

Comhairle Ceantair
Lár Uladh
Mid Ulster
District Council

Local Development Plan

High Sperrins and Clogher Valley Areas of Contraint on Wind Turbines and High Structures (AoC)

Proposed Areas of Contraint on Wind Turbines and High Structures

1.0 Introduction

1.1 The purpose of this paper is to provide the background, rationale and methodology for the designation of Areas of Constraint on Wind Turbines and High Structures within the Mid Ulster District, hereafter referred to as Areas of Constraint (AoC). AoC's are environmentally sensitive areas where a more restrictive policy is applied in relation to wind turbines and other high structures. Within AoC's wind turbine development and high structures will normally be restricted to 15m in height.

It is proposed to introduce Areas of Constraint into the following two areas (See Map A):

- The High Sperrins
- The escarpments and prominent ridges overlooking Clogher Valley

1.2 The proposed AoC is shown as a thick blue line in overall context 'Map A' and in detailed maps 1-6 (Appendix 1).The proposed Special Countryside Area (SCA) is also shown, and is indicated by a thick red line. Whereas AoC's place restrictions on particular types of development i.e. wind turbines and high structures, SCA's restrict all forms development, unless proposals meet one of the listed exceptions. The background, rationale and methodology for the proposed SCA is contained in related papers 'SCA: High Sperrins and Slieve Beagh' and 'SCA: Lough Neagh/Lough Beg'.

2.0 Background and Regional Policy Context

2.1 The Regional Development Strategy (RDS) requires the protection of designated areas of countryside from inappropriate development. One of the central objectives of the RDS is the protection and enhancement of the environment through an approach to development and policy formulation, which has the state of the environment as a central deciding factor. The RDS points out the introduction of specific designations is an effective way of ensuring nature conservation interests are protected.

2.2 The RDS emphasises that the diverse range of habitats, species, landscapes and earth science features in Northern Ireland are highly valued assets, which should be conserved, protected and enhanced for their own intrinsic value. It advises that protection of these assets is also justified by the tangible benefits they have for the economy, the environment, and the health and wellbeing of society. Collectively, these derived benefits are known as ecosystem services.

2.3 Similarly, the Strategic Planning Policy Statement (SPPS) recognises how safeguarding our unique landscape (including heritage assets) and biological diversity makes an important contribution to the protection of the wider global ecosystem, advising that 'it is critical that this vital asset is preserved and improved for the enjoyment and benefit of future generations'.

2.3 The SPPS states that 'Depending upon a council's objectives and local circumstances, it may be appropriate to include additional strategic policies and proposals, zonings and designations specific to issues pertaining to the plan area, provided they are of a

strategic nature' and that that local polices 'may be brought forward to maintain the landscape quality and character of Areas of High Scenic Value'.

2.4 The 'Environment' chapter of the MUDC Preferred Options Paper emphasises the importance of giving appropriate consideration to environmental issues in the allocation of land for future development. The preferred approach for protecting the districts environmental assets is by setting clear constraints at a strategy level and provide a balanced approach by delivering key policies to control development in a consistent and sustainable manner. The POP highlights 6 key environment measures for the district, including;

- '*Manage Development in the Sperrins to protect open vista and bogland whilst accommodating sensitive development to meet the needs of local residents and visitors'*

- '*Protect the Clogher Valley and other important ridgelines and river valleys from obtrusive development whilst maximising recreation and leisure opportunities'.*

Rationale

2.5 The proposed AoC designation seeks to give effect to above measures by identifying those parts of the district that require additional protection, over and above that which is generally applicable in the countryside, due to their particular sensitivities and vulnerabilities. This approach is consistent with the LDP's 14th objective; '*The need to protect and enhance the natural and built environment to achieve biodiversity, quality design, enhanced leisure and economic opportunity and promote health and wellbeing*.' The introduction of an AoC also gives effect to LDP Strategic Planning Guideline 10 (SPG 10) which aims to '*Facilitate the protection of vulnerable landscapes and conservation interests, from inappropriate and over dominant development while promoting adequate provision of open space and landscaping integrated with broader green and blue infrastructure systems'.*

2.6 As part of the POP consultation process, Mid Ulster District Council invited all relevant stakeholders to make comment on the councils preferred option of having a defined area wherein the development of wind turbines and high structures would be restricted. In their response, NIEA Natural Environment Division welcomed the concept as a mechanism to protect our most vulnerable landscapes. Adjoining Councils Omagh and Fermanagh, Causeway Coast and Glens and Derry and Strabane acknowledged that the AoC's are a common area of interest and highlight the need for a joined up approach. Causeway Coast and Glens raised concerns that proposed restrictions may have a detrimental impact on those who live or farm within the AONB. MUDC continues to engage with adjoining councils including Monaghan County Council, as part of the Sperrins and Cross Border Forums. Those within and representing the renewable industry strongly opposed the concept and preferred to see existing policy PP18 Renewable Energy being retained.

2.7 Mid Ulster's Renewable Energy Strategy incorporates regional strategic objectives as laid out in the SPPS, including; the need to ensure that the environmental, landscape, visual and amenity impacts associated with or arising from renewable energy are adequately addressed and, that adequate protection is given to the regions built natural and cultural heritage features. This is balanced with the need to encourage energy efficiencies and promoting the use of renewable energy.

2.8 Existing policy RE1 of PPS 18 Renewable Energy recognises the dominating and prominent nature of wind energy development stating that "of all renewable technologies, wind turbines are likely to have the greatest visual and landscape

effects". The Councils preferred approach is to streamline and tailor existing policy in relation to environmentally sensitive areas and in particular to our vulnerable and distinctive landscapes. It is considered that this would provide the right balance between development, and protection of our most important landscapes and assets.

2.9 In addition to wind turbines, proposals for telecommunications, overhead cables and other high structures will be restricted to 15 metres in height within AoC's, albeit with several exceptions included. The proposed 'Telecommunications, Overhead Cables and High Structures' policy reads as follows;

'…*telecommunications development, overhead cables and high structures will normally be restricted to 15 metres in height above original ground levels in 'Areas of Constraint on Wind Turbines and High Structures'.*

Exceptions will be considered however where it is demonstrated that it is:'
- an essential electricity transmission or supply which if not provided for would result in demonstrable hardship;
- telecommunications apparatus to serve a recognised 'not spot';
- for a farm structure essential for the operation of agriculture in the area;

Where the above exceptions apply, a 25 metre height restriction will be applied and the applicant will be required to demonstrate that they have given full consideration to the landscape sensitivity of the area. Higher structures will only be considered if it is demonstrated that the proposal is of regional importance'

3.0 Methodology

3.1 As stated above, the proposed AoC covers two areas. These are;

- The High Sperrins (Maps 1-4)
- The escarpments and prominent ridges of Clogher Valley (Maps 5 and 6)

Map A shows the full extent of the proposed AoC for all of Mid Ulster District Council area. This has been broken down into 6 separate detailed maps for assessment and illustrative purposes (Appendix 1) .

3.2 The proposed AoC has been primarily informed by NILCA 2000 and its associated '*Landscape Analysis and Settlement Settings'* maps. The NILCA is a landscape character survey and analysis prepared for the whole of Northern Ireland by Environmental Resource Management (ERM) for the Department for the Environment and Rural Affairs (DAERA) and the Department for Infrastructure (DfI). It consists of a regional report and 26 Landscape Character Assessment reports for each of the legacy council districts. The general NILCA report and the subsidiary document which covers the landscapes of Magherafelt, Cookstown and Dungannon Districts state that they are to be used as '*a common point of reference'* to feed into and complement/supplement local planning policies.

3.3 In March 2018 MUDC carried out a review of the NILCA report in so far as it related to the Mid Ulster Council area. This Landscape Review concluded that the NILCA 2000 continues to provide robust baseline for informing future decisions concerning the planning management and protection of our landscapes. The Landscape Review considered that although many parts of the district have experienced key intervening changes since the NILCA was published in 2000, the overall character and inherent sensitivities of individual LCA's, as defined within it, have not been significantly affected. As such, the Landscape Review suggests that proposed environmental polices and associated designations should primarily be informed by NILCA 2000, in

addition to other complementary documents such as the NIRCLA 2016, the SPG on Wind Energy Development in NI landscapes, NIEA NED map viewer and the CORINE Landcover database.

3.4 Out of the 130 LCA's identified in NILCA, 22 fall within Mid Ulster. The proposed AoC falls within 9 of these (See Map B). These are;

1. Glenshane Slopes
2. Binevenagh
3. Sperrin Mountains
4. South Sperrin
5. Beaghmore Moors and Marsh
6. Upper Moyola Valley
7. Carrickmore Hills
8. Brougher Mountain
9. Slieve Beagh.

3.5 The Northern Ireland Regional Landscape Character Assessment (NIRLCA), released in 2016, identifies broad patterns in the variation of landscape character across Northern Ireland, rationalising the number of Landscape Character Areas from 130 (as identified in NILCA 2000) to 26.The regional landscape character assessments are less detailed than the original 130 LCAs but nonetheless contain information which complements the existing LCAs. The proposed AoC falls within 4 regional landscape character areas, which are;

1.Sperrins
2.Clogher Valley
3.Slieve Beagh
4.Carrickmore Hills and Pomeroy Hills.

3.6. Current Supplementary Planning Guidance (SPG) Wind energy Development in Northern Irelands Landscapes (2010) Energy has also been used to inform the proposed AoC designation. This document provides an important additional layer of information when considering existing landscape character. It '*sets out the background to the Landscape Character Areas and Special landscapes of Northern Ireland'* and contains an assessment of each of the 130 Landscape Character Areas (LCAs) as identified in NILCA 2000. Each individual assessment provides valuable information on key landscape and visual characteristics and values of each LCA, providing a more updated assessment of local landscape character (2010).

3.7 Within the SPG, each LCA has been assessed in terms of its sensitivity to wind energy development, on a five point scale ranging from High Sensitivity to Low Sensitivity. A High Sensitivity rating implies that the '*landscape is very vulnerable to change and would be adversely affected by wind energy development, which would result in a significant change in landscape and visual characteristics and values*' whereas a low sensitivity rating implies that the landscape '*is not vulnerable to change and would not be adversely affected by wind energy development, which would not result in significant change in landscape and visual characteristics and values*.'

3.8 The SPG goes onto say that within many LCAs there is considerable variation in sensitivity level across the area, reflecting the fact that the LCAs are broad character or identity areas. For example, a high sensitivity level does not necessarily mean that there is likely to be no capacity for wind energy development within the LCA and conversely a low sensitivity level does not mean that there are no constraints to development. It does not automatically translate therefore, that those LCA's identified

as having a High Sensitivity should fall within the proposed AoC. All of the 9 LCA's that include the proposed AoC have either a 'High' or a 'High to Medium' sensitivity rating.

3.9 In addition to the above, the proposed AoC has also been informed by the CORINE Landcover database (See Map C), the NIEA Natural Environment Division (NED) Map-viewer (https://www.daera-ni.gov.uk/services/natural-environment-map-viewer) and the Department for Communities (DfC) Beaghmore Candidate Area of Significant Archaeological Interest (ASAI). These data sources have been used to identify the location and extent of both natural and historical environment areas of interest that warrant inclusion within the proposed AoC, such as the Teal lough SAC Blanket Bog and Beaghmore Stone Circle,

3.10 Informed by the above key factors, an initial line was plotted on Geographical Information Systems (GIS) and overlain on the most up to date OSNI ortho-photography, along with other GIS shapefile environmental data including international, national and local environmental designations such as, AONB, SAC's and SPA's, ASSI's SLNCIs, and AoHSV's. A desktop visual assessment was carried out and a second AoC boundary line was deduced utilising natural features to inform boundary definition. This line formed the basis for subsequent field survey work to determine the exact delineation of the proposed AoC boundary.

3.11 The proposed AoC has been primarily informed by '*Prominent Ridges'* and '*Key views'* as identified within the NILCA '*Landscape Analysis and Settlement Settings*' maps and associated LCA descriptions. Where the AoC closely follows identified prominent ridges, the outer limit generally ranges from contours of 200m to 250m's encompassing some of the more exposed, sensitive and widely visible landscapes within our district. The proposed AoC extends from this outer/lower limit until it meets either the proposed SCA boundary, as it does at Slieve Gallion and Slieve Beagh, or the district boundary, as it does on the Glenshane slopes where it borders with Causeway Coast and Glens and at Broughderg and Davagh where it borders with Fermanagh and Omagh District council.

3.12 Around Slieve Gallion the proposed AoC (and SCA) detaches from the rest of the Sperrins AoC. At Slieve Beagh, the proposed AoC abuts the proposed SCA which extends to the district border with neighbouring Councils Fermanagh and Omagh and Monaghan County Council in the Republic of Ireland (Map 6). On the northern side of the Clogher Valley, the proposed AoC comprises a strip of land incorporating prominent ridges along Brougher Mountain (Map 5).

3.13 Not all prominent ridges identified within NILCA fall within the proposed AoC. This is due to a combination of factors, including the inherent quality of the particular landscape and man-made influences that have occurred over intervening years. The rugged landform of Evinashoran Mountain for example, as highlighted within NILCA, has been significantly changed as result of both wind energy development and the continuation of quarrying operations in the area (see Appendix 1 LCA pressure map). Although identified as a prominent landform in the local landscape within NILCA, this area has been left out of the proposed AoC.

3.14. Similarly, NILCA 2000 defines prominent ridges in the upland areas between Garvaghey and Pomeroy including lands at Shantavny, Todds Leap and Cappagh mountain (Slievemore LCA). In the SPG on Wind Energy Development, this area is classified as having a 'Medium to low' sensitivity rating to wind energy development, giving an indication of its unexceptional landscape quality. It has also has seen a

substantial phase of wind energy development in recent years, including for example Slievedivenagh wind farm, as well as a growth in the number of single turbine approvals (see Appendix 1 LCA Development Pressure Maps). Given the key intervening changes in this areas and its inherent low sensitivity to wind energy development, this area has not been included within the proposed AoC. Development proposals for wind energy and high structures in areas outside of AoC's will however fall to be considered under the relevant criterion based policies, including consideration of potential cumulative impacts.

3.15 The proposed AoC also aligns with, and includes the Beaghmore Area of Significant Archaeological Interest (ASAI). Beaghmore is the most extensive stone circle and alignment complex in Northern Ireland. In July 2017 the Department for Communities (DfC), following consultation with Historic Monuments Council, recommended that it be extended. The revised candidate ASAI takes into account the surrounding horizons of the landscape which widely encompass and form the setting for the stone circles and alignments.

3.16 In DfC's Statement of Significance for the revised ASAI it states that *'The erection of masts, pylons, turbines or other large scale development, including large agricultural sheds, or quarrying and mining activities, within this distinctive landscape would adversely impact the landscape character and the contribution it makes to setting, experience and significance of the stone circles and the other heritage assets within the ASAI'*. It is considered logical therefore to align part of the AoC with this existing ASAI designation. European protected Blanket Bog Teal Lough Special Area of Conservation (SAC) and Lough Fea and surrounding areas are also included within the proposed AoC.

3.17 The boundaries of the proposed AoC are largely defined by physical features such roads, field patterns, rivers, streams, breaks of slope, tree lines, land cover and topography. In cases where a physical limit was difficult to establish the boundary coincides with a known contour line or a recognised land cover such as natural grassland, peatbogs, moors and heathland as indicated in the NED map viewer and the Corine Database.

3.18 A more detailed assessment for each part of the proposed AoC (Maps 1-6) is outlined below.

4.0 Justification and Assessment

4.1 The High Sperrins AoC

The proposed High Sperrins AoC, which falls entirely within the Sperrins AONB, has been subdivided into 4 parts for assessment purposes (see Appendix 1, Maps 1-4). These are described below.

Map 1 - North of Moneyneaney Road

4.2 In Map 1, the proposed AoC line (coloured blue), closely follows the lowest point indicated by the prominent ridges (in this case between 250 and 350 metres) as defined the Magherafelt District NILCA 'Landscape Analysis and Settlement Settings Map'. As shown on Map 1 the line begins at the most northern part of the district where it forms a boundary with Causeway Coast and Glens District Council. Initially following existing field boundaries on both sides of the Drumbane Road it pushes out to the Knockoneill Road for a short distance to include a chambered grave and rath.

4.3 Although the prominent ridges identified in NILCA extend to the east of Corlacky Road, the Corlacky Road has been retained as the outer boundary of the proposed AoC as it coincides with the Sperrins AONB boundary. A short distance before the Corlacky Road meets the Slaghtneill Road the AoC line veers west to align more closely with the prominent ridges, excluding some road frontage development and localised valleys, before following the Tirkane Road between Carntogher SLNCI and Ballynamore Bog SLNCI. The AoC line leaves the Tirkane Road to follow field boundaries around Crockcor mountain before traversing the Glenshane Pass and Coolnasillagh Road till it meets the Moneynenaney Road.

4.4 This first instalment of the proposed AoC falls within two LCA's i.e. the Glenshane Slopes LCA and Binevenagh LCA, as defined in NILCA. This area is described in NILCA as the 'prominent and sensitive ridgelines of the upland landscapes which enclose the district to the west'. The highest summit Carntogher (465m's) which straddles the district boundary with Causeway Coast and Glens towers over the Glenshane Pass forming a dramatic gateway to the Sperrins from Mid Ulster district, along the A6.

4.5 NILCA 2000 describes the moorland landscape of the Glenshane Slopes as being 'extremely sensitive to change' where even 'relatively small elements such as electricity pylons or a single building can be viewed over long distances'. It states that 'any buildings or infrastructure (such as windfarm developments) on the upper slopes would be extremely visually intrusive and would threaten its intrinsic qualities of wild remoteness and isolation'. It goes on to state that 'the ridgetops and summits are particularly sensitive, as are the slopes of Crockcor'.

4.6 Heading south, part of the proposed AoC falls within Binevenagh LCA. This part of the AoC is framed by Coolnasillagh Road to the east, Moneyneaney Road to the west, Fivemilestraight to the south and the District boundary to the north (see photo below).



Photo 1. Taken from the main Draperstown- Tobermore Road, showing Moydamlaght Forest on Mullaghmore and Coolnasillagh mountain stretching to the right.

4.7 NILCA 2000 identifies the most significant pressure on this upland moorland landscape as being conifer plantations, such as that at Moydamlaght forest as seen above. The distinctive slope profile of the escarpments summits are landmarks for miles around. NILCA states that the open upland plateau is also an extremely sensitive landscape where any built development would represent an intrusion and that 'wind farms and transmission masts may have a detrimental influence, particularly if they are sited close to escarpment summits'. It is these exposed and widely visible landscapes that the proposed AoC is seeking to protect.

Map 2 -South of Moneyneaney Road and North of Sixtowns Road

4.8 This part of the proposed AoC extends from the Moneyneany Road to the Sixtowns Road. As above, the boundaries of this part of the proposed AoC are largely defined by field patterns, roads, lanes and to a lesser extent contour lines in areas where there are no defined features on the ground. This part of the AoC falls within two LCA's, i.e. Sperrin Mountains and the South Sperrins, with a small area on the western fringes falling within the Upper Moyola Valley LCA. This mountainous landscape is described in NILCA as being 'extremely sensitive to change' where even relatively small elements, such as electricity pylons or a single building are visible over long distances. It is an area of high scenic quality that is widely visible and valued for its sense of wild remoteness.



Photo 2. Taken from Sixmilestraight looking east towards Crockmore and Crockbrack Rock Hill to the left and Craigagh Hill to the right, all within Sperrin Mountains LCA.

4.9 The proposed AoC line continues to follow the prominent ridges as defined in NILCA taking it across the Glenelly Road and River into the South Sperrins LCA as far as the Sixtowns Road. Only the eastern tip of South Sperrins LCA falls within our district. NILCA advises that this whole LCA is 'extremely sensitive to changes that would affect its unspoilt character and the transition from the secluded valley landscape pattern to that of the upland summits'.Given its wild, tranquil and unspoilt character it's not surprising that the South Sperrins LCA has an overall 'High' sensitivity to wind energy development as per the SPG on wind energy development. LCA Development Pressure Analysis (Appendix 2) indicates there is little or no development pressure within this part of the proposed AoC, confirming its remote, inaccessible character. It is also noted that the SPG highlights this part of the South Sperrins as being particularly sensitive to wind energy development due its wide visibility.

4.10 This areas unsuitability for wind energy development has also been highlighted as part of planning appeal 2007/A1313 for a Wind Farm development comprising the erection of 7 No. Turbines at Mullaghturk. The PAC agreed with MUDC in that the proposal would, if permitted, have had an unacceptable impact on the visual amenity and landscape character of the area and would have been detrimental to the environmental quality of the Sperrins AONB. The site and surrounding areas were described in the PAC report as having 'a sense of tranquillity and absence of built development of a nature increasingly rarely found in Northern Ireland' (See photo 3 below). It is considered that this decision supports the need for an AoC in this part of the district.



Photo 3. Taken from edge of Lough Fea, looking northwest towards Sixtowns Road and South Sperrins LCA.

Map 3 -Sixtowns Road to Dunamore (incorporating Beaghmore ASAI, Teal Lough SAC and Lough Fea)

4.11 The line of the proposed AoC leaves the prominent ridges of the South Sperrins to align with the Beaghmore Area of Significant Archaeological Interest (ASAI) designation. Beaghmore ASAI is the most extensive stone circle and alignment complex in Northern Ireland and was extended in 2017 by the Department for Communities (DfC) following consultation with Historic Monuments Council. In the Statement of Significance for the revised ASAI it states that '*The landscape of this ASAI is sensitive to change which would adversely affect those distinctive qualities outlined above. The erection of masts, pylons, turbines or other large scale development, including large agricultural sheds, or quarrying and mining activities, within this distinctive landscape would adversely impact the landscape character and the contribution it makes to setting, experience and significance of the stone circles and the other heritage assets within the ASAI'*. It is considered logical therefore to align this part of the AoC with this existing ASAI designation.

4.12 At the old Magherafelt/Cookstown district boundary the AoC line veers away from the ASAI designation boundary to incorporate Teal Lough Blanket Bog SAC/ASSI to the east. Here, the boundary of the AoC is defined by a combination of drains, ditches and post and wire fences before aligning with the northern boundary of Teal lough SAC/ASSI designation until it meets Tullybrick Road. The line follows Tullybrick Road for approximately 400metres before continuing eastwards/northeastwards along a stream, then south-eastwards along a minor road till it meets Lough Fea Road. The AoC line follows the southern direction of Lough Fea Road and is drawn tightly around the eastern side of Lough Fea till it returns to the Tullybrick Road on Lough Fea's southern side.

4.13 At this location the AoC has been drawn to include an area of high scenic quality in and around Lough Fea, as highlighted within the NILCA 'Landscape Analysis and Settlement Settings Map' for Cookstown. Areas influenced by activities such as sand and gravel extraction have been excluded. For this part of Slieve Gallion LCA the SPG on Wind energy Development specifically advises that 'care should be taken to avoid adverse impacts on views westwards across the plateau area around Lough Fea towards South Sperrin LCA and on views of Slieve Gallion from the south and east'. This is considered to be a particularly sensitive part of Slieve Gallion LCA requiring greater policy control and has therefore been included within the proposed AoC.

4.14 Heading south from Tullybrick Road onto the Spawell Road the AoC encloses an elevated area of heathland, excluding lands influenced by sand and gravel extraction to the east. The line follows a combination of private laneways and drainage ditches until it links up with Ballynagilly Lane. From Ballynagilly Lane it aligns with the defined prominent ridges of Fir Mountain as far as Slaght Road, again excluding existing sand and gravel pits (Stanley Bell and Sons) on both sides of Ballynagilly Road. LCA pressure maps (Appendix 2) shows evidence of pressure from wind energy development in this area, including an application for 8 No. turbines under planning reference LA09/2015/0459/F.

4.15 The proposed line continues in a southerly direction along Slaght Road, Ballynasolus Road and then Beltoneanan Road before veering east along Corvanaghan Road. This part of the AoC closely follows the prominent ridges defined in NILCA 2000 and also aligns with the Sperrins AONB boundary, enclosing the peaks and slopes of Beleevnanmore, Oughtmore, Beltonean and Evishbrack Mountains, and Davagh Forest. The AoC continues to follow the defined prominent ridges and AONB boundary along Meenanea Road until it links up once again with Beaghmore Candidate ASAI designation. At this point the proposed AoC line aligns with the Candidate ASAI boundary to include all of this historic landscape as far as the district boundary with Omagh and Fermanagh Council.

Map 4. Slieve Gallion

4.16 The proposed AoC also includes the prominent ridges and slopes of Slieve Gallion. Slieve Gallion is the most easterly peak of the whole Sperrins and has a major presence within the district. It has a distinctive profile, with a steep sided, flatter summit than the surrounding mountains and an uneven slope profile. Its summit and steep slopes are extremely sensitive to change and are prominent in views throughout the lowlands on the western shores of Lough Neagh. NILCA 2000 advises that 'any building or additional tall masts on the open slopes or summit of Slieve Gallion would be extremely prominent and potentially intrusive' (see photo 4 below). The Slieve Gallion LCA Development Pressure Map LCA (Appendix A) shows evidence of development pressure in the form of wind energy development encroaching into the more elevated parts of Slieve Gallion. This includes an operational wind farm comprising 6 No. Turbines at Crockandun and several other operational and some not as yet implemented single turbine approvals.

4.17 Boundaries of the proposed AoC around Slieve Gallion are defined mainly by field patterns, ditches and drains, enclosing an area characterised by natural grassland cover, forested areas (Iniscarn and Mobouy forest) and agricultural/arable land (see Map C ' Mid Ulster Land Cover'). Contours range from approximately 200ms up to 450 m's where it meets the proposed SCA boundary. Similar to other parts of the Sperrins,

lands beyond the AoC designation which fall within the proposed SCA, continue to rise steeply up to the more remote and inaccessible mountain tops.

