

From: aisling o'connell
Sent: 23 September 2025 22:48
To: Niamh Archibald; Sean Bateson; Steven Callaghan; Brenda Chivers; Mark Fielding; Richard Holmes; Dawn Huggins; Michelle Knight-McQuillan; Allister Kyle; Amy Mairs; Jonathan McAuley; John McAuley; Peter McCully; Margaret Anne McKillop; Cara McShane; Ashleen Schenning; Richard Stewart; Tanya Elder; Sean McGlinchey; Darryl Wilson; John Wisener; Ivor Wallace; Maighréad Watson; Leanne Peacock; Planning
Subject: Benbradagh Wind Farm

Dear Councillor

Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to urge you to call on the Planning Committee to refuse the planning application iLA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
5. Failure to provide updated information:
 - i. The developer has failed to provide updated emission calculations for the reduced scheme.
 - ii. The developer has failed to provide updated electricity generation capacity (MW) figures for the reduced scheme.

iii. The developer has failed to provide an updated ES economic statement to reflect the revised reduced scheme – construction costs, benefit to the local economy, financial benefits to landowners, rates contributions etc.

The absence of the above information renders the application and the EIA as incomplete. The benefits of the scheme cannot be accurately assessed without this information and thus a balanced decision cannot be properly undertaken. This is a major application in which there is very significant public interest. Updated revised information which is required as part of the ES, must be provided, and must also be advertised to the public.

(*Based on outdated ES Chapter 3 Socio-Economic Impacts, para. 3.7, given the fact that the remaining four turbines are downslope from the two removed, it can be assumed that these will be at the lower end of the stated capacity: 3.45 - 4.80 MW per turbine, thus the proposed development will contribute circa $3.45\text{MW} \times 4 = 13.8\text{MW}$, not the 28.8MW currently stated in the Planning report).

6. The Climate Change Act (Northern Ireland) 2022 - creates a statutory duty on “Northern Ireland departments” to ensure emissions targets are met (as detailed in Section 52), but does NOT create a statutory duty on local councils (or the PAC). Thus to give determining weight to climate targets would be potentially a legal misapplication by the Council. The Act requires emissions reductions and renewable electricity consumption targets but does not create a hierarchy where climate considerations outweigh statutory planning duties and environmental and AONB protections.

7. The applicant presents the scheme as “green energy”, but the carbon account ignores the full lifecycle emissions: peat oxidation, concrete and steel foundations, grid infrastructure, and the unresolved problem of turbine decommissioning and blade waste. These impacts must be considered as part of the overall balance.

8. There is widespread cross-community opposition to the proposed development with nearly 1300 objections submitted to date. The Roe Valley is becoming increasingly encircled with wind turbines - in addition to what is currently visible there are three consented windfarms that have not yet been built - Rigged Hill Repowering, Ballyhanedin, and Smulgedon - all with turbines 150m (500feet) high. There is also a cluster of single wind turbines scattered along the foot of Benbradagh. (In addition, Maghermore windfarm at Banagher has also recently received consent, although this PAC decision may be subject to a future Judicial Review).

9. The proposal fails to comply with SPG advice on separation distances between windfarms. Planning policy (SPPS, PPS18) requires safeguarding of our distinctive skylines and for cumulative impacts of wind energy developments to be assessed so as to avoid cumulative harm and saturation. The iconic landmark character of the Benbradagh and the very wide visibility from within the Roe valley, requires specific distances between windfarms that this proposal does not comply with. Distances to Smulgedon windfarm and the cluster of single turbines around Dungiven have not been assessed or considered.

10. The proposed development of four industrial-scale, 150m (500 feet) high turbines would breach the distinctive and celebrated ridgeline of Benbradagh that is protected under planning policy (LCA 36), and would be highly visible throughout the area, as can be very clearly seen in the applicant's Zone of Theoretical Visibility Map Figure 10.15, attached, (which can be found on the planning portal). This diagram confirms that the giant blades/ rotors would be clearly visible throughout most of Dungiven and beyond in outlying areas up to over 10-15km away.

Other ZTVs show that the hubs would be fully visible up to Derrychrier in the highly important transient view of Benbradagh when approaching Dungiven from the west on the new A6.

11. Of critical importance is scale of the proposed turbines – they are larger than anything built or consented to date in Northern Ireland. They will have a blade radius of 68m and rotor diameter/ swept path of 136m, which is 1.7 x larger than the radius and diameter of the existing turbines in Evishagaran windfarm, which already are enormous in scale and impact when viewed coming over the Glenshane Pass.(Evishagaran turbines are radius 40m, and rotor diameter/ sweep 80m).

12. The breach of the ridgeline would open the floodgates for further encroachment and development along the ridgeline in terms of visual impact and landscape character considerations. This is already evidenced by the variations of turbines the applicant has explored for this

application site – 12no. in their PAN submission to the Department of Infrastructure on 22nd September 2020; 6no.in the initial submitted planning application, and now the reduced scheme of 4no. in the hope of getting a foothold for further development.

Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and 2, and the pre-application community consultation event carried out in August 2024 signaling a further extension to the south of the existing Evishagaran windfarm.

13. NIEA Countryside and Coast Landscape Team (CC&L) submitted two polar-opposite responses to the 4no. turbine scheme - despite both the scheme and planning policy being the same at the date of each response(22nd April 2024 and 30th April 2025).

The applicant alleged in their letter of 17 October 2024, directed to NIEA CC&L and the Council, that the reduced 4 turbine scheme submitted December 2023/ January 2024 had addressed community concerns - this is absolutely not the case and incorrect, and as such renders NIEA CC&L's second response invalid. The community continues to oppose this application.

In addition as mentioned earlier, the Climate Change Act does not create a hierarchy where climate considerations outweigh or alter statutory planning duties and environmental and AONB protections. Climate targets should be considered in the balancing of impacts and benefits in making a final decision, not prior to a landscape visual impact assessment.

14. It is notable that the planning report details that the Council's planning team share the community's concerns regarding the visual impact of the proposal.

15. Local communities feel they are being thrown under the bus, that the area is on the tipping point of being saturated and turned into "one big wind factory", with no thought for the people living here, that their concerns are not being listened to, and cumulative impact and collective loss of local landmarks, culture, heritage, sense of place and local identity has not been properly assessed or considered.

16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as 'Benbradagh's crown o'er Dungiven town', and the well known ballad 'Finvola The Gem of the Roe' about the daughter of Dermot O'Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. 'Hill of Thieves'" is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven.

The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry –PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/ decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedspaces

within a 4.3mile radius of Dungiven (see spreadsheet attached), and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

The ES assessment, in the community's opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that *"the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost"* –concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment effortsand initiatives to promote it as a landmark destination and Dungiven as "Gateway to the Sperrins". In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.

19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,
Aisling O'Connell
4 Abbeyfields Dungiven BT47 4UX

Sent from [Outlook for iOS](#)

From: Carmel McReynolds
Sent: 23 September 2025 21:43
To: Planning
Subject: Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

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The potential for a proposed development to detract from local people’s sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry –PAC ref no.2018/C007, para 10.116.
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20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Andrew and Charlie Williamson

Address: 4 Royal Hill, Maze, Lisburn

From: ann louise bresnahan
Sent: 23 September 2025 21:27
To: Planning
Subject: Re: Planning application ref. LA01/2023/0008/F – Brishey Wind Farm

Dear Planning Committee Members,

As members of the Sperrins community, we are writing to call for the Planning Committee to refuse the planning application LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

We support renewable energy in principle, but it must not come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance considering these points, and the extent of outstanding information and issues that have not been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) this application would cause more harm than benefit.

Community and Environmental Concerns

1. Unaddressed radiological concerns: Community concerns regarding contamination and radiation (Chernobyl legacy and radon exposure), raised to the Council, the Chief Executive, and NIEA on 30th May and again on 17th September, do not appear to have been addressed or considered in the final Habitat Regulations Assessment (HRA). This renders the HRA incomplete. The release of contamination from construction and operation of this development could impact the environment and human health. With the Sperrins already raising concerns of higher cancer incidence, community fears are not unfounded.
2. Sensitive peatland site: The application site lies in deep peatland directly connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.

Radiological Risks – Tellus, Scottish Evidence and Regulatory Admissions

3. Incomplete reliance on Tellus data: The only radiological mapping available in Northern Ireland comes from the Tellus airborne survey (2005–2008). Chapter 18 of the official Tellus Unearthed report (Beamish, British Geological Survey) explicitly confirms that:
 - o Peat soils attenuate gamma signals, meaning airborne survey results underestimate radionuclide concentrations beneath peat.
 - o Localised “hotspots” are smoothed out by the survey’s spatial averaging, so Tellus cannot detect site-specific risks.
 - o The survey does not measure radon emissions, inhaled particulates, or mobilisation of radionuclides into watercourses.

4. Scottish Technical Report (2021, Communities B4 Power Companies): An independent study in Scotland highlighted the same regulatory failure:
 - o No systematic peat-core testing for Cs-137 was carried out despite widespread Chernobyl fallout.
 - o Reliance on broad airborne averages means regulators cannot demonstrate peat disturbance is safe.
 - o The report concluded that communities “cannot be reassured” until proper baseline sampling is conducted.
5. Written confirmation from regulators: In correspondence received this year, NIEA and DAERA have both confirmed in writing that no baseline radiological monitoring of peatlands has been carried out in Northern Ireland. They rely instead on historic Tellus averages, despite the known limitations described above. This means the risks of disturbing deep peat remain completely unassessed.
6. Implications for Causeway Coast & Glens Council:
 - o No baseline radiological surveys have been carried out at the Brishey site, despite it being deep peat linked to the River Roe SAC.
 - o Approving the development without such assessment risks breaches of:
 - The Environmental Liability Regulations (NI) 2009
 - The Planning (EIA) Regulations (NI) 2017
 - The Ionising Radiations Regulations 2017
 - The Aarhus Convention and Article 2 ECHR (right to life)
 - o Councillors, as the “competent authority,” are responsible for ensuring Habitats Regulations Assessments and EIAs are complete and lawful. Endorsing a scheme without radiological testing could expose the Council to judicial review or Ombudsman investigation

Further Concerns

7. The River Roe and Tributaries SAC in turn flows into Lough Foyle — shared international waters between Northern Ireland and the Republic of Ireland — creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
8. Environmental impacts are required to be fully assessed prior to approval, as mandated by law. As the competent authority, the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community.
9. The developer has failed to provide updated emission calculations, updated generation capacity, or an updated economic statement to reflect the reduced scheme. The absence of this information renders the EIA incomplete and prevents a balanced decision.

10. Planning policy (SPPS, PPS18) requires safeguarding of distinctive skylines and prevention of cumulative harm. Benbradagh lies in the Sperrins AONB, is a key cultural landmark, and is already under severe cumulative pressure from multiple wind farm consents.
11. The proposed 150m turbines would breach the protected ridgeline of Benbradagh and be visible across the Roe Valley, causing significant and permanent landscape harm.
12. Tourism, heritage, rural needs and equality duties (Section 75 and the Rural Needs Act) have not been properly assessed, despite statutory requirements.

Conclusion

Given the incomplete environmental assessment, unaddressed radiological hazards, cumulative landscape and cultural impacts, and the absence of updated scheme information, this application cannot lawfully or responsibly be approved.

We therefore urge the Planning Committee to refuse permission for application LA01/2023/0008/F.

Yours sincerely,

Ann Louise Bresnahan

6 Aughabrack Road Plumbridge

Bt798at

Laura Crawford

From: Ann Murphy
Sent: 23 September 2025 22:31
To: Planning
Subject: Fw: Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

[Sent from Yahoo Mail for iPhone](#)

Begin forwarded message:

On Tuesday, September 23, 2025, 5:54 pm, Carmel McReynolds <Carmel.McReynolds@eani.org.uk> wrote:

Forward on to whoever and copy and paste

To: 'planning@causewaycoastandglens.gov.uk'
<planning@causewaycoastandglens.gov.uk>
Subject: Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

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I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.

2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.

3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.

4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.

5. Failure to provide updated information:

i. The developer has failed to provide updated emission calculations for the reduced scheme.

ii. The developer has failed to provide updated electricity generation capacity (MW) figures for the reduced scheme.

iii. The developer has failed to provide an updated ES economic statement to reflect the revised reduced scheme – construction costs, benefit to the local economy, financial benefits to landowners, rates contributions etc.

The absence of the above information renders the application and the EIA as incomplete. The benefits of the scheme cannot be accurately assessed without this information and thus a balanced decision cannot be properly undertaken. This is a major application in which there is very significant public interest. Updated revised information which is required as part of the ES, must be provided, and must also be advertised to the public.

(*Based on outdated ES Chapter 3 Socio-Economic Impacts, para. 3.7, given the fact that the remaining four turbines are downslope from the two removed, it can be assumed that these will be at the lower end of the stated capacity: 3.45 - 4.80 MW per turbine, thus the proposed development will contribute circa $3.45\text{MW} \times 4 = 13.8\text{MW}$, not the 28.8MW currently stated in the Planning report).

6. The Climate Change Act (Northern Ireland) 2022 - creates a statutory duty on "Northern Ireland departments" to ensure emissions targets are met (as detailed in Section 52), but does NOT create a statutory duty on local councils (or the PAC). Thus to give determining weight to climate targets would be potentially a legal misapplication by the Council. The Act requires emissions reductions and renewable electricity consumption targets but does not create a hierarchy where climate considerations outweigh statutory planning duties and environmental and AONB protections.

7. The applicant presents the scheme as "green energy", but the carbon account ignores the full lifecycle emissions: peat oxidation, concrete and steel foundations, grid infrastructure, and the unresolved problem of turbine decommissioning and blade waste. These impacts must be considered as part of the overall balance.

8. There is widespread cross-community opposition to the proposed development with nearly 1300 objections submitted to date. The Roe Valley is becoming increasingly encircled with wind turbines - in addition to what is currently visible there are three

consented windfarms that have not yet been built - Rigged Hill Repowering, Ballyhanedin, and Smulgedon - all with turbines 150m (500feet) high. There is also a cluster of single wind turbines scattered along the foot of Benbradagh. (In addition, Maghermore windfarm at Banagher has also recently received consent, although this PAC decision may be subject to a future Judicial Review).

9. The proposal fails to comply with SPG advice on separation distances between windfarms. Planning policy (SPPS, PPS18) requires safeguarding of our distinctive skylines and for cumulative impacts of wind energy developments to be assessed so as to avoid cumulative harm and saturation. The iconic landmark character of the Benbradagh and the very wide visibility from within the Roe valley, requires specific distances between windfarms that this proposal does not comply with. Distances to Smulgedon windfarm and the cluster of single turbines around Dungiven have not been assessed or considered.

