope of getting a foothold for other development.
 - k. Consultation responses from NIEA Countryside and Coast Landscape Team.
 - l. Position of Planning Department on visual amenity, as set out in the Planning Committee Report.
 - m. Concerns of local community not being considered.
 - n. Cultural and historic value of Benbradagh to local people.
 - o. Pre-application community consultation flawed.
 - p. Tourism impact assessment in ES is flawed. Adverse impact on the Sperrins AONB.

q. Need to consider proposal relative to the Rural Needs Act and Equality Impact Assessment.

- 1.2 The second objection from an individual also raises the issue of the consideration of contamination and radiation from Chernobyl legacy and others.
- 1.3 The third objection is from a business (shop) owner. They set out that they expend effort making their shop inviting to customers but how the proposed windfarm would make Dungiven a very uninviting place to come to.
- 1.4 Radiation deposition originating from the Chernobyl Nuclear Power Station incident in 1986 (located in modern Ukraine) is a matter known to UK/ Northern Ireland central government. The application site is not distinguishable from the hundreds of square kilometres forming the Sperrin range. No instruction or guidance has issued from central government pertaining to the consideration of planning applications relative to this issue. If there was likely to be an issue of concern for consideration through the planning process, instruction or guidance would have issued accordingly.
- 1.5 Regarding site drainage, transboundary issues on Ireland (Innishowen, Co. Donegal) through Lough Foyle are likely to be inconsequential given the extent of dilution. There is no evidence that the HRA is either not robust or incomplete.
- 1.6 The Agent has since provided figures regarding power output, environmental and economic benefits. The figures for the reduced scheme are as follows:
 - Generation output of up to 19.2MW
 - Energy yield between 67,645MWh and 86,178MWh, equivalent to c. 0.9%-1.2% of NI's current annual electricity needs (7,2512GWh as of June 2025 (NISRA)).
 - Power to between 21,292 and 27,126 homes (37%-47% of the CCGBC population (2021 census)).
 - Contribute to a reduction of between 24,858-41,518 tonnes of CO₂ emissions.
 - Between £41.2m and £44.1m expenditure anticipated to be invested (and retained) in the NI economy (64%-65% of total expenditure):
 - Development: £815k;

- Construction: £9.9m;
- Operation & Maintenance: Between £851k and £933k (annually), representing between £29.7m and £32.6m over 35yrs; and
- Decommissioning: £691k.
- Creation of 96.6 FTE job years.
- Additional GVA to NI supply chain of between £2.4m-£3m (min. capacity) and £2.5m-£3.1m (max. capacity).
- Generation of annual business rates payable for the proposed development will equate to between £175k-£244k per annum, of which £89k-£123k will go to CCGBC.

As a material consideration, these benefits are afforded significant weight.

- 1.7 It is acknowledged that while the targets in the Climate Change Act (Northern Ireland) 2022 are material considerations, they do not impose a statutory duty on the Council.
- 1.8 While there may be lifecycle emissions, these are unlikely to be significant and are definitively outweighed by the environmental benefits of the proposal.
- 1.9 Cumulative impacts are considered at paragraph 8.65 of the Planning Committee Report. Cumulative assessment, including with respect to Smulgedon Wind Farm and single wind turbines, is considered in the Environmental Statement, Volume 1, Chapter 4- Landscape and Visual Impact.
- 1.10 The visual impact of the proposal, including relative to Benbradagh, is set out at paragraphs 8.61- 8.64 of the Planning Committee Report. The dimensions of the turbines are shown in the drawings accompanying the application.
- 1.11 Any further applications for wind farm development will, if submitted, be assessed on merit.
- 1.12 The consultation responses from NIEA Countryside, Coast and Landscape Team are considered at Paragraphs 8.12, 8.56- 8.57 and 8.64 of the Planning Committee Report. The reason for their change in position is rationalised by the scheme reduction from 6 to 4 turbines.

- 1.13 Issues of objection, including visual impact, are considered at paragraphs 8.104- 8.118 of the Planning Committee Report. The matter of pre-application community consultation is considered at paragraph 8.112.
- 1.14 Consideration of the project relative to tourism is set out a Paragraphs 8.102- 8.103 of the Planning Committee Report.
- 1.15 There is no requirement to consider the Rural Needs Act and Equality Impact Assessment relative to each planning application.
- 1.16 For the reasons set out in the Planning Committee Report, the Planning Department considers the proposal acceptable in terms of visual amenity. Accordingly, it would not make Dungiven an uninviting place to come to.
- 1.17 The following decommissioning condition should also be included:

All above ground structures shall be dismantled and removed from the site (“decommissioning”) either 35 years from the date of this permission or shall be removed if electricity generation has ceased on site for a period of 12 months (unless further consent has been granted), whichever is the shorter. The land shall be restored in accordance with an agreed scheme to be submitted to the Council at least one year prior to the commencement of any decommissioning works. This scheme shall include details of all works and measures to restore the site, the timeframe within which the works shall be carried out along with proposals for aftercare for a period of 3 years after completion of the restoration works.

Reason: To ensure the development is decommissioned in a manner that protects the ecology and hydrology of the site beyond the life span of the windfarm.

2.0 Recommendation

- 2.1 That the Committee note the contents of this Addendum and agree with the recommendation to approve the application in accordance with Paragraph 1.1 of the Planning Committee Report.