4.18 The proposed Slieve Gallion AoC line essentially follows the prominent ridges defined in NILCA. It does however exclude some areas within the defined prominent ridges that have become degraded due to quarrying operations, such as the Cullion/Mobuy Road quarry on its eastern side and the Tulnagee quarry on its western side. Photo 4 below gives an indication of the extent of the proposed AoC (and the proposed SCA) as viewed from the Moneymore/Desertmartin Road, approximately 3-4 km's away.

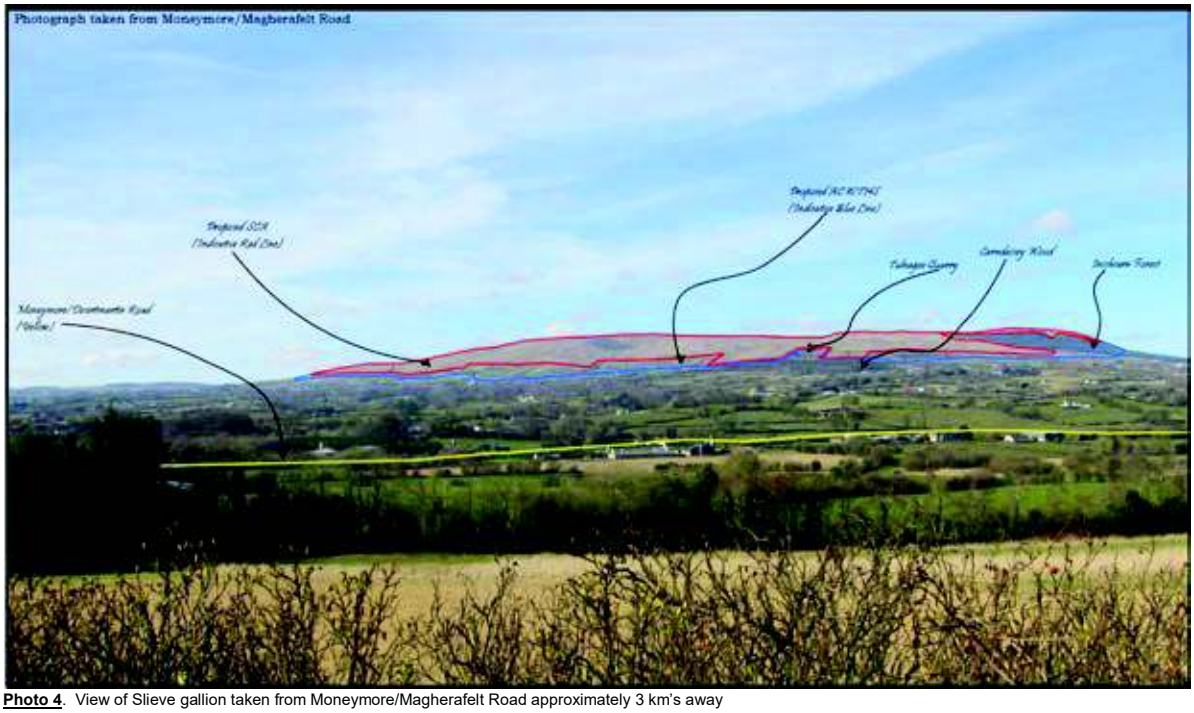


Photo 4. View of Slieve gallion taken from Moneymore/Magherafelt Road approximately 3 km's away

Clogher Valley AoC

Map 5- Brougher Mountain

4.19 Brougher Mountain LCA straddles the district boundary with Fermanagh and Omagh District Council and overlooks the Clogher Valley lowlands. NILCA 2000 has identified its prominent slopes and ridge summits as being particularly vulnerable to change, including in particular the 'escarpment at Errigal' and 'Mad Womans Leap'. In the last 10-15 years, this area has experienced substantial change, particularly in the form of new wind farm development. Lendrums Bridge (20 No.turbines) and Hunters Hill (8 No.turbines) wind farms now form a wind farm cluster in the upper reaches. Brougher mountain LCA Pressure Analysis Maps (Appendix 2) show how there is pressure for more similar development, including a current application for 9 No. Wind Turbines at Murleys Road. The effect of this development pressure in landscape terms has been highlighted in the NI Regional Landscape Character Assessment (2016) which advises that 'The wind farm at Lendrum's Bridge is visible within the valley and further wind farms would affect perception of this ridge line'.

4.20 Whilst there is no doubt that there are parts of Brougher Mountain LCA which have undergone key landscape changes, many parts remain unaltered. It is considered that the introduction of an AoC will help protect the sensitivity of those ridges which remain vulnerable and help prevent an unacceptable proliferation of turbines/high structures along the Clogher Valley ridgeline. Map 5 shows how the extent of the proposed AoC

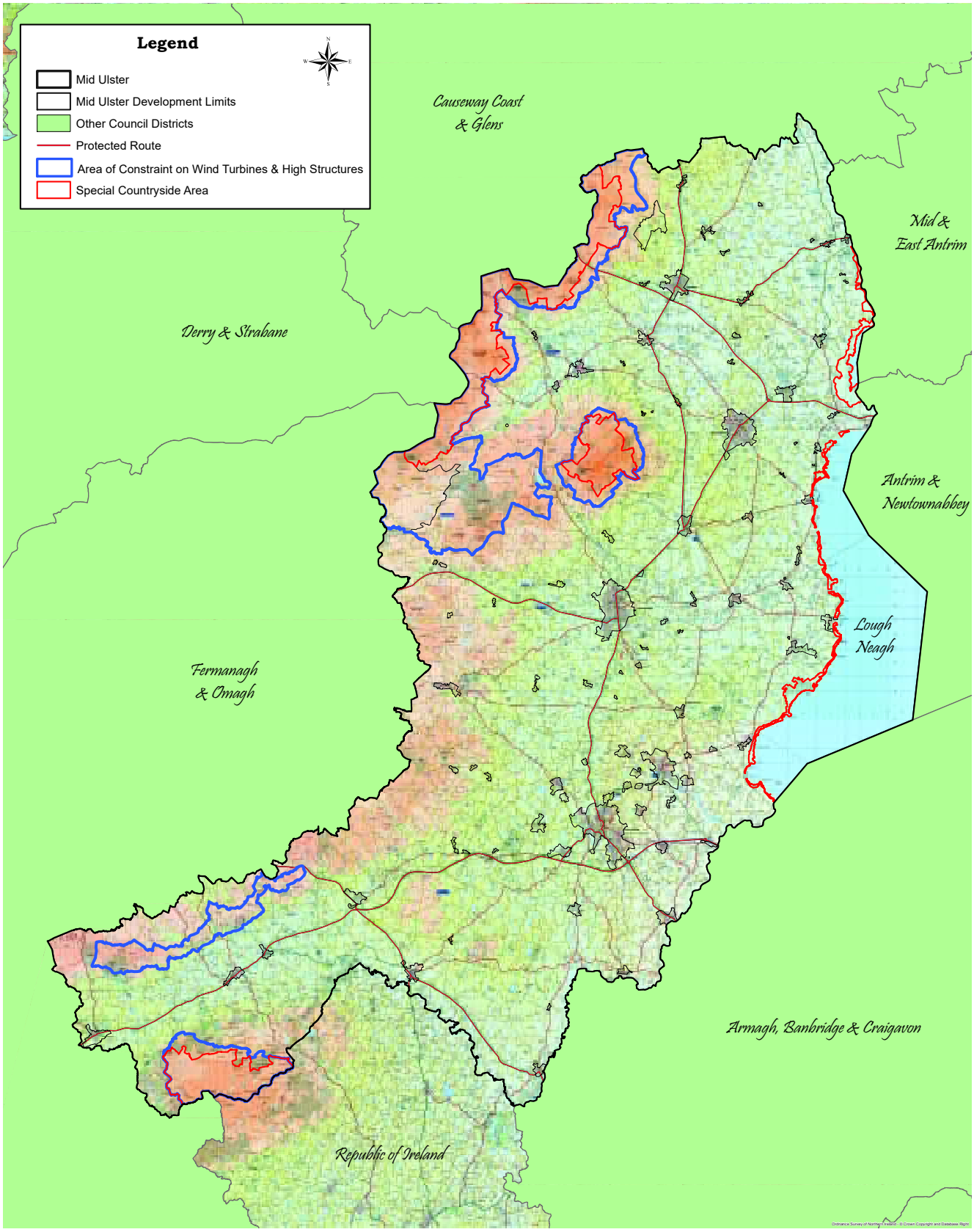
includes a strip of land stretching from the edge of Cole Glen Forest, north of Fivemiletown Road, to the main Ballygawley-Omagh line. The extent of this area closely follows the prominent ridges defined in NILCA 2000, taking into account the intervening changes. On the ground, boundaries are mainly defined by field patterns and hedgerows enclosing an area characterised by combination of agricultural land, pastures, peatbogs, natural grassland and traditional woodland scrub.

Map 6 - Slieve Beagh

4.21 The proposed AoC also includes a strip of land at Slieve Beagh in the very south of the district. Slieve Beagh blanket bog is an area of international significance because of its size, intact nature and wetland features. It is already afforded a degree of protection through the numerous existing non-planning designations, namely; Special Area of Conservation (SAC) RAMSAR, Special Protection Area (SPA) and Area of Special Scientific Interest (ASSI). In recognition of its unique landscape and ecological value, a significant part of this area is proposed as a Special Countryside Area (SCA) wherein development would only be permitted in exceptional circumstances (see related paper 'Sperrins and Slieve Beagh SCA').

4.22 It is proposed to include an area to the north of the proposed SCA within the Area of Constraint on wind turbines and high structures. This will incorporate prominent ridges, as defined in NILCA 2000, which also fall within the European SPA designation and within the Area of Special Scientific Interest (ASSI). It is considered that the sensitivity and wide visibility of this landscape coupled with potential development pressures warrants the introduction of an AoC. Boundaries of the proposed AoC are defined on the ground by a combination of minor roads, hedgerows, post and wire fences and tree lines incorporating an elevated area characterised forestry, peat bogs and transitional woodland scrub.

Map A
Mid Ulster Area of Constraint on Wind Turbines & High Structures and Special Countryside Area



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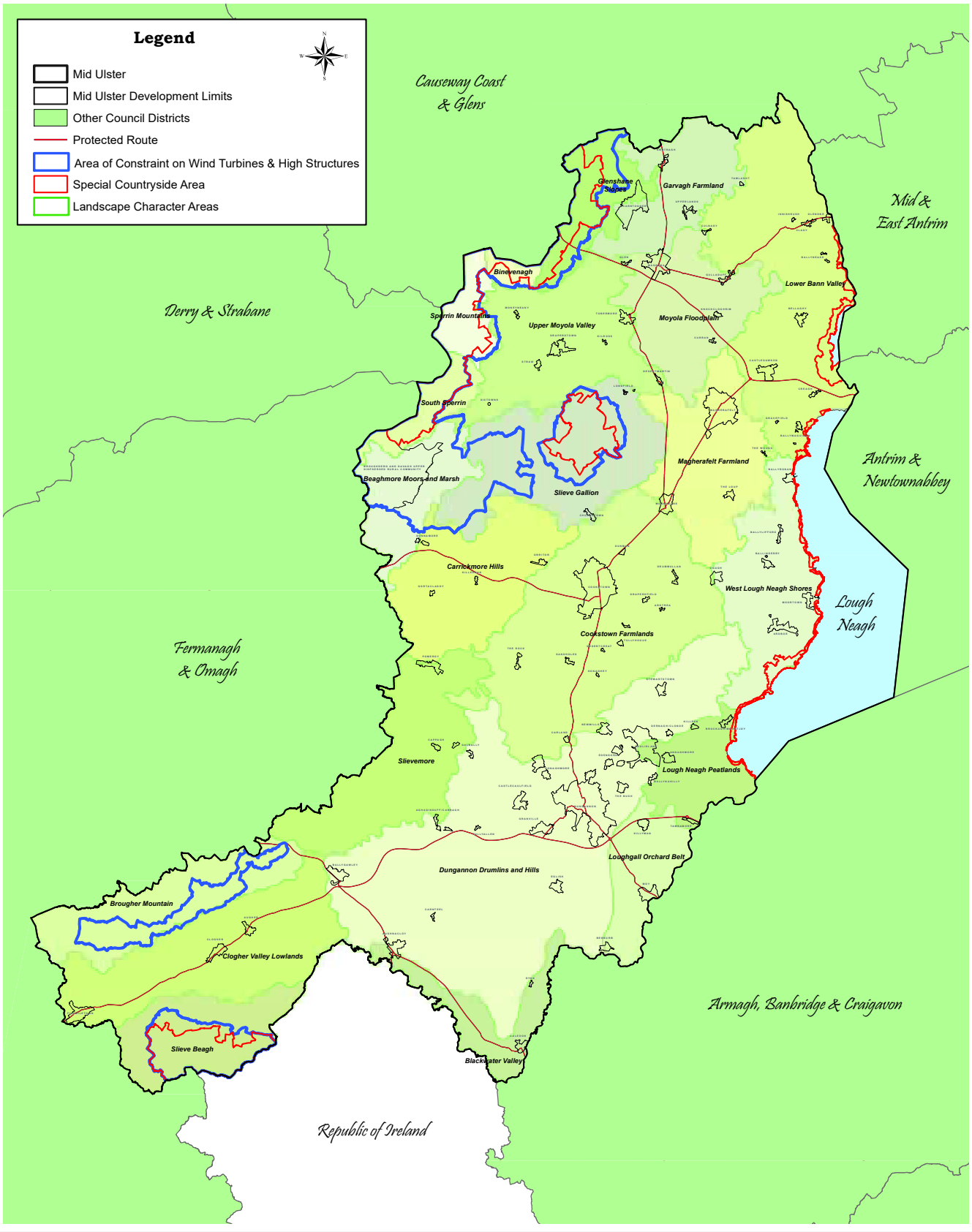
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Map B
Mid Ulster Landscape Character Areas



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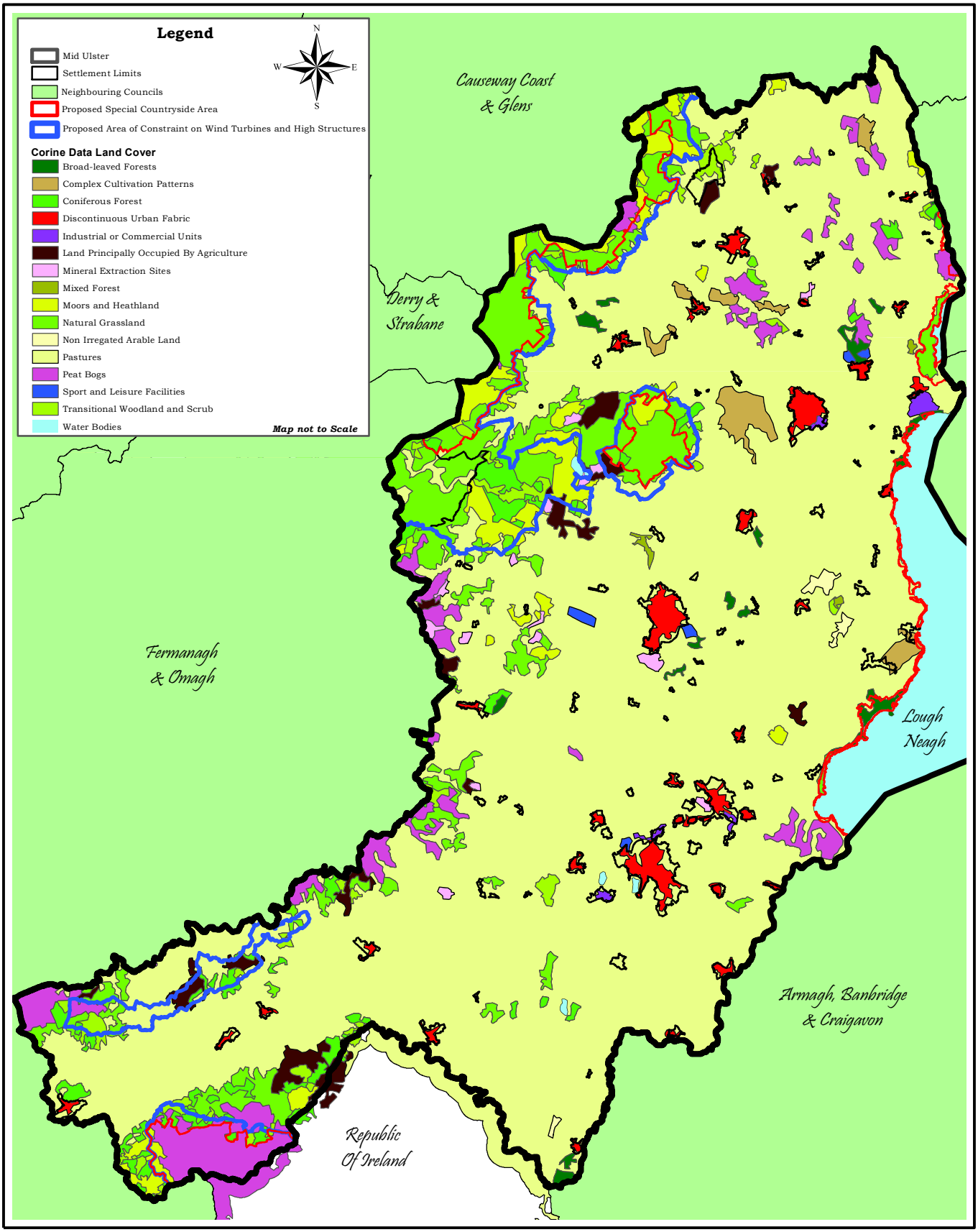
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Map C - Mid Ulster CORINE Land Cover Map



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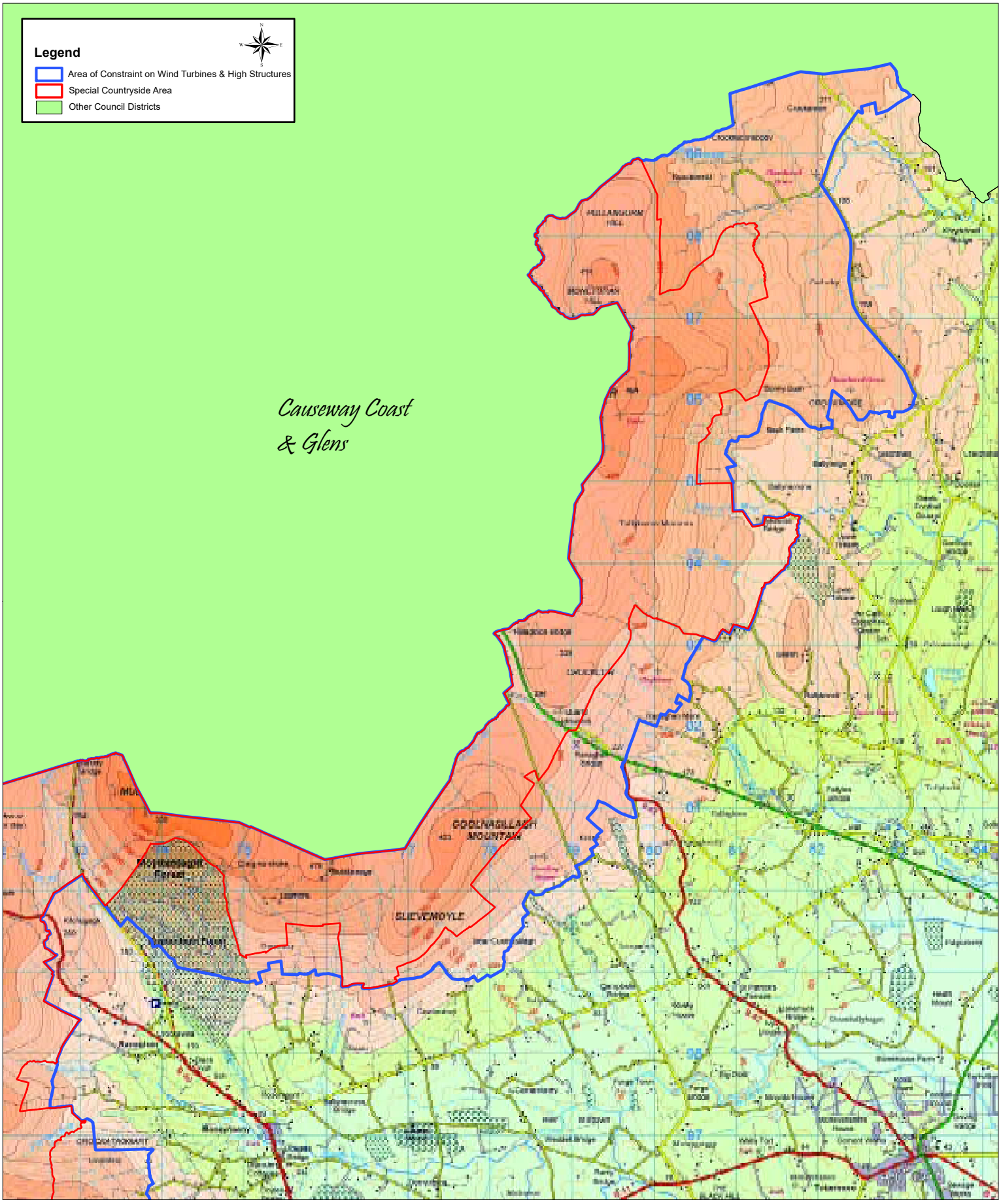
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Appendix 1 Maps 1-6

Proposed Area of Constraint on Wind Turbines and High Structures (AoC) and Special Countryside Area (SCA).

Map 1
Mid Ulster Area of Constraint on Wind Turbines & High Structures and Special Countryside Area

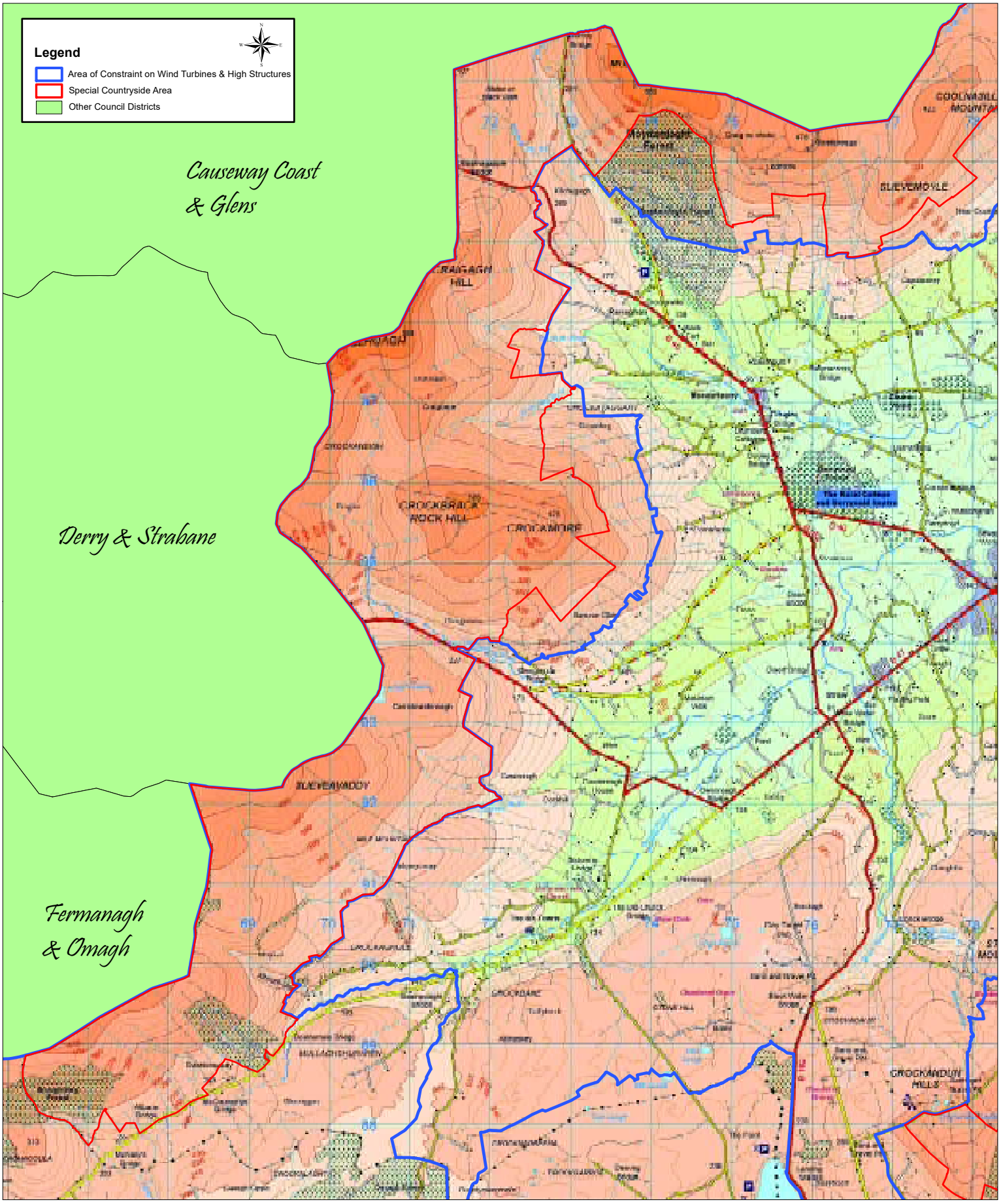


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Map 2
Mid Ulster Area of Constraint on Wind Turbines & High Structures and Special Countryside Area