10. The proposed development of four industrial-scale, 150m (500 feet) high turbines would breach the distinctive and celebrated ridgeline of Benbradagh that is protected under planning policy (LCA 36), and would be highly visible throughout the area, as can be very clearly seen in the applicant's Zone of Theoretical Visibility Map Figure 10.15, attached, (which can be found on the planning portal). This diagram confirms that the giant blades/ rotors would be clearly visible throughout most of Dungiven and beyond in outlying areas up to over 10-15km away.

Other ZTVs show that the hubs would be fully visible upto Derrychrier in the highly important transient view of Benbradagh when approaching Dungiven from the west on the new A6.

11. Of critical importance is scale of the proposed turbines – they are larger than anything built or consented to date in Northern Ireland. They will have a blade radius of 68m and rotor diameter/ swept path of 136m, which is 1.7 x larger than the radius and diameter of the existing turbines in Evishagaran windfarm, which already are enormous in scale and impact when viewed coming over the Glenshane Pass.(Evishagaran turbines are radius 40m, and rotor diameter/ sweep 80m).

12. The breach of the ridgeline would open the floodgates for further encroachment and development along the ridgeline in terms of visual impact and landscape character considerations. This is already evidenced by the variations of turbines the applicant has explored for this application site – 12no. in their PAN submission to the Department of Infrastructure on 22nd September 2020; 6no. in the initial submitted planning application, and now the reduced scheme of 4no. in the hope of getting a foothold for further development.

Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and 2, and the pre-application community consultation event carried out in August 2024 signaling a further extension to the south of the existing Evishagaran windfarm.

13. NIEA Countryside and Coast Landscape Team (CC&L) submitted two polar-opposite responses to the 4no. turbine scheme - despite both the scheme and planning policy being the same at the date of each response (22nd April 2024 and 30th April 2025).

The applicant alleged in their letter of 17 October 2024, directed to NIEA CC&L and the Council, that the reduced 4 turbine scheme submitted December 2023/ January 2024 had addressed community concerns - this is absolutely not the case and incorrect, and as such renders NIEA CC&L's second response invalid. The community continues to oppose this application.

In addition as mentioned earlier, the Climate Change Act does not create a hierarchy where climate considerations outweigh or alter statutory planning duties and environmental and AONB protections. Climate targets should be considered in the balancing of impacts and benefits in making a final decision, not prior to a landscape visual impact assessment.

14. It is notable that the planning report details that the Council's planning team share the community's concerns regarding the visual impact of the proposal.

15. Local communities feel they are being thrown under the bus, that the area is on the tipping point of being saturated and turned into "one big wind factory", with no thought for the people living here, that their concerns are not being listened to, and cumulative impact and collective loss of local landmarks, culture, heritage, sense of place and local identity has not been properly assessed or considered.

16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as 'Benbradagh's crown o'er Dungiven town', and the well known ballad 'Finvola The Gem of the Roe' about the daughter of Dermot O'Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. 'Hill of Thieves' is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven.

The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry –PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/ decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedspaces within a 4.3mile radius of Dungiven (see spreadsheet attached), and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

The ES assessment, in the community's opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in

2014 detailing that *“the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost”* – concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as “Gateway to the Sperrins”. In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.

19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Ann Murphy

Address: 25 Carnanbane Road

Dungiven

Bt47 4sr

Laura Crawford

From: Lee Kane
Sent: 23 September 2025 21:25
To: Planning
Subject: FW: benbradagh_September_23_2025_1
Attachments: benbradagh_September_23_2025_1.docx

For noting.

Lee

From: Bronagh Mackle
Date: Tuesday, 23 September 2025 at 20:40
To: Philip Anderson

Niamh Archibald

g>, Ciaran Archibald
g>, Sean Bateson
Yvonne Boyle
Steven Callaghan
ov.uk>, Aaron Callan
>, Brenda Chivers
>, Michael Coyle
Mark Fielding
k>, Richard Holmes
.uk>, Dawn Huggins
jk>, Sandra Hunter
Lee Kane
Bill Kennedy
Michelle Knight-McQuillan <Michelle.Knight-
Allister Kyle
Amy Mairs
>, Jonathan McAuley
John McAuley
Peter McCully
Kathleen McGurk
Sharon Mckillop
Margaret Anne McKillop
Oliver McMullan
Ciaran McQuillan
Cara McShane
, Dermot Nicholl
>, Ashleen Schenning
Edgar Scott
Richard Stewart
, Tanya Elder
Mervyn Storey
Sean McGlinchey
Darryl Wilson
>, John Wisener
>, Ivor Wallace

Maighréad Watson
Russell Watton
>, Leanne Peacock

Subject: benbradagh_September_23_2025_1

Hello

It has been reported that a planning application for a wind farm on Benbradagh mountain in Dungiven is scheduled for determination, this week, by Causeway Coast and Glens Council, with a recommendation for approval. I have attached a letter voicing my concerns about this issue.

Regards
Bronagh Mackle

Causeway Coast and Glens Borough Council processes personal information in compliance with the Data Protection Act 2018. To learn more, you can review our privacy notice at <http://www.causewaycoastandglens.gov.uk/footer-information/privacy-statement>. If you have received this email in error, please contact the sender and securely delete. You must not copy, share or take any further action with the information contained therein without approval. Any opinions expressed are those of the author and do not necessarily represent those of Causeway Coast and Glens Borough Council. Please consider the environment before printing.

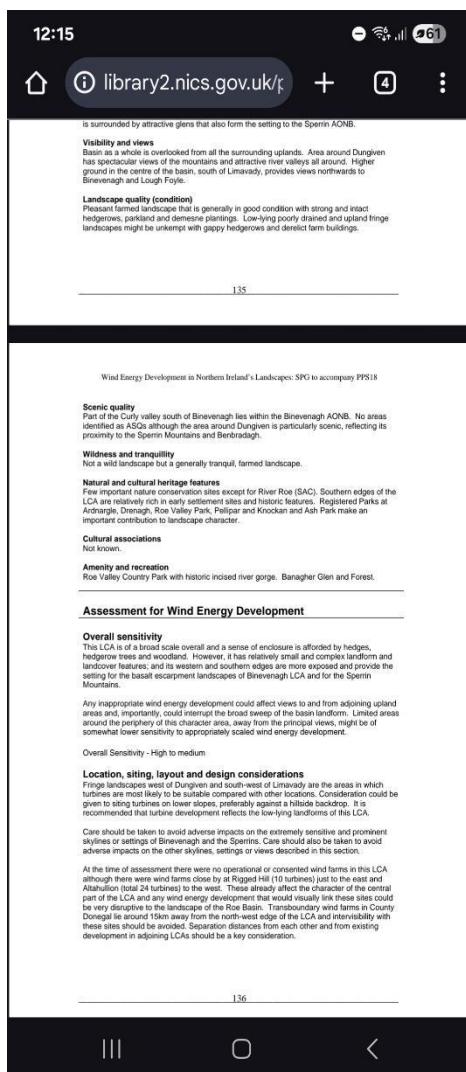
23/9/2025

Dear Alderman/Councillor,

It has been reported that a planning application for a wind farm on Benbradagh mountain in Dungiven is scheduled for determination, this week, by Causeway Coast and Glens Council, with a recommendation for approval.

This has caused grave concern and deep unrest within the local community. The decision is widely viewed as unethical, disrespectful to, and dismissive of the people you were elected to represent.

As a deeply concerned resident of the Causeway Coast and Glens council area, I urge you to defend the interests of local people and protect our natural environment.



Please refer to this screen shot from a report drawn up by the Northern Ireland Environmental Agency, into Wind Energy Development in Northern Ireland's Landscapes. It is part of a Landscape Character Area assessment for our area.

The overall sensitivity to wind farms in this area has been assessed as High to Medium.

It also states that “care should be taken to avoid adverse impacts on the extremely sensitive and prominent skylines or settings of Binevenagh and the Sperrins.” Benbradagh is one of the prominent skylines in the Sperrins.

Benbradagh, our iconic area of natural beauty has not changed since this report was drawn up, why then has the approach to planning for/allowing wind farm development changed in the interim?

In February 2025, it was reported that the Causeway Coast and Glens PEACEPLUS Partnership launched the local action plan with £6.1m in funding secured to deliver peacebuilding projects. One of those projects is Benbradagh, the Gateway to the Sperrins: the project will work alongside the local community to improve accessibility.

Time and money were spent on a consultation process for this project, where local people came together to highlight the importance of Benbradagh, as a beautiful natural asset in our area. Recent visitors to our area from Canada did not want to leave until they had walked to the top of Benbradagh to enjoy its rugged natural beauty and the scenic vista across the Roe Valley. At one of the consultation events we drew up a list of ideas to help improve access to Benbradagh and make it a place where an increasing number of people would choose to visit. This project will be completely nullified if a wind farm is allowed in the area.

Look at this photo and ask how you can allow this unique and distinctive AONB to be devastated by a wind farm.



We are relying on you, our local elected representatives to stand with the people in our community to protect our area of natural beauty.

A quote from a spokesperson for our local community, sums this issue up. "Benbradagh is more than a mountain – it is a symbol of identity, history and belonging. Let's protect it together."

Bronagh Mackle

From: Carmel McReynolds
Sent: 23 September 2025 23:29
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

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(*Based on outdated ES Chapter 3 Socio-Economic Impacts, para. 3.7, given the fact that the remaining four turbines are downslope from the two removed, it can be assumed that these will be at the lower end of the stated capacity: 3.45 - 4.80 MW per turbine, thus the proposed development will contribute circa 3.45MW x 4 = 13.8MW, not the 28.8MW currently stated in the Planning report).

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I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Catherine Mc Knight, Emmet Mc Knight, Corey Mc Knight, Zack Mc Knight

Address: 45 Brockagh Rd, Eglinton, Bt47 3hl

From: Catherine Thompson >
Sent: 23 September 2025 22:29
To: Niamh Archibald; Sean Bateson; Steven Callaghan; Brenda Chivers; Mark Fielding; Richard Holmes; Dawn Huggins; Michelle Knight-McQuillan; Allister Kyle; Amy Mairs; Jonathan McAuley; John McAuley; Peter McCully; Margaret Anne McKillop; Cara McShane; Ashleen Schenning; Richard Stewart; Tanya Elder; Sean McGlinchey; Darryl Wilson; John Wisener; Ivor Wallace; Maighréad Watson; Leanne Peacock; Planning
Subject: Wind farm on top of benbradagh

Dear Councillor

Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to urge you to call on the Planning Committee to refuse the planning application iLA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

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The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry – PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/ decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedspaces

within a 4.3mile radius of Dungiven (see spreadsheet attached), and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

The ES assessment, in the community's opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that *"the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost"* –concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as "Gateway to the Sperrins". In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.

19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Catherine Thompson

Address: 55 Abbeyfields, Dungiven,

From: Catherine Thompson
Sent: 23 September 2025 22:33
To: Planning
Subject: wind farm

Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to call for the Planning Committee to refuse the planning application LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
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Yours sincerely,

Name: Cathy Hegarty

Address: 160 Sawel place, Dungiven

From: Carmel McReynolds
Sent: 23 September 2025 21:40
To: Planning
Subject: FW: Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

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16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as 'Benbradagh's crown o'er Dungiven town', and the well known ballad 'Finvola The Gem of the Roe' about the daughter of Dermot O'Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. 'Hill of Thieves' is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven.

The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

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I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Ciaran and Tish O Malley

Address: no8 The Glebe, Fareham, England , P0142PA

From: Claire <
Sent: 23 September 2025 22:29
To: Niamh Archibald; Sean Bateson; Steven Callaghan; Brenda Chivers; Mark Fielding; Richard Holmes; Dawn Huggins; Michelle Knight-McQuillan; Allister Kyle; Amy Mairs; Jonathan McAuley; John McAuley; Peter McCully; Margaret Anne McKillop; Cara McShane; Ashleen Schenning; Richard Stewart; Tanya Elder; Sean McGlinchey; Darryl Wilson; John Wisener; Ivor Wallace; Maighréad Watson; Leanne Peacock; Planning
Subject: Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

Dear Councillor

Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

As (ma member of the Dungiven and Roe Valley community, I am are writing to urge you to call on the Planning Committee to refuse the planning application iLA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below are my concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
5. Failure to provide updated information:
 - i. The developer has failed to provide updated emission calculations for the reduced scheme.
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iii. The developer has failed to provide an updated ES economic statement to reflect the revised reduced scheme – construction costs, benefit to the local economy, financial benefits to landowners, rates contributions etc.

The absence of the above information renders the application and the EIA as incomplete. The benefits of the scheme cannot be accurately assessed without this information and thus a balanced decision cannot be properly undertaken. This is a major application in which there is very significant public interest. Updated revised information which is required as part of the ES, must be provided, and must also be advertised to the public.

(*Based on outdated ES Chapter 3 Socio-Economic Impacts, para. 3.7, given the fact that the remaining four turbines are downslope from the two removed, it can be assumed that these will be at the lower end of the stated capacity: 3.45 - 4.80 MW per turbine, thus the proposed development will contribute circa $3.45\text{MW} \times 4 = 13.8\text{MW}$, not the 28.8MW currently stated in the Planning report).

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I respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Claire Mckeown

Address: 17 Abbeyfields Dungiven BT47 4Uw

Sent from my iPhone

From: Carmel McReynolds
Sent: 23 September 2025 21:45
To: Planning
Subject: Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

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I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Concepta and Justin Gilheaney

Address: 76 Corratistune rd, Derrylin, Co Fermanagh

From: Carmel McReynolds
Sent: 23 September 2025 21:55
To: Planning
Subject: Planning application ref. LA01/2023/0008/F – Brishey windfarm

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The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people’s sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry –PAC ref no.2018/C007, para 10.116.
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Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as “Gateway to the Sperrins”. In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.
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20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Denise, Tom and Zara Cunningham

Address: 249B Camlough Rd, Pomeroy , Co Tyrone

From: Carmel McReynolds
Sent: 23 September 2025 21:51
To: Planning
Subject: Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to call for the Planning Committee to refuse the planning application LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

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Yours sincerely,

Name: Dermot and Pam O Malley

Address: 10 Saltcoats Garden, Livingston, West Lothian, Scotland

Laura Crawford

From: elaine mcguigan
Sent: 23 September 2025 21:28
To: Planning
Subject: Brishey Windfarm

Sent from [Outlook for Android](#)

From: Estelle Mulgrew
Sent: 24 September 2025 02:07
To: Niamh Archibald; Sean Bateson; Steven Callaghan; Brenda Chivers; Mark Fielding; Richard Holmes; Dawn Huggins; Michelle Knight-McQuillan; Allister Kyle; Amy Mairs; Jonathan McAuley; John McAuley; Peter McCully; Margaret Anne McKillop; Cara McShane; Ashleen Schenning; Richard Stewart; Tanya Elder; Sean McGlinchey; Darryl Wilson; John Wisener; Ivor Wallace; Maighr  ad Watson; Leanne Peacock; Planning
Subject: Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

Dear Councillor

Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

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application site – 12no. in their PAN submission to the Department of Infrastructure on 22nd September 2020; 6no. in the initial submitted planning application, and now the reduced scheme of 4no. in the hope of getting a foothold for further development.

Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and 2, and the pre-application community consultation event carried out in August 2024 signaling a further extension to the south of the existing Evishagaran windfarm.

13. NIEA Countryside and Coast Landscape Team (CC&L) submitted two polar-opposite responses to the 4no. turbine scheme - despite both the scheme and planning policy being the same at the date of each response (22nd April 2024 and 30th April 2025).

The applicant alleged in their letter of 17 October 2024, directed to NIEA CC&L and the Council, that the reduced 4 turbine scheme submitted December 2023/ January 2024 had addressed community concerns - this is absolutely not the case and incorrect, and as such renders NIEA CC&L's second response invalid. The community continues to oppose this application.

In addition as mentioned earlier, the Climate Change Act does not create a hierarchy where climate considerations outweigh or alter statutory planning duties and environmental and AONB protections. Climate targets should be considered in the balancing of impacts and benefits in making a final decision, not prior to a landscape visual impact assessment.

14. It is notable that the planning report details that the Council's planning team share the community's concerns regarding the visual impact of the proposal.

15. Local communities feel they are being thrown under the bus, that the area is on the tipping point of being saturated and turned into "one big wind factory", with no thought for the people living here, that their concerns are not being listened to, and cumulative impact and collective loss of local landmarks, culture, heritage, sense of place and local identity has not been properly assessed or considered.

16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as 'Benbradagh's crown o'er Dungiven town', and the well known ballad 'Finvola The Gem of the Roe' about the daughter of Dermot O'Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. 'Hill of Thieves' is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven.

The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry – PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedspaces

within a 4.3mile radius of Dungiven (see spreadsheet attached), and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

The ES assessment, in the community's opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that *"the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost"* –concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment effortsand initiatives to promote it as a landmark destination and Dungiven as "Gateway to the Sperrins". In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.

19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name:

Address:

Sent from [Outlook for iOS](#)

Laura Crawford

From: eugene kerlin
Sent: 23 September 2025 22:52
To: Planning
Subject: Planning application ref. LA01/2023/0008/F – Brishey windfarm

From: Fidelma O'Kane < >
Sent: 24 September 2025 00:13
To: Niamh Archibald; Sean Bateson; Steven Callaghan; Brenda Chivers; Mark Fielding; Richard Holmes; Dawn Huggins; Michelle Knight-McQuillan; Allister Kyle; Amy Mairs; Jonathan McAuley; John McAuley; Peter McCully; Margaret Anne McKillop; Cara McShane; Ashleen Schenning; Richard Stewart; Tanya Elder; Sean McGlinchey; Darryl Wilson; John Wisener; Ivor Wallace; Maighréad Watson; Leanne Peacock; Planning
Subject: Benbradagh Wind Farm LA01/2023/0008/F

Dear Councillor

Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

I am writing to urge you to call on the Planning Committee to refuse the planning application LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

Renewable energy must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below are my concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation under the Espoo Convention. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
5. Failure to provide updated information:
 - i. The developer has failed to provide updated emission calculations for the reduced scheme.
 - ii. The developer has failed to provide updated electricity generation capacity (MW) figures for the reduced scheme.

iii. The developer has failed to provide an updated ES economic statement to reflect the revised reduced scheme – construction costs, benefit to the local economy, financial benefits to landowners, rates contributions etc.

The absence of the above information renders the application and the EIA as incomplete. The benefits of the scheme cannot be accurately assessed without this information and thus a balanced decision cannot be properly undertaken. This is a major application in which there is very significant public interest. Updated revised information which is required as part of the ES, must be provided, and must also be advertised to the public.

(*Based on outdated ES Chapter 3 Socio-Economic Impacts, para. 3.7, given the fact that the remaining four turbines are downslope from the two removed, it can be assumed that these will be at the lower end of the stated capacity: 3.45 - 4.80 MW per turbine, thus the proposed development will contribute circa $3.45\text{MW} \times 4 = 13.8\text{MW}$, not the 28.8MW currently stated in the Planning report).

6. The Climate Change Act (Northern Ireland) 2022 - creates a statutory duty on “Northern Ireland departments” to ensure emissions targets are met (as detailed in Section 52), but does NOT create a statutory duty on local councils (or the PAC). Thus to give determining weight to climate targets would be potentially a legal misapplication by the Council. The Act requires emissions reductions and renewable electricity consumption targets but does not create a hierarchy where climate considerations outweigh statutory planning duties and environmental and AONB protections.

7. The applicant presents the scheme as “green energy”, but the carbon account ignores the full lifecycle emissions: peat oxidation, concrete and steel foundations, grid infrastructure, and the unresolved problem of turbine decommissioning and blade waste. These impacts must be considered as part of the overall balance.

8. There is widespread cross-community opposition to the proposed development with nearly 1300 objections submitted to date. The Roe Valley is becoming increasingly encircled with wind turbines - in addition to what is currently visible there are three consented windfarms that have not yet been built - Rigged Hill Repowering, Ballyhanedin, and Smulgedon - all with turbines 150m (500feet) high. There is also a cluster of single wind turbines scattered along the foot of Benbradagh. (In addition, Maghermore windfarm at Banagher has also recently received consent, although this PAC decision may be subject to a future Judicial Review).

9. The proposal fails to comply with SPG advice on separation distances between windfarms. Planning policy (SPPS, PPS18) requires safeguarding of our distinctive skylines and for cumulative impacts of wind energy developments to be assessed so as to avoid cumulative harm and saturation. The iconic landmark character of the Benbradagh and the very wide visibility from within the Roe valley, requires specific distances between windfarms that this proposal does not comply with. Distances to Smulgedon windfarm and the cluster of single turbines around Dungiven have not been assessed or considered.

10. The proposed development of four industrial-scale, 150m (500 feet) high turbines would breach the distinctive and celebrated ridgeline of Benbradagh that is protected under planning policy (LCA 36), and would be highly visible throughout the area, as can be very clearly seen in the applicant's Zone of Theoretical Visibility Map Figure 10.15, attached, (which can be found on the planning portal). This diagram confirms that the giant blades/ rotors would be clearly visible throughout most of Dungiven and beyond in outlying areas up to 10-15km away.

Other ZTVs show that the hubs would be fully visible up to Derrychrier in the highly important transient view of Benbradagh when approaching Dungiven from the west on the new A6.

11. Of critical importance is scale of the proposed turbines – they are larger than anything built or consented to date in Northern Ireland. They will have a blade radius of 68m and rotor diameter/ swept path of 136m, which is 1.7 x larger than the radius and diameter of the existing turbines in Evishagaran windfarm, which already are enormous in scale and impact when viewed coming over the Glenshane Pass.(Evishagaran turbines are radius 40m, and rotor diameter/ sweep 80m).

12. The breach of the ridgeline would open the floodgates for further encroachment and development along the ridgeline in terms of visual impact and landscape character considerations. This is already evidenced by the variations of turbines the applicant has explored for this

application site – 12no. in their PAN submission to the Department of Infrastructure on 22nd September 2020; 6no. in the initial submitted planning application, and now the reduced scheme of 4no. in the hope of getting a foothold for further development.

Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and 2, and the pre-application community consultation event carried out in August 2024 signaling a further extension to the south of the existing Evishagaran windfarm.

13. NIEA Countryside and Coast Landscape Team (CC&L) submitted two polar-opposite responses to the 4no. turbine scheme - despite both the scheme and planning policy being the same at the date of each response (22nd April 2024 and 30th April 2025).

The applicant alleged in their letter of 17 October 2024, directed to NIEA CC&L and the Council, that the reduced 4 turbine scheme submitted December 2023/ January 2024 had addressed community concerns - this is absolutely not the case and incorrect, and as such renders NIEA CC&L's second response invalid. The community continues to oppose this application.

In addition as mentioned earlier, the Climate Change Act does not create a hierarchy where climate considerations outweigh or alter statutory planning duties and environmental and AONB protections. Climate targets should be considered in the balancing of impacts and benefits in making a final decision, not prior to a landscape visual impact assessment.

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The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry – PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/ decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedspaces

within a 4.3mile radius of Dungiven, and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

The ES assessment, in the community's opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that *"the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost"* –concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as "Gateway to the Sperrins". In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.

19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,
Fidelma O'Kane
384 Crockanboy Road,
Omagh.
Co. Tyrone
BT79 9AF

Sent from my iPad

Laura Crawford

From: Gemma Brolly <
Sent: 23 September 2025 23:23
To: David Jackson
Cc: Niamh Archibald; Sean Bateson; Steven Callaghan; Brenda Chivers; Mark Fielding; Richard Holmes; Dawn Huggins; Michelle Knight-McQuillan; Allister Kyle; Amy Mairs; Jonathan McAuley; John McAuley; Peter McCully; Margaret Anne McKillop; Cara McShane; Ashleen Schenning; Richard Stewart; Tanya Elder; Sean McGlinchey; Darryl Wilson; John Wisener; Ivor Wallace; Maighr  ad Watson; Leanne Peacock; Planning
Subject: Brishey Objection LA01/2023/0008/F
Attachments: Brishey objection 23.09.25.docx

Dear Chief Executive,

I hope this message finds you well.

Please find attached my detailed submission regarding the planning application LA01/2023/0008/F for the proposed Brishey wind farm on Benbradagh, which is due for determination on 24th September.

I am writing not only as Deputy Leader of Aont   but as someone with deep respect for our history, our land, and our communities. This application raises profound concerns for public health, the environment, and our cultural heritage. Benbradagh is more than a landscape feature—it is a landmark of ecological importance, spiritual significance, and a symbol of identity for generations in the Roe Valley.

I respectfully ask that you, as Chair, ensure the strength of community opposition and the serious legal, environmental, and cultural grounds for refusal are fully considered.

Thank you for your time and leadership on this matter.

Le meas,
Gemma Brolly
Deputy Leader, Aont  

Re: Planning application ref. LA01/2023/0008/F – Brishey Windfarm

Dear Councillors,

As Deputy Leader of Aontú, I speak not only from a position of leadership, but from a place of deep-rooted respect for our history, our land, and the legacy of those who fought to protect and nurture it. I am steadfastly committed to the preservation of our natural environment—especially our vulnerable peatlands and the bird species now facing significant threat, I write to urge you to refuse planning permission for application LA01/2023/0008/F for the proposed Brishey wind farm on Benbradagh.

While I recognise the need for renewable energy, I believe in such a concept as ‘balance’. I believe renewables must not come at the expense of the very landscapes, habitats, and communities they claim to protect. This proposal threatens our environment, our health, our heritage, and our sense of place. On balance, its damage outweighs its modest energy contribution.

Below are my concerns, including recent planning precedents that underline why refusal is necessary:

1. Community Concerns: Radiation & Contamination

Serious concerns about contamination and radiation legacy (including Chernobyl fallout) have been raised with CCGC Planning, the CCGC Chief Executive, NIEA, and others (30 May and 17 Sept). Yet these have not been addressed in the final Habitat Regulations Assessment (HRA). This renders the HRA incomplete.

The Sperrins already have significantly higher cancer rates than elsewhere in the North. Fears that disturbing peat will release contamination are not unfounded.

2. Peatlands: Carbon Stores & Radioactive Legacy

The site is within sensitive peatland connected to the River Roe SAC. Peat is a vital carbon store, but it also traps Cs-137 radionuclides. Disturbance risks pollution downstream.

Legal precedent: the Mynydd y Gwair wind farm (Wales) was overturned by appeal judges due to harm to peat bog habitats. Protecting peat is not optional—it is a legal and environmental necessity.

3. Transboundary Impacts

The River Roe and Tributaries SAC flows into Lough Foyle—international waters shared with the Republic of Ireland. There is no evidence of the required notification or consultation with the Republic.

4. Failure of Environmental Assessment Duties

Environmental impacts must be fully assessed before approval. The Council, as competent authority, is legally responsible for ensuring the robustness of the HRA.

Climate targets under the NI Climate Change Act do not override statutory obligations to safeguard health, habitats, and heritage.

5. Absence of Updated Information

The developer has failed to provide:

- i. Updated emission calculations for the reduced scheme.
- ii. Updated generation capacity figures.
- iii. An updated ES economic statement reflecting the reduced scheme.

These omissions render the application and EIA incomplete. Courts have quashed applications for similar failures—for example, the Coole Wind Farm (Westmeath, 2025), where omission of a grid connection in the EIA notice invalidated the approval.

6. Statutory Context: Climate Duties

The Climate Change Act (NI) 2022 places obligations on Departments, not councils. Giving determining weight to climate targets here would be a misapplication.

7. Full Carbon Account Ignored

The scheme's carbon account ignores peat oxidation, steel/concrete emissions, grid infrastructure, and turbine decommissioning/blade waste. These lifecycle costs undermine its "green" credentials.

8. Scale of Opposition

Nearly 1,300 objections have been submitted. Three other consented but unbuilt windfarms already surround Roe Valley. Maghermore windfarm was only recently consented, and may yet face judicial review.

9. Cumulative & Policy Breaches

PPS18 and SPPS require cumulative impacts and skyline protection to be assessed. Distances to Smulgedon and local turbines have not been assessed.

Failure to comply with separation guidance undermines compliance with policy.

10–12. Landscape & Ridgeline Breach

10. Four 150m turbines would breach the distinctive ridgeline of Benbradagh (LCA 36), dominating views across Dungiven and beyond.

11. The proposed turbines are unprecedented in scale for Northern Ireland—rotor diameters 1.7x larger than Evishagaran's already enormous machines.

12. Approval risks setting a precedent, paving the way for further encroachment along the ridgeline. Similar patterns have occurred elsewhere (Altahullion 1 → Altahullion 2; Glenconway 1 → Glenconway 2).

