

From:
Sent: 23 September 2025 12:39
To: Planning
Subject: Planning application ref. LA01/2023/0008/F – Brishey windfarm

To Planning,

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.
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.
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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 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.

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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.

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 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,
Shauna McGroarty
53 Birren Road
Dungiven

Laura Crawford

From: fergal crossan
Sent: 23 September 2025 13:19
To: Planning
Subject: I am sharing 'To Planning_Benbradagh Objection Letter_Application ref_LA01_2023_0008_F' with you
Attachments: To Planning_Benbradagh Objection Letter_Application ref_LA01_2023_0008_F.pdf

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

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Yours sincerely,

Name: Fergal Crossan

Address: 73 slieveboy rd, craigbane, Claudy, Co. Derry. Bt474as

From: Bernedette Mcmonagle
Sent: 23 September 2025 13:42
To: Planning
Subject: Re. Planning application ref. LA01/2023/0008/F – Brisheywindfarm

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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 Dungiventown', 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 Dillion, 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.

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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

Bernadette McMonagle

156 Ardanlee

Derry

BT48 8RT

Laura Crawford

From: Save Benbradagh
Sent: 23 September 2025 13:48
To: Planning
Subject: Re: OBJECTION to Brishey Windfarm – Application Ref: LA01/2023/0008/F
Attachments: Save Benbradagh Group_Objection Letter Rev.01_Application ref_LA01_2023_0008_F.pdf

Hi,

We have notice a typo in our objection letter sent yesterday.

Point 11 should read:

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).

Please find attached amended letter, for uploading.

Thank you,

Save Benbradagh Group

On Mon, Sep 22, 2025 at 8:34 AM Save Benbradagh

wrote:

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

As members of the Dungiven and Roe Valley 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 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.
 - 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).
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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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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,

Save Benbradagh Group

Dungiven

23.09.2025

From: jeanette.kelly49
Sent: 23 September 2023 14:16
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.

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

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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,
Jeanette Kelly

49 Lackagh Park
Dungiven
BT47 4ND

From: Patrick McWilliams
Sent: 23 September 2025 14:18
To: Planning
Subject: Please REFUSE Benbradagh Wind Farm – LA01/2023/0008/F

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

As a former member of the Dungiven and Roe Valley community, 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.

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.
 - 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 40m 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 68m, 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.

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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,

Patrick McWilliams (formally of curragh road)

Now living @ 52 monks avenue , whitley bay , ne25 9RT

Laura Crawford

From: agnes caldwell
Sent: 23 September 2025 14:40
To: Planning
Subject: Re: Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

Hi Laura,

Apologies, I am unsure what happened to the text, please see below.

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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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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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.

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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: Agnes Caldwell & Joseph O'Neill

Address: 750 Feeny Rd, Dungiven, BT47 4TB

Sent from my iPhone

On 23 Sep 2025, at 14:34, Planning <Planning@causewaycoastandglens.gov.uk> wrote:

Agnes

I refer to your e-mail which has no text.

If you wish for the Planning Department to consider and objection, please resubmit by e-mail and I will confirm receipt once received

Thanks Laura

From: agnes caldwell

Sent: 23 September 2025 12:11

To: Planning <Planning@causewaycoastandglens.gov.uk>

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

Sent from my iPhone

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.

From: Niall Higgins
Sent: 23 September 2025 14:41
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.

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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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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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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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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.

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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,

Name: Niall Higgins

Address: 29 Greenhaven Dungiven

From: Lorraine Maguire
Sent: 23 September 2025 15:16
To: Planning
Subject: planning application LA01/2023/0008/F Brishey Wind Farm, Benbradagh

As members of the Dungiven and Roe Valley 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 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.

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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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.