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Map 3
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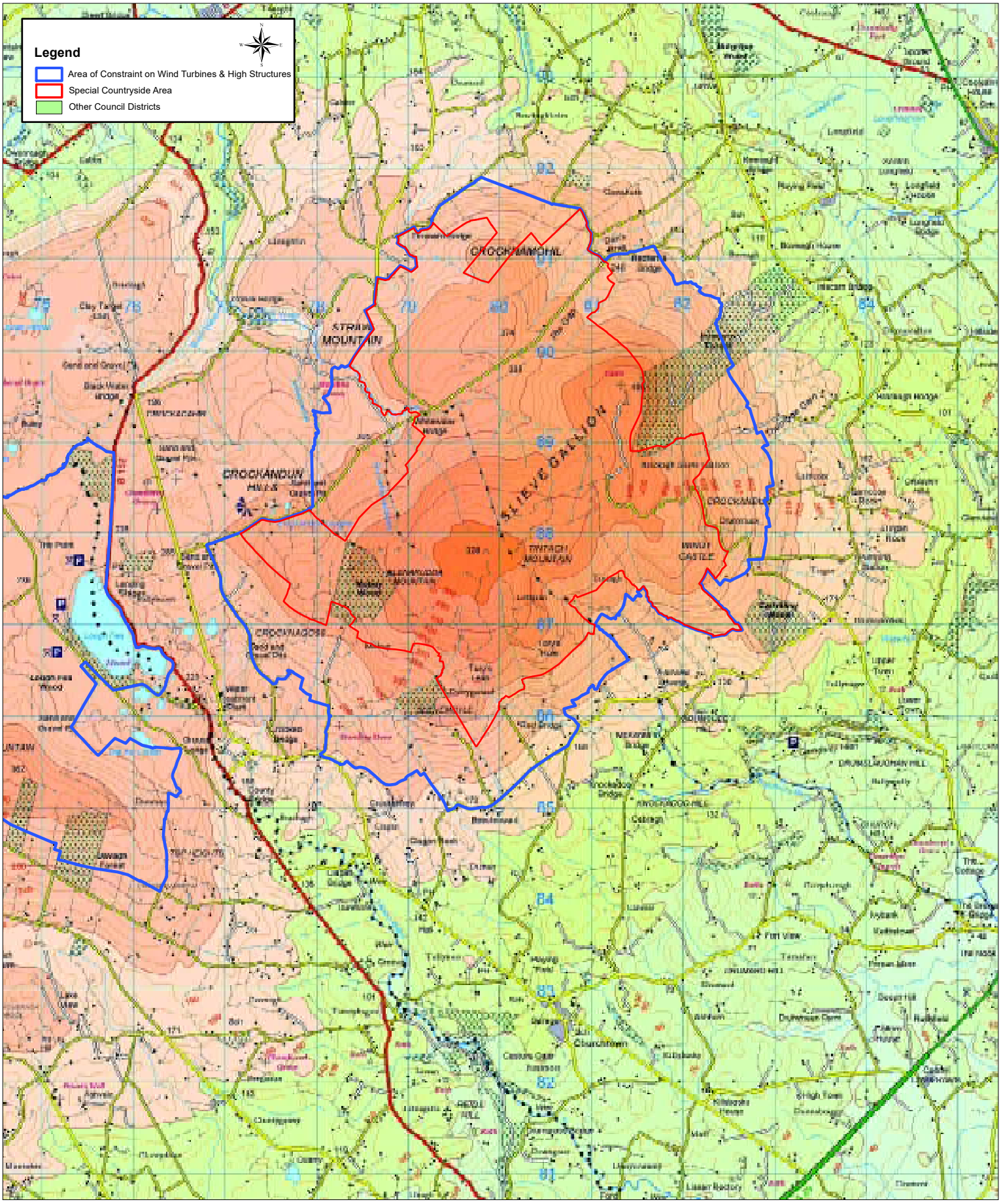


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Map 4
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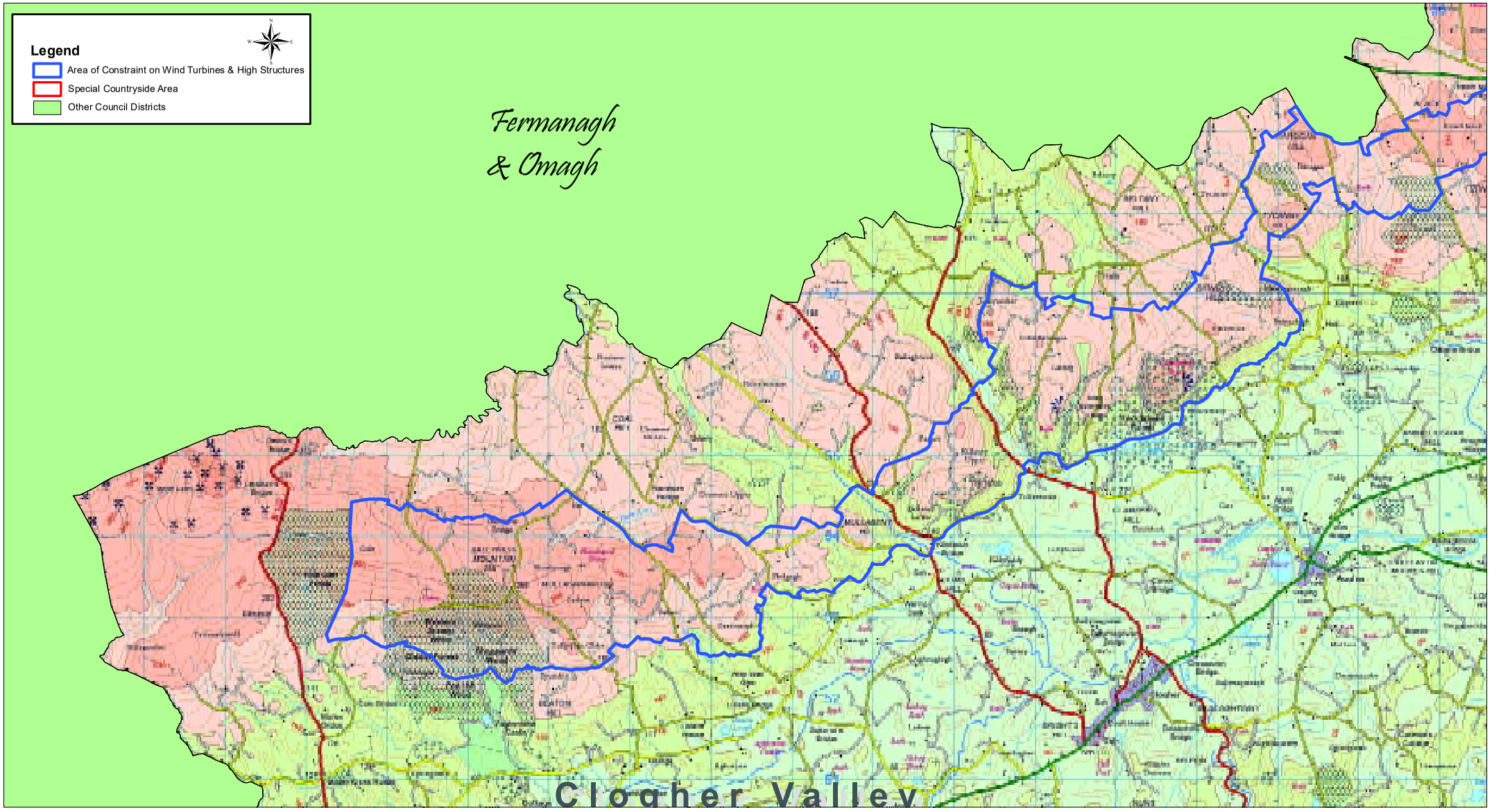
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Map 5

Mid Ulster Area of Constraint on Wind Turbines & High Structures and Special Countryside Area



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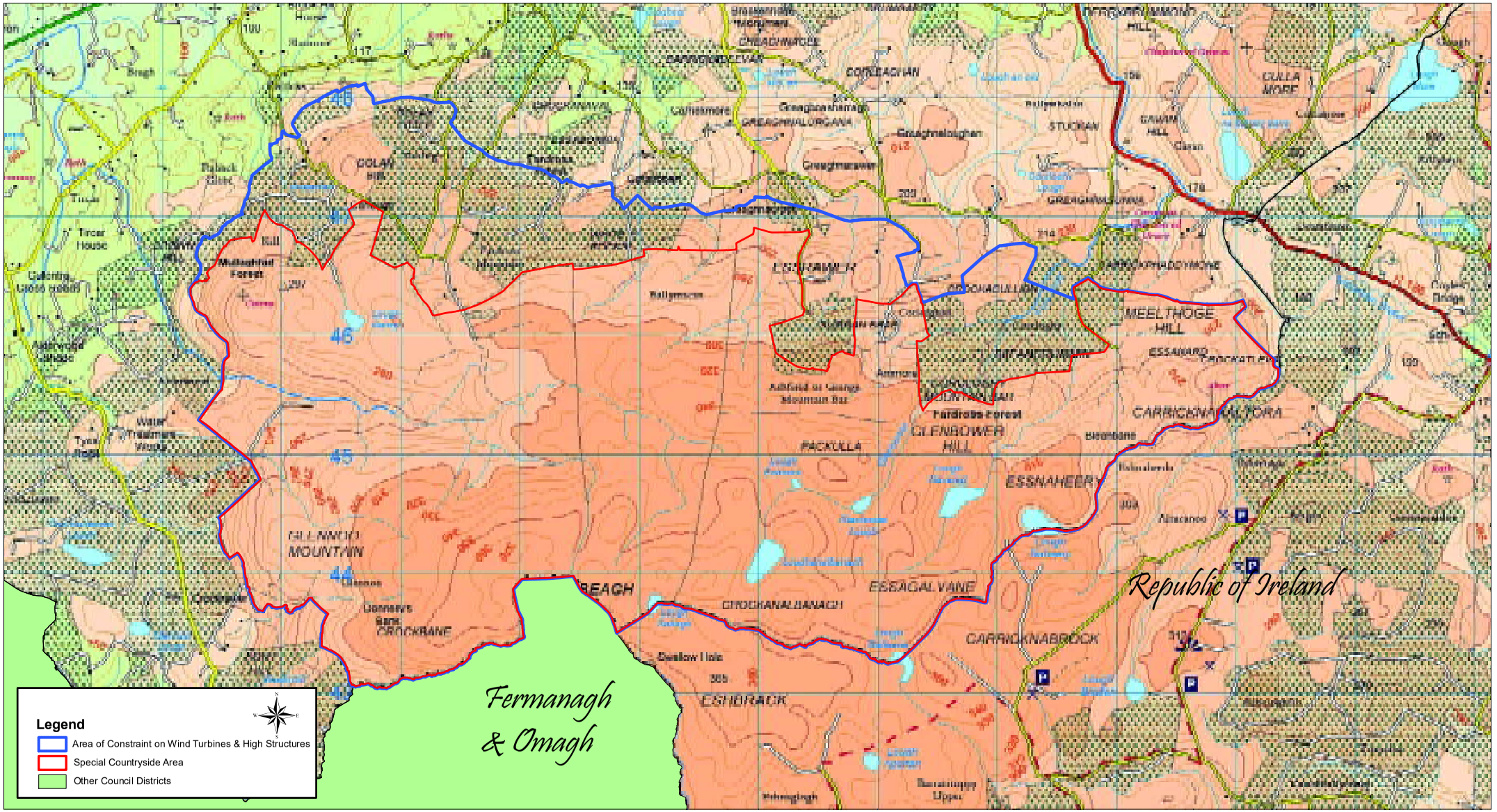
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Map 6

Mid Ulster Area of Constraint on Wind Turbines & High Structures and Special Countryside Area



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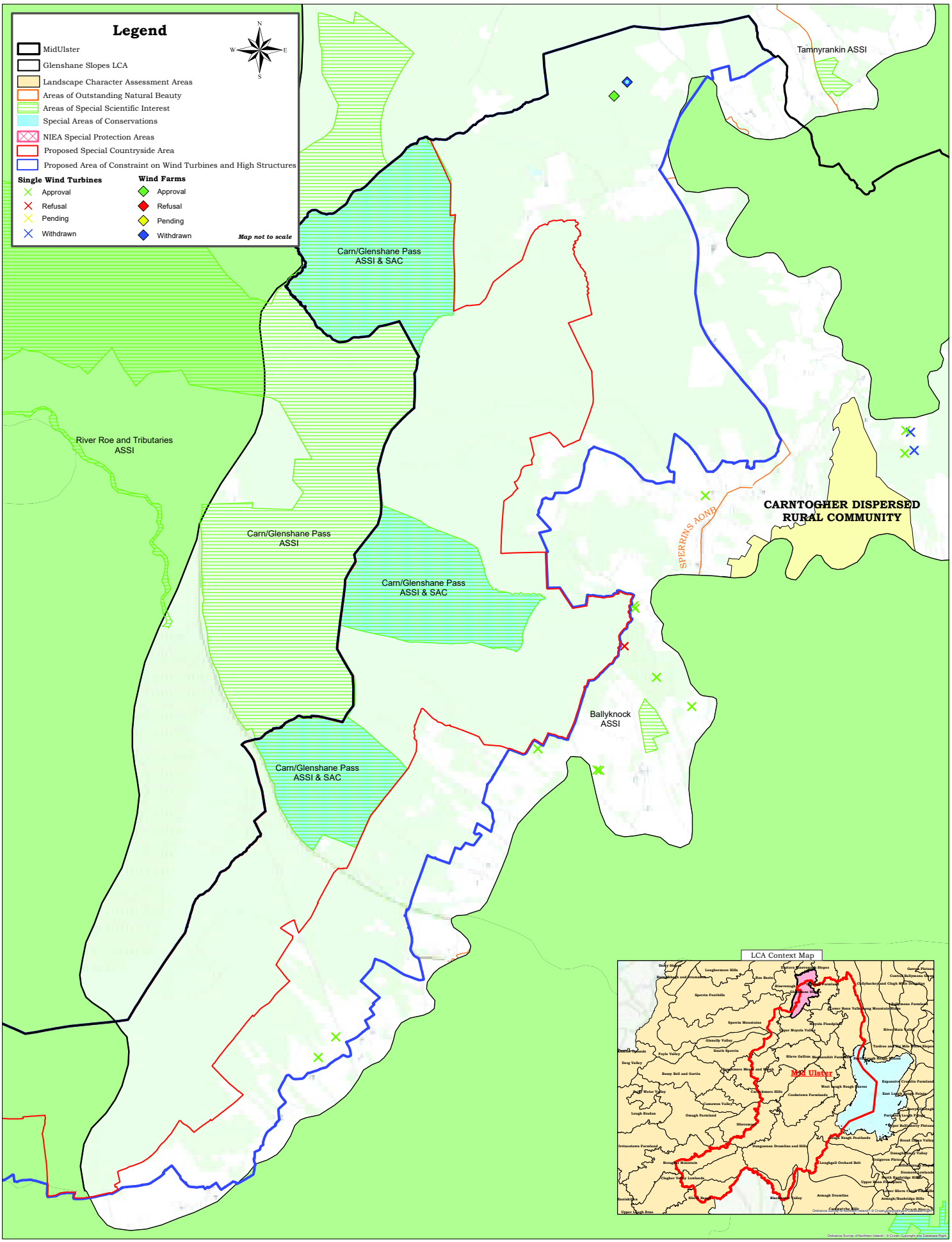
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Appendix 2

Mid Ulster Landscape Character Areas (LCA) Development Pressure Analysis Maps

Glenshane Slopes

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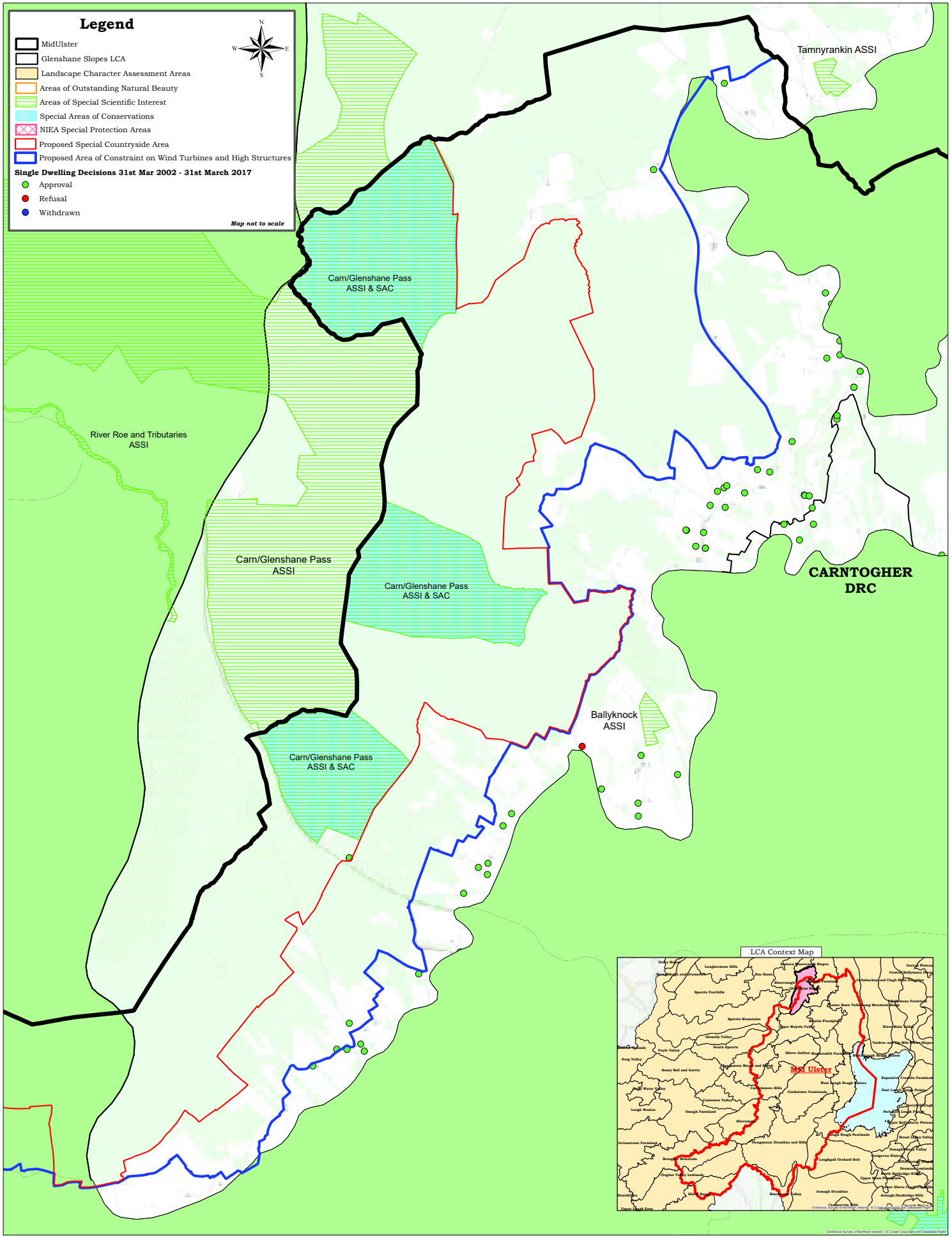
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Glenshane Slopes

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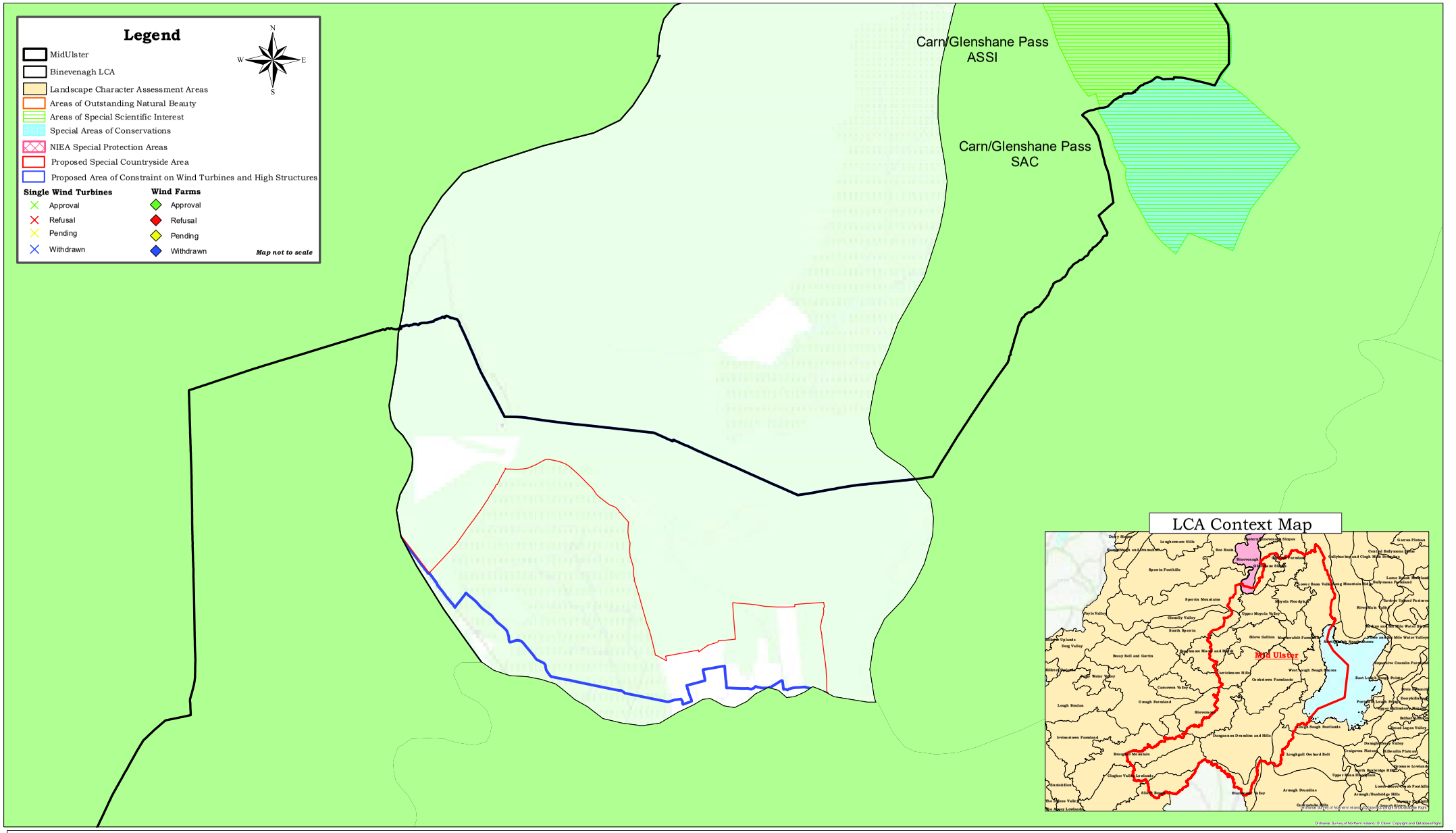
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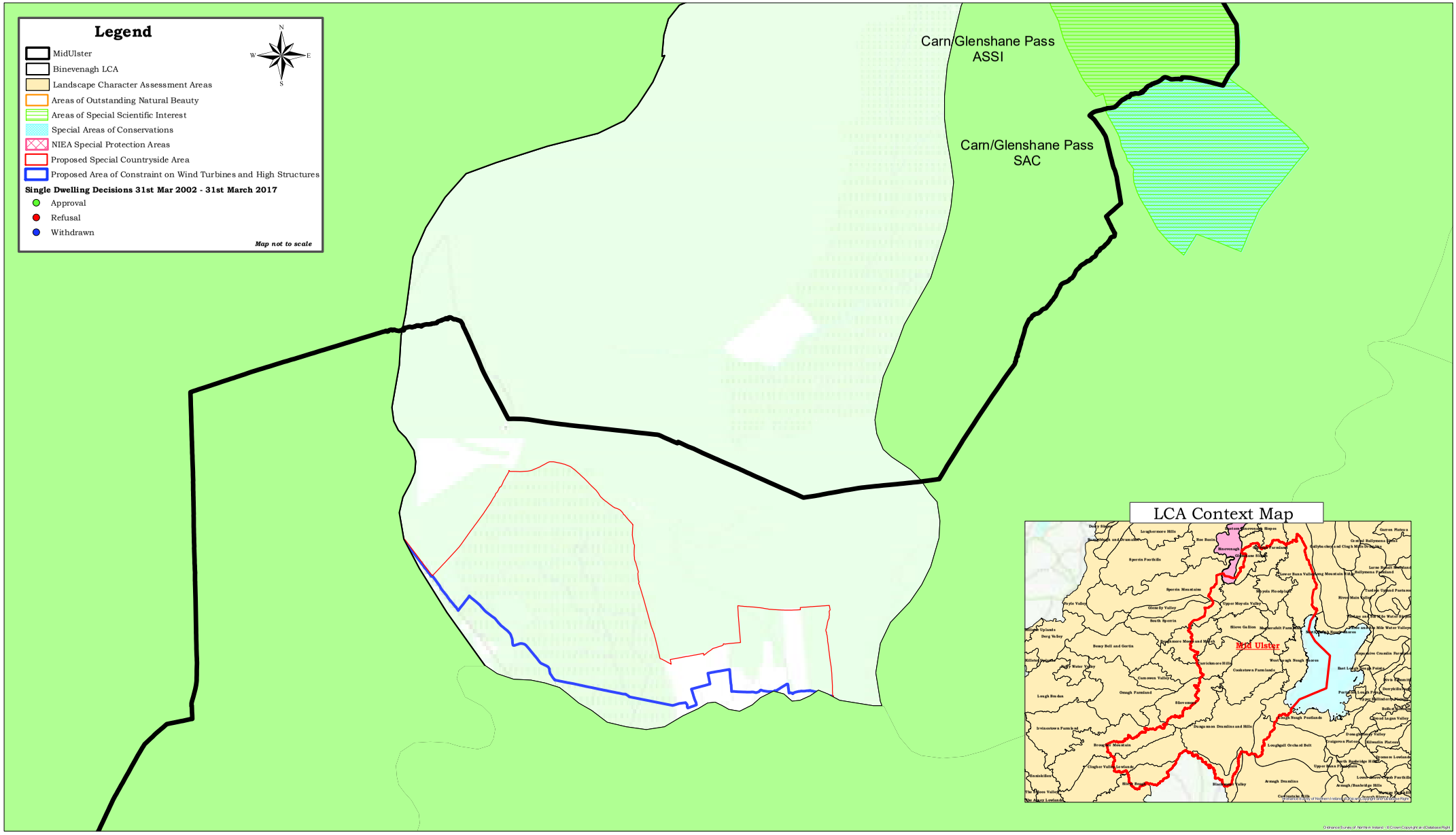
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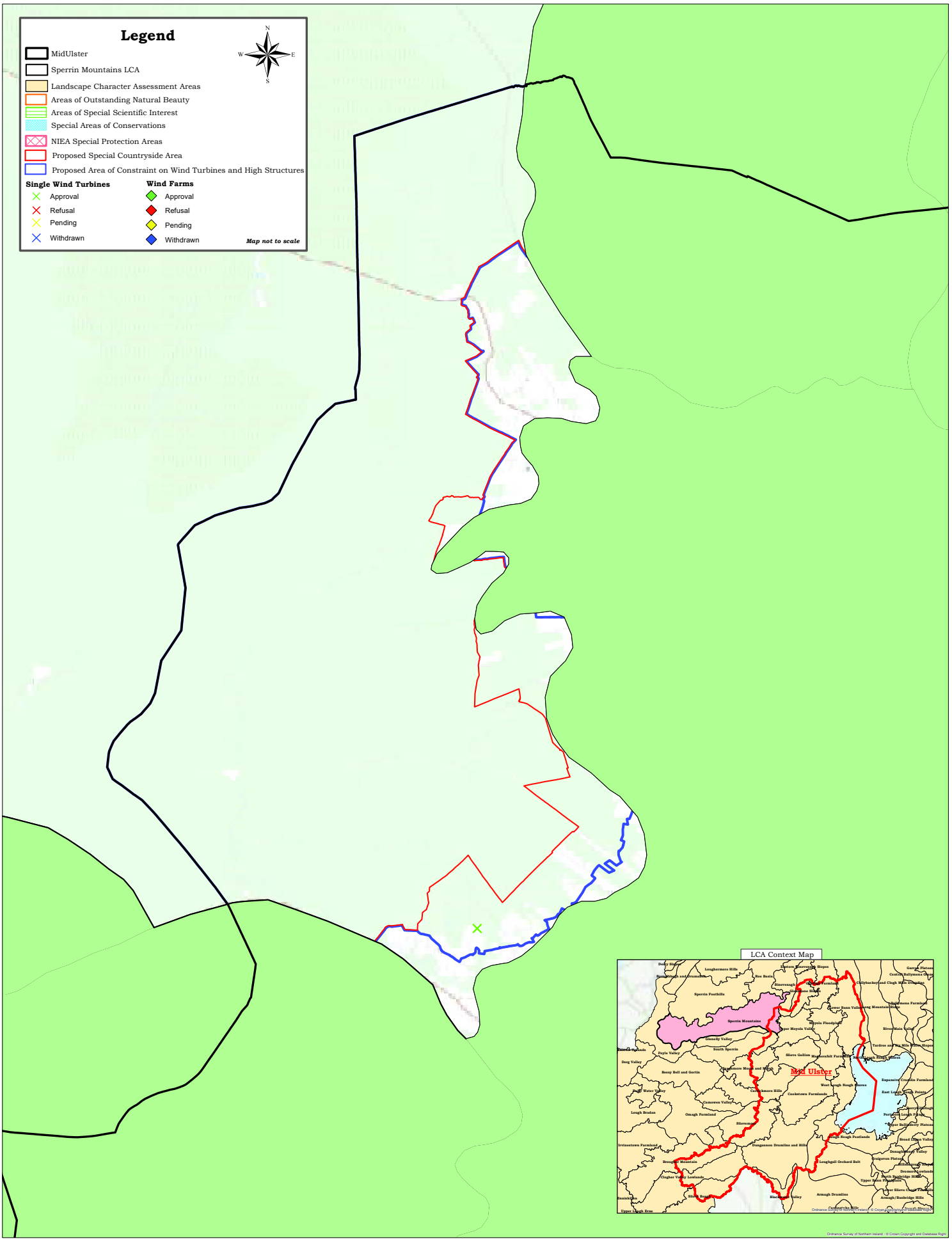
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Sperrin Mountains