13–14. Inconsistent Agency Responses

13. NIEA’s contradictory landscape responses undermine confidence in the process.

14. The Council’s own planning report acknowledges visual impact concerns.

15. Community Impact: Saturation & Identity

Locals fear being “sacrificed” to a wind factory with no regard for cumulative impact.

Loss of cultural landmarks and sense of place has been recognised as material (e.g. Doraville Wind Farm Inquiry, PAC 2018/C007).

16. Cultural & Spiritual Significance of Benbradagh

Benbradagh (Hill of Thieves) in the Sperrins AONB is iconic, revered in folklore, song, and poetry—linked with Dermot O’Cahan, Finvola, and Grainne Rua.

It is embedded in family histories, photos, and the identity of Dungiven. Industrialisation of such a landscape cannot be reconciled with heritage duties.

Precedent: the Keirs Hill Wind Farm (Scotland) was refused due to impacts on historic sites and landscape setting.

17. Flawed Pre-Application Consultation

As a resident close to the Garvagh area who would normally view local events particularly for Garvagh Community Centre and Glenullin Resource Centre, I can confirm neither myself or any of my family or friends recall seeing these ‘adverts’ which it must be said were placed in media, not read locally; leaflets only covered 2km (mostly uninhabited land). The Dungiven community was excluded and only learned of the plan months later. This lack of meaningful engagement has not only excluded key communities but has also fostered deep suspicion around the process itself. The selective communication and limited outreach have caused significant damage to public trust in the planning system.

18. Tourism Impacts Ignored

The ES dismisses local tourism, despite 470+ bedspaces within 4.3 miles of Dungiven.

Tourism here is landscape-dependent and growing post-Covid. Benbradagh is a marketing asset—its desecration risks economic harm.

PAC refused Doraville windfarm partly on adverse impact on AONB and tourism.

19–20. Rural Needs & Equality Duties

19. The Rural Needs Act requires social/economic needs of rural communities be considered. This proposal risks undermining tourism and amenity.

20. Section 75 (NI Act 1998) requires equality screening. There is no evidence this has been done, despite impacts on vulnerable groups (children, elderly, ill health).

Benbradagh is sacred ground—ecologically, culturally, and spiritually. Courts across Ireland, Britain, and Europe have consistently upheld refusals of wind farms where peatlands, habitats, heritage, or inadequate assessments were at stake. The same principles apply here.

I urge the Committee to stand with the community, respect the law, and refuse permission for application LA01/2023/0008/F. To grant it would not only scar Benbradagh for generations but also invite legal challenge for failure to uphold statutory obligations.

I hope the Committee will listen not just to technical reports, but to the voices of those whose ancestors walked these hills, whose children will inherit our land, and who understand that some things are too precious to sacrifice.

Yours sincerely,

Gemma Brolly
Aontú Deputy Leader

Laura Crawford

From: Helen Murphy < >
Sent: 24 September 2025 00:19
To: Planning
Subject: Benbradagh Wind Farm – LA01/2023/0008/F
Attachments: geraldine & Donal Ocallaghan.docx; heather Currie & Euan Lang.docx; maggie Connolly & family.docx; maire & Mike buckley.docx; Marina Gillen.docx; The Grant family.docx; Mc Kinley family.docx

Please see enc objections

Dear Sir/madam

Re: Planning application ref. LA01/2023/0008/F – Brishey windfarm

We are writing to register the strongest possible objection to the proposed construction of a wind farm and associated infrastructure at Brishey

The construction of high turbines will we feel completely and permanently alter this landscape of beautiful scenery with breath taking views and greatly impair the peace and enjoyment of this area. We find that the choice of this site inappropriate and unacceptable in terms of visual impact, and consequently the associated noise levels. The area will be saturated with turbines.

Seriously the construction of 150m high turbines will we feel, completely and permanently alter this landscape of beautiful scenery with breath taking views and greatly impair the peace and enjoyment of this area, which we as a family enjoy immensely for a weekend stroll or hike. Why can you not put them some where else like out at sea where they will not harm anyone, and are visually less obtrusive, and where they have been shown to be more efficient and productive. We are not happy about this at all.

From: Philip Williamson <
Sent: 23 September 2025 22:52
To: Planning
Subject: Fwd: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to call for the Planning Committee to refuse the planning application LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
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ii. The developer has failed to provide updated electricity generation capacity (MW) figures for the reduced scheme.

iii. The developer has failed to provide an updated ES economic statement to reflect the revised reduced scheme – construction costs, benefit to the local economy, financial benefits to landowners, rates contributions etc.

The absence of the above information renders the application and the EIA as incomplete. The benefits of the scheme cannot be accurately assessed without this information and thus a balanced decision cannot be properly undertaken. This is a major application in which there is very significant public interest. Updated revised information which is required as part of the ES, must be provided, and must also be advertised to the public.

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Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and 2, and the pre-application community consultation event carried out in August 2024 signaling a further extension to the south of the existing Evishagaran windfarm.

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In addition as mentioned earlier, the Climate Change Act does not create a hierarchy where climate considerations outweigh or alter statutory planning duties and environmental and AONB protections. Climate targets should be considered in the balancing of impacts and benefits in making a final decision, not prior to a landscape visual impact assessment.

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15. Local communities feel they are being thrown under the bus, that the area is on the tipping point of being saturated and turned into "one big wind factory", with no thought for the people living here, that their concerns are not being listened to, and cumulative impact and collective loss of local landmarks, culture, heritage, sense of place and local identity has not been properly assessed or considered.

16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as 'Benbradagh's crown o'er Dungiven town', and the well known ballad 'Finvola The Gem of the Roe' about the daughter of Dermot O'Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. 'Hill of Thieves' is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven.

The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry –PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/ decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedspaces within a 4.3mile radius of Dungiven (see spreadsheet attached), and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

The ES assessment, in the community's opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that *"the outlook for tourism in Ireland will be bleak if*

an essential component – beautiful and unspoilt scenery – is lost” – concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as “Gateway to the Sperrins”. In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.

19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Hazel and Adam Williamson

Address: 93 Dergenagh Road Dungannon, BT70 1TW

Laura Crawford

From: Helen Murphy >
Sent: 24 September 2025 00:19
To: Planning
Subject: Benbradagh Wind Farm – LA01/2023/0008/F
Attachments: geraldine & Donal Ocallaghan.docx; heather Currie & Euan Lang.docx; maggie Connolly & family.docx; maire & Mike buckley.docx; Marina Gillen.docx; The Grant family.docx; Mc Kinley family.docx

Please see enc objections

96a Dunboe Rd,

Macosquin

Coleraine

BT51 4JS

20/09/2025

Dear Sir/madam

Re: Planning application ref. LA01/2023/0008/F – Brishey windfarm

We are writing to register the strongest possible objection to the proposed construction of a wind farm and associated infrastructure at Brishey

The construction of high turbines will we feel completely and permanently alter this landscape of beautiful scenery with breath taking views and greatly impair the peace and enjoyment of this area. We find that the choice of this site inappropriate and unacceptable in terms of visual impact, and consequently the associated noise levels. The area will be saturated with turbines.

Yours faithfully

From: Helen Murphy
Sent: 23 September 2025 23:18
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm- OBJECTION

Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

As member(s) of the Dungiven and Roe Valley community, we are writing to urge you to call on the Planning Committee to refuse the planning application iLA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
5. Failure to provide updated information:
 - i. The developer has failed to provide updated emission calculations for the reduced scheme.
 - ii. The developer has failed to provide updated electricity generation capacity (MW) figures for the reduced scheme.
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Ballyhanedin, and Smulgedon - all with turbines 150m (500feet) high. There is also a cluster of single wind turbines scattered along the foot of Benbradagh. (In addition, Maghermore windfarm at Banagher has also recently received consent, although this PAC decision may be subject to a future Judicial Review).

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IWe respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Helen, Declan and Bronagh murphy

Address: 16 Drumbane rd Dungiven bt474qs

From: Carmel McReynolds
Sent: 23 September 2025 22:20
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

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16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as ‘Benbradagh’s crown o’er Dungiven town’, and the well known ballad ‘Finvola The Gem of the Roe’ about the daughter of Dermot O’Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. ‘Hill of Thieves’ is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven.

The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

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I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Jackie and Gareth Williamson

Address: 435 Tempo Rd, Doon, Bt943gq

From: Philip Williamson
Sent: 23 September 2025 22:54
To: Planning
Subject: Fwd: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to call for the Planning Committee to refuse the planning application LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
5. Failure to provide updated information:
 - i. The developer has failed to provide updated emission calculations for the reduced scheme.

ii. The developer has failed to provide updated electricity generation capacity (MW) figures for the reduced scheme.

iii. The developer has failed to provide an updated ES economic statement to reflect the revised reduced scheme – construction costs, benefit to the local economy, financial benefits to landowners, rates contributions etc.

The absence of the above information renders the application and the EIA as incomplete. The benefits of the scheme cannot be accurately assessed without this information and thus a balanced decision cannot be properly undertaken. This is a major application in which there is very significant public interest. Updated revised information which is required as part of the ES, must be provided, and must also be advertised to the public.

(*Based on outdated ES Chapter 3 Socio-Economic Impacts, para. 3.7, given the fact that the remaining four turbines are downslope from the two removed, it can be assumed that these will be at the lower end of the stated capacity: 3.45 - 4.80 MW per turbine, thus the proposed development will contribute circa $3.45\text{MW} \times 4 = 13.8\text{MW}$, not the 28.8MW currently stated in the Planning report).

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Yours sincerely,

Name: Jamie and Sarah Williamson

Address: 7 Royal Hill, Maze, Lisburn

From: Joe brady
Sent: 23 September 2025 22:37
To: Niamh Archibald; Sean Bateson; Steven Callaghan; Brenda Chivers; Mark Fielding; Richard Holmes; Dawn Huggins; Michelle Knight-McQuillan; Allister Kyle; Amy Mairs; Jonathan McAuley; John McAuley; Peter McCully; Margaret Anne McKillop; Cara McShane; Ashleen Schenning; Richard Stewart; Tanya Elder; Sean McGlinchey; Darryl Wilson; John Wisener; Ivor Wallace; Maighr  ad Watson; Leanne Peacock; Planning
Subject: Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

Dear Councillor

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I respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,
Joe Brady
Rannnyglas,
Dungiven
BT47 4NE

Sent from my iPhone

From: keith.kelly49
Sent: 23 September 2025 21:15
To: Niamh Archibald; Sean Bateson; Steven Callaghan; Brenda Chivers; Mark Fielding; Richard Holmes; Dawn Huggins; Michelle Knight-McQuillan; Allister Kyle; Amy Mairs; Jonathan McAuley; John McAuley; Peter McCully; Margaret Anne McKillop; Cara McShane; Ashleen Schenning; Richard Stewart; Tanya Elder; Sean McGlinchey; Darryl Wilson; John Wisener; Ivor Wallace; Maighr  ad Watson; Leanne Peacock; Planning
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1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
5. Failure to provide updated information:
 - i. The developer has failed to provide updated emission calculations for the reduced scheme.
 - ii. The developer has failed to provide updated electricity generation capacity (MW) figures for the reduced scheme.

iii. The developer has failed to provide an updated ES economic statement to reflect the revised reduced scheme – construction costs, benefit to the local economy, financial benefits to landowners, rates contributions etc.

The absence of the above information renders the application and the EIA as incomplete. The benefits of the scheme cannot be accurately assessed without this information and thus a balanced decision cannot be properly undertaken. This is a major application in which there is very significant public interest. Updated revised information which is required as part of the ES, must be provided, and must also be advertised to the public.

(*Based on outdated ES Chapter 3 Socio-Economic Impacts, para. 3.7, given the fact that the remaining four turbines are downslope from the two removed, it can be assumed that these will be at the lower end of the stated capacity: 3.45 - 4.80 MW per turbine, thus the proposed development will contribute circa $3.45\text{MW} \times 4 = 13.8\text{MW}$, not the 28.8MW currently stated in the Planning report).

6. The Climate Change Act (Northern Ireland) 2022 - creates a statutory duty on “Northern Ireland departments” to ensure emissions targets are met (as detailed in Section 52), but does NOT create a statutory duty on local councils (or the PAC). Thus to give determining weight to climate targets would be potentially a legal misapplication by the Council. The Act requires emissions reductions and renewable electricity consumption targets but does not create a hierarchy where climate considerations outweigh statutory planning duties and environmental and AONB protections.

7. The applicant presents the scheme as “green energy”, but the carbon account ignores the full lifecycle emissions: peat oxidation, concrete and steel foundations, grid infrastructure, and the unresolved problem of turbine decommissioning and blade waste. These impacts must be considered as part of the overall balance.

8. There is widespread cross-community opposition to the proposed development with nearly 1300 objections submitted to date. The Roe Valley is becoming increasingly encircled with wind turbines - in addition to what is currently visible there are three consented windfarms that have not yet been built - Rigged Hill Repowering, Ballyhanedin, and Smulgedon - all with turbines 150m (500feet) high. There is also a cluster of single wind turbines scattered along the foot of Benbradagh. (In addition, Maghermore windfarm at Banagher has also recently received consent, although this PAC decision may be subject to a future Judicial Review).

9. The proposal fails to comply with SPG advice on separation distances between windfarms. Planning policy (SPPS, PPS18) requires safeguarding of our distinctive skylines and for cumulative impacts of wind energy developments to be assessed so as to avoid cumulative harm and saturation. The iconic landmark character of the Benbradagh and the very wide visibility from within the Roe valley, requires specific distances between windfarms that this proposal does not comply with. Distances to Smulgedon windfarm and the cluster of single turbines around Dungiven have not been assessed or considered.

10. The proposed development of four industrial-scale, 150m (500 feet) high turbines would breach the distinctive and celebrated ridgeline of Benbradagh that is protected under planning policy (LCA 36), and would be highly visible throughout the area, as can be very clearly seen in the applicant’s Zone of Theoretical Visibility Map Figure 10.15, attached, (which can be found on the planning portal). This diagram confirms that the giant blades/ rotors would be clearly visible throughout most of Dungiven and beyond in outlying areas upto over 10-15km away.

Other ZTVs show that the hubs would be fully visible upto Derrychrier in the highly important transient view of Benbradagh when approaching Dungiven from the west on the new A6.

