

Laura Crawford

From:
Sent: 24 September 2025 08:54
To: Planning
Subject: For the urgent attention of: Ms. Elaine Olphert

Importance: High

Dear Ms. Olphert,

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

As owner of this property I would like to highlight my concerns as follows:

Drumcovitt House

There does not appear to be an assessment of the impact of the proposal on Drumcovitt House, which is a listed building and detailed as having “fine views of Benbradagh”.

ZTVs show the 4 turbines will be visible from this location including the hubs.

This will have a considerable deleterious impact on this heritage asset which does not appear to have been assessed. Impacts to and from the setting of local buildings needs consideration.

Yours sincerely,

Sarah Wallis

Drumcovitt House
704 Feeny Road
Feeny
Co. L'Derry
BT47 4SU

Tel:
Mobile:

www.drumcovitt.com
<https://virtualvisitr.com/panoramas/Drumcovitt-House/tour-c.html>



Discover the Sperrins and Make it Yours!

Laura Crawford

From: Kathleen McGurk
Sent: 23 September 2025 11:40
To: Planning
Subject: FW:

From: claire kelly >
Sent: 23 September 2025 11:28
To: Ciaran McQuillan Orlagh McCaughan
Cara McShane
; Brenda Chivers
; Kathleen McGurk
Mark Fielding
David Jackson
Mayors Office
Jemma Morris
Laura Haslett
Kathryn Campbell
Louise Mullan
Business Support in Causeway Coast and Glens

Subject:

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/ 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).

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

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

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

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

10. The proposed development of four industrial-scale, 150m (500 feet) high turbines would breach the distinctive and celebrated ridgeline of Benbradagh that is protected under planning policy (LCA 36), and would be highly visible throughout the area, as can be very clearly seen in the applicant's Zone of Theoretical Visibility Map Figure 10.15, attached, (which can be found on the planning portal). This diagram confirms that the giant blades/ rotors would be clearly visible throughout most of Dungiven and beyond in outlying areas upto over 10-15km away. Other ZTVs show that the hubs would be fully visible upto Derrychrier in the highly important transient view of Benbradagh when approaching Dungiven from the west on the new A6.

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

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: Claire mc gill

Address: 128 Main Street dungiven

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Laura Crawford

From: Save Benbradagh
Sent: 24 September 2025 09:06
To: Planning
Subject: WHOOPER SWANS_OBJECTION to Brishey Windfarm – Application Ref: LA01/2023/0008/F
Attachments: 24.09.25_Save Benbradagh Group_Whooper Swans_Objection Letter_Application ref_LA01_2023_0008_F..pdf

For the urgent attention of: Ms. Elaine Olphert

24.09.2025

Dear Ms. Olphert,

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

Whooper Swan Survey Habitats Regulations Assessment

We wish to highlight the following:

HRA requires a developer to demonstrate beyond reasonable scientific doubt that there will be no adverse environmental impacts arising from the project.

Ornithological survey methodology for Whooper Swans has been prescribed by Nature Scotland for wind farms with the requirements to observe flight lines between feeding and roosting sites one hour before sun rise and after sunset at vantage points of a proposed wind farm.

Hinterland surveys of wetlands for the target species should also have been completed as per the Irish Wetland Bird Survey methodology (Lewis et al., 2018). The Hinterland Survey should have established the populations, locations and flight lines of nearby feeding and roosting sites on Lough Swilly, Lough Foyle, River Foyle, River Bann, Lough Beg and Lough Neagh. The latest January 2020 census shows Whooper Swan populations at these locations of over 4,000.

A Nocturnal Migration Audio Survey should also have been completed in parallel with visual surveys with acoustic monitoring via autonomous recording units to monitor nocturnal Whooper Swans activities at the visual vantage points across the proposed wind farm site. Recording devices are programmed to record continuously starting one hour before sunset and 30 minutes before sunrise and thereby provide a complete assessment with the visual and hinterland surveys. The temporal and spatial distribution of Whooper Swans calls across the development site provides evidence if the target species has established nocturnal flight paths across the site.

Collision Risk Assessment can only be undertaken if the flight habits, established flight characteristics and published avoidance rate have been determined for the wind farm site with an in-combination assessment of electrical power connection lines. Disturbance and Displacement Assessments also need to be considered regarding target species avoiding flight paths near wind farms and thereby impacting their weight and survival rates for return migration to Iceland.

The absence of Hinterland and Nocturnal surveys presents incomplete evidence that demonstrates beyond reasonable scientific doubt that there will be no adverse impacts on protected SAC, SPA and RAMSAR sites and species.

Any planning consent based on these lacunae will be unlawful.

We trust the above breaches will be taken into consideration and this application will be refused.

Yours sincerely,
Save Benbradagh Group

Laura Crawford

From: Save Benbradagh >
Sent: 24 September 2025 09:09
To: Planning
Subject: OBJECTION to Brishey Windfarm – Application Ref: LA01/2023/0008/F
Attachments: 24.09.25_Save Benbradagh Group_Cumulative Impact_Objection Letter_rev.01
_Application ref_LA01_2023_0008_F..pdf

For the urgent attention of: Elaine Olphert

24.09.2025

Dear Ms. Olphert,

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

We would re-iterate our comments regarding saturation, and failure by developer to accurately assess cumulative impacts of wind energy developments surrounding the Roe Valley basin.

We would contest that - given the wide open nature of the Roe Valley, with little tree coverage and ash trees forming a high percentage of same and unfortunately subject to high rates of ash dieback, and that wind energy developments are all on much higher ground than the valley basin – that the separation distances between wind energy developments should be 12km as detailed in Chapter 3.2 of Wind Energy Development in Northern Ireland's Landscapes.