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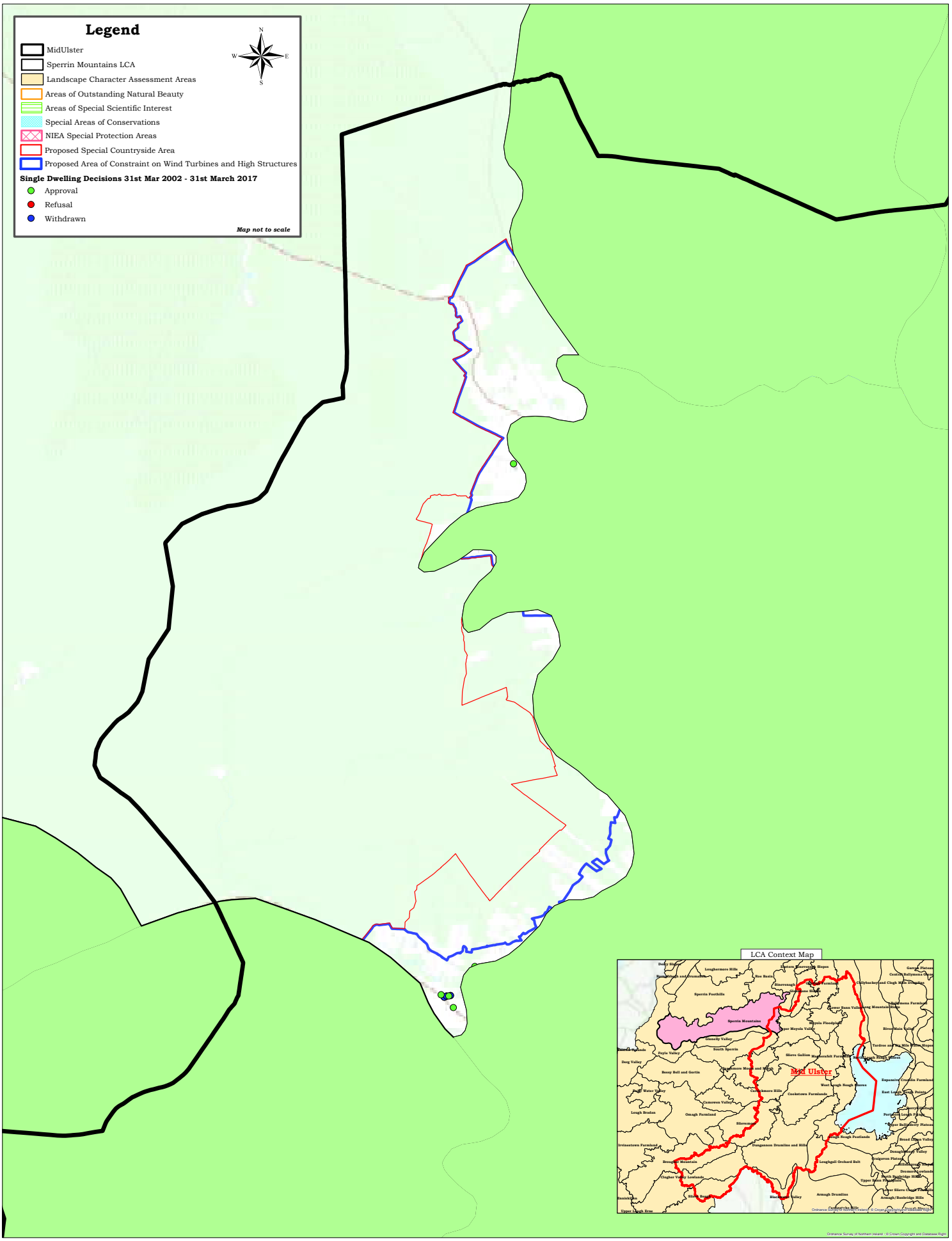
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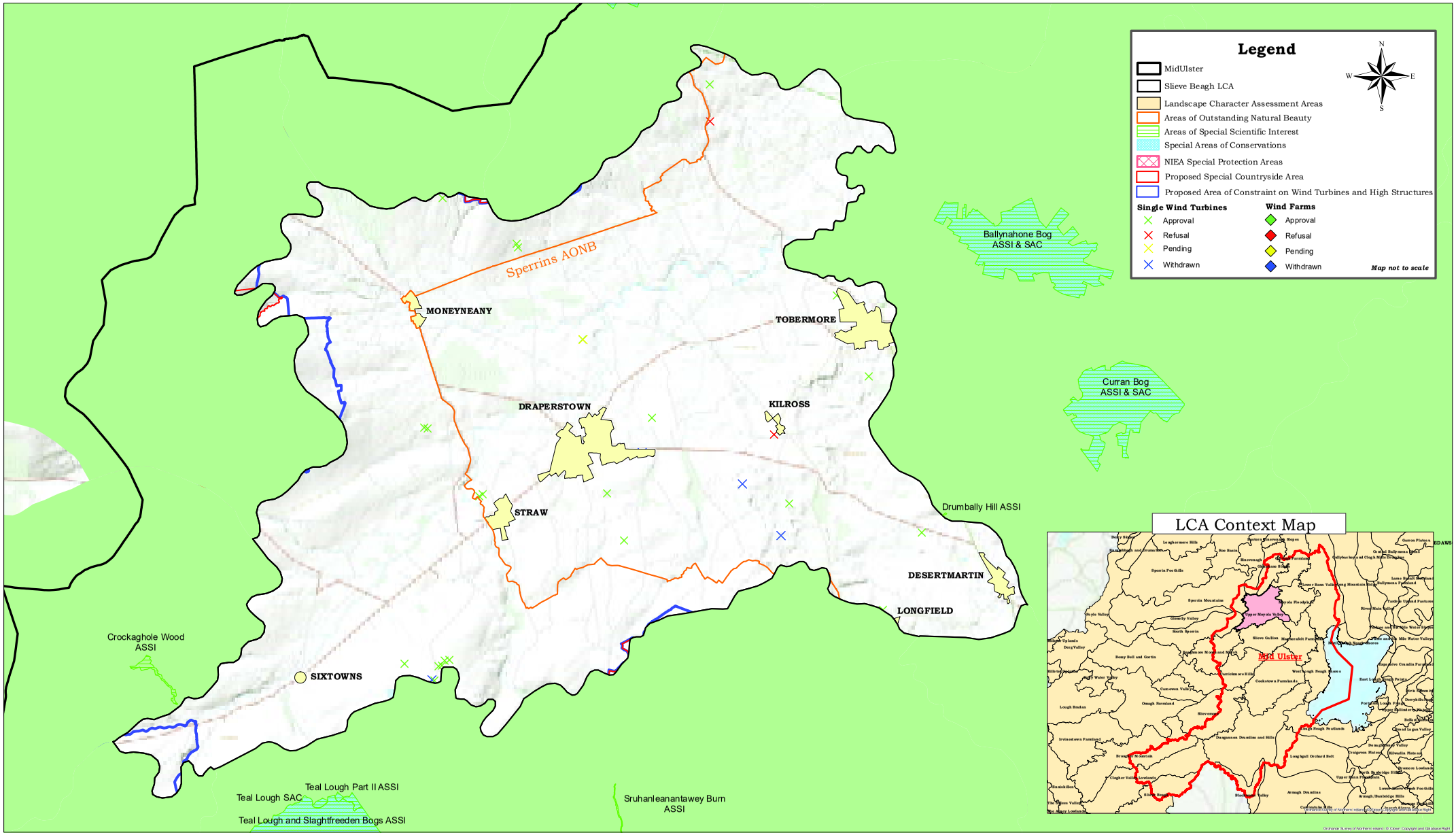
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Upper Moyola Valley

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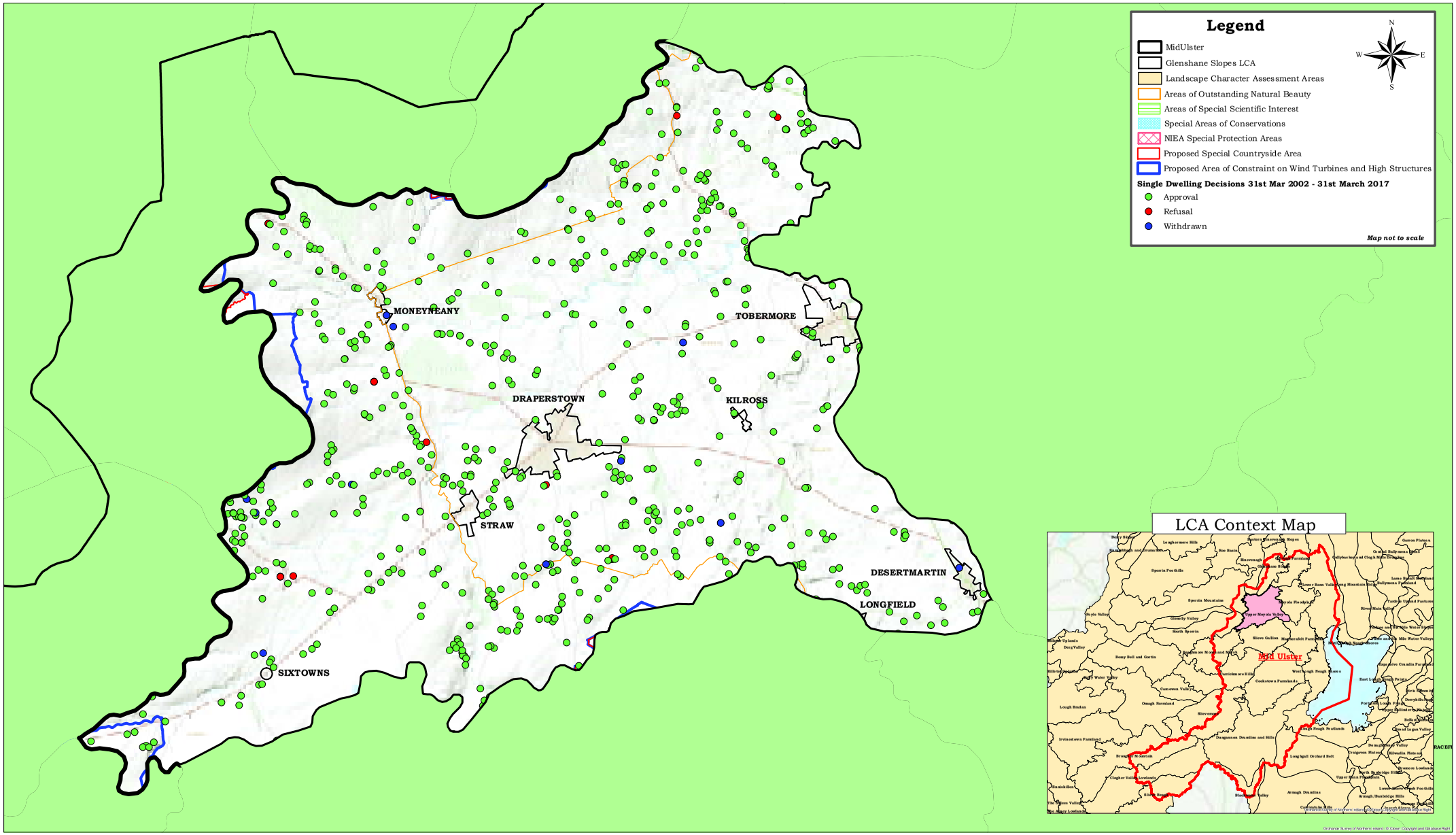
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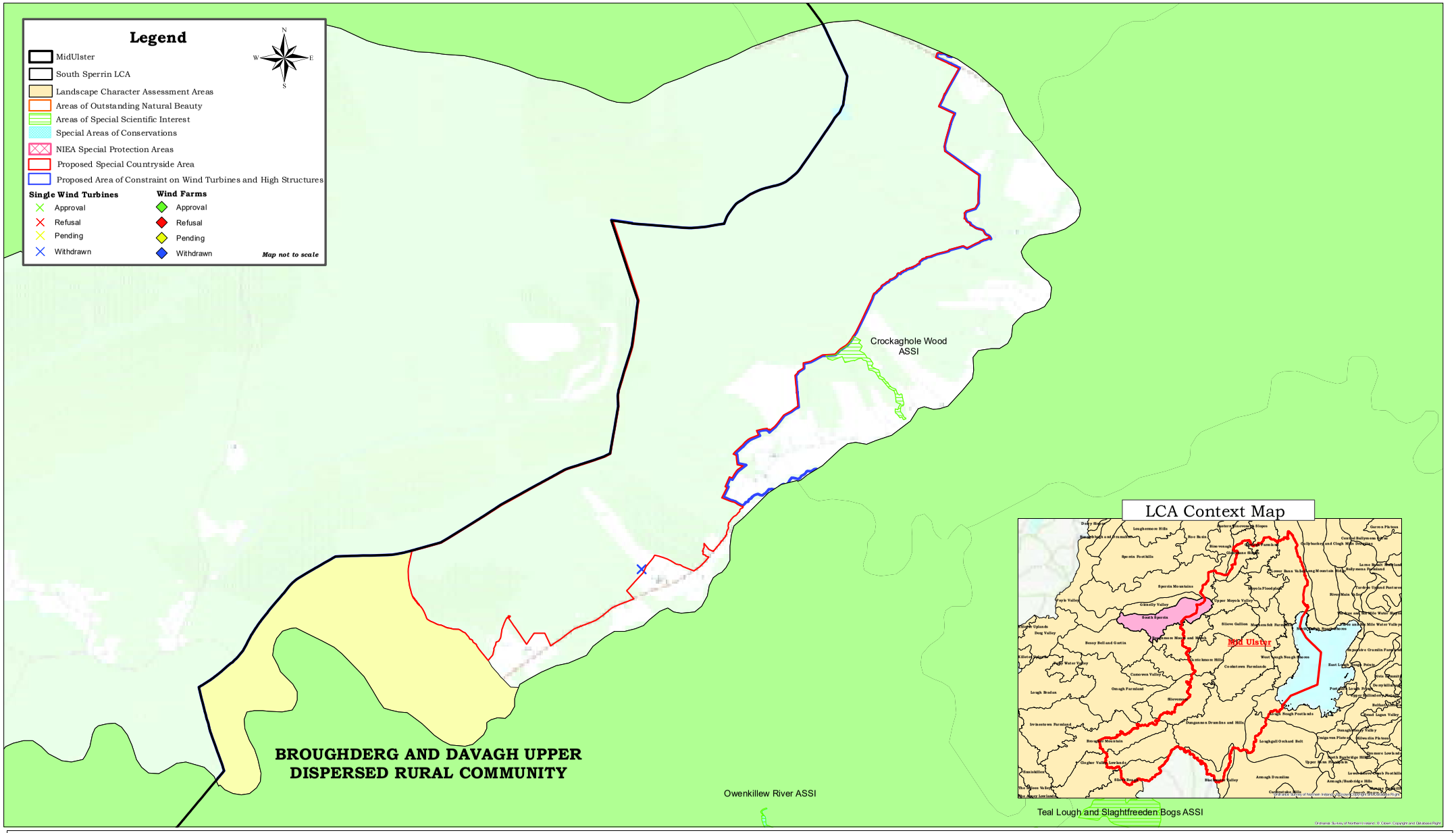
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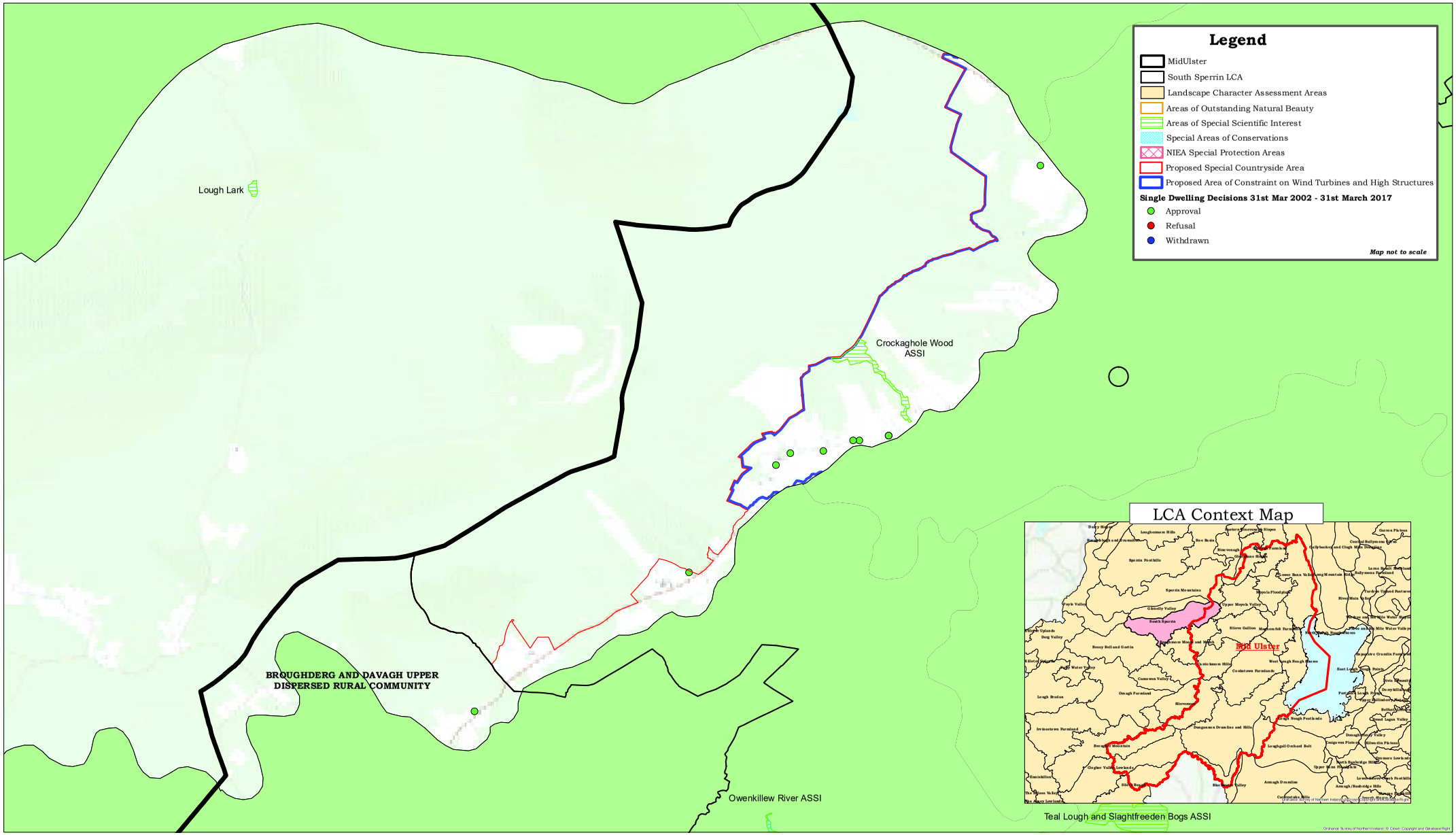
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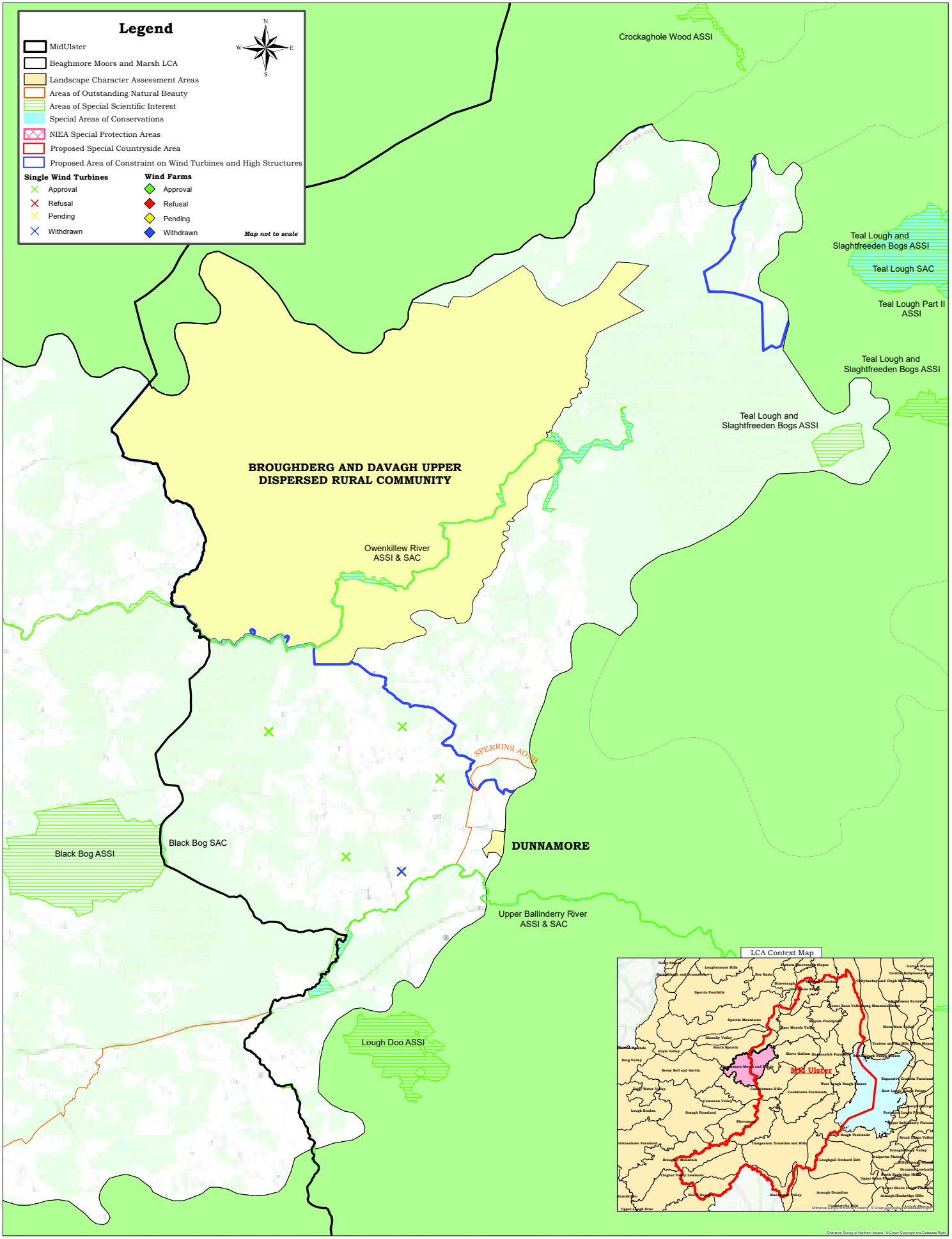
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Beaghmore Moors and Marsh