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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: Lorraine Maguire, Jack Hartin, Rhys Hartin, Ciara Hartin and Pádraig Hartin

Address:

27 O'Cahan Place
Dungiven
BT47 4SX

[Sent from AOL on Android](#)

From: Michelle O'Connor
Sent: 23 September 2025 15:45
To: 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; 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 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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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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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,

Michelle O'Connor
37 MOUNTAINVIEW PARK
Dungiven
Bt47 4na

Sent from [Outlook for iOS](#)

Sent from [Outlook for iOS](#)

Sent from [Outlook for iOS](#)

From: Carmel McReynolds
Sent: 23 September 2025 16:16
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:-

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.

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.
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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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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: Carmel MC Reynolds

Address: 115 Curragh Rd , Dungiven , Bt474qj

From: Seamus McShane
Sent: 23 September 2025 16:19
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: Save Benbradagh – LA01/2023/0008/F

Dear Councillor/Alderman

Please REFUSE Benbradagh Wind Farm

As a resident of the Sperrins , we are 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.

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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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: Seamus McShane, Charles McShane, Angela McShane, Adrienne McShane

Address: 23 Glencush Road, Dunamanagh, Co. Tyrone BT82 0LY

From: Elizabeth Kelly
Sent: 23 September 2025 16:18
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 of the Dungiven and Roe Valley community, 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.

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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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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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.

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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 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 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: Elizabeth Kelly
Address: Dungiven

Sent from my iPhone

From: Pauline McHenry
Sent: 23 September 2025 16:47
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:-

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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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,

Pauline McHenry-McGarry
Sent with [Proton Mail](#) secure email.

From: mary cooke
Sent: 23 September 2025 16:49
To: Planning
Subject: Planning application ref. LA01/2023/0008/F – Brishey windfarm

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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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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 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: Mary Cooke

Address: 9 Kevin Lynch Park, Dungiven. BT47 4GZ

From: Ciara Hassan
Sent: 23 September 2025 16:56
To: Niamh Archibald
Subject: URGENT - Benbradagh Wind Farm LA01/2023/0008/F

Dear Councillor,

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

As a member of the Dungiven and Roe Valley community, 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.

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 is 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.
- 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).

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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.

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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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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.

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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,

Ciara Hassan
48 Derrychrier Road
Dungiven

From: Jackie Mackle

Date: Tuesday, 23 September 2025 at 15:17

To: Philip Anderson

Niamh Archibald

Ciaran Archibald
Sean Bateson
Yvonne Boyle
Steven Callaghan
Aaron Callan
>, Brenda Chivers
, Michael Coyle
Mark Fielding
Richard Holmes
, Dawn Huggins
Sandra Hunter
Lee Kane
Kennedy
Michelle Knight-McQuillan <Michelle.Knight-
llister 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

Subject: Objection to Benbradagh Windfarm.

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. Please see attached letter with further points relating to this issue.

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



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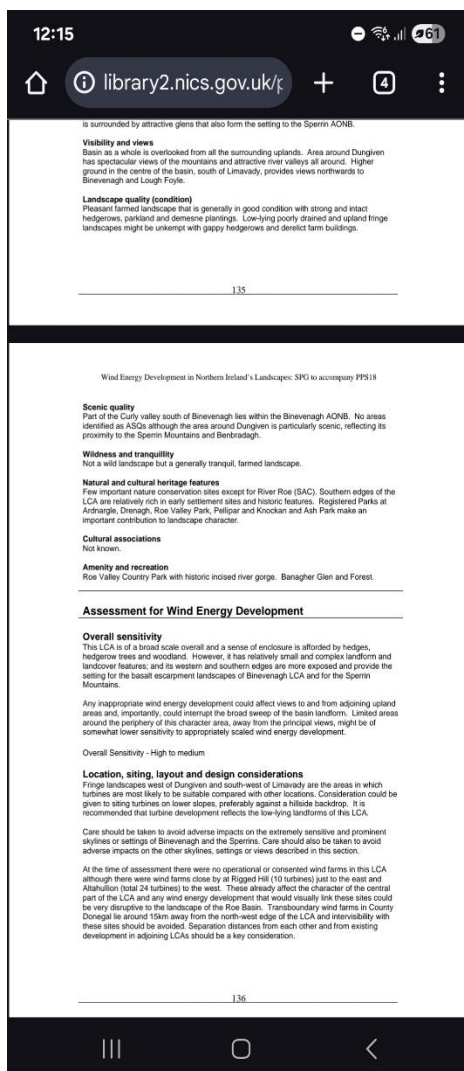
23/9/2025

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.”

