

**COUNCIL FOR NATURE CONSERVATION
AND THE COUNTRYSIDE**
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05 March 2010

Ms Jane Curley
Planning Headquarters
Millennium House
17-25 Great Victoria Street
Belfast
BT2 7BN
Via Email

Dear Ms Curley

Planning Application – K/2006/1934/F
Proposed Windfarm – CASTLECRAIG, Drumquin, Co.Tyrone

This development is for 10 wind turbines (reduced from 25 in the original application) of 127m in height, and the site sits within Landscape Character Area (LCA) 14 Lough Bradan. The PPS18 and its accompanying Draft Supplementary Planning Guidelines should be applied to this application.

In our response to the original application, CNCC highlighted the issue of cumulative landscape impacts of windfarms in this area, and the Further Environmental Information provided has set out to address this issue, as has the significant reduction in the number of turbines proposed. Since our response the draft SPG has also been published, giving detailed information and assessment on the capacity of this landscape to absorb windfarm development. While the SPG states that this LCA can accommodate large windfarms with medium or large turbines, if carefully sited, it goes on to suggest that the threshold would be two large developments and that it is already close to capacity. This reinforces our concerns about the cumulative effects of the windfarm development in this and neighbouring LCAs. Indeed the FEI acknowledges this with the admission that this development would reinforce the Lough Bradan area as a 'windfarm landscape'.

Having stated this, the FEI includes a series of detailed photomontages from a series of viewpoints around the site, showing how Castlecraig would appear with all the other windfarms in the area. We feel that these photomontages reinforce our earlier concern about cumulative effects, with the skyline becoming full of turbines when viewed from several of the viewpoints. The effect is slightly diminished in the photomontages by breaking the views into quadrants, but the human eye and brain is quite capable of taking in and registering a much wider panorama. The FEI concludes that even substantial visual impact is not of great concern, because there are few clear views of the turbines anyway, which seems seriously at odds with the contention that this is a 'windfarm landscape'.

The issue here is one of thresholds, and where a line should be drawn. CNCC feels that this LCA is at the point where the landscape is about to be overwhelmed by wind turbines, and that its capacity has been reached with existing and approved windfarms. This is further complicated by the cumulative transboundary effect, with the wider landscape in this part of Tyrone/Fermanagh becoming compromised.

CNCC's other primary concern was over Hen Harriers and other species of raptor. The FEI makes it clear that this is an important area for Hen Harriers, with at least 3% of the Northern Ireland population nesting within foraging distance. While there is no evidence of windfarms affecting Hen Harriers, they remain a priority species in Northern Ireland with a Species Action Plan drawn up, and with two large SPAs declared specifically for the species. This makes this a difficult decision, but we do recognise that the developer has addressed the issue and we welcome the inclusion of a Habitat Management Plan for the site, and the commitment to ongoing monitoring of the Harrier population.

In conclusion, CNCC welcomes the many improvements in this application from the original, including the reduction in turbine numbers, the extra care in siting of turbines, the use of a floating road, and the opportunities for habitat and peat condition improvement. We remain very concerned about the impact of yet another windfarm on an already cluttered landscape, giving a long ridgeline dominated by turbines. We would also have ongoing concerns about the Hen Harrier population in the area.

Yours sincerely

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

**PATRICK CASEMENT
CHAIRMAN**