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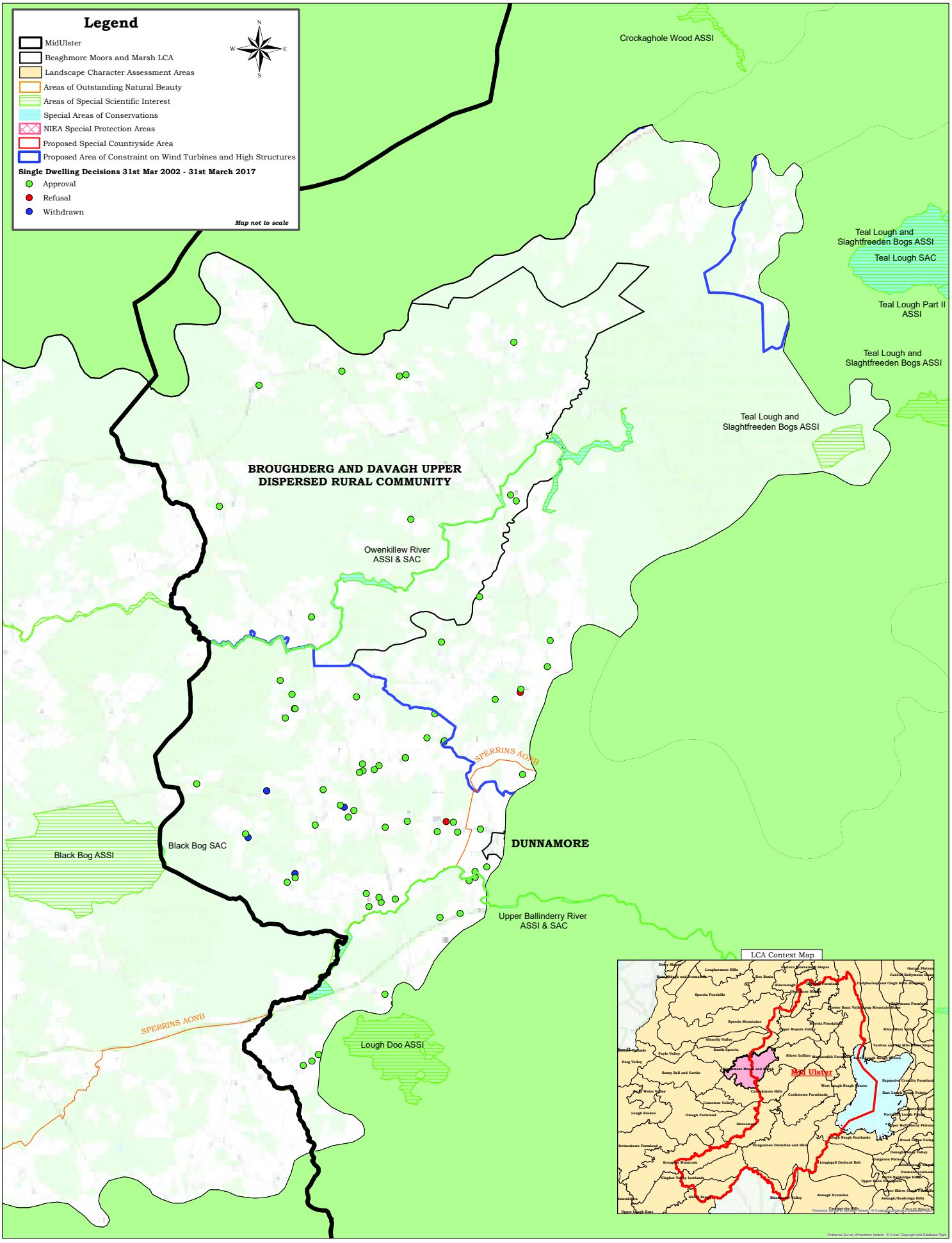
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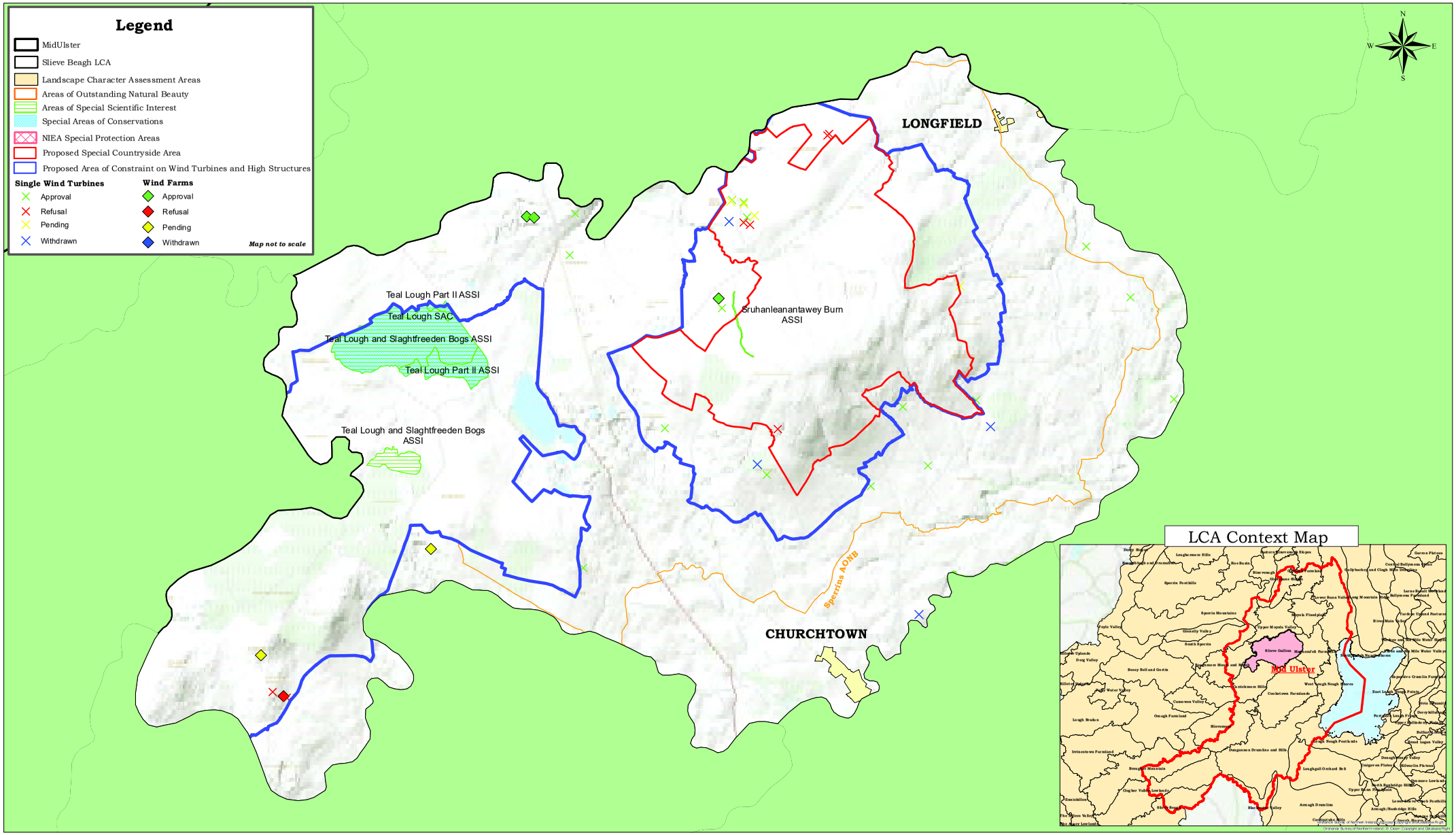
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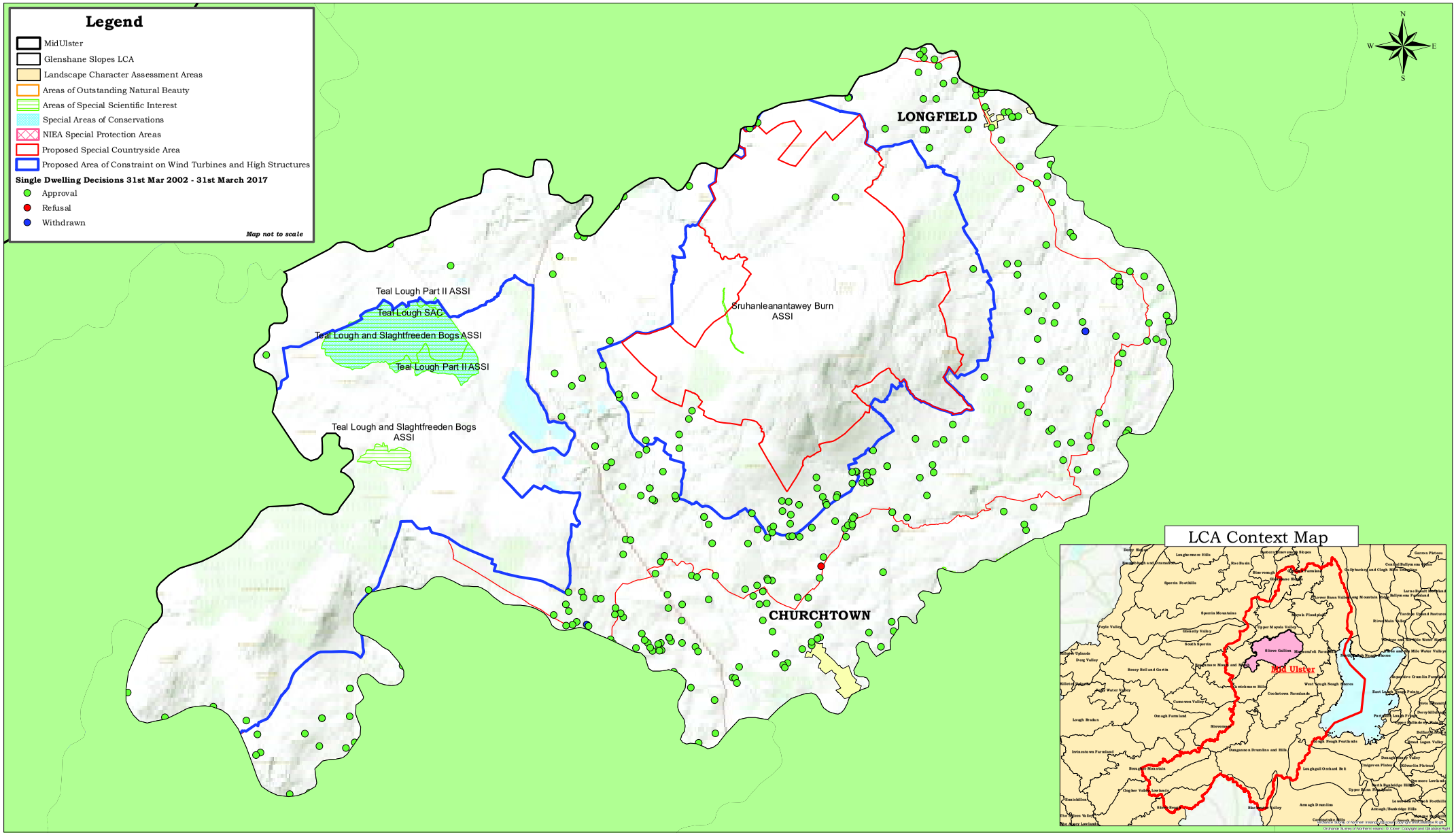
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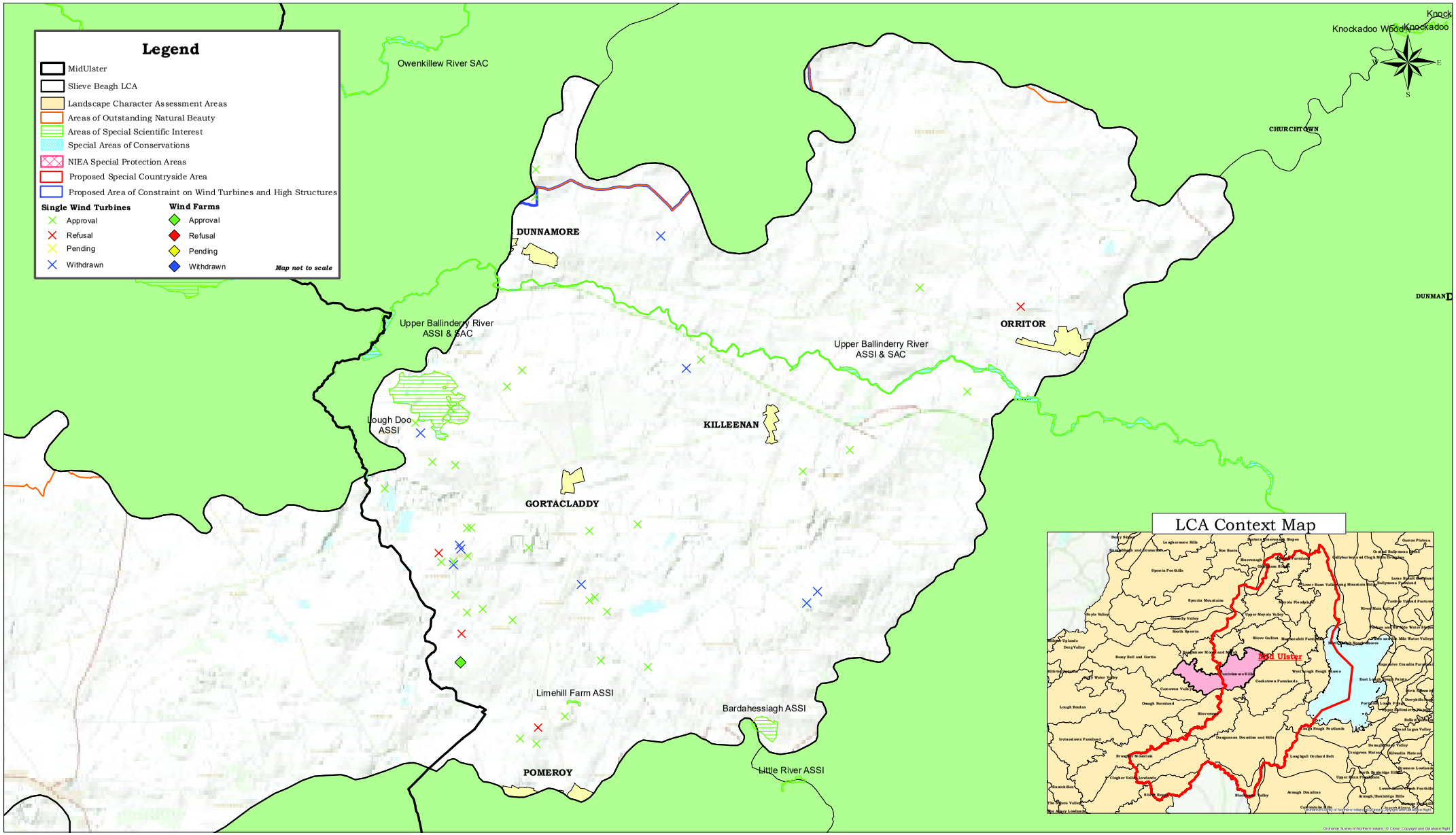
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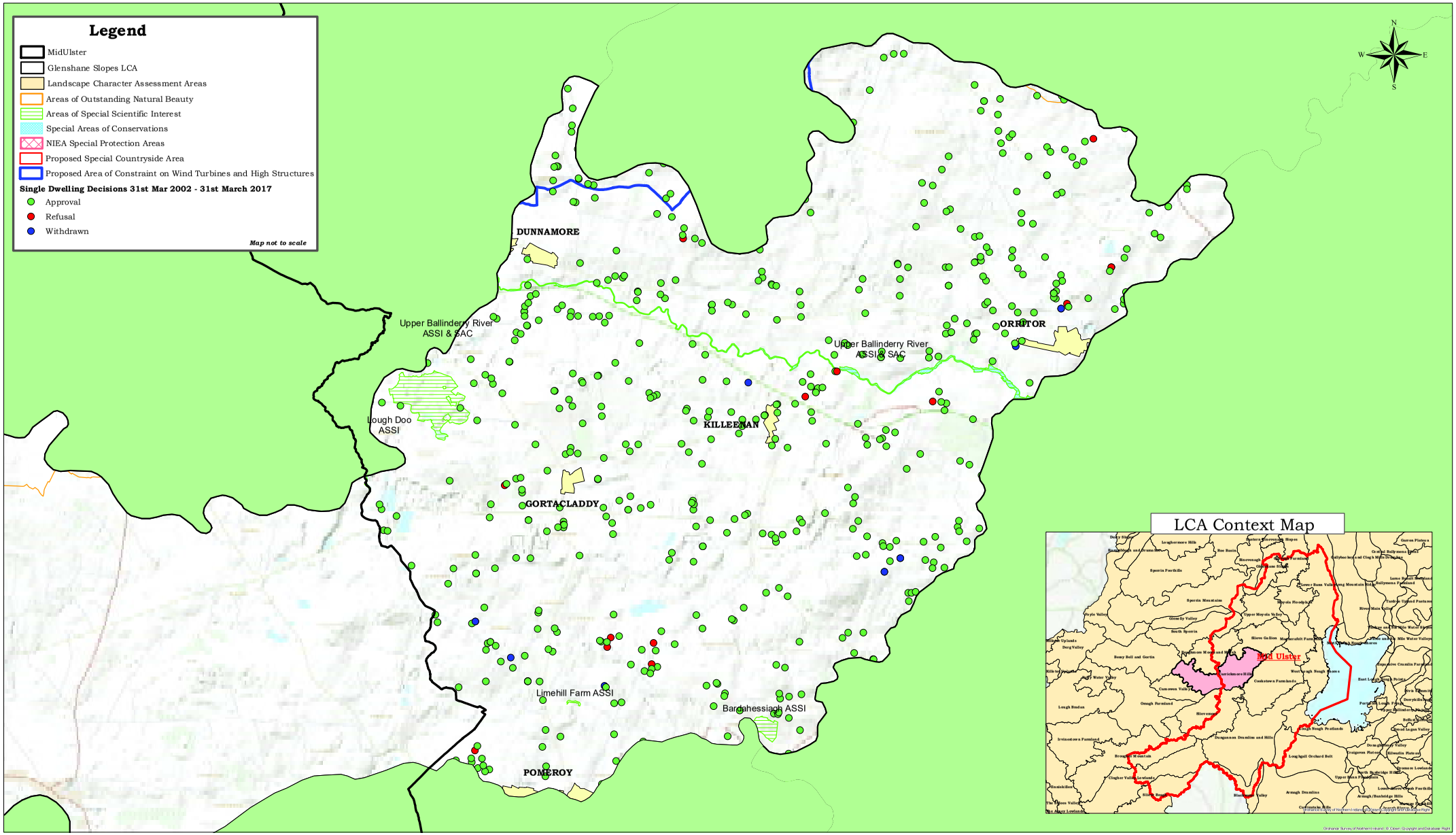
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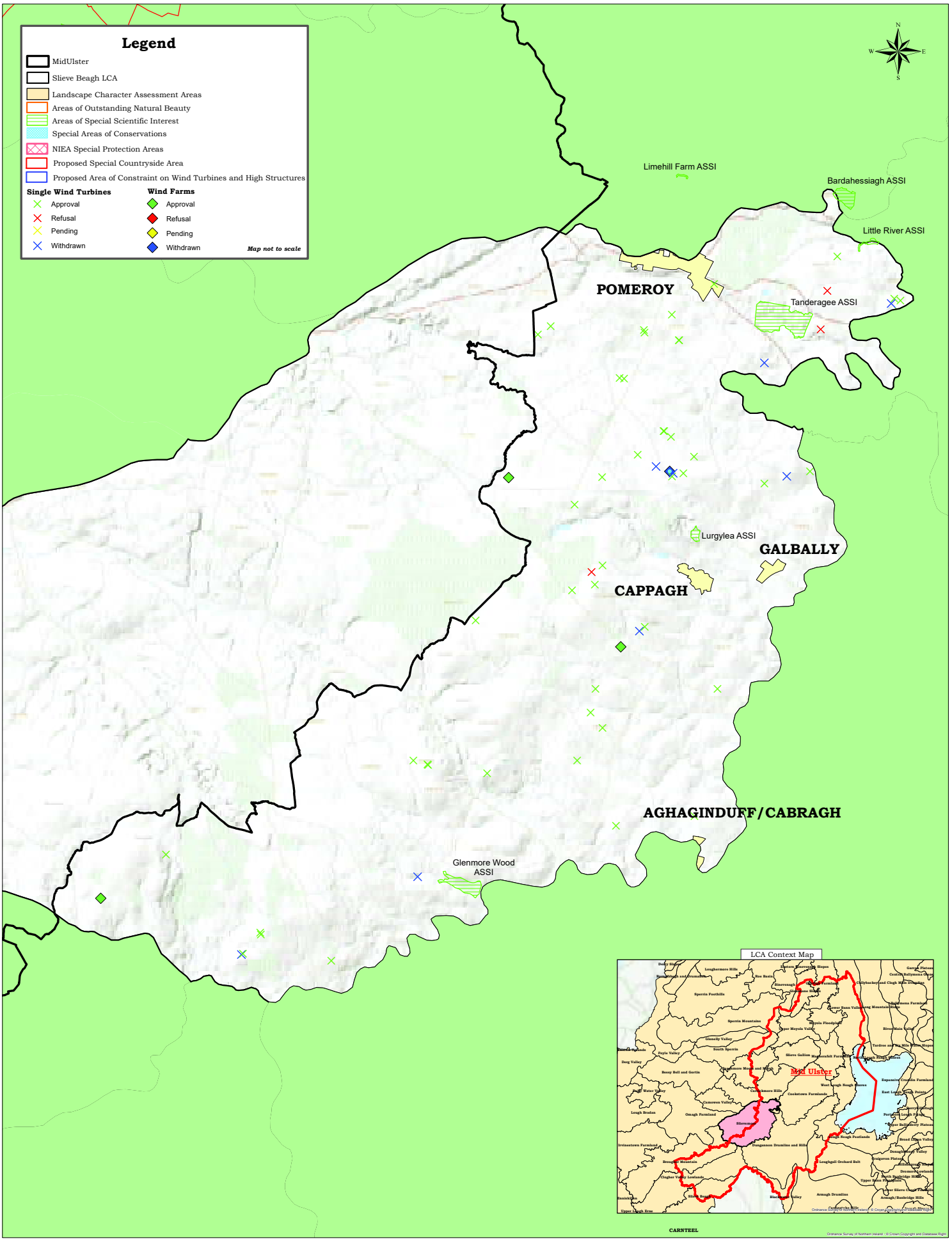
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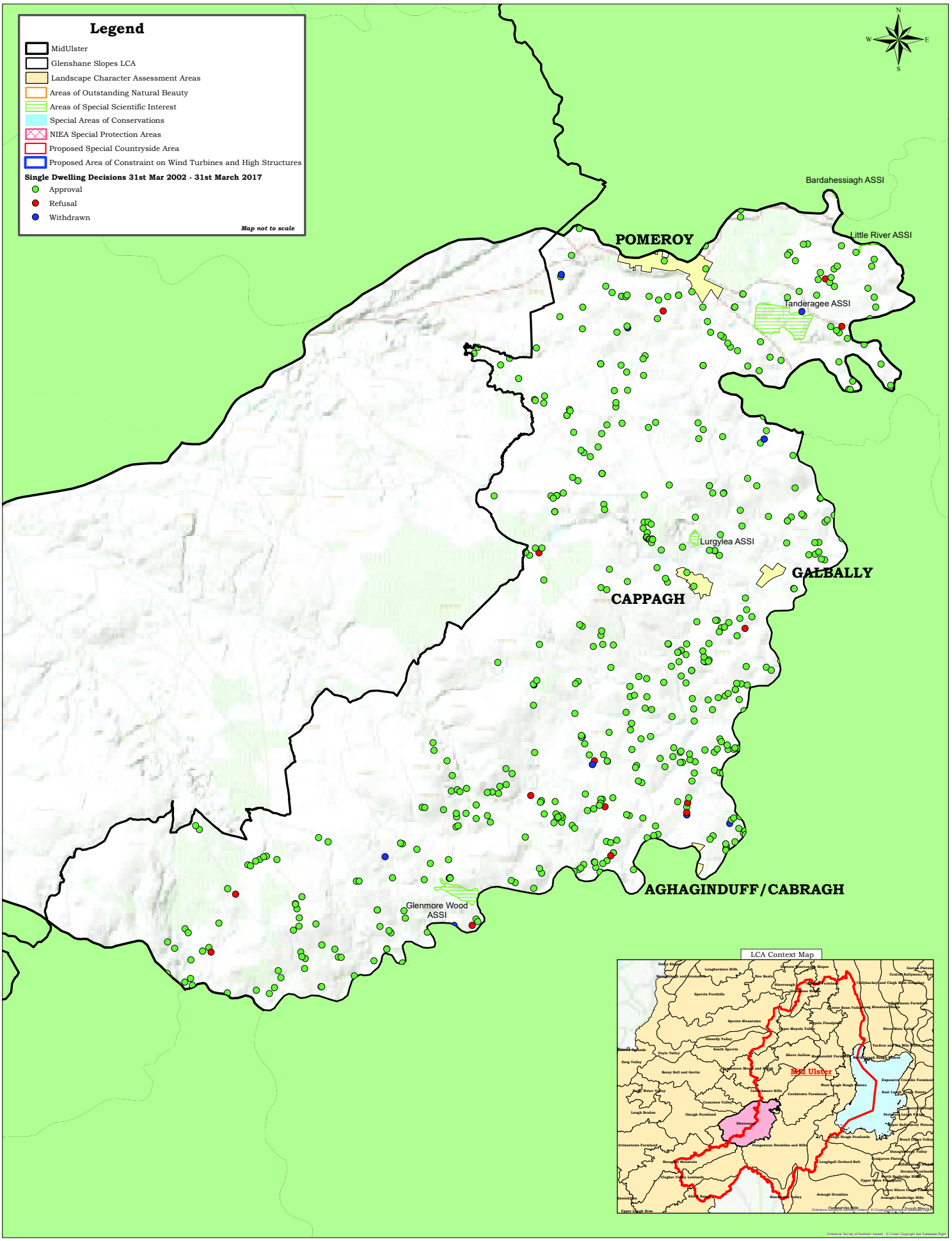
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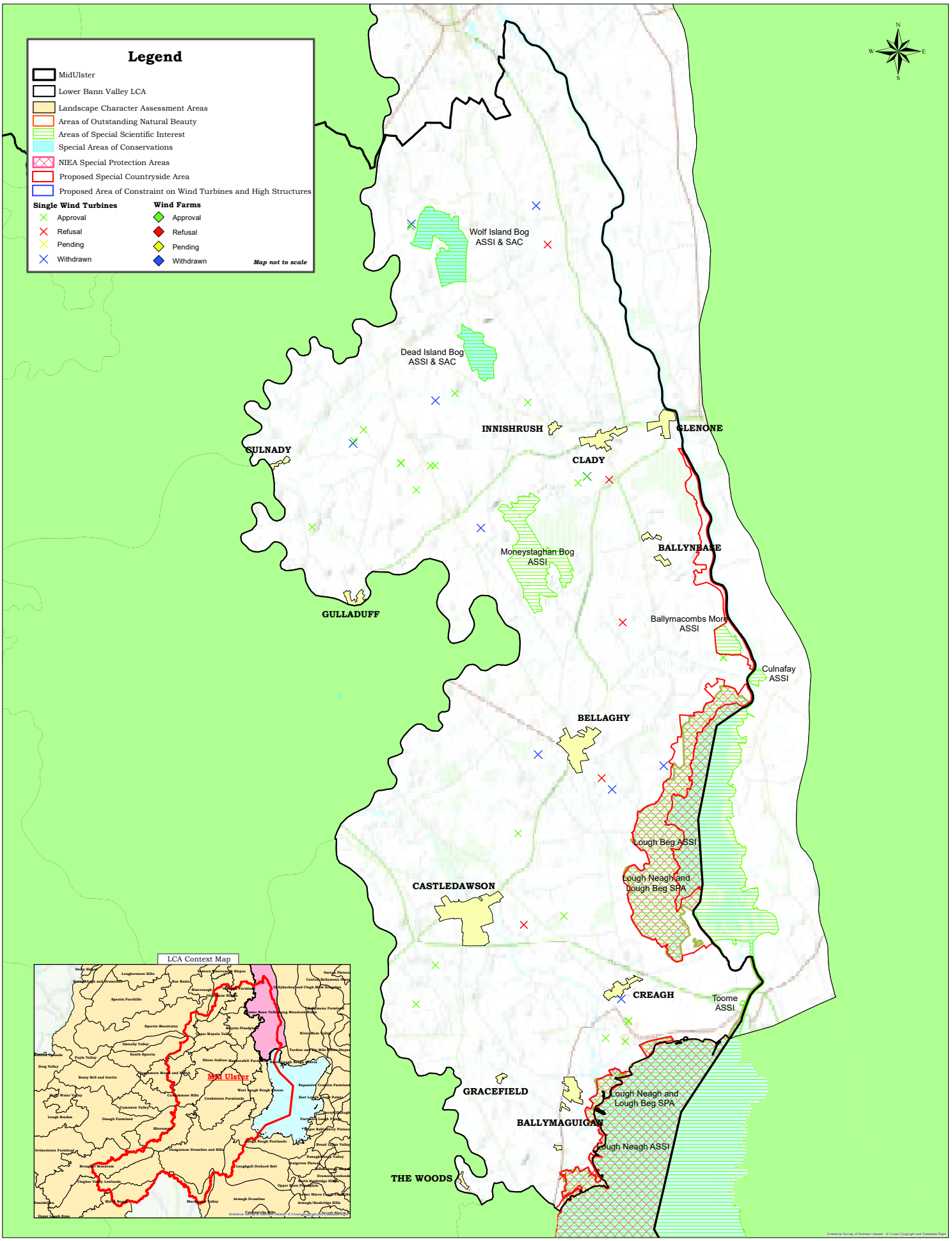
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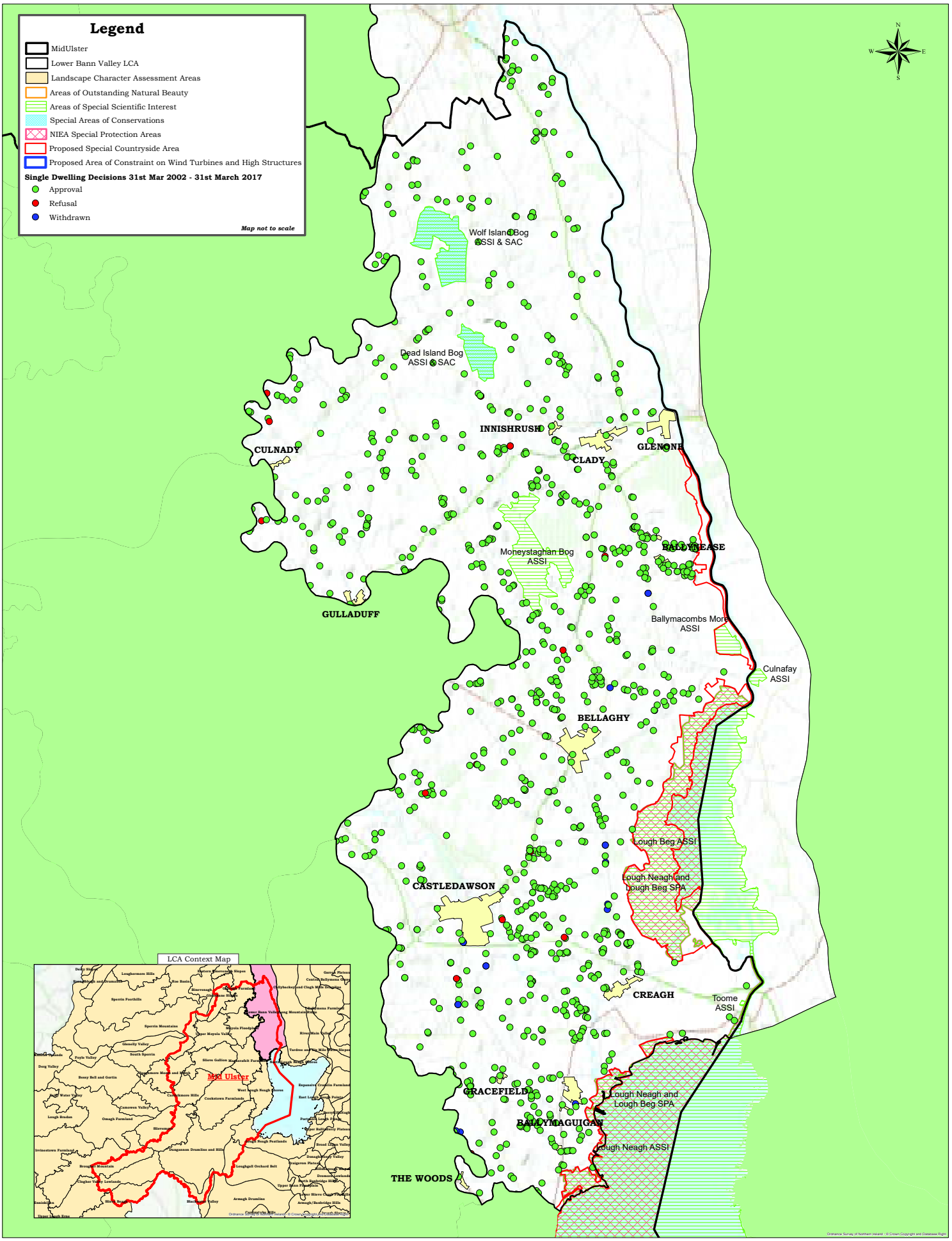
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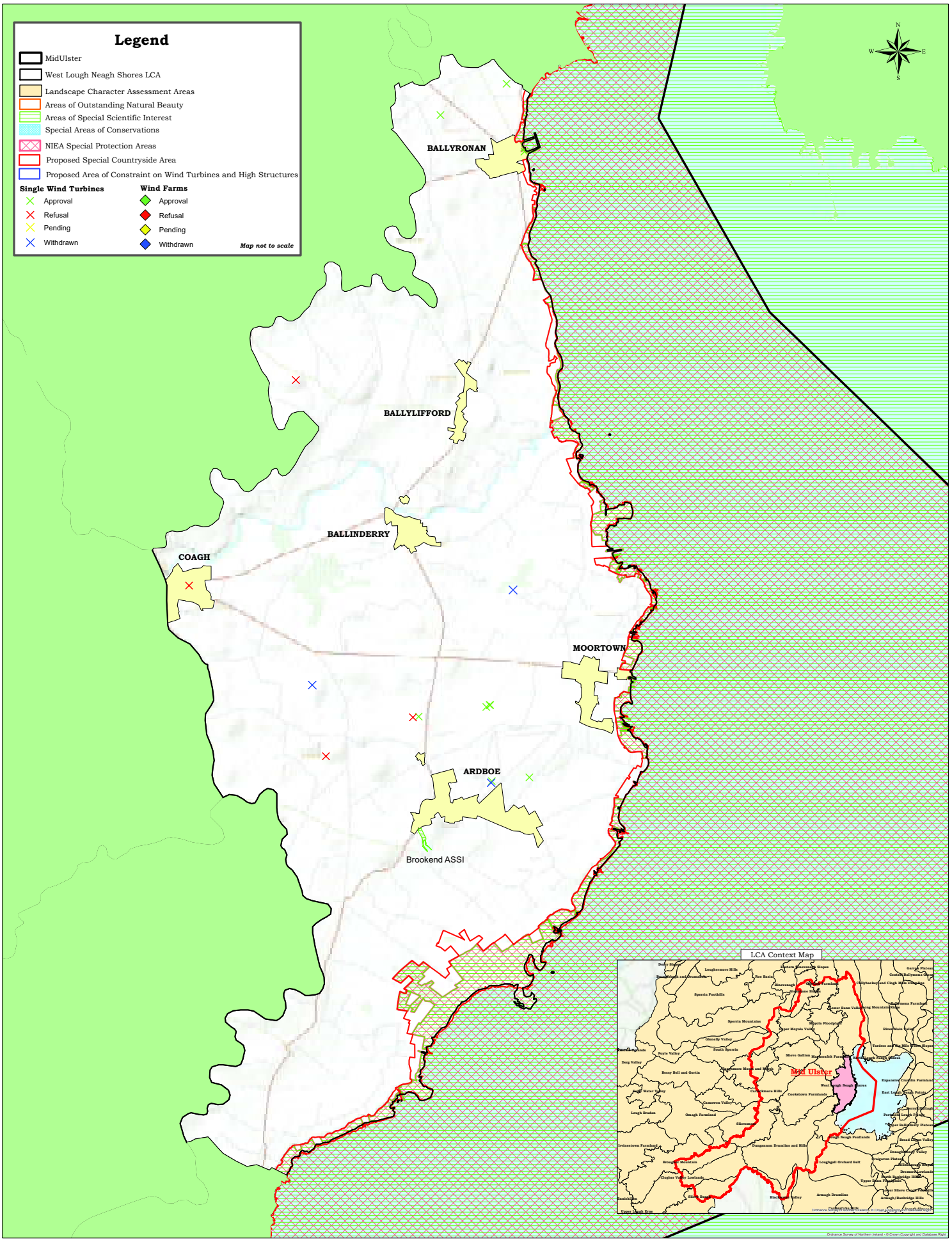
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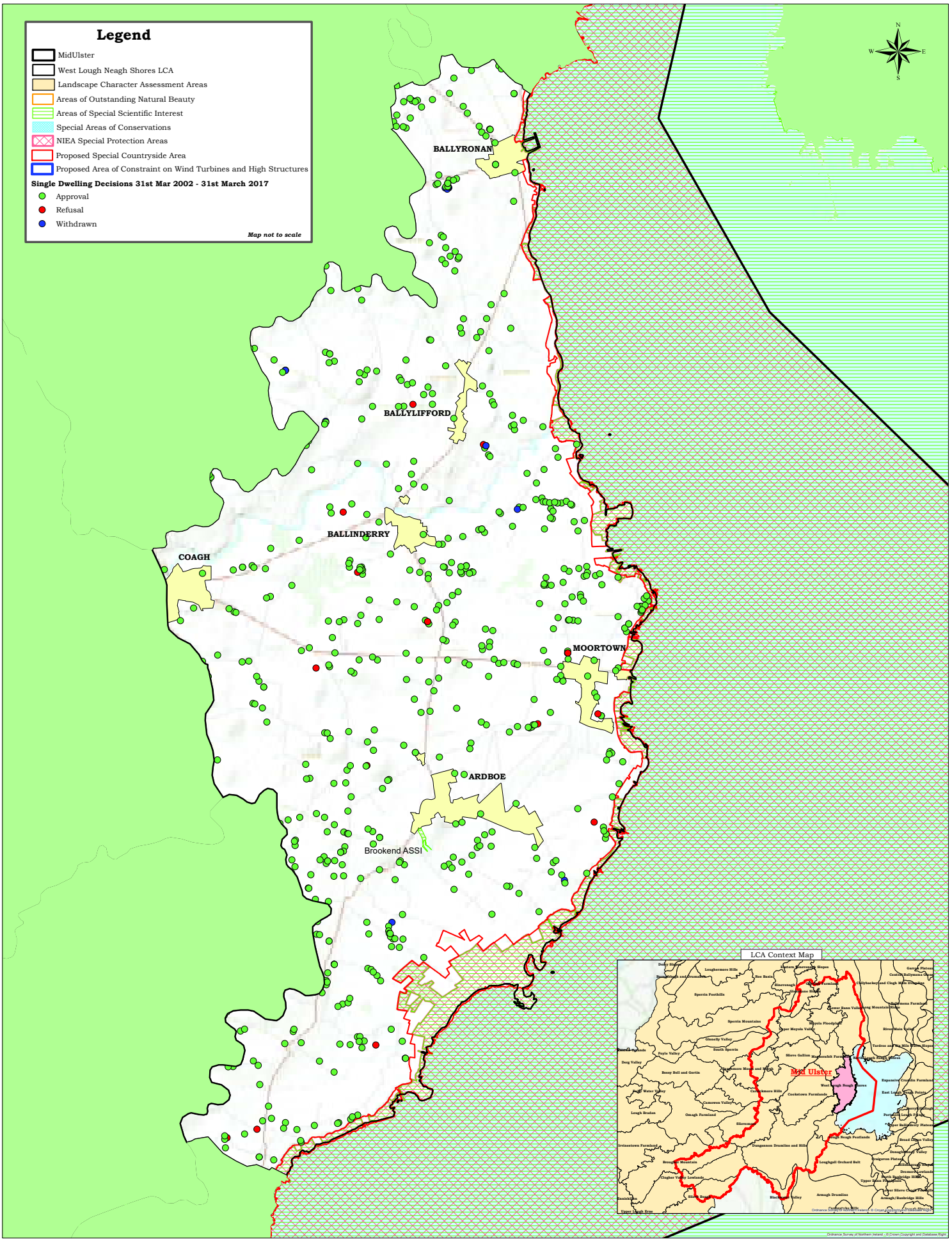
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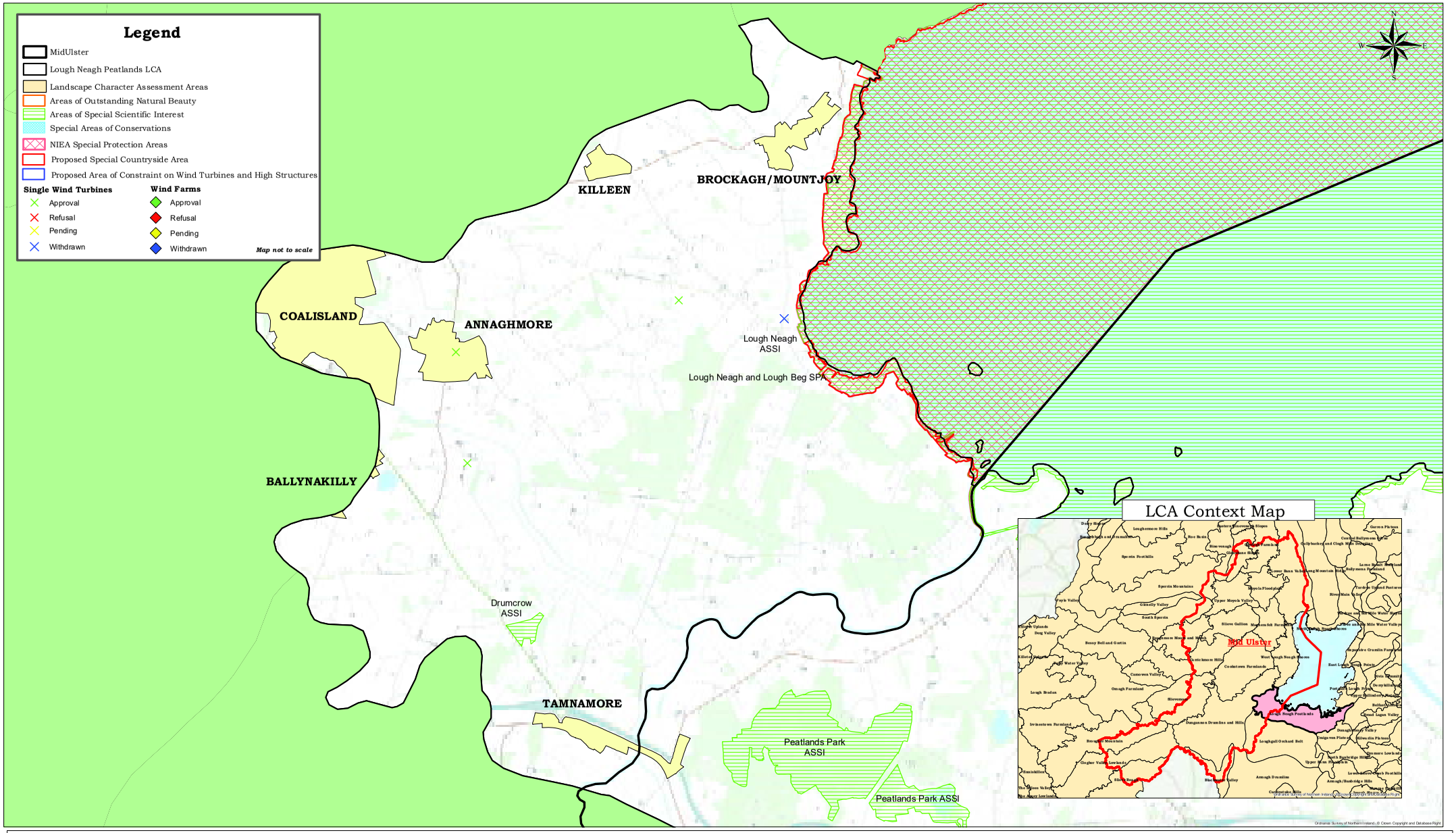
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Lough Neagh Peatlands