Mrs Jacqueline Mackle

Laura Crawford

From: Maranna Sweeney
Sent: 23 September 2025 17:47
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

Sent from my iPhone

From: Caroline Sweeney
Sent: 23 September 2025 18:08
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

As member(s) of the Dungiven and Roe Valley community, I we are 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.

IWe 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 our concerns for further consideration:-

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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.

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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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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: Caroline Sweeney

Address: 12 Glenroe Park Dungiven BT47 4PE

Name Eileen Sweeney

Address 76 Magheramore Rd Dungiven BT47 4SP

From: Sean
Sent: 23 September 2025 19:07
To: iamh.Archibald@causewaycoastandglens.org; 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: Benbradagh wind farm objection

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 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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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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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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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.

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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.

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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.

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Yours sincerely,
Sean McAllister
6 Kevin Lynch Park Dungiven

From: Pauline Sweeney
Sent: 23 September 2025 19:15
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; Maighréad Watson; Leanne Peacock; Planning
Subject: Wind farm Benbradagh

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Yours sincerely,
Pauline Brolly
435 Ballyquin Road
Dungiven
BT474NQ

Sent from my iPhone

From: Erin McReynolds
Sent: 23 September 2025 19:29
To: Planning
Subject: Fwd: Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

To: 'planning@causewaycoastandglens.gov.uk'
<planning@causewaycoastandglens.gov.uk>
Subject: 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',

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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.
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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: Clare McReynolds

Address:

380 Drumrane Road

Dungiven
Co.Derry

From: Erin McReynolds
Sent: 23 September 2025 19:24
To: Planning
Subject: Fwd: Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

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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.
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5. Failure to provide updated information:

- i. The developer has failed to provide updated emission calculations for the reduced scheme.
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Name: Erin McReynolds

Address:

380 Drumrane Road

Dungiven
Co.Derry

From: Erin McReynolds
Sent: 23 September 2023 19:30
To: Planning
Subject: Fwd: Re. 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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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: James McReynolds

Address:

380 Drumrane Road

Dungiven
Co.Derry

From: Erin McReynolds
Sent: 23 September 2023 19:28
To: Planning
Subject: Fwd: Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm

To: 'planning@causewaycoastandglens.gov.uk'

<planning@causewaycoastandglens.gov.uk>

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:-

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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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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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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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.

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Yours sincerely,

Name: Thomas McReynolds

Address:

380 Drumrane Road

Dungiven
Co.Derry

From: julie toner
Sent: 23 September 2025 19:32
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

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 LA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

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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: Julie Toner

Address: 155 Whitehill Park Limavady

From: Bronagh Kearney
Sent: 23 September 2025 20:23
Cc: Planning
Subject: Benbradagh Wind Farm – LA01/2023/0008/F

Dear Councillor

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

11. Of critical importance is the 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 of radius 40m, and rotor diameter/ sweep 80m).

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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.

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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 the 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,
Bronagh Kearney
100 Glenelly Road
Plumbridge
BT79 8BP

From: Elaine Mullan
Sent: 23 September 2025 20:30
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

Dear Councillor

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

As members of the Dungiven and Roe Valley community, we are 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.

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.
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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,

Elaine and Owen Mullan

18 church view
Drumturn
BT490UY

Sent from my iPhone

From: Kevy Ned
Sent: 23 September 2025 20:51
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: Benbradagh wind farm objection

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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 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,
Kevin Devine
60 Tornoge Rd
Donemana
Bt820sj

Sent from [Outlook for iOS](#)