11. Of critical importance is scale of the proposed turbines – they are larger than anything built or consented to date in Northern Ireland. They will have a blade radius of 68m and rotor diameter/ swept path of 136m, which is 1.7 x larger than the radius and diameter of the existing turbines in Evishagaran windfarm, which already are enormous in scale and impact when viewed coming over the Glenshane Pass.(Evishagaran turbines are radius 40m, and rotor diameter/ sweep 80m).

12. The breach of the ridgeline would open the floodgates for further encroachment and development along the ridgeline in terms of visual impact and landscape character considerations. This is already

evidenced by the variations of turbines the applicant has explored for this application site – 12no. in their PAN submission to the Department of Infrastructure on 22nd September 2020; 6no. in the initial submitted planning application, and now the reduced scheme of 4no. in the hope of getting a foothold for further development.

Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and 2, and the pre-application community consultation event carried out in August 2024 signaling a further extension to the south of the existing Evishagaran windfarm.

13. NIEA Countryside and Coast Landscape Team (CC&L) submitted two polar-opposite responses to the 4no. turbine scheme - despite both the scheme and planning policy being the same at the date of each response (22nd April 2024 and 30th April 2025).

The applicant alleged in their letter of 17 October 2024, directed to NIEA CC&L and the Council, that the reduced 4 turbine scheme submitted December 2023/ January 2024 had addressed community concerns - this is absolutely not the case and incorrect, and as such renders NIEA CC&L's second response invalid. The community continues to oppose this application.

In addition as mentioned earlier, the Climate Change Act does not create a hierarchy where climate considerations outweigh or alter statutory planning duties and environmental and AONB protections. Climate targets should be considered in the balancing of impacts and benefits in making a final decision, not prior to a landscape visual impact assessment.

14. It is notable that the planning report details that the Council's planning team share the community's concerns regarding the visual impact of the proposal.

15. Local communities feel they are being thrown under the bus, that the area is on the tipping point of being saturated and turned into "one big wind factory", with no thought for the people living here, that their concerns are not being listened to, and cumulative impact and collective loss of local landmarks, culture, heritage, sense of place and local identity has not been properly assessed or considered.

16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as 'Benbradagh's crown o'er Dungiven town', and the well known ballad 'Finvola The Gem of the Roe' about the daughter of Dermot O'Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. 'Hill of Thieves' is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven. The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities. The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry – PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism

impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedspaces within a 4.3mile radius of Dungiven (see spreadsheet attached), and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

The ES assessment, in the community's opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that "the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost" –concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as "Gateway to the Sperrins". In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.

19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,
Name: Keith Kelly
Address: 49 lackagh park
Dungiven

Laura Crawford

From: lucia mccloskey
Sent: 24 September 2025 00:55
To: Planning
Cc: Niamh Archibald; Sean Bateson; Steven Callaghan; Brenda Chivers; Mark Fielding; Richard Holmes; Dawn Huggins; Michelle Knight-McQuillan; Allister Kyle; Amy Mairs; Jonathan McAuley; John McAuley; Peter McCully; Margaret Anne McKillop; Cara McShane; Ashleen Schenning; Richard Stewart; Tanya Elder; Sean McGlinchey; Darryl Wilson; John Wisener; Ivor Wallace; Maighr  ad Watson; Leanne Peacock; Planning
Subject: Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

From: Carmel McReynolds
Sent: 23 September 2025 22:10
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to call for the Planning Committee to refuse the planning application LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
5. Failure to provide updated information:
 - i. The developer has failed to provide updated emission calculations for the reduced scheme.
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The potential for a proposed development to detract from local people’s sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry –PAC ref no.2018/C007, para 10.116.
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I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Lynsey and Ryan Thompson

Address: Boyagh, Porthall, Lifford

From: Mabel Campbell
Sent: 24 September 2025 07:07
To: Niamh Archibald; Sean Bateson; Steven Callaghan; Brenda Chivers; Mark Fielding; Richard Holmes; Dawn Huggins; Michelle Knight-McQuillan; Allister Kyle; Amy Mairs; Jonathan McAuley; John McAuley; Peter McCully; Margaret Anne McKillop; Cara McShane; Ashleen Schenning; Richard Stewart; Tanya Elder; Sean McGlinchey; Darryl Wilson; John Wisener; Ivor Wallace; Maighréad Watson; Leanne Peacock; Planning
Subject: Objection to Benbradagh Wind Farm LA01/2023/0008/F

Dear Councillor

Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

As a resident of the Sperrins Area of Outstanding Natural Beauty I am writing to urge you to call on the Planning Committee to refuse the planning application iLA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

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12. The breach of the ridgeline would open the floodgates for further encroachment and development along the ridgeline in terms of visual impact and landscape character considerations. This is already evidenced by the variations of turbines the applicant has explored for this application site – 12no. in their PAN submission to the Department of Infrastructure on 22nd September 2020; [6no.in](#) the initial submitted planning application, and now the reduced scheme of 4no. in the hope of getting a foothold for further development.

Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and 2, and the pre-application community consultation event carried out in August 2024 signaling a further extension to the south of the existing Evishagaran windfarm.

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The applicant alleged in their letter of 17 October 2024, directed to NIEA CC&L and the Council, that the reduced 4 turbine scheme submitted December 2023/ January 2024 had addressed community concerns - this is absolutely not the case and incorrect, and as such renders NIEA CC&L's second response invalid. The community continues to oppose this application.

In addition, as mentioned earlier, the Climate Change Act does not create a hierarchy where climate considerations outweigh or alter statutory planning duties and environmental and AONB protections. Climate targets should be considered in the balancing of impacts and benefits in making a final decision, not prior to a landscape visual impact assessment.

14. It is notable that the planning report details that the Council's planning team share the community's concerns regarding the visual impact of the proposal.

15. Local communities feel they are being thrown under the bus, that the area is on the tipping point of being saturated and turned into "one big wind factory", with no thought for the people living here, that their concerns are not being listened to, and cumulative impact and collective loss of local landmarks, culture, heritage, sense of place and local identity has not been properly assessed or considered.

16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as 'Benbradagh's crown o'er Dungiven town', and the well known ballad 'Finvola The Gem of the Roe' about the daughter of Dermot O'Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. 'Hill of Thieves'" is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven.

The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry –PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/ decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

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The ES assessment, in the community's opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that *"the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost"* – concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of the same was cited as a determining factor in PAC decision for Doraville wind farm.

Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as "Gateway to the Sperrins". In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.

19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Mabel Campbell

Address: 28 Bradkeel Road. Plumbridge. BT798BJ

Laura Crawford

From: Helen Murphy
Sent: 24 September 2025 00:19
To: Planning
Subject: Benbradagh Wind Farm – LA01/2023/0008/F
Attachments: geraldine & Donal Ocallaghan.docx; heather Currie & Euan Lang.docx; maggie Connolly & family.docx; maire & Mike buckley.docx; Marina Gillen.docx; The Grant family.docx; Mc Kinley family.docx

Please see enc objections

17/09/25

Reference *Brishey Windfarm proposal*-Benbradagh Wind Farm –
LA01/2023/0008/F

Dear Sir/Madam,

We often visit the Dungiven area from County Monaghan to tour around the Sperrins during the summer holidays with our kids. We wish to object to the proposed turbines in Benbradagh. The Sperrin AONB was first designated in 1968 and encompasses a largely mountainous area. It is essential to ensure that this area continues to be an asset for future generations to enjoy, and that the population at large can enjoy its qualities. 'Government's Departments and district councils have a statutory duty to have regard for the need to conserve the natural beauty and amenity of the countryside' <https://www.daera-ni.gov.uk/articles/>. (1) We have so much to learn from our landscape and we believe it should have protected status. Areas of outstanding natural beauty should not be blighted by industrial sized turbines for the benefit of a handful of farmers, and multi-millionaire wind turbine companies who really do not care about the Sperrins or its future.

Yours faithfully,

Maggie, Sean and Niall Connolly

Co Monaghan

(1) Sperrin area of outstanding natural beauty <https://www.daera-ni.gov.uk/articles/sperrin-area-outstanding-natural-beauty>

From: Carmel McReynolds
Sent: 23 September 2025 22:07
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to call for the Planning Committee to refuse the planning application LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
5. Failure to provide updated information:
 - i. The developer has failed to provide updated emission calculations for the reduced scheme.
 - ii. The developer has failed to provide updated electricity generation capacity (MW) figures for the reduced scheme.
 - iii. The developer has failed to provide an updated ES economic statement to reflect the revised reduced scheme – construction costs, benefit to the local economy, financial benefits to landowners, rates contributions etc.

The absence of the above information renders the application and the EIA as incomplete. The benefits of the scheme cannot be accurately assessed without this information and thus a balanced decision cannot be properly undertaken. This is a major application in which there is very significant public interest. Updated revised information which is required as part of the ES, must be provided, and must also be advertised to the public.

(*Based on outdated ES Chapter 3 Socio-Economic Impacts, para. 3.7, given the fact that the remaining four turbines are downslope from the two removed, it can be assumed that these will be at the lower end of the stated capacity: 3.45 - 4.80 MW per turbine, thus the proposed development will contribute circa 3.45MW x 4 = 13.8MW, not the 28.8MW currently stated in the Planning report).

6. The Climate Change Act (Northern Ireland) 2022 - creates a statutory duty on "Northern Ireland departments" to ensure emissions targets are met (as detailed in Section 52), but does NOT create a statutory duty on local councils (or the PAC). Thus to give determining weight to climate targets would be potentially a legal misapplication by the Council. The Act requires emissions reductions and renewable electricity consumption targets but does not create a hierarchy where climate considerations outweigh statutory planning duties and environmental and AONB protections.
7. The applicant presents the scheme as "green energy", but the carbon account ignores the full lifecycle emissions: peat oxidation, concrete and steel foundations, grid infrastructure, and the unresolved problem of turbine decommissioning and blade waste. These impacts must be considered as part of the overall balance.
8. There is widespread cross-community opposition to the proposed development with nearly 1300 objections submitted to date. The Roe Valley is becoming increasingly encircled with wind turbines - in addition to what is currently visible there are three consented windfarms that have not yet been built - Rigged Hill Repowering, Ballyhanedin, and Smulgedon - all with turbines 150m (500feet) high. There is also a cluster of single wind turbines scattered along the foot of Benbradagh. (In addition, Maghermore windfarm at Banagher has also recently received consent, although this PAC decision may be subject to a future Judicial Review).
9. The proposal fails to comply with SPG advice on separation distances between windfarms. Planning policy (SPPS, PPS18) requires safeguarding of our distinctive skylines and for cumulative impacts of wind energy developments to be assessed so as to avoid cumulative harm and saturation. The iconic landmark character of the Benbradagh and the very wide visibility from within the Roe valley, requires specific distances between windfarms that this proposal does not comply with. Distances to Smulgedon windfarm and the cluster of single turbines around Dungiven have not been assessed or considered.
10. The proposed development of four industrial-scale, 150m (500 feet) high turbines would breach the distinctive and celebrated ridgeline of Benbradagh that is protected under planning policy (LCA 36), and would be highly visible throughout the area, as can be very clearly seen in the applicant's Zone of Theoretical Visibility Map Figure 10.15, attached, (which can be found on the planning portal). This diagram confirms that the giant blades/ rotors would be clearly visible throughout most of Dungiven and beyond in outlying areas up to over 10-15km away.

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I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Maire Kerr

Address: 19 Lough View Court, Loughmacrory, Omagh

From: Carmel McReynolds
Sent: 23 September 2025 21:57
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

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18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedspaces within a 4.3mile radius of Dungiven (see spreadsheet attached), and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

The ES assessment, in the community’s opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that “*the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost*” – concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as “Gateway to the Sperrins”. In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.
19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.
20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Majella and Sean Mc Kinney

Address: 18 Petrie Way, Culmore Rd, Derry , Bt48 8pw

Laura Crawford

From: Helen Murphy
Sent: 24 September 2025 00:19
To: Planning
Subject: Benbradagh Wind Farm – LA01/2023/0008/F
Attachments: geraldine & Donal Ocallaghan.docx; heather Currie & Euan Lang.docx; maggie Connolly & family.docx; maire & Mike buckley.docx; Marina Gillen.docx; The Grant family.docx; Mc Kinley family.docx

Please see enc objections

17 Fairhead view

Ballycastle,

Bt54 6LU

Benbradagh Wind Farm – LA01/2023/0008/F

Dear Sir/Madam,

We often visit the Dungiven area to tour around the Sperrins as a family, whilst staying in local Airbnb' s. We wish to object to the proposed turbines in benbradagh mountain range. As a family group, we often go walking with our two dogs and bring a picnic with us. If this went ahead, we would no longer choose to come here and stay, and would bring our trade somewhere else, which would be more peaceful. These industrial size turbines are a bloody eyesore, a visual disturbance, and would create excessive noise, day and night, thereby reducing the peaceful character of the area. We have seen their detrimental effects elsewhere. We have family members who live near one and they are tortured by shadow flicker. We visit this area to relax and unwind visiting local eateries as well as the Roe valley country park.

Yours faithfully,

Laura Crawford

From: Helen Murphy
Sent: 24 September 2025 00:19
To: Planning
Subject: Benbradagh Wind Farm – LA01/2023/0008/F
Attachments: geraldine & Donal Ocallaghan.docx; heather Currie & Euan Lang.docx; maggie Connolly & family.docx; maire & Mike buckley.docx; Marina Gillen.docx; The Grant family.docx; Mc Kinley family.docx

Please see enc objections

14/09/25

Dear Sir/madam

Benbradagh Wind Farm – LA01/2023/0008/F

We are writing to register the strongest possible objection to the proposed construction of turbines and associated infrastructure on Benbradagh mountain Dungiven for the following reasons.

As regular hill walker I oppose the wind farm as destroying the natural environment and the peace and tranquillity this area of AONB offers. It is important to conserve and enhance the natural beauty and amenities of this area as well as conserving wildlife, historic objects and natural phenomena within it rather than blighting it with huge wind turbines. Areas of outstanding natural beauty should not be blighted by industrial sized turbines for the benefit of a handful of farmers and renewable energy companies who really do not care about the Sperrins or its future.

Yours faithfully,

Laura Crawford

From: Helen Murphy
Sent: 24 September 2025 00:19
To: Planning
Subject: Benbradagh Wind Farm – LA01/2023/0008/F
Attachments: geraldine & Donal Ocallaghan.docx; heather Currie & Euan Lang.docx; maggie Connolly & family.docx; maire & Mike buckley.docx; Marina Gillen.docx; The Grant family.docx; Mc Kinley family.docx

Please see enc objections

5/09/25

Dear Sir/madam

Benbradagh Wind Farm – LA01/2023/0008/F

We are writing to register the strongest possible objection to the proposed construction of a wind farm and associated infrastructure Benbradagh Dungiven for the following reasons.

