

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

An Advisory Council to the Department of the Environment

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23rd July 2010

Irene Garret
Planning Appeals Commission
Park House
87/91 Great Victoria Street
Belfast
BT2 7AG

Dear Ms Garret

PAC Reference 2007/A1313
Planning Application H/2004/1395/F
Proposed Windfarm at Mullaghturk Mountain

CNCC has the following points to make on the FEI that the Commission has received in respect of this appeal:-

1. Visual Amenity and Landscape Character

CNCC remains convinced that this development would seriously affect the visual amenity and the quality and character of the landscape of the Sperrin AONB. This area, LCA 24, South Sperrin, is of high scenic quality with a strong sense of tranquillity due to its remoteness and inaccessibility. Its unspoilt character makes it highly sensitive to change and commercial wind energy development would have an overwhelming landscape impact. In the draft Supplementary Planning Guidelines Mullaghturk is singled out as a focal point where the landscape is too sensitive for any commercial windfarm development such as this.

The southern part of LCA 24 also provides the landscape setting for the neighbouring LCA 25, Beaghmore Moors and Marsh, including its important archaeological landscapes. As the draft SPG states 'This is a wide-open, windswept landscape with a strong wilderness character, reinforced by a sense that human occupation was once much more widespread than it is today'. This windfarm development would definitely have a negative impact on this important and sensitive area.

2. Peat Stability

CNCC believes that whatever the stability of the peat substrate there should be a presumption against this type of development on peat, particularly on blanket bog, even when it is partially cut-over as in this situation. Blanket Bog is a priority habitat as set out in Annex 1 of the EU Habitats Directive, and Northern Ireland holds a significant part of the UK (and EU) resource. We therefore believe that it is inappropriate to develop a windfarm on this type of substrate. In addition, the damage caused to the peat in the construction of turbine bases and the connecting roadways will inevitably lead to significant losses of stored carbon through oxidation of the exposed peat, thereby reducing the carbon savings claimed for the windfarm.

Yours sincerely



PATRICK CASEMENT
CHAIRMAN