Single Wind Turbine and Windfarm Decisions 31st March 2002 - 31st March 2017



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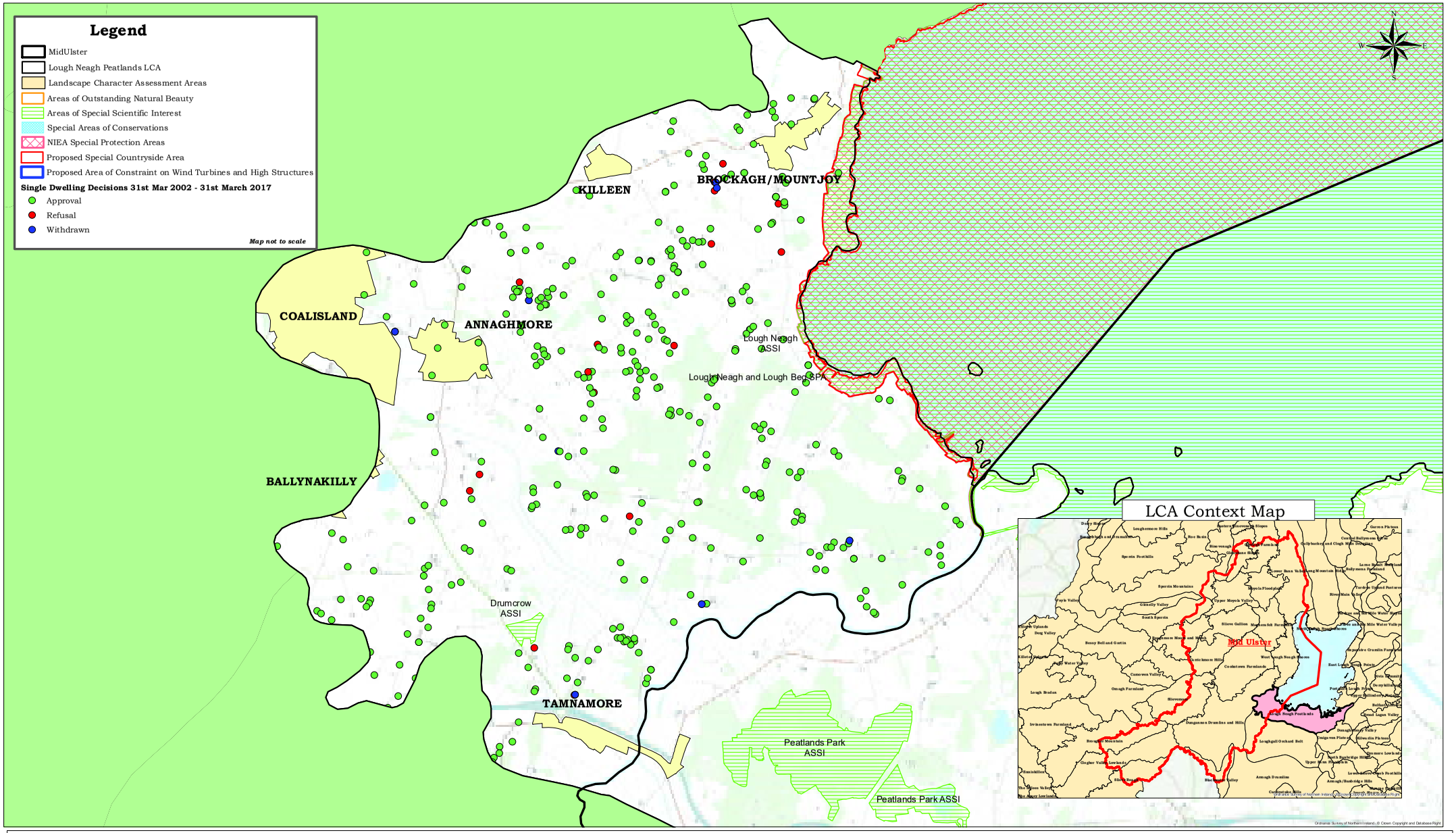
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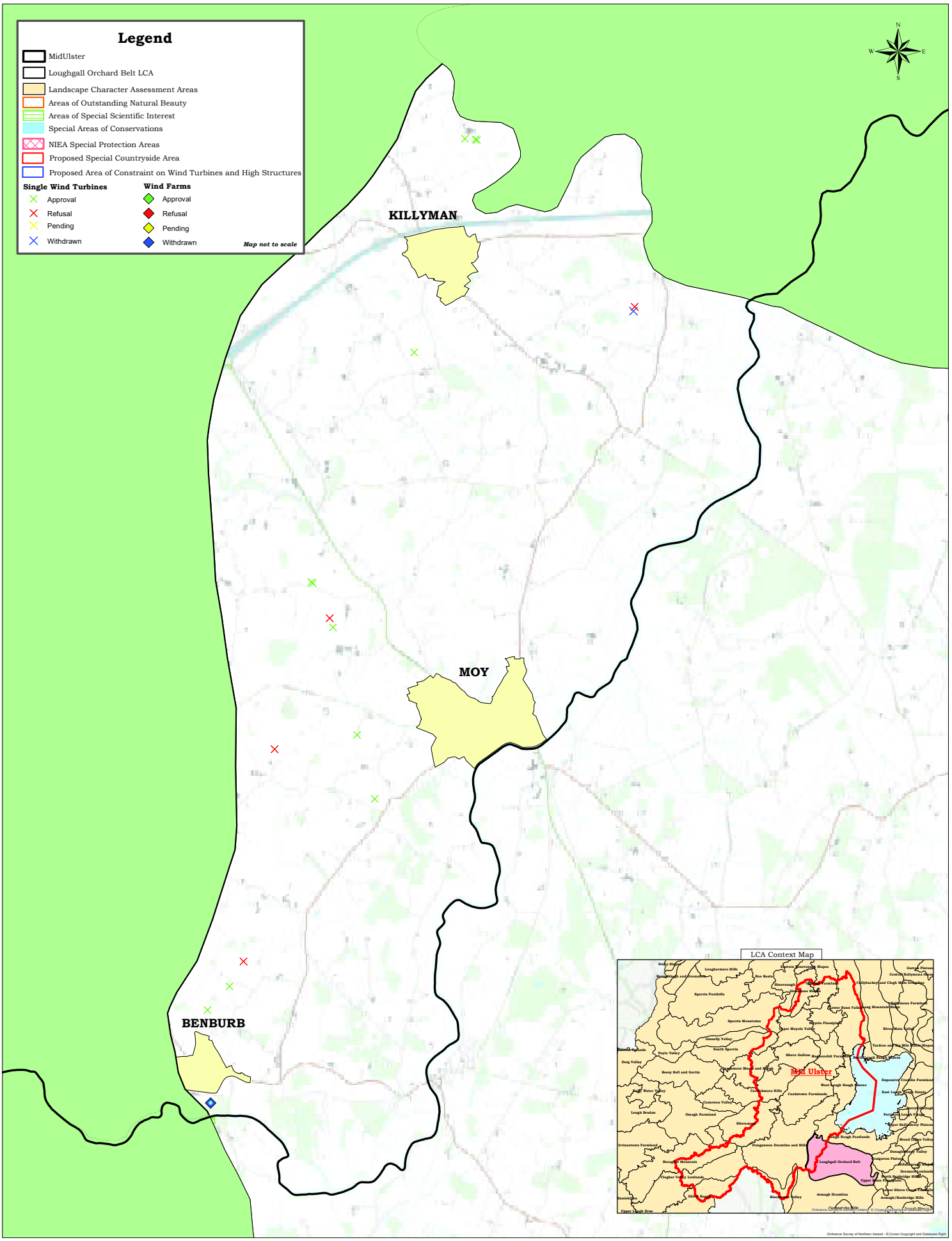
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Loughgall Orchard Belt

