

**COUNCIL FOR NATURE CONSERVATION
AND THE COUNTRYSIDE**
An Advisory Council to the Department of the Environment

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9th April 2010

Ryan Beech
Planning Appeals Commission
Park House
87/91 Great Victoria Street
Belfast
BT2 7AG

Dear Mr Beech

Planning Application B/2007/0563/F
Dunmore Wind Farm, Bolea Road, Limavady
PAC Reference 2009/A0037

CNCC supports Planning Service in its refusal of Planning Permission for this development of 8 wind turbines, on the following grounds:-

- It would produce an unacceptable degree of visual intrusion in the heart of the Binevenagh Area of Outstanding Natural Beauty, and in doing so would devalue the quality of the AONB, damaging its distinctive landscape character and reducing its tourism potential. The AONB is designated under the Nature Conservation and Amenity Lands Order (NI) 1985, which requires all public bodies to 'have regard to the need to conserve the natural beauty and amenity of the countryside'. It is also a Countryside Policy Area within the draft Northern Area Plan, and Planning Service is therefore directed to protect and enhance its unique landscape character.
- The Supplementary Planning Guidance to PPS 18 states that much of this landscape is of extreme sensitivity, due to its iconic, landmark quality and very wide visibility. It goes on to say that commercial wind energy development at the northern or southern ends of the escarpment would be unacceptable, and there is little or no expansion capacity for windfarms beyond the existing development at Rigged Hill. We would support this viewpoint.
- We have concerns about the construction of windfarms on peatland, not because of the risk of slippage, but because this is a priority habitat, and also our most important store of carbon which we cannot afford to damage.

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- We have concerns about the potential for damage to the River Roe and Tributaries Special Area of Conservation and Area of Special Scientific Interest, designated because of its salmonid populations.
- We are concerned about cumulative effects of windfarms within and adjacent to our most important and designated landscapes. Applications such as this one are being considered on their own, but there are a number of other applications in the area, including one immediately beside this one, which would effectively form one large development if both were approved. There needs to be some better mechanism for taking a more strategic view of these applications.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Patrick Casement', with a horizontal line underneath.

PATRICK CASEMENT
CHAIRMAN