

**Elaine Mullin**

---

**From:** Josephine Clarke [REDACTED]  
**Sent:** 19 April 2019 15:51  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** Local Development Plan  
**Attachments:** CBRA to Development Plan.docx; CBRA to Development Plan.docx

Attached is the response from Broughderg Concerned Residents To MUDC area Plan

Concerned Broughderg Residents Association

123 Broughderg Rd

Omagh

BT79 8JN

19<sup>th</sup> April 2019

Dear Development Plan

The following paragraphs our responses from the concerned residents to MUDC Draft Plan Strategy for the local Development Plan2030.

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 their 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 Davagh Dark Skies Park.

It is therefore very appropriate that provision is being made in Mid Ulster Council ( MUDC) 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.

Whilst we are not anti-renewable we agree that wind turbines and tall structures and the accompanying industrialisation are not appropriate for all landscapes especially the vulnerable and distinctive landscapes in this part of the Sperrins AONB. In this regard we particularly welcome paragraph 22.18.

22.19 states that in order to protect the character of these areas, a Special Countryside Area has been proposed in order to restrict large wind turbines and other high structures, an Area of Constraint on Wind Turbines and high Structures has been proposals.

These proposals are very welcome as to date quite a number of proposed turbines in the Broughderg 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 impact on visual amenity and landscape character through the scale and siting of the projects which were being proposed.

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.

We agree with the Statement in Paragraph 22.33

We also welcome the proposed designations; Dispersed Rural community and Areas 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. Concerned Broughderg Residents 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 policies which are designed to provide protection for public safety, human health, residential amenity, archaeological heritage, high scenic value of the Sperrins AONB are implemented.

Concerned Broughderg Residents Association