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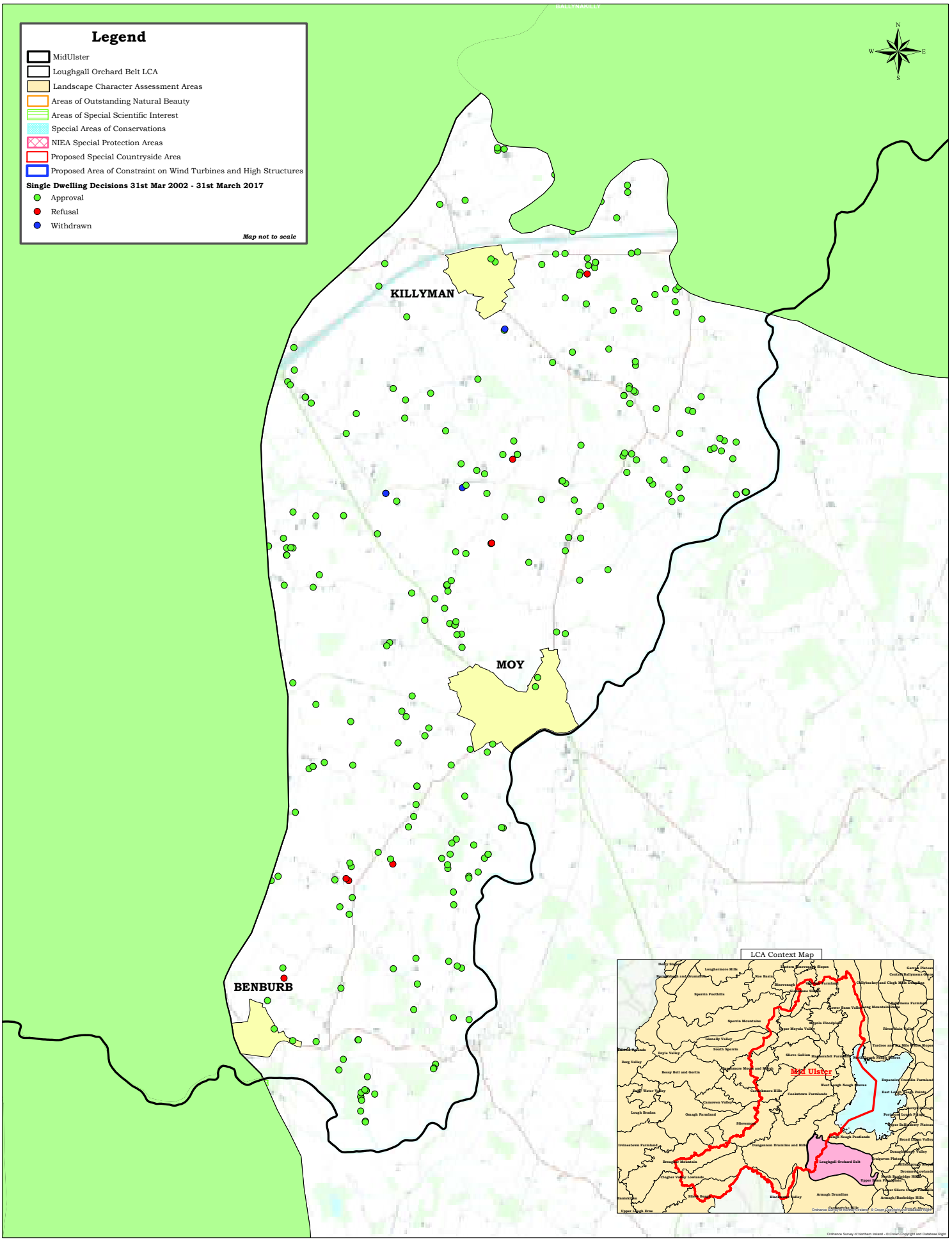
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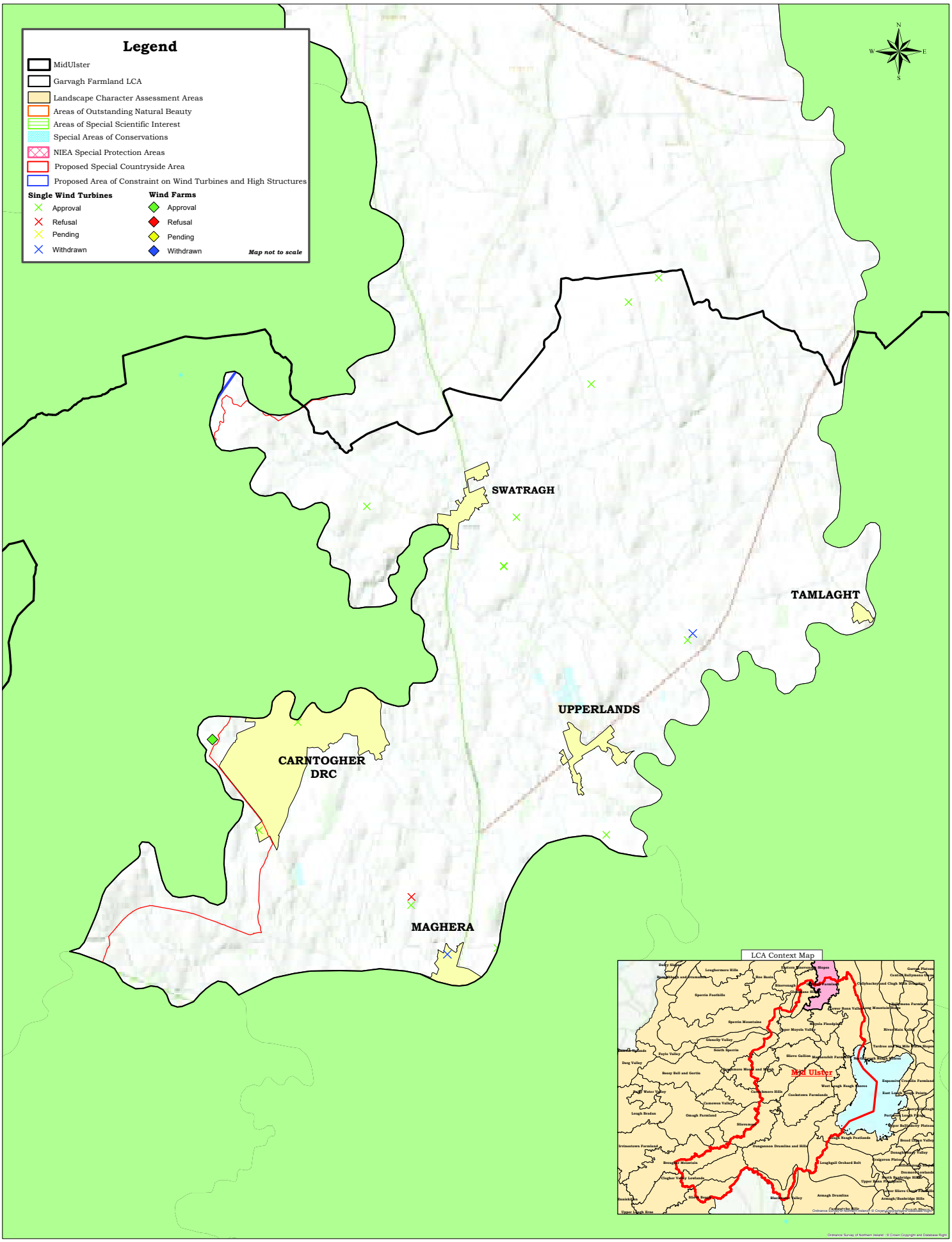
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Garvagh Farmland

Single Wind Turbine and Windfarm Decisions 31st March 2002 - 31st March 2017



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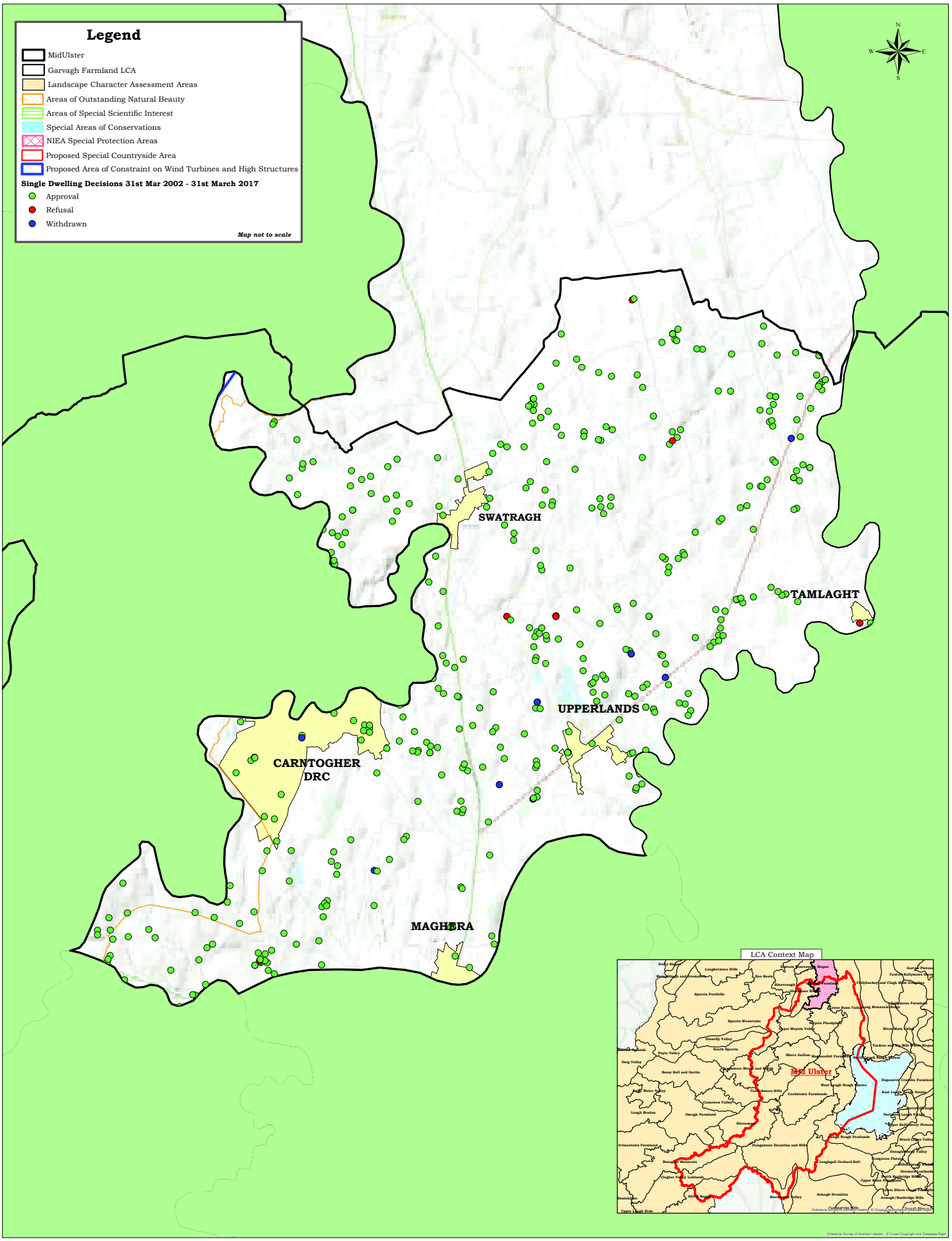
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Garvagh Farmland

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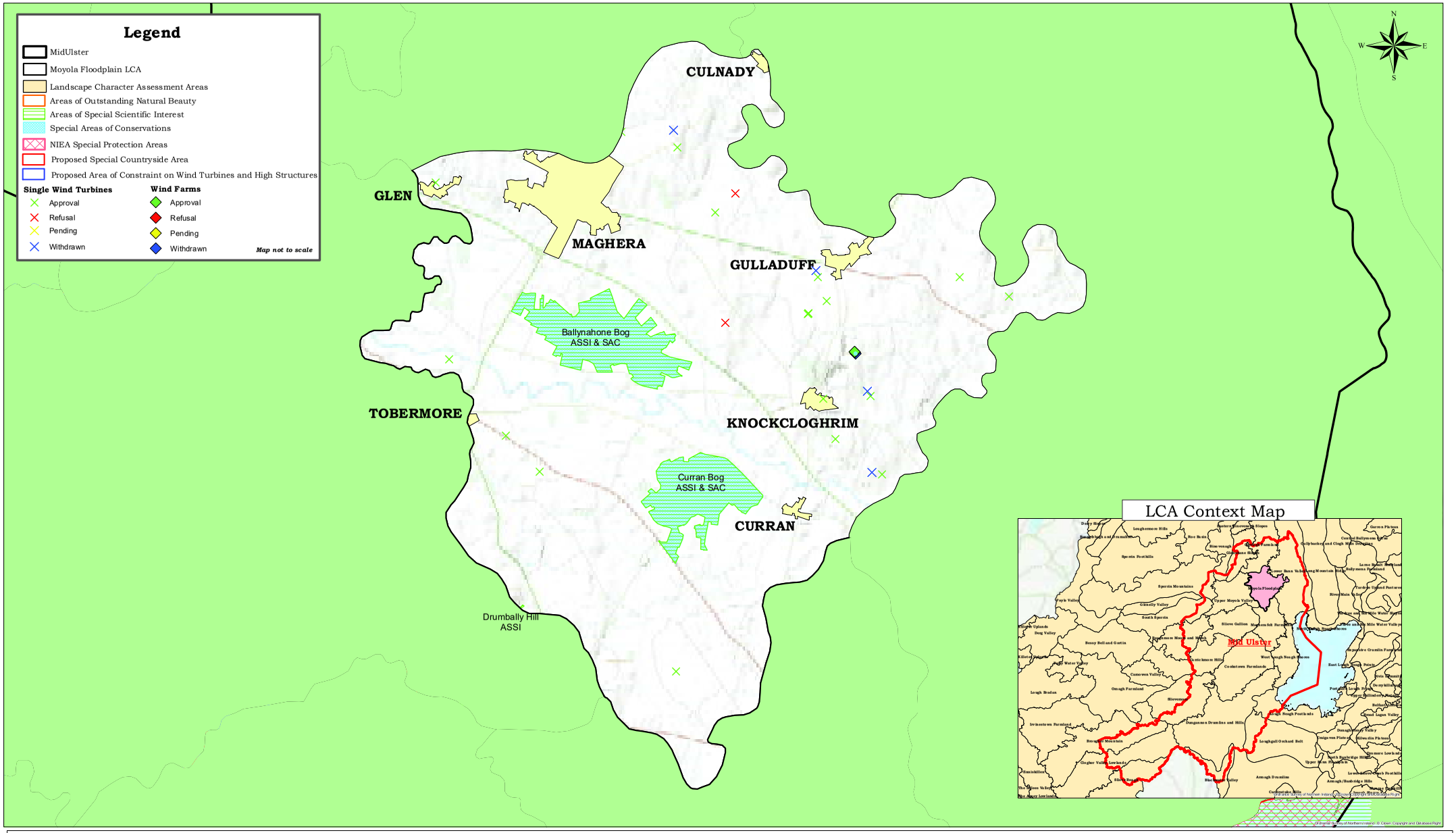
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Moyola Floodplain

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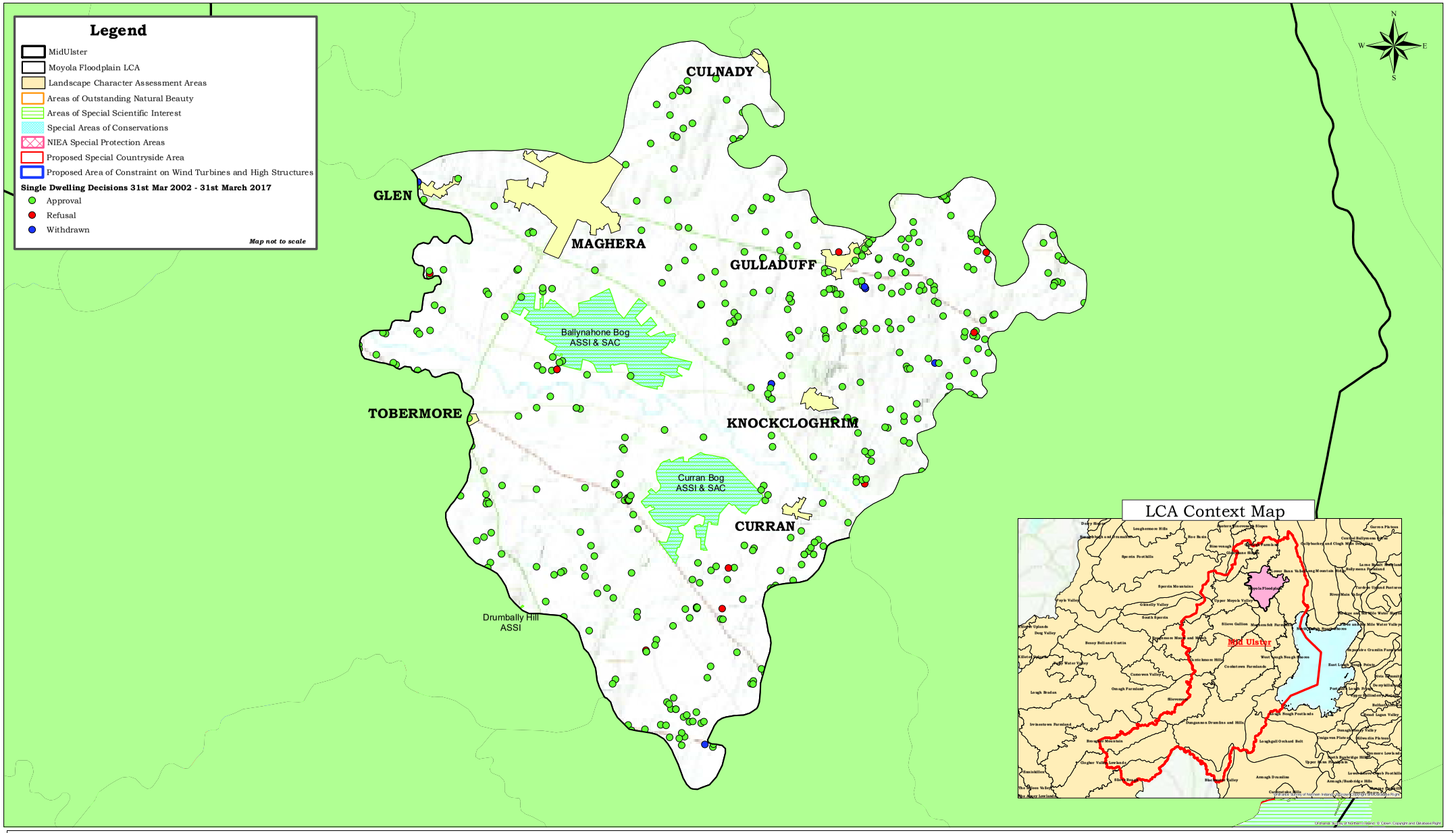
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Moyola Floodplain

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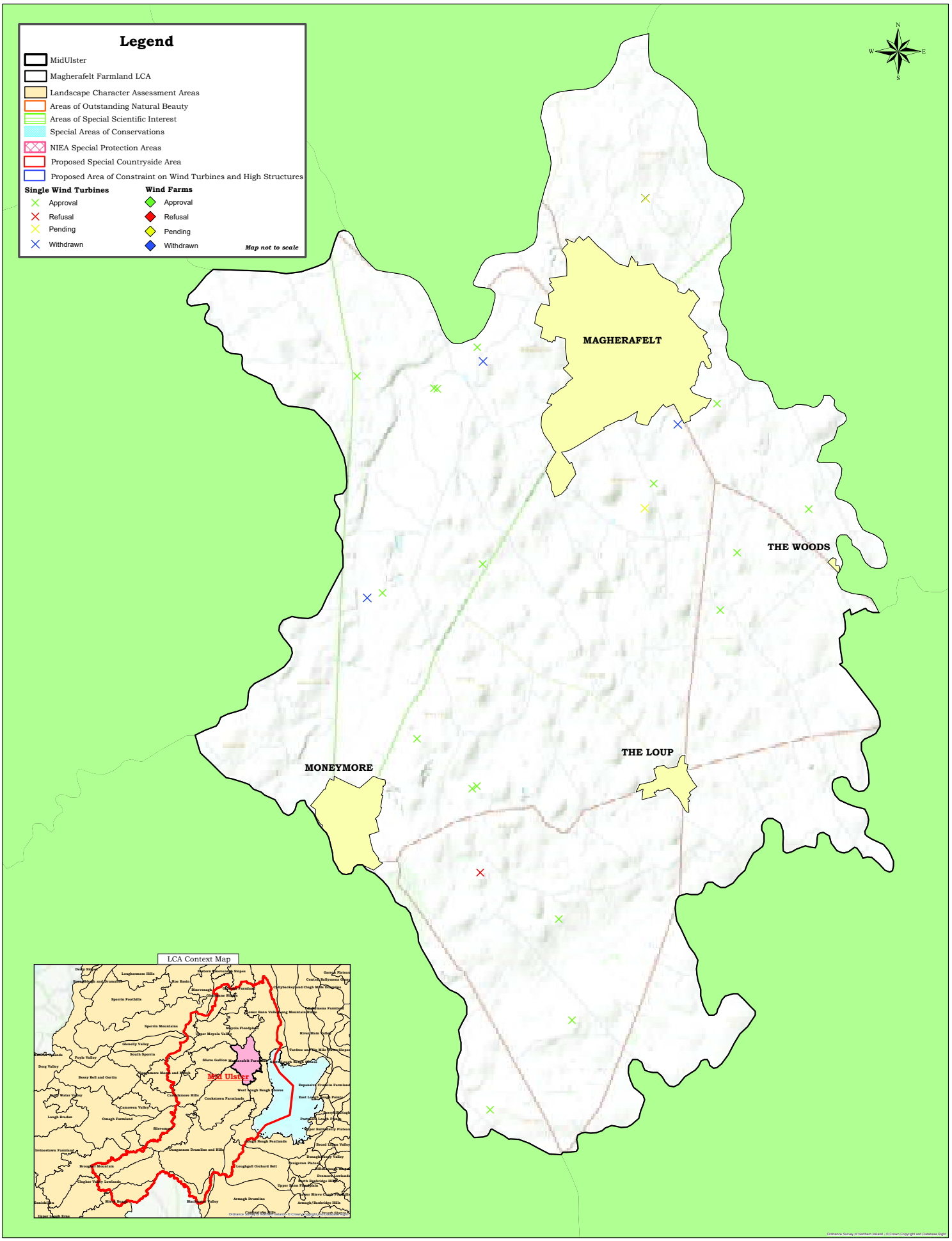
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Magherafelt Farmland

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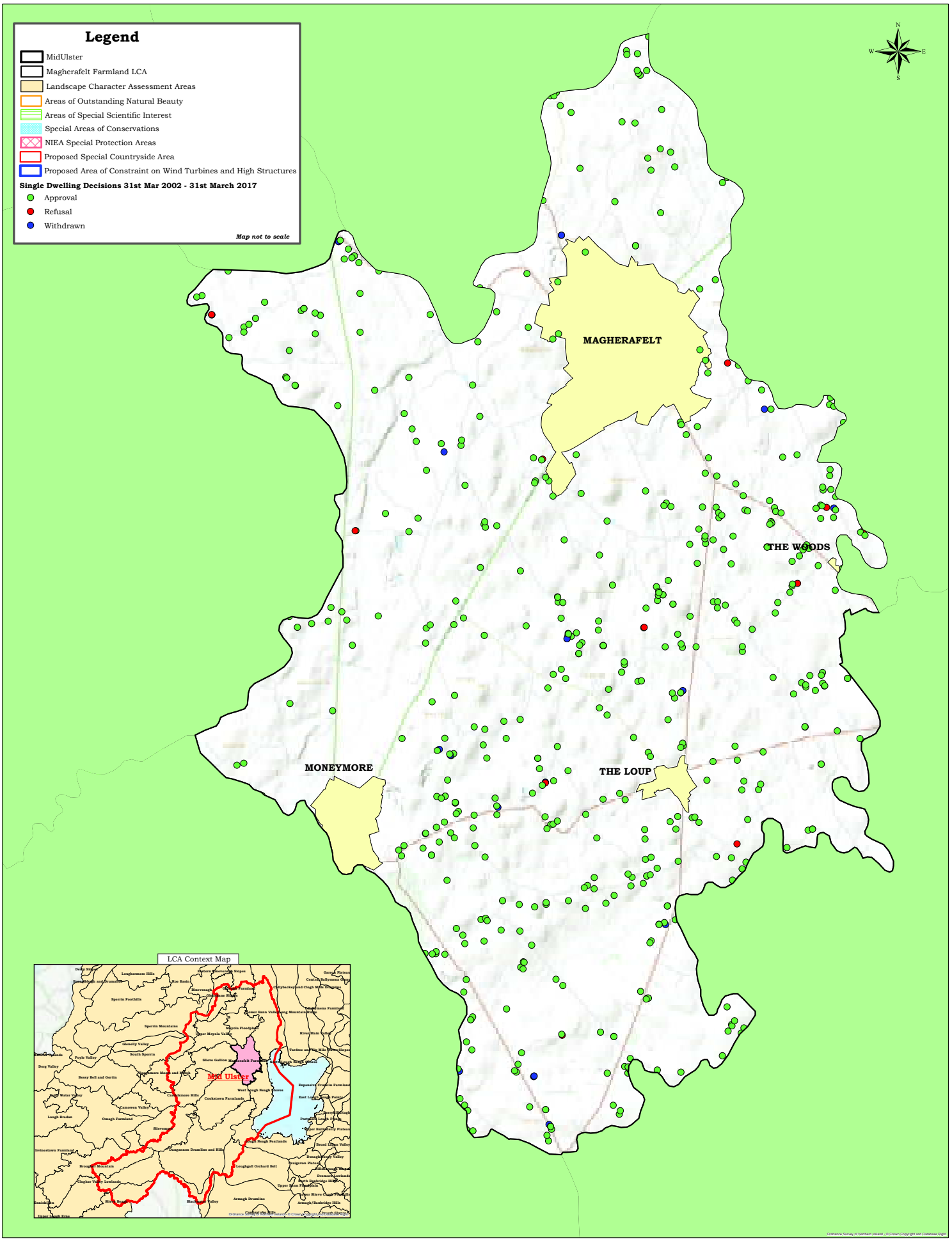
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Magherafelt Farmland

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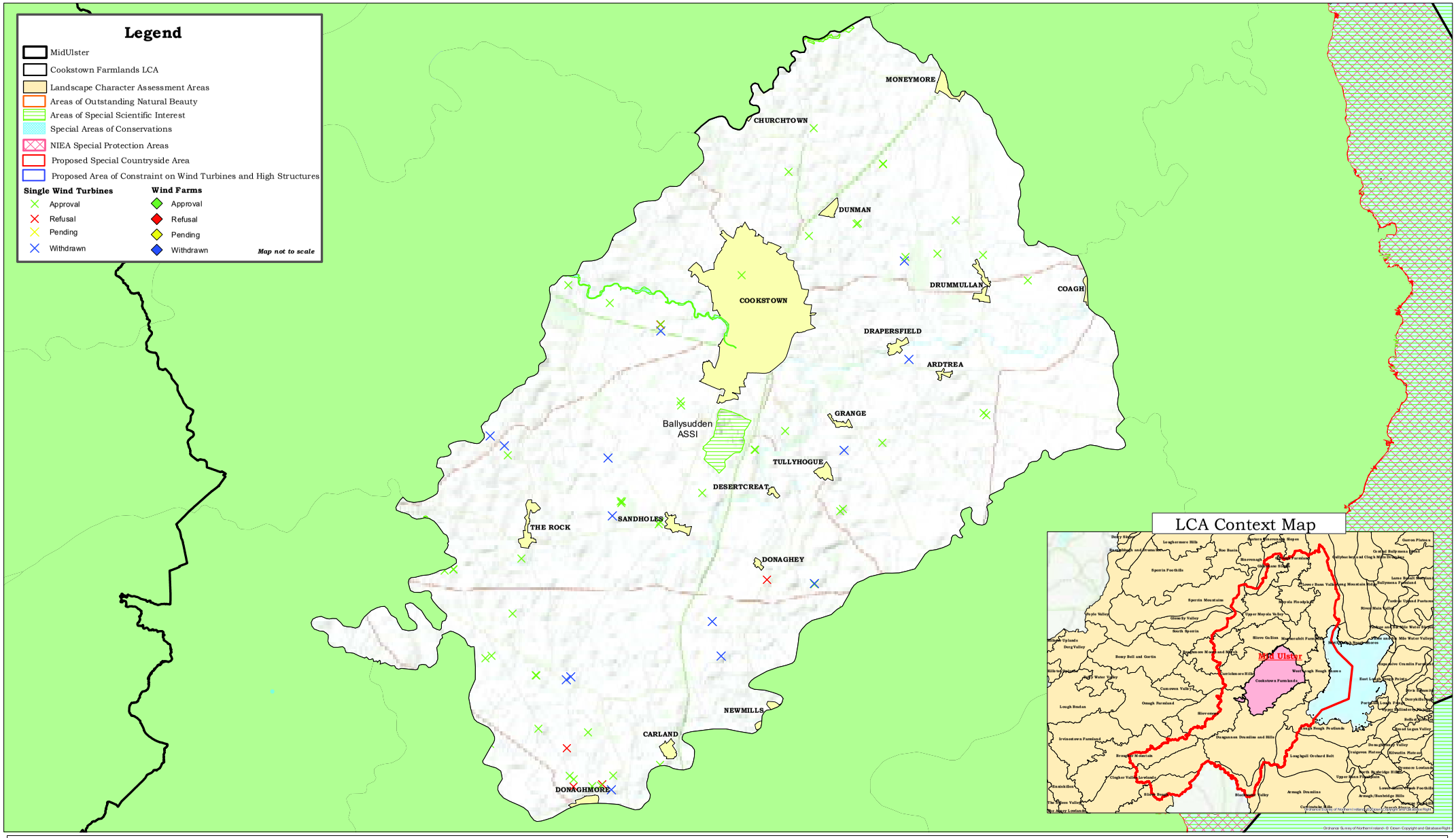
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Cookstown Farmlands

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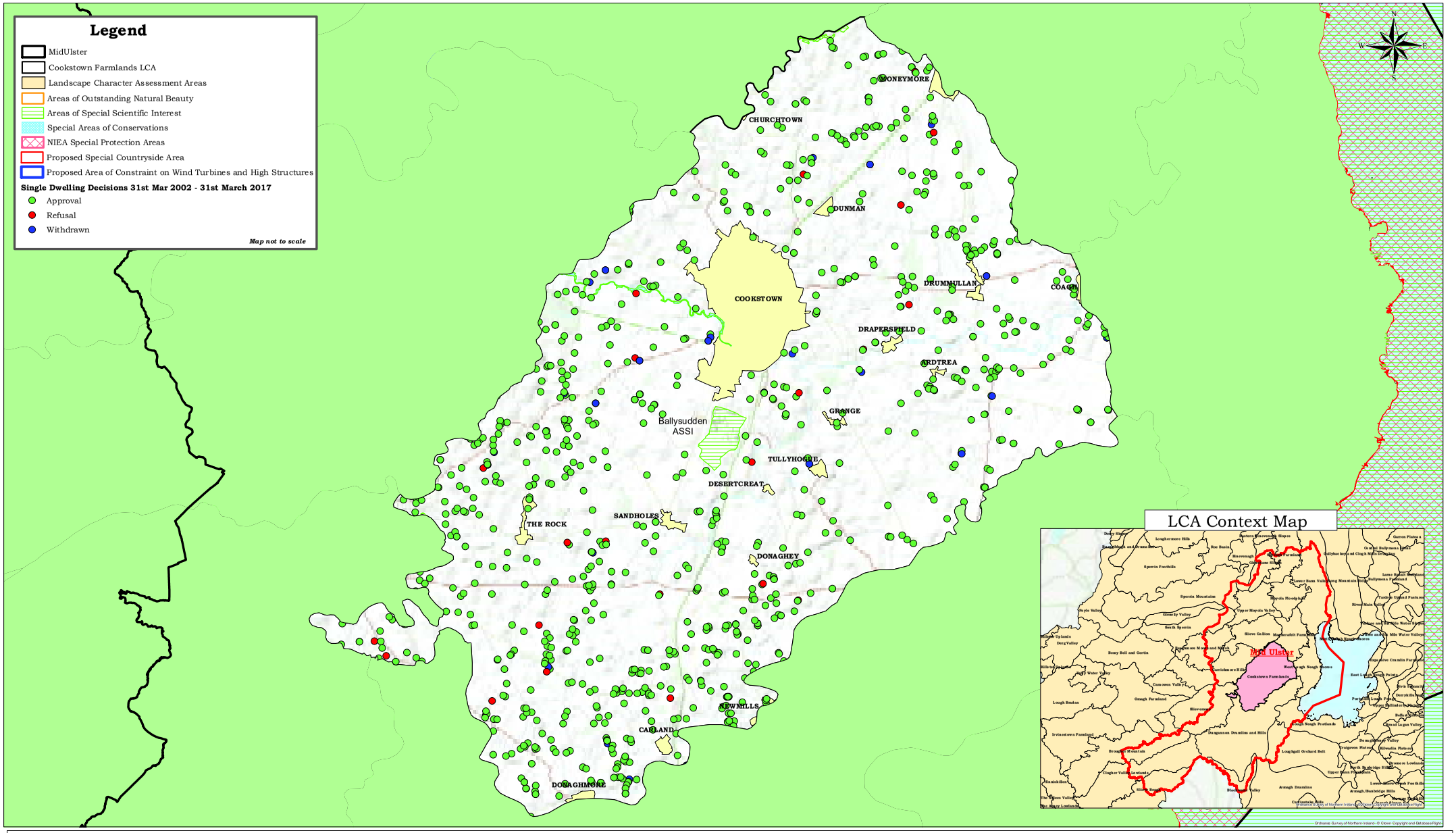
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Cookstown Farmlands

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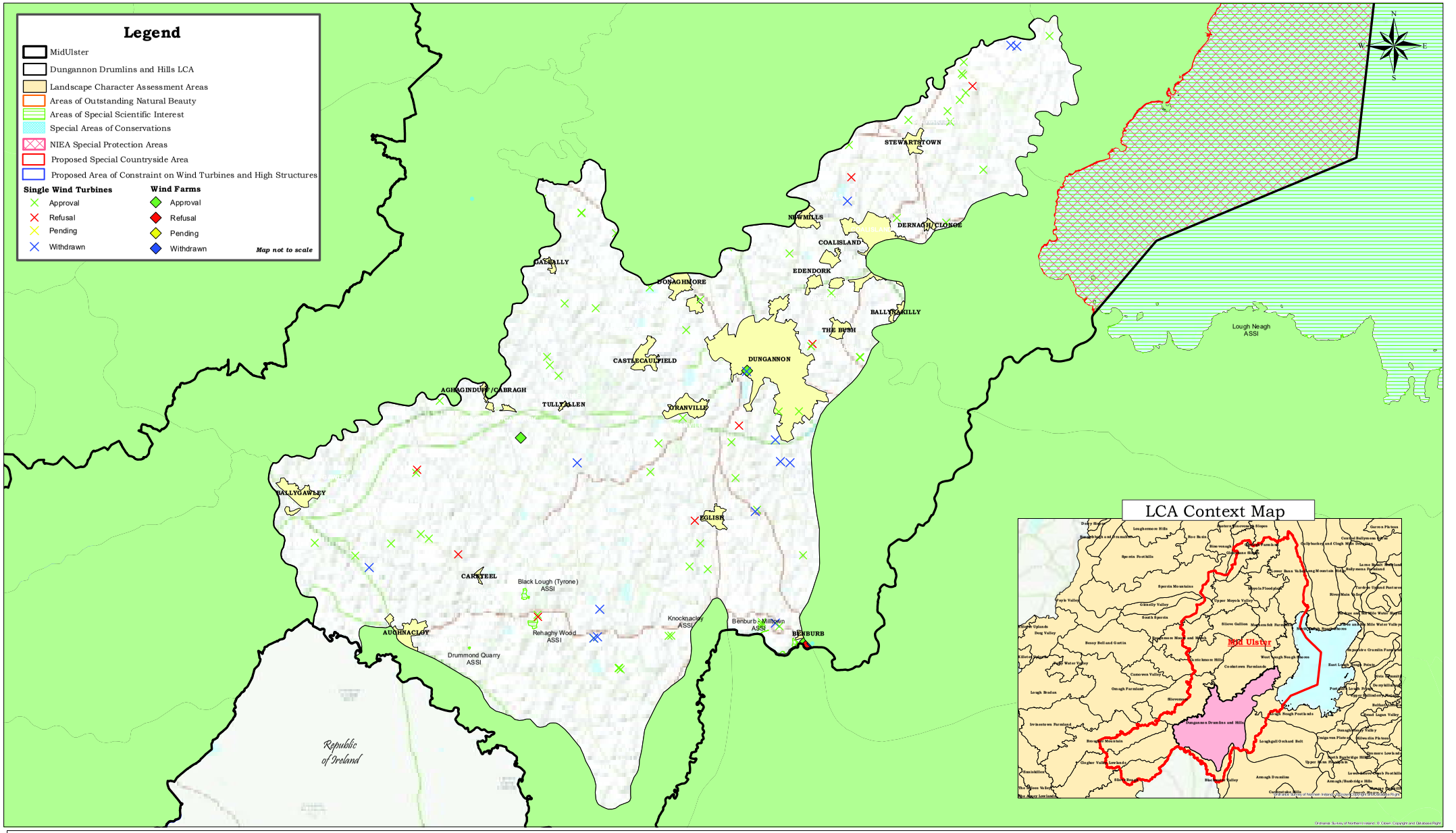
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Dungannon Drumlins and Hills

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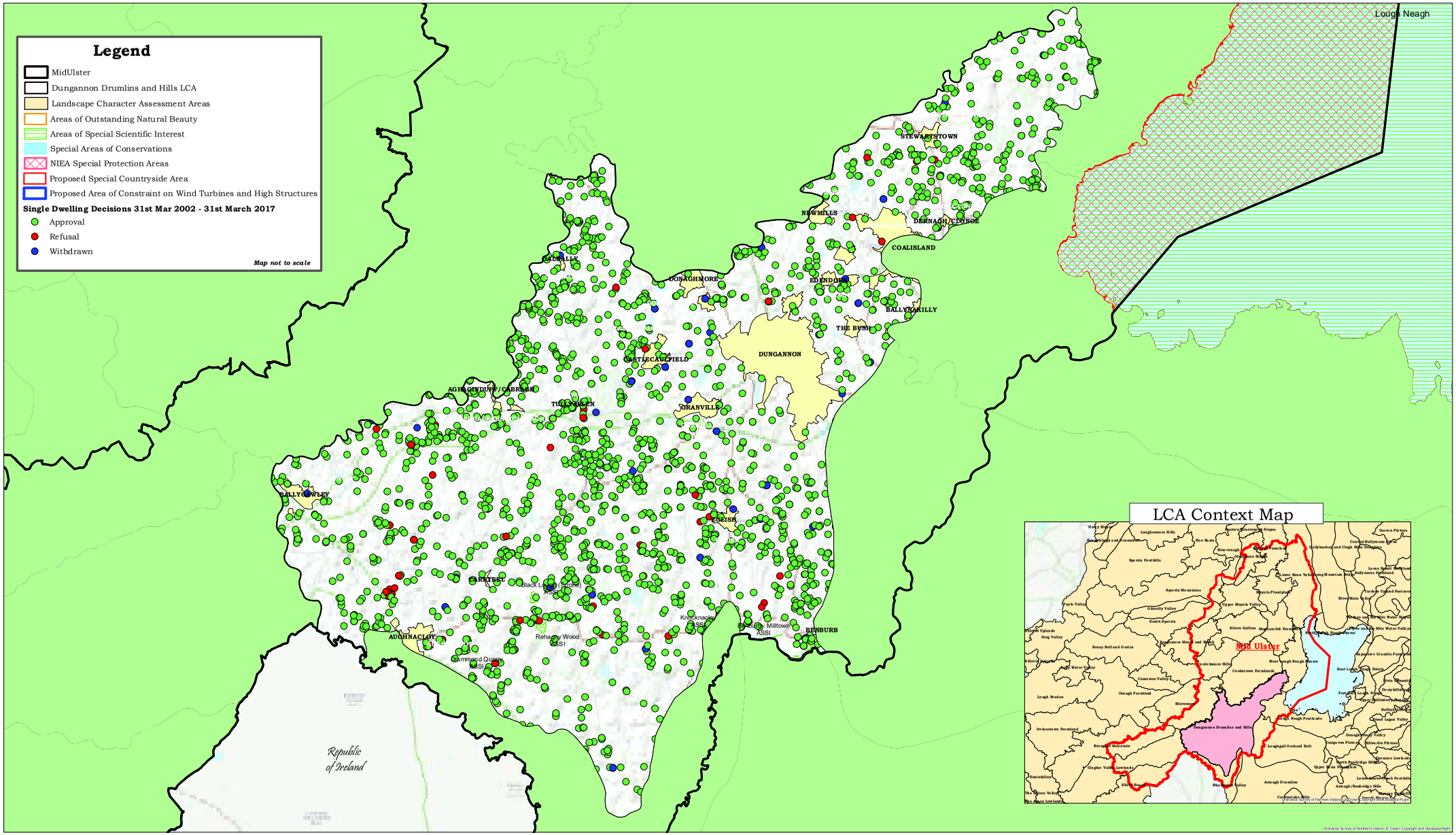
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Dungannon Drumlins and Hills

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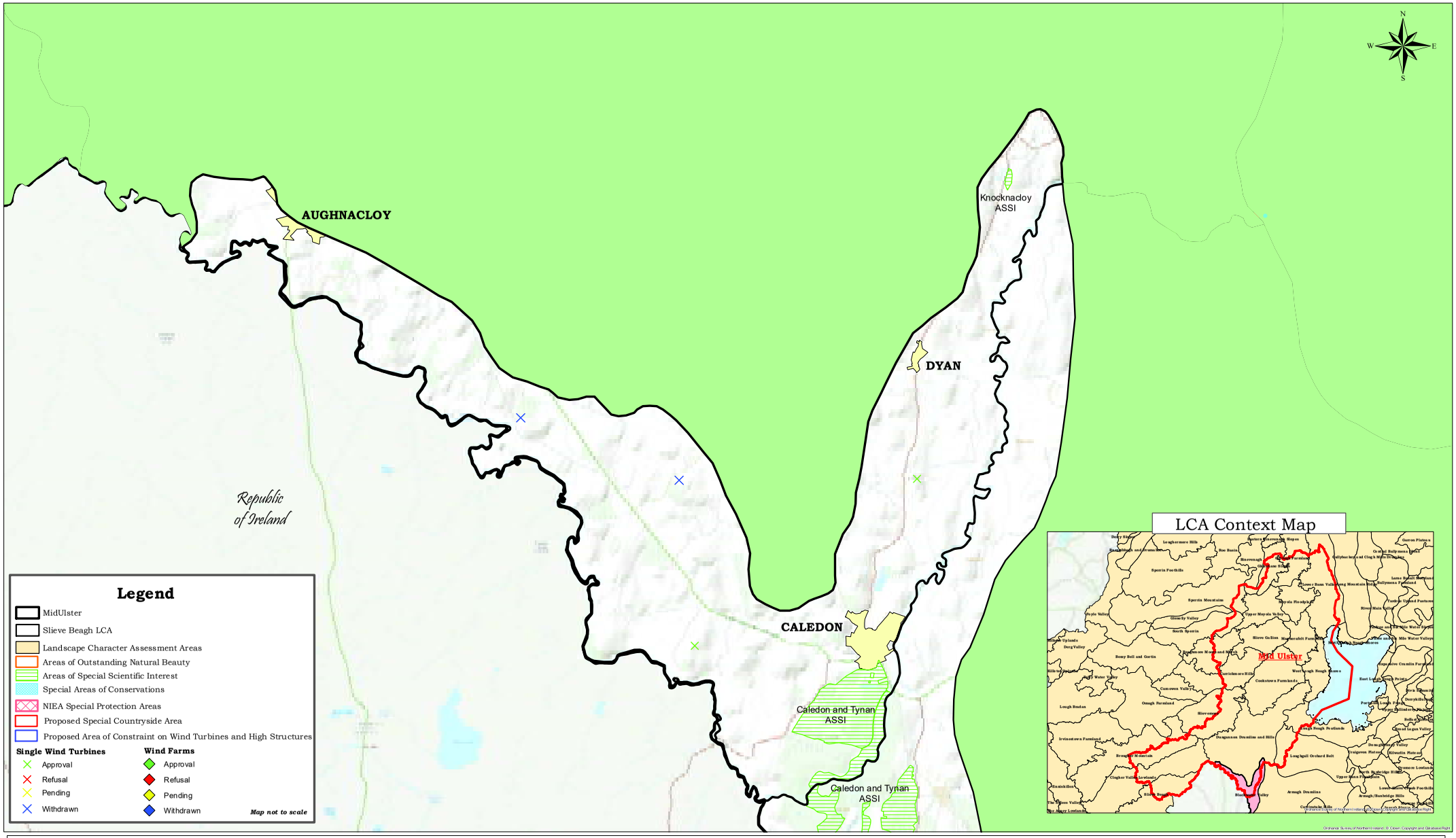
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Blackwater Valley

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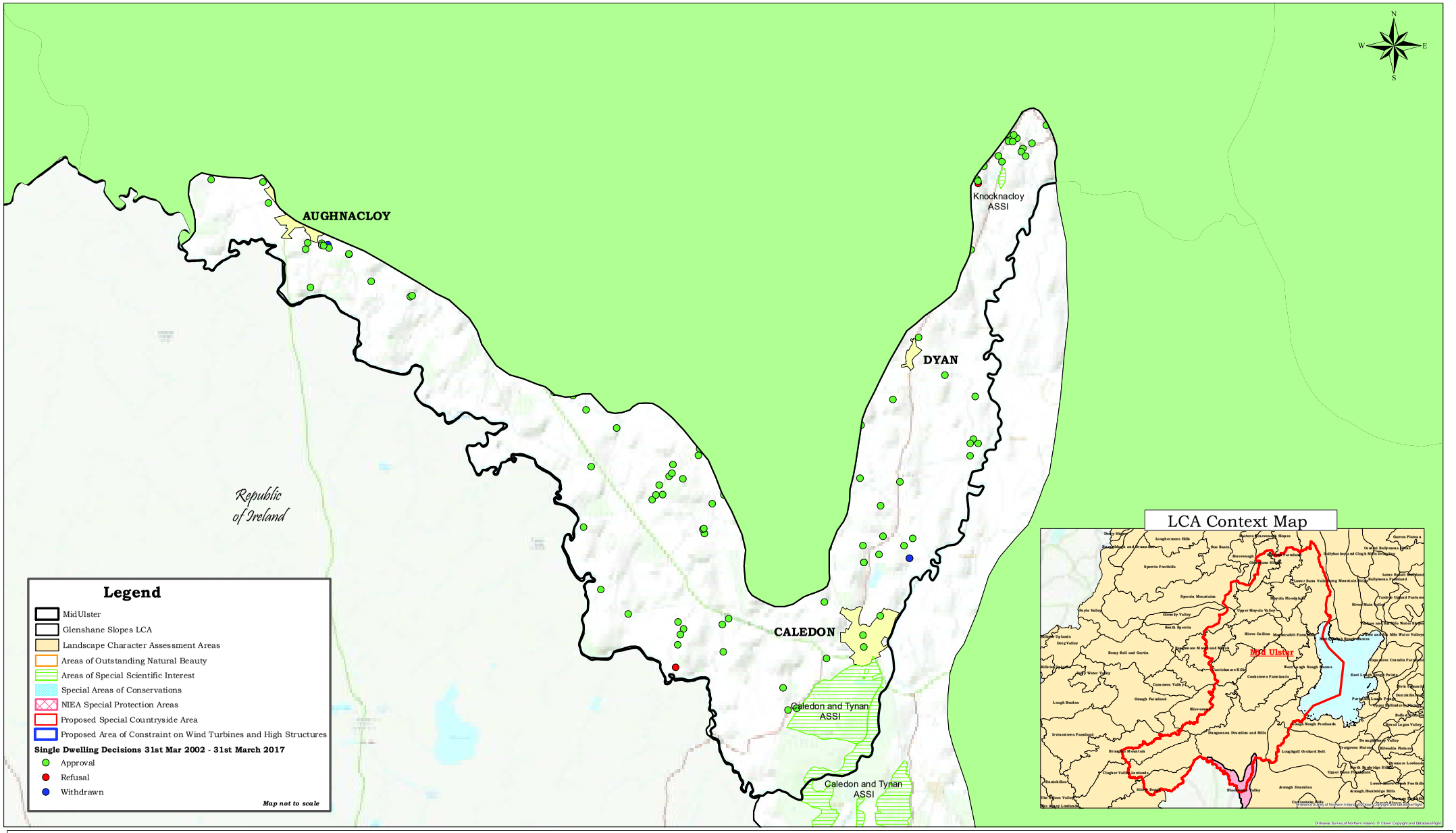
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