This guide also details that for sites in landscapes “with some enclosure”, (which is not reflective of the Roe valley basin), 6km separation distances may be suitable.

Our assessment indicates that - taken to nearest turbine as follows - the lesser of these distances isn't even being met:-

- a) Dunbeg South - to - Rigged Hill Repowering (consented but not yet built) - **3.8km**
- b) Rigged Hill Repowering - to – Craiggore – **2km**
- c) Craiggore - to - Smulgedon (consented but not yet built) – **1.3km**
- d) Smulgedon - to – Brishey (proposed) – **3.6km**
- e) Brishey – to - Cluster of single wind turbines at foot of Benbradagh (3 of which have got permission to increase in height an rotor diameter in past 12-15months, 1 constructed recently increased in height in last year - therefore ES LVIA outdated) – **2km**
- f) Cluster of single wind turbines at foot of Benbradagh – to – Magheramore (consented) *not taken into consideration in PAC decision despite being raised as a concern by 3rd party objectors at Hearing!* – **3.8km**

g) Magheramore - to - Ballyhanedin (consented but not yet built) – **6.7km**

h) Ballyhanedin - to - Altahullion I and II and Glenconway I and II – **4.2km**

These figures clearly demonstrate severe non-compliance with separation distances around the Roe Valley, and very significant saturation. This saturation is being experienced negatively by local communities - even with a number of these windfarms not yet constructed.

Additional points:

Impacts on transport corridors and important tourism routes , especially the A6.

We would also highlight that para. 3.3.2 of “Wind Energy Development in Northern Ireland's Landscapes” states “The North West – issues that need careful consideration – impacts on transport corridors and important tourism routes , especially the A6”.

Viewpoint analysis – skewed baseline creates bias

The visualisations for the revised scheme are presented in relation to the previous 6 turbine scheme, rather than in relation to the landscape as existing / current baseline. This creates significant skew and bias. In addition the developer has deliberately chosen viewpoints with maximum amount of foreground visual clutter to disguise the impact of the proposal.

ZTVs

The developer relies heavily on ZTV submissions, and did so in their rebuttal to NIEA landscapes team. Best Practice Guide to PPS18 para. 1.3.31 details these have their shortcomings. Consideration of impact in same is considered over a wide area 25-30km, resulting in significantly reduced/ diluted figures of % of area impacted, when para. 1.3.25 details that windfarms at distances of over 15km are minor elements in the landscape and therefore not of significance. In addition the accuracy of ZTVs cannot be verified, (not unless the developer was to share and submit their model, and the Council and NIEA had software for viewing same).

Extract : Best Practice Guidance to PPS18

Visual Assessment

- 1.3.31 There are a number of techniques which may be used to inform visual assessment of a proposed development:
- a **zone of theoretical visibility map** will show where a wind farm may be seen from;
 - **viewpoint analysis** based on key viewpoints throughout the surrounding area;
 - computer generated **wireline diagrams** will indicate how wind turbines will appear from specific viewpoints; and
 - **photo- and video montages** are images whereby an impression of a proposed development is superimposed upon an actual photograph or video of the proposed site.

All of these have strengths and limitations.

Visual Impact

- 1.3.25 Turbines in wind farms will normally be tall, frequently located in open land, and therefore will often be highly visible. Domestic turbines will be smaller (generally less than 15m). It will normally be unrealistic to seek to conceal them. Developers should seek to ensure that through good siting and design, landscape and visual impacts are limited and appropriate to the location. The visual impact will be dependent on the distance over which a wind farm may be viewed, whether the turbines can be viewed adjacent to other features, different weather conditions, the scale and layout of the development and the landscape and nature of the visibility. The following is a general guide to the effect which distance has on the perception of the development in an open landscape.

General Perception of a Wind Farm in an Open Landscape:

Up to 2kms	Likely to be a prominent feature
2-5kms	Relatively prominent
5-15kms	Prominent in clear visibility - seen as part of the wider landscape
15-30kms	Only seen in very clear visibility - a minor element in the landscape.

We trust these views will be taken into consideration and this harmful proposal will be refused.

Yours sincerely,

Save Benbradagh Group

Dungiven

Laura Crawford

From: Save Benbradagh
Sent: 24 September 2025 09:16
To: Planning
Subject: WHOOPER SWANS_02_OBJECTION to Brishey Windfarm – Application Ref: LA01/2023/0008/F
Attachments: 24.09.25_Save Benbradagh Group_Whooper Swans 02_Objection Letter_Application ref_LA01_2023_0008_F..pdf

For the urgent attention of: Ms. Elaine Olphert

24.09.2025

Dear Ms. Olphert,

**Re. Planning application ref. LA01/2023/0008/F – Brishey windfarm
Whooper Swans assessments**

We wish to highlight the following:

- The Office of Environmental Protection concluded that there may have been failures by DAERA to comply with environmental law in respect of their general duties to protect and maintain wild bird populations (including whooper swans), and wrote to DAERA in this regard on 09.06.2025. Given NIEA's responses to this application predate this action by the OEP it is critical that this issue is reviewed. See link below for info:

<https://www.theoep.org.uk/news/oep-finds-possible-failures-comply-environmental-law-daera-relating-protection-wild-birds-0>

We trust the above will be taken into consideration and this application will be refused.

Yours sincerely,

Save Benbradagh Group,
Dungiven

From: Bridin McCloskey
Sent: 24 September 2025 09:24
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 (a) member(s) of the Dungiven and Roe Valley community, I am/ we are writing to urge you to call on the Planning Committee to refuse the planning application iLA01/2023/0008/F for the proposed wind farm on Benbradagh, which is due for determination on Wednesday 24th September.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Bridin McCloskey
46 Derrychrier Road
Dungiven