

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

An Advisory Council to the Department of the Environment

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11 May 2010

Mr Robert Robinson
The Planning Service
Headquarters
Millennium House
17-25 Great Victoria Street
Belfast
BT2 7BN
Via Email

Dear Robert

Planning Application - H/2010/0009/F Proposed Windfarm – Crockandun, near Draperstown

This development is for 11 wind turbines of 125m in height, within Landscape Character Area 41, Slieve Gallion. PPS 18 and the draft Supplementary Planning Guidelines to it should be applied to this application.

CNCC notes that this LCA is judged to have limited capacity for small/medium windfarm development, with turbines of medium height, in the area for which this development is proposed, set back from the steeper more prominent slopes. We believe this to be a well-sited development in landscape terms, though with some reservations about the height of the turbines, particularly as they lie within the Sperrin AONB.

The habitat is mostly cut-over/degraded peat or poor acid grassland, and though these are not priority habitats in nature conservation terms, they are of interest and value in themselves and as a mosaic of different vegetation types. This is shown by the variety of plants and animals recorded in the site surveys. While the turbine siting has avoided the deepest peat, we note that turbines T1, T4, T7, T10 and T11 are all sited on peat between 0.5 and 1 metre deep. This means that a considerable amount of peat will be dug up and /or exposed, particularly when the road development (4km of new road and 1.6km of upgraded road) is considered. We would question the need for new road to link turbines T3 and T7, and the continuation of road beyond T5, T7, and T8. While great care must be taken in avoiding run-off during construction we would also point out the opportunity that arises for permanently blocking drains to create conditions more conducive to active peat deposition as part of the mitigation for peat loss.

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We note the presence of breeding Merlins on or adjacent to this site, and the good populations of their principle prey species, Meadow Pipits and Skylarks across the site. This is clearly an important hunting ground for the Merlins, and we retain some concerns over the risk of collision to birds concentrating on the pursuit of prey. We recommend careful monitoring of the Merlins and their breeding performance.

We welcome the use of borrow pits to provide material for the roads, and their use to hold excavated material, which should be covered as rapidly as possible with organic soil to prevent further oxidation of peat. We are also pleased to see that a Habitat Management Plan is being developed, and that great care will be taken to avoid damage to Sruhanleanantawey ASSI.

Yours sincerely

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

**PATRICK CASEMENT
CHAIRMAN**