As regular hill walkers with children we oppose the wind farm as destroying the natural environment and the peace and tranquillity this area of AONB offers. We come from Cushendall and visit family members here every summer, availing of local Airbnb's, as well as tapping into local cafes and eateries. This area beauty should not be blighted by industrial sized turbines, which could be placed elsewhere. If it went ahead, we would not stay here again.

Yours faithfully,

Laura Crawford

From: Martin
Sent: 23 September 2025 21:41
To: Planning
Subject: Planning application ref. LA01/2023/0008/F – Brishey windfarm

From: Martin
Sent: 23 September 2025 21:34
Subject: Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

Dear Councillor

Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to urge you to call on the Planning Committee to refuse the planning application iLA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
 2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
 3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
 4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
 5. Failure to provide updated information:
 - i. The developer has failed to provide updated emission calculations for the reduced scheme.
 - ii. The developer has failed to provide updated electricity generation capacity (MW) figures for the reduced scheme.
 - iii. The developer has failed to provide an updated ES economic statement to reflect the revised reduced scheme – construction costs, benefit to the local economy, financial benefits to landowners, rates contributions etc.
- The absence of the above information renders the application and the EIA as incomplete. The benefits of the scheme cannot be accurately assessed without this information and thus a

balanced decision cannot be properly undertaken. This is a major application in which there is very significant public interest. Updated revised information which is required as part of the ES, must be provided, and must also be advertised to the public.

(*Based on outdated ES Chapter 3 Socio-Economic Impacts, para. 3.7, given the fact that the remaining four turbines are downslope from the two removed, it can be assumed that these will be at the lower end of the stated capacity: 3.45 - 4.80 MW per turbine, thus the proposed development will contribute circa $3.45\text{MW} \times 4 = 13.8\text{MW}$, not the 28.8MW currently stated in the Planning report).

6. The Climate Change Act (Northern Ireland) 2022 - creates a statutory duty on “Northern Ireland departments” to ensure emissions targets are met (as detailed in Section 52), but does NOT create a statutory duty on local councils (or the PAC). Thus to give determining weight to climate targets would be potentially a legal misapplication by the Council. The Act requires emissions reductions and renewable electricity consumption targets but does not create a hierarchy where climate considerations outweigh statutory planning duties and environmental and AONB protections.

7. The applicant presents the scheme as “green energy”, but the carbon account ignores the full lifecycle emissions: peat oxidation, concrete and steel foundations, grid infrastructure, and the unresolved problem of turbine decommissioning and blade waste. These impacts must be considered as part of the overall balance.

8. There is widespread cross-community opposition to the proposed development with nearly 1300 objections submitted to date. The Roe Valley is becoming increasingly encircled with wind turbines - in addition to what is currently visible there are three consented windfarms that have not yet been built - Rigged Hill Repowering, Ballyhanedin, and Smulgedon - all with turbines 150m (500feet) high. There is also a cluster of single wind turbines scattered along the foot of Benbradagh. (In addition, Maghermore windfarm at Banagher has also recently received consent, although this PAC decision may be subject to a future Judicial Review).

9. The proposal fails to comply with SPG advice on separation distances between windfarms. Planning policy (SPPS, PPS18) requires safeguarding of our distinctive skylines and for cumulative impacts of wind energy developments to be assessed so as to avoid cumulative harm and saturation. The iconic landmark character of the Benbradagh and the very wide visibility from within the Roe valley, requires specific distances between windfarms that this proposal does not comply with. Distances to Smulgedon windfarm and the cluster of single turbines around Dungiven have not been assessed or considered.

10. The proposed development of four industrial-scale, 150m (500 feet) high turbines would breach the distinctive and celebrated ridgeline of Benbradagh that is protected under planning policy (LCA 36), and would be highly visible throughout the area, as can be very clearly seen in the applicant’s Zone of Theoretical Visibility Map Figure 10.15, attached, (which can be found on the planning portal). This diagram confirms that the giant blades/ rotors would be clearly visible throughout most of Dungiven and beyond in outlying areas upto over 10-15km away.

Other ZTVs show that the hubs would be fully visible upto Derrychrier in the highly important transient view of Benbradagh when approaching Dungiven from the west on the new A6.

11. Of critical importance is scale of the proposed turbines – they are larger than anything built or consented to date in Northern Ireland. They will have a blade radius of 68m and rotor diameter/ swept path of 136m, which is 1.7 x larger than the radius and diameter of the existing turbines in Evishagaran windfarm, which already are enormous in scale and impact when viewed coming over the Glenshane Pass.(Evishagaran turbines are radius 40m, and rotor diameter/ sweep 80m).

12. The breach of the ridgeline would open the floodgates for further encroachment and development along the ridgeline in terms of visual impact and landscape character considerations. This is already evidenced by the variations of turbines the applicant has explored for this application site – 12no. in their PAN submission to the Department of Infrastructure on 22nd September 2020; 6no. in the initial submitted planning application, and now the reduced scheme of 4no. in the hope of getting a foothold for further development.

Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and

2, and the pre-application community consultation event carried out in August 2024 signaling a further extension to the south of the existing Evishagaran windfarm.

13. NIEA Countryside and Coast Landscape Team (CC&L) submitted two polar-opposite responses to the 4no. turbine scheme - despite both the scheme and planning policy being the same at the date of each response(22nd April 2024 and 30th April 2025).

The applicant alleged in their letter of 17 October 2024, directed to NIEA CC&L and the Council, that the reduced 4 turbine scheme submitted December 2023/ January 2024 had addressed community concerns - this is absolutely not the case and incorrect, and as such renders NIEA CC&L's second response invalid. The community continues to oppose this application.

In addition as mentioned earlier, the Climate Change Act does not create a hierarchy where climate considerations outweigh or alter statutory planning duties and environmental and AONB protections. Climate targets should be considered in the balancing of impacts and benefits in making a final decision, not prior to a landscape visual impact assessment.

14. It is notable that the planning report details that the Council's planning team share the community's concerns regarding the visual impact of the proposal.

15. Local communities feel they are being thrown under the bus, that the area is on the tipping point of being saturated and turned into "one big wind factory", with no thought for the people living here, that their concerns are not being listened to, and cumulative impact and collective loss of local landmarks, culture, heritage, sense of place and local identity has not been properly assessed or considered.

16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as 'Benbradagh's crown o'er Dungiven town', and the well known ballad 'Finvola The Gem of the Roe' about the daughter of Dermot O'Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. 'Hill of Thieves'" is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven.

The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry –PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/ decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedspaces within a 4.3mile radius of Dungiven (see spreadsheet attached), and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

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19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Martin Heaney
5 Hass Road
Dungiven

From: martin g tracey
Sent: 24 September 2025 07:59
To: Planning
Subject: Formal objection to proposed wind farm development at Benbradagh

Formal Objection to Proposed Wind Farm Development at Benbradagh

I strongly object to the proposed wind farm development at Benbradagh on the following grounds:

1. Failure to Consider Cold War Heritage

- Benbradagh is not just a natural landmark but also a site of modern historic importance. It hosted a U.S. military communications base during the Cold War, with underground bunkers and associated infrastructure.
- Declassified records confirm that the site was used for military communications and the storage of high explosives. In the 1980s, Irish intelligence suspected nuclear weapons could be held there (though the British government denied this). Regardless, the site is a recognised relic of Cold War history.
- Under the Strategic Planning Policy Statement (SPPS) and PPS6: Planning, Archaeology and the Built Heritage, planning authorities must identify, protect, and give weight to sites of archaeological, cultural, and historic interest, including modern military heritage.
- No adequate assessment of this heritage asset has been undertaken. Approving development without recognising and assessing this cultural significance would be a clear breach of planning policy.

2. Unresolved Contamination Risks from Past Military Use

- Former military occupation creates the possibility of residual contamination (munitions residues, fuels, oils, or other chemicals) in the soils and substructures of Benbradagh.

- The Environmental Liability Regulations (NI) 2009 and the EIA Regulations require that such risks be properly assessed before permission is granted.
- To date, no Environmental Statement has adequately addressed this issue, nor have NIEA or DAERA confirmed any testing of the soils for military contaminants. Proceeding without such assessment would breach the precautionary principle.

3. Radiological Risks in Deep Peat Soils

- Beyond military contamination, Benbradagh is part of the wider Sperrins uplands which received significant fallout from the 1986 Chernobyl disaster.
- Objectors in the Doraville PAC case (2019) raised these risks. At that time, DAERA dismissed them, claiming “no evidence” of hazardous levels of radioactivity.
- However, since then:
 - Tellus Mapping (2016, published in Unearthed) shows clear bands of high Caesium-137 (Cs-137) concentration across NI, including the Sperrins. This was not referenced in the Doraville decision.
 - RIFE Reports (2020–2023) and SEPA findings confirm the persistence of Cs-137 in upland soils.
 - FOI/EIR responses in 2024–2025 confirm NIEA/DAERA have never carried out below-ground radiological testing in peatlands, meaning their “no evidence” position is based on an absence of monitoring, not scientific proof.
- In addition, radon emissions are a known natural hazard in the Sperrins’ geology. DAERA acknowledged radon in Doraville but downplayed it without proper baseline studies.
- Together, these issues highlight a complete failure to apply the precautionary principle under EIA law, and a breach of obligations under the Euratom Directive 2013/59 (retained EU law), which requires assessment of environmental radiation exposure pathways.

4. Environmental and Climate Concerns

- Benbradagh is an iconic mountain in the Sperrins AONB. Industrial turbines would cause irreversible landscape destruction and undermine the scenic and cultural value of this unique area.
- Disturbing deep blanket bog will result in the release of stored carbon, directly undermining climate targets.
- Construction risks damage to watercourses through peat slides, siltation, and contamination, threatening river systems and downstream communities.
- These impacts have not been properly assessed in terms of cumulative or transboundary effects, as required by the EIA Regulations and case law (e.g. Finch and A5 rulings).

5. Community and Equality Duties

- The failure to assess the cultural and health impacts on the surrounding rural community breaches duties under the Rural Needs Act (2016) and Section 75 of the NI Act (1998).
- Communities in the Sperrins already face disproportionate burdens from industrial wind development. Proceeding without full assessment of these duties would render the process procedurally unfair.

Conclusion

The Benbradagh proposal is fundamentally flawed. It:

- Fails to recognise and assess the mountain's Cold War heritage assets.
- Ignores contamination risks from past military use.
- Dismisses credible radiological hazards from Chernobyl fallout and radon without testing.
- Undermines the landscape, biodiversity, and carbon storage functions of an iconic mountain within the Sperrins AONB.
- Breaches statutory duties under the SPPS, PPS6, PPS18, the EIA Regulations, the Environmental Liability Regulations, the Euratom Directive, the Rural Needs Act, and Section 75 of the NI Act.

For these reasons, the application is unsound and should be refused.

Name

Martin Tracey

Laura Crawford

From: Mary Mc Henry
Sent: 24 September 2025 02:42
To: Planning
Subject: Re. Planning application ref. LA01/2023/0008/F - Brishey windfarm.

Sent from [Outlook for Android](#)

From: Carmel McReynolds
Sent: 23 September 2025 21:59
To: Planning
Subject: Planning application ref. LA01/2023/0008/F – Brishey windfarm

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to call for the Planning Committee to refuse the planning application LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

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Other ZTVs show that the hubs would be fully visible upto Derrychrier in the highly important transient view of Benbradagh when approaching Dungiven from the west on the new A6.
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Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and 2, and the pre-application community consultation event carried out in August 2024 signaling a further extension to the south of the existing Evishagaran windfarm.
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Yours sincerely,

Name: Maureen Maher and Lawrence Maher

Address: 1 Cranlee Park, Derry bt488Aj

Laura Crawford

From: Melanie Crockett
Sent: 23 September 2025 21:49
To: Planning
Subject: Planning application ref. LA01/2023/0008/F – Brishey wind farm

Sent from [Outlook for iOS](#)

From: Carmel McReynolds
Sent: 23 September 2025 22:00
To: Planning
Subject: Planning application ref. LA01/2023/0008/F – Brishey windfarm

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Yours sincerely,

Name: Melissa and Grace Mc Cafferty

Address: 21 Beech Grove, Waterside , Derry

From: Carmel McReynolds < >
Sent: 23 September 2025 22:02
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

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Yours sincerely,

Name: Michelle and Feargal Mc Kinney

Address: 130 Glenshane, Derry Bt473sg

Laura Crawford

From: Helen Murphy <
Sent: 24 September 2025 00:19
To: Planning
Subject: Benbradagh Wind Farm – LA01/2023/0008/F
Attachments: geraldine & Donal Ocallaghan.docx; heather Currie & Euan Lang.docx; maggie Connolly & family.docx; maire & Mike buckley.docx; Marina Gillen.docx; The Grant family.docx; Mc Kinley family.docx

Please see enc objections

mairebuckley@hotmail

22/09/25

Benbradagh Wind Farm – LA01/2023/0008/F

We are writing to register the strongest possible objection to the proposed construction of a wind farm and associated infrastructure at Benbradagh Dungiven for the following reasons.

As regular visitors to Benbradagh we oppose the wind farm as destroying the natural environment and the peace and tranquillity this area offers. The turbines would create noise by day and night, as well as visual disturbance, thereby reducing the peaceful character of the area to the detriment of us visitors who stay within local AirBnB accommodation in this locality. The highlight of our trip is always the mountain at Benbradagh which has beautiful scenery and breath taking views, it is off the beaten track, unspoilt and well worth the hike.

Yours faithfully,

From:

Sent:

To:

24 September 2025 06:18

Niamh Archibald; Sean Bateson; Steven Callaghan; Brenda Chivers; Mark Fielding; Richard Holmes; Dawn Huggins; Michelle Knight-McQuillan; Allister Kyle; Amy Mairs; Jonathan McAuley; John McAuley; Peter McCully; Margaret Anne McKillop; Cara McShane; Ashleen Schenning; Richard Stewart; Tanya Elder; Sean McGlinchey; Darryl Wilson; John Wisener; Ivor Wallace; Maighr  ad Watson; Leanne Peacock; Planning

Subject:

Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

Dear Councillor

Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to urge you to call on the Planning Committee to refuse the planning application iLA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
5. Failure to provide updated information:
 - i. The developer has failed to provide updated emission calculations for the reduced scheme.
 - ii. The developer has failed to provide updated electricity generation capacity (MW) figures for the reduced scheme.

iii. The developer has failed to provide an updated ES economic statement to reflect the revised reduced scheme – construction costs, benefit to the local economy, financial benefits to landowners, rates contributions etc.

The absence of the above information renders the application and the EIA as incomplete. The benefits of the scheme cannot be accurately assessed without this information and thus a balanced decision cannot be properly undertaken. This is a major application in which there is very significant public interest. Updated revised information which is required as part of the ES, must be provided, and must also be advertised to the public.

(*Based on outdated ES Chapter 3 Socio-Economic Impacts, para. 3.7, given the fact that the remaining four turbines are downslope from the two removed, it can be assumed that these will be at the lower end of the stated capacity: 3.45 - 4.80 MW per turbine, thus the proposed development will contribute circa $3.45\text{MW} \times 4 = 13.8\text{MW}$, not the 28.8MW currently stated in the Planning report).

6. The Climate Change Act (Northern Ireland) 2022 - creates a statutory duty on “Northern Ireland departments” to ensure emissions targets are met (as detailed in Section 52), but does NOT create a statutory duty on local councils (or the PAC). Thus to give determining weight to climate targets would be potentially a legal misapplication by the Council. The Act requires emissions reductions and renewable electricity consumption targets but does not create a hierarchy where climate considerations outweigh statutory planning duties and environmental and AONB protections.

7. The applicant presents the scheme as “green energy”, but the carbon account ignores the full lifecycle emissions: peat oxidation, concrete and steel foundations, grid infrastructure, and the unresolved problem of turbine decommissioning and blade waste. These impacts must be considered as part of the overall balance.

8. There is widespread cross-community opposition to the proposed development with nearly 1300 objections submitted to date. The Roe Valley is becoming increasingly encircled with wind turbines - in addition to what is currently visible there are three consented windfarms that have not yet been built - Rigged Hill Repowering, Ballyhanedin, and Smulgedon - all with turbines 150m (500feet) high. There is also a cluster of single wind turbines scattered along the foot of Benbradagh. (In addition, Maghermore windfarm at Banagher has also recently received consent, although this PAC decision may be subject to a future Judicial Review).

9. The proposal fails to comply with SPG advice on separation distances between windfarms. Planning policy (SPPS, PPS18) requires safeguarding of our distinctive skylines and for cumulative impacts of wind energy developments to be assessed so as to avoid cumulative harm and saturation. The iconic landmark character of the Benbradagh and the very wide visibility from within the Roe valley, requires specific distances between windfarms that this proposal does not comply with. Distances to Smulgedon windfarm and the cluster of single turbines around Dungiven have not been assessed or considered.

10. The proposed development of four industrial-scale, 150m (500 feet) high turbines would breach the distinctive and celebrated ridgeline of Benbradagh that is protected under planning policy (LCA 36), and would be highly visible throughout the area, as can be very clearly seen in the applicant's Zone of Theoretical Visibility Map Figure 10.15, attached, (which can be found on the planning portal). This diagram confirms that the giant blades/ rotors would be clearly visible throughout most of Dungiven and beyond in outlying areas up to over 10-15km away.

Other ZTVs show that the hubs would be fully visible up to Derrychrier in the highly important transient view of Benbradagh when approaching Dungiven from the west on the new A6.

11. Of critical importance is scale of the proposed turbines – they are larger than anything built or consented to date in Northern Ireland. They will have a blade radius of 68m and rotor diameter/ swept path of 136m, which is 1.7 x larger than the radius and diameter of the existing turbines in Evishagaran windfarm, which already are enormous in scale and impact when viewed coming over the Glenshane Pass.(Evishagaran turbines are radius 40m, and rotor diameter/ sweep 80m).

12. The breach of the ridgeline would open the floodgates for further encroachment and development along the ridgeline in terms of visual impact and landscape character considerations. This is already evidenced by the variations of turbines the applicant has explored for this

application site – 12no. in their PAN submission to the Department of Infrastructure on 22nd September 2020; 6no. in the initial submitted planning application, and now the reduced scheme of 4no. in the hope of getting a foothold for further development.

Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and 2, and the pre-application community consultation event carried out in August 2024 signaling a further extension to the south of the existing Evishagaran windfarm.

13. NIEA Countryside and Coast Landscape Team (CC&L) submitted two polar-opposite responses to the 4no. turbine scheme - despite both the scheme and planning policy being the same at the date of each response (22nd April 2024 and 30th April 2025).

The applicant alleged in their letter of 17 October 2024, directed to NIEA CC&L and the Council, that the reduced 4 turbine scheme submitted December 2023/ January 2024 had addressed community concerns - this is absolutely not the case and incorrect, and as such renders NIEA CC&L's second response invalid. The community continues to oppose this application.

In addition as mentioned earlier, the Climate Change Act does not create a hierarchy where climate considerations outweigh or alter statutory planning duties and environmental and AONB protections. Climate targets should be considered in the balancing of impacts and benefits in making a final decision, not prior to a landscape visual impact assessment.

14. It is notable that the planning report details that the Council's planning team share the community's concerns regarding the visual impact of the proposal.

15. Local communities feel they are being thrown under the bus, that the area is on the tipping point of being saturated and turned into "one big wind factory", with no thought for the people living here, that their concerns are not being listened to, and cumulative impact and collective loss of local landmarks, culture, heritage, sense of place and local identity has not been properly assessed or considered.

16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as 'Benbradagh's crown o'er Dungiven town', and the well known ballad 'Finvola The Gem of the Roe' about the daughter of Dermot O'Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. 'Hill of Thieves' is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven.

The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry – PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/ decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedspaces

within a 4.3mile radius of Dungiven (see spreadsheet attached), and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

The ES assessment, in the community's opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that *"the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost"* –concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as "Gateway to the Sperrins". In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.

19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Natasha O'Neill

38 Abbeyfields
Dungiven
Bt474ux

Sent from my iPhone

From: Nodlaig Ní Bh
Sent: 23 September 2025 22:17
To: Planning
Subject: Benbradagh: Development at Brishey**

A Chara,

Please convey this information to the Chief planner and members of the planning committee for their consideration at the meeting in respect of the wind farm development at Brishey.

I wish to address the importance of Benbradagh mountain as a cultural and natural asset and the obligations of the State authority and the Wind energy company to avoid adverse impact on human rights in accordance with the UN Guiding Principles on Business and Human Rights.

The UN Guiding Principles on Business and Human Rights (UNGPs) are the most authoritative and widely adopted set of principles for responsible business, endorsed in 2011. The principles call on both governments and companies to identify and prevent potential human rights abuses.

Benbradagh mountain has been central to our cultural and natural heritage and to our identity for generations. A unique ridgeline which the Council has failed to protect with blades visible from Evishagaran.

Our mountain in the Sperrins AONB has been stripped of protections. Wind companies have adopted a salami slicing approach to avoid having projects dealt with as projects of 'regional significance'. It is evident that the plan is to expand the Evishagaran wind farm across the mountain. In the interests of balance, fairness and proportionality, this application must be refused. Our voices must be heard and our human rights respected.

The Irish language is woven into the mountain, its history and heritage. The minority language community in Dungiven has a deep attachment to Benbradagh. The placenames of the mountain (including Briseadh (Brishey) are the names of classrooms in Gaelscoil Neachtain and the geography and history of the mountain is contained in the Gaelic placenames. Benbradagh also has an important connection with Gaelcholáiste Dhoire at Dungiven Castle.

The mountain gets due mention in the Annals of the Four Masters as 'Binn Fhada Rí Ciannachta' - the long ridge of the King of Ciannacht, which reflects its significance to the people of the area and their identity going back to the 6th Century.

The mountain connects the glen of Dungiven with 'Glen an Iolair' - The Glen of the eagle (Glenullin). This ancient passageway over the mountain will be blocked by the proposed development at Brishey.

The mountain is famed in local song and story both ancient and recent including the 'Hill of Thieves' by Cara Dillon and my own song entitled 'Dún Geimhin',
"The Castle stands beneath its sheltering mountain.."

The proposed development of large scale wind turbines on this iconic mountain will contribute to the further erosion of our heritage, impede/ block access over the mountain and impact the enjoyment of our cultural heritage.

In line with international standards, the United Nations Human Rights Council has reiterated in several resolutions that the destruction of cultural heritage may severely impact the enjoyment of cultural rights and all human rights. In resolution 33/20 (2016), the Human Rights Council stressed the irreversible harm caused by the destruction of cultural heritage and its devastating impact on communities and their identities. In this regard, it is important to highlight that the destruction of cultural heritage not only violates cultural rights but can also exacerbate social, political, and economic instability, particularly in conflict and *post-conflict situations*.

The community of Dungiven is at breaking point in respect of the industrialisation of Benbradagh mountain. Ironically, Brishey (Briseadh) translates as the breach as it was where a battle occurred.

The Special Rapporteur on cultural rights has also recently emphasised that the protection of cultural heritage is integral to the broader framework of human rights, particularly the right to participation in cultural life. Destruction or damage to cultural heritage undermines this right and impedes the collective memory and identity of communities.

This requirement reinforces the following objective of the Strategic Planning Policy Statement for Northern Ireland (SPPS)

“Regional Strategic Objectives

6.219 The regional strategic objectives for renewable energy are to:

- ensure that the environmental, landscape, visual and amenity impacts associated with or arising from renewable energy development are adequately addressed;
- ensure adequate protection of the region's built, natural, and cultural heritage features. “

Kindly acknowledge receipt of this submission.

Le dea-ghuí | Kind regards,
Nodlaig Ní Bhrollaigh

From: Carmel McReynolds <
Sent: 23 September 2025 22:03
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

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I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Noreen Carolan and Paul mc Cann

Address: 4 Cranlee Park, Derry BT488aj

Laura Crawford

From: Patricia Mc Henry
Sent: 24 September 2025 02:16
To: Planning
Subject: Re. Planning application ref. LA01/2023/0008/F - Brishey windfarm

From: Carmel McReynolds
Sent: 23 September 2025 22:15
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

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The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

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The ES assessment, in the community’s opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that “*the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost*” – concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as “Gateway to the Sperrins”. In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.
19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.
20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Paul Bradley and Deirdre Rodden

Address: 98 Grangemore Park, Derry, BT48 0RZ

From: Philip Williamson
Sent: 23 September 2025 22:50
To: Planning
Subject: Fwd: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to call for the Planning Committee to refuse the planning application LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
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 - i. The developer has failed to provide updated emission calculations for the reduced scheme.
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Yours sincerely,

Name: Philip, Luke an Ellen Williamson

Address: 83 Dergenagh Road Dungannon, BT70 1TW

From: Carmel McReynolds
Sent: 23 September 2025 21:49
To: Planning
Subject: FW: Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

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Yours sincerely,

Name: Ronnie Doherty

Address: 13 Faughan Crescent, Drumahoe, bt473la

From: Carmel McReynolds >
Sent: 23 September 2025 22:05
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

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Name: Rosemary Mc Kee and Jonathan Mc Kee

Address: 75 Curragh Rd, Coleraine

From: Carmel McReynolds
Sent: 23 September 2025 22:13
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

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Yours sincerely,

Name: Samantha, Geoff, Amelia and Sophia Cummings

Address: 8a Clarefield, Killyman, Dungannon

Laura Crawford

From: Sarah-Jane Goldring
Sent: 23 September 2025 22:02
To: Planning
Subject: Objection to Brishey WindFarm, Benbradagh
Attachments: To Planning_Benbradagh Objection Letter_Rev.01_Application ref_LA01_2023_0008_F.docx

Dear Planning Department,

Please see attached a letter of objection relating to the proposed wind farm.

Regards,

Sarah-Jane Goldring

To Planning... planning@causewaycoastandglens.gov.uk

Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

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(*Based on outdated ES Chapter 3 Socio-Economic Impacts, para. 3.7, given the fact that the remaining four turbines are downslope from the two removed, it can be assumed that these will be at the lower end of the stated capacity: 3.45 - 4.80 MW per turbine, thus the proposed development will contribute circa 3.45MW x 4 = 13.8MW, not the 28.8MW currently stated in the Planning report).

6. The Climate Change Act (Northern Ireland) 2022 - creates a statutory duty on "Northern Ireland departments" to ensure emissions targets are met (as detailed in Section 52), but does NOT create a statutory duty on local councils (or the PAC). Thus to give determining weight to climate targets would be potentially a legal misapplication by the Council. The Act requires emissions reductions and renewable electricity consumption targets but does not create a hierarchy where climate considerations outweigh statutory planning duties and environmental and AONB protections.
7. The applicant presents the scheme as "green energy", but the carbon account ignores the full lifecycle emissions: peat oxidation, concrete and steel foundations, grid infrastructure, and the unresolved problem of turbine decommissioning and blade waste. These impacts must be considered as part of the overall balance.
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9. The proposal fails to comply with SPG advice on separation distances between windfarms. Planning policy (SPPS, PPS18) requires safeguarding of our distinctive skylines and for cumulative impacts of wind energy developments to be assessed so as to avoid cumulative harm and saturation. The iconic landmark character of the Benbradagh and the very wide visibility from within the Roe valley, requires specific distances between windfarms that this proposal does not comply with. Distances to Smulgedon windfarm and the cluster of single turbines around Dungiven have not been assessed or considered.
10. The proposed development of four industrial-scale, 150m (500 feet) high turbines would breach the distinctive and celebrated ridgeline of Benbradagh that is protected under planning policy (LCA 36), and would be highly visible throughout the area, as can be very clearly seen in the applicant's Zone of Theoretical Visibility Map Figure 10.15, attached, (which can be found on the planning portal). This diagram confirms that the giant blades/ rotors would be clearly visible throughout most of Dungiven and beyond in outlying areas up to over 10-15km away.

Other ZTVs show that the hubs would be fully visible upto Derrychrier in the highly important transient view of Benbradagh when approaching Dungiven from the west on the new A6.
11. Of critical importance is scale of the proposed turbines – they are larger than anything built or consented to date in Northern Ireland. They will have a blade radius of 68m and rotor diameter/ swept path of 136m, which is 1.7 x larger than the radius and diameter of the existing turbines in Evishagaran windfarm, which already are enormous in scale and impact when viewed coming over the Glenshane Pass.(Evishagaran turbines are radius 40m, and rotor diameter/ sweep 80m).
12. The breach of the ridgeline would open the floodgates for further encroachment and development along the ridgeline in terms of visual impact and landscape character considerations. This is already evidenced by the variations of turbines the applicant has explored for this application site – 12no. in their PAN submission to

the Department of Infrastructure on 22nd September 2020; 6no.in the initial submitted planning application, and now the reduced scheme of 4no. in the hope of getting a foothold for further development.

Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and 2, and the pre-application community consultation event carried out in August 2024 signaling a further extension to the south of the existing Evishagaran windfarm.

13. NIEA Countryside and Coast Landscape Team (CC&L) submitted two polar-opposite responses to the 4no. turbine scheme - despite both the scheme and planning policy being the same at the date of each response (22nd April 2024 and 30th April 2025).

The applicant alleged in their letter of 17 October 2024, directed to NIEA CC&L and the Council, that the reduced 4 turbine scheme submitted December 2023/ January 2024 had addressed community concerns - this is absolutely not the case and incorrect, and as such renders NIEA CC&L's second response invalid. The community continues to oppose this application.

In addition as mentioned earlier, the Climate Change Act does not create a hierarchy where climate considerations outweigh or alter statutory planning duties and environmental and AONB protections. Climate targets should be considered in the balancing of impacts and benefits in making a final decision, not prior to a landscape visual impact assessment.

14. It is notable that the planning report details that the Council's planning team share the community's concerns regarding the visual impact of the proposal.
15. Local communities feel they are being thrown under the bus, that the area is on the tipping point of being saturated and turned into "one big wind factory", with no thought for the people living here, that their concerns are not being listened to, and cumulative impact and collective loss of local landmarks, culture, heritage, sense of place and local identity has not been properly assessed or considered.
16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as 'Benbradagh's crown o'er Dungiven town', and the well known ballad 'Finvola The Gem of the Roe' about the daughter of Dermot O'Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. 'Hill of Thieves' is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven.

The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry –PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/ decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedspaces within a 4.3mile radius of Dungiven (see spreadsheet attached), and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

The ES assessment, in the community's opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that *"the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost"* – concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as "Gateway to the Sperrins". In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.

19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name:

Address:

Laura Crawford

From: Save Benbradagh
Sent: 23 September 2025 21:06
To: Planning
Subject: OBJECTION to Brishey Windfarm – Application Ref: LA01/2023/0008/F
Attachments: 23.09.25_Save Benbradagh Group_Objection Letter_Application ref_LA01_2023_0008_F.docx

For the urgent attention of: Elaine Oliphert

23.09.2025

Dear Ms. Olphert,

Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

We wish to highlight the capacity in which we make submissions. In addition to the facebook groups memberships shown overleaf, there are a significant number of members in our group who are not on social media.

We would confirm that ALL objection letters submitted are to be treated as current and are applicable to the current proposal being determined.

Please note that members of our group have previously spoken with Planners in this regard, who assured us this would be the case.

We are appalled by and consider recent submissions by the developer in this regard to be another attempt to try and deny our community the opportunity to have a voice regarding this proposal, as has been our experience of the flawed pre-application community consultation process.

We trust this clears up any ambiguity the developer has created in this regard.

We continue to respectfully urge the Committee to stand with the community and refuse permission for this proposed harmful wind farm development on the iconic landmark of Benbradagh in the Sperrins AONB.

Yours sincerely,

Save Benbradagh Group

Dungiven



Save Benbradagh

Private group · 758 members



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Save Benbradagh - Public Page

509 followers · 128 following

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[Following](#)

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From: Carmel McReynolds
Sent: 23 September 2025 22:11
To: Planning
Subject: FW: Planning application ref. LA01/2023/0008/F – Brishey windfarm

As (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to call for the Planning Committee to refuse the planning application LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

I/ We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below is my/ are our concerns for further consideration:-

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrins area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.
2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.
3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.
4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.
5. Failure to provide updated information:
 - i. The developer has failed to provide updated emission calculations for the reduced scheme.
 - ii. The developer has failed to provide updated electricity generation capacity (MW) figures for the reduced scheme.
 - iii. The developer has failed to provide an updated ES economic statement to reflect the revised reduced scheme – construction costs, benefit to the local economy, financial benefits to landowners, rates contributions etc.

The absence of the above information renders the application and the EIA as incomplete. The benefits of the scheme cannot be accurately assessed without this information and thus a balanced decision cannot be properly undertaken. This is a major application in which there is very significant public interest. Updated revised information which is required as part of the ES, must be provided, and must also be advertised to the public.

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The ES assessment, in the community’s opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that “*the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost*” – concerns of local people regarding the application are not unfounded.

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I/ We respectfully urge the Committee to stand with the community and refuse permission for this planning application LA01/2023/0008/F for the proposed harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name: Una Mc Ginley, Patricia Strain

Address: 89 Elmvale, Derry , Bt48 8SJ

Laura Crawford

From: Standing OurGround
Sent: 23 September 2025 23:45
To: Planning
Subject: Objection– LA01/2023/0008/F
Attachments: To Planningcauseway Coast Glens.docx

Dear Sir/Madam

Please find attached our objection to proposed windfarm LA01/2023/008/F

Thank you in Anticipation
Standing Our Ground
Women of the Sperrins

Sent from [Outlook](#)

planning@causewaycoastandglens.gov.uk

Dear Sir/Madam

Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

As member(s) of the Women of Sperrin's community, we are writing to urge you to call on the Planning Committee to refuse the planning application iLA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

We support renewable energy in principle, but it must NOT come at the expense of our most sensitive landscapes, our key landmarks, our environment and habitats, public health, the culture and identity of local communities, and local tourism. On balance - considering these points, and the extent of outstanding information and issues that haven't been properly assessed, against the very small contribution this scheme would make to renewable energy targets (circa 13MW*) - this application would cause more harm than benefit.

Below are our concerns for further consideration: -

1. Community concerns regarding contamination and radiation (Chernobyl legacy and other), raised to the Causeway Coast and Glens Council (CCGC) Planning, CCGC Chief Executive, and the NIEA (together with other councils and government departments), on 30th May, and flagged up again on 17th September, do not appear to have been addressed, mentioned or considered in the final Habitat Regulations Assessment (HRA), thus rendering the HRA incomplete. There is concern that the release of radiation and contamination from the construction and operation of the proposed development will have impacts on the environment and human health. With the Sperrin's area widely recognised as having significantly higher cancer rates than the rest of the province, community fears are not unfounded.

2. The application site lies in sensitive peatland connected to the River Roe Special Area of Conservation. Peat is not only a vital carbon store but also holds radioactive Cs-137 from Chernobyl. Disturbing it risks pollution and long-term harm downstream. No baseline radiological surveys have been carried out, meaning risks to human health and habitats have not been properly assessed.

Back to Chernobyl. From a medical perspective, the two most important radionuclides released by the accident were iodine-131 and caesium-137. Iodine-131 has a half-life of about 8 days, so exposures were over about 2 months after the accident (10 half-lives).

However, caesium-137 has a half-life of 30 years, meaning it will be a concern for about 300 years.

3. The River Roe and Tributaries SAC in turn flows into Lough Foyle - shared international waters between Northern Ireland and the Republic of Ireland - creating transboundary impacts that require notification and consultation. There is no evidence to suggest this has taken place.

4. Environmental impacts are required to be fully assessed PRIOR to approval, as mandated by law. As the "competent authority" the Council is legally responsible for ensuring robustness and completeness of the HRA and full compliance with environmental legislation; furthermore, it has a duty to safeguard the health, wellbeing and human rights of its community. The Climate Change Act does not override or lessen these legal obligations.

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i. The developer has failed to provide updated emission calculations for the reduced scheme.

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12. The breach of the ridgeline would open the floodgates for further encroachment and development along the ridgeline in terms of visual impact and landscape character considerations. This is already evidenced by the variations of turbines the applicant has explored for this application site – 12no. in their PAN submission to the Department of Infrastructure on 22nd September 2020; 6no. in the initial submitted planning application, and now the reduced scheme of 4no. in the hope of getting a foothold for further development.

Establishment of initial permission creating precedent for further approvals has happened in various locations in the area - Altahullion 1 paving the way for Altahullion 2 and Glenconway 1 and 2, and the pre-application community consultation event carried out in August 2024 signalling a further extension to the south of the existing Evishagaran windfarm.

13. NIEA Countryside and Coast Landscape Team (CC&L) submitted two polar-opposite responses to the 4no. turbine scheme - despite both the scheme and planning policy being the same at the date of each response (22nd April 2024 and 30th April 2025).

The applicant alleged in their letter of 17 October 2024, directed to NIEA CC&L and the Council, that the reduced 4 turbine scheme submitted December 2023/ January 2024 had addressed community concerns - this is absolutely not the case and incorrect, and as such renders NIEA CC&L's second response invalid. The community continues to oppose this application.

In addition, as mentioned earlier, the Climate Change Act does not create a hierarchy where climate considerations outweigh or alter statutory planning duties and environmental and AONB protections. Climate targets should be considered in the balancing of impacts and benefits in making a final decision, not prior to a landscape visual impact assessment.

14. It is notable that the planning report details that the Council's planning team share the community's concerns regarding the visual impact of the proposal.

15. Local communities feel they are being thrown under the bus, that the area is on the tipping point of being saturated and turned into "one big wind factory", with no thought for the people living here, that their concerns are not being listened to, and cumulative impact and collective loss of local landmarks, culture, heritage, sense of place and local identity has not been properly assessed or considered.

The integrity and preservation of families, homes, their futures is at stake and will have serious financial ramifications and a detrimental effect on physical and mental health.

Divide and Conquer has and is a strategy used to target communities, families and individuals and its happening here across the Sperrin's community over this past twenty years used by big industry supported by PR consultants to break down relationships and

unity between rural community groups, families, trying to bribe those with access to resources whether it be material or psychological, also with threats to withdraw resources that are necessary, creating fear concern leading to Reputations smeared and sabotaged. Is it a case of trying to silence anyone who dares to ask questions?

We need decision makers to investigate and understand that “business as usual” is unacceptable. The importance of these very serious human and environmental health issues what has and is happening across the Sperrin’s cannot be underestimated.

There are many examples of the failure to use the precautionary principle in the past, which have resulted in serious and often irreversible damage to health, nature, and environments. Appropriate, precautionary and proportionate actions need and should be taken to avoid even more plausible and potentially serious threats to health, nature, the environment, and the electricity grid/supply because of every aspect of this wind industry.

Government bureaucracies including Departments of health, planning and noise pollution have consistently failed to protect, but also to investigate the position people found themselves in and failed to investigate and act when serious health problems including exhaustion, fatigue and neurological health issues,

There are those who do not care how much of the environment they trash or who they exploit, and they will stop at nothing to get it.

There is a complete violation of people's human rights. Is our government and its departments failing in their "Duty of Care" to protect its citizens and its environment.

16. Benbradagh (meaning Hill of Thieves), is in the Sperrins AONB, and is one of the most iconic mountains in the North, visible for miles within the Roe Valley and along the new A6. It is synonymous with and forms the backdrop to Dungiven, and is much revered and of deep cultural and spiritual significance to the local community, celebrated over the centuries in folklore, poems and song - such as ‘Benbradagh’s crown o’er Dungiven town’, and the well known ballad ‘Finvola The Gem of the Roe’ about the daughter of Dermot O’Cahan – the clan associated with Dungiven Old Priory. The mountain ridge is also the hideout and stomping ground of Grainne Rua, the local banshee, believed to forewarn certain families and clans of impending death. These stories are celebrated in many ways by the Dungiven community. ‘Hill of Thieves’ is the title of the award-winning album about the area by internationally acclaimed traditional singer Cara Dillon, who is originally from Dungiven.

The mountain forms the backdrop and setting against which generations of local communities have lived out their lives – it features in just about every family and local

photograph down through the years and is deeply embedded in their psyche and identity, and referenced in all their activities.

The potential for a proposed development to detract from local people's sense of place and connection to the land was recognised by the PAC to be a material consideration in Doraville Wind Farm public inquiry –PAC ref no.2018/C007, para 10.116.

17. The pre-application community consultation for the application was deeply flawed and prejudiced with regards to the Dungiven community, with adverts placed in newspapers not widely read by the local demographic, and leaflets only distributed to properties within a 2km radius of the application site - that distance mostly made up of open mountainside (by comparison other pre-application consultation events have entailed leaflet drops for a 5km radius). Both these acts/ decisions resulted in the Dungiven community not being aware of the proposal or indeed the subsequent planning application until 4-5 months after it was submitted.

18. Locals are concerned as to the impact of the proposal on the tourism industry, and the employment and important form of diversified income this provides for the rural area. The tourism impact assessment in the ES is deeply flawed and does not take into consideration the vibrant, landscape-dependent, tourism industry within the area, evidenced by 470+ tourism bedsplaces within a 4.3mile radius of Dungiven (see spreadsheet attached), and testament to the high regard and value with which the scenery and heritage in the area is held. Tourism and leisure in the area has expanded dramatically since the covid pandemic, and has huge further potential. Benbradagh is used as a unique selling point in promotion of the area; the proposal will undoubtedly alter and diminish the splendour of the mountain.

The ES assessment, in the community's opinion, is so non-objective that it renders itself invalid. Given that the same consultant published a report for the Irish Tourist Industry in 2014 detailing that "*the outlook for tourism in Ireland will be bleak if an essential component – beautiful and unspoilt scenery – is lost*" –concerns of local people regarding the application are not unfounded.

Adverse visual impact on the Sperrins AONB and potential impact on Tourism Assets and growth of same was cited as a determining factor in PAC decision for Doraville windfarm.

Approving this application would scar Benbradagh for generations, and undermine recent investment efforts and initiatives to promote it as a landmark destination and Dungiven as "Gateway to the Sperrins". In addition as previously mentioned, if the application is granted permission, and precedent established, it will be impossible to stop further turbines along the ridgeline of the mountain in the future.

19. The Council has statutory duties under the Rural Needs Act to consider the social and economic needs of rural communities in decision-making. Dungiven is a rural town already under pressure from multiple wind farms. Further industrialisation of Benbradagh risks damaging tourism, heritage, and rural amenity. There is no evidence that the specific rural needs of local residents - in terms of health, wellbeing, or sustainable economic alternatives - have been meaningfully assessed.

20. Section 75 of the Northern Ireland Act 1998 requires equality screening to assess differential impacts on protected groups. Wind farm developments can disproportionately affect vulnerable groups, including children, older people, and those with health conditions, via noise and shadow flicker. The planning file contains no evidence of an Equality Impact Assessment or screening decision, raising questions about compliance with statutory duties.

We respectfully urge you to stand with the community and call for refusal of permission for this harmful wind farm development on the iconic landmark of Benbradagh.

Yours sincerely,

Name:

Address: