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From: Standing OurGround <WomenoftheSperrins@outlook.com>
Sent: 19 April 2019 12:51
To: DevelopmentPlan@midulstercouncil.org
Subject: Response To Development Plan
Attachments: standing Our Ground Women of Sperrins.docx

To whom it may concern

Please find attached our response to the Mid Ulster Development Plan.....

Standing Our Ground Women of Sperrins

c/o 123 Broughderg Rd

Omagh

BT79 8JN

17th April 2019

We are fully aware that the Broughderg Area Development Association (BADA), since its formation in 1997, has worked tirelessly to protect and preserve the distinctive, natural, cultural, wildlife habitats and archaeological heritage and high scenic value of our local area as a tourist destination within this part of the Sperrins Area of Outstanding Natural Beauty (AONB).

Already positive returns from our efforts are evident. In recent years Davagh Forest Mountain Bike Trails and Play Park have been established. This Davagh Forest sporting and recreational complex along with the iconic world renowned Beaghmore Stone Circles have seen a massive increase in visitor numbers in recent years. And just as this Area Plan is being prepared work (sponsored by MUDC) is underway for the construction of the Dark Skies Conservatory in Davagh - the proposed focal point for Beaghmore Dark Skies Park.

It is therefore very appropriate that provision is being made in mid Ulster Councils (MUDCs) Local Development Plan to protect and preserve the qualities and characteristics of vulnerable and distinctive landscapes, such as that within the BADA region, which are particularly sensitive to renewable energy development especially development consisting of wind turbines.

We particularly welcome the introduction of Special Countryside Areas (SCA's) and areas of Constraint on Wind Turbines and High Structures (AOCWTHS) proposed in paragraph 22.11.

22.14 Justification and Amplication Mid Ulster Council will presume in favour of renewable energy development of all types except where it is likely to cause harm to our most vulnerable and distinctive landscapes or where it would be detrimental to the public safety, human health or residential amenity.

We state that we are not anti-renewable energy but are off the strong belief through detailed investigation that wind turbines are detrimental to human health and residential amenity.

22.18 Heading Vulnerable and Distinctive Landscapes.

Our most vulnerable and distinctive landscapes comprises of the Sperrins which has been designated as AONB and the internationally important habitat of Slieve Beagh. Within these areas there are places where renewable energy development may be acceptable, particularly in the less visionally prominent areas. However, the areas are dominated by the open nature of the mountain tops which are predominately open and exposed blanket and raised bog, moss and wild grassland. 22.19 states in order to protect the character of these areas, a Special Countryside Area has been designated etc to restrict large wind turbines and other high structures, an Area of Constraint on Wind Turbines and high Structures has been designated.

To date quite a number of proposed turbines in this landscape locality which straddles both Fermanagh Omagh District Council (FODC) and Mid Ulster District Council(MUDC) areas have been refused due to the unacceptable visual impact and visual amenity and landscape character through the scale and siting of the projects which were being proposed.

And in relation to protecting the open and exposed vulnerable Sperrin AONB Landscapes which are particularly sensitive to renewable energy development especially, development consisting of wind turbines; we urge Mid Ulster District Council(MUDC) to cooperate with Fermanagh Omagh District Council(FODC) to ensure that the adjoining and corresponding area of the South Sperrin, already proposed as having no underlying capacity for wind energy, is afforded the same protection within the respective area plans.

Wind Energy

22.21 The key tests for wind energy will relate to the impact on the wind turbine on the landscape as well as potential impacts on public safety, human health and residential amenity.

22.22.it will not be possible to ensure that wind turbines remain hidden or unseen in the landscape. No one could argue with that fact.

22.23 Statement is certainly true, but you state that it will be up to the applicant to demonstrate that visual dominance will not occur. An independent need to take responsibility for this not the applicant so that further investigation on noise and shadow flicker is fully investigated.

Beneficial for the applicant to demonstrate the residents are in support of the proposal...again can the developers be trusted?

We also welcome the proposed designations; Dispersed Rural community Area of Constraint on Wind turbines and High Structures, Tourism Conservation Zone, Area of Constraint on mineral Development and Area of significant Archaeological Interest as detailed on Map 20.

Policy HE1 Beaghmore Stone circles Area of Significant Archaeological Interest is particularly welcome. Broughderg Area Development Association is totally in agreement with the justification and Amplification of this policy as detailed in paragraph 17.10.

We sincerely hope that the positive policies, which include the proposed designations, restrictions, protections, public safety, human health, residential amenity, archaeological heritage, high scenic value are implemented.

Standing Our Ground Women of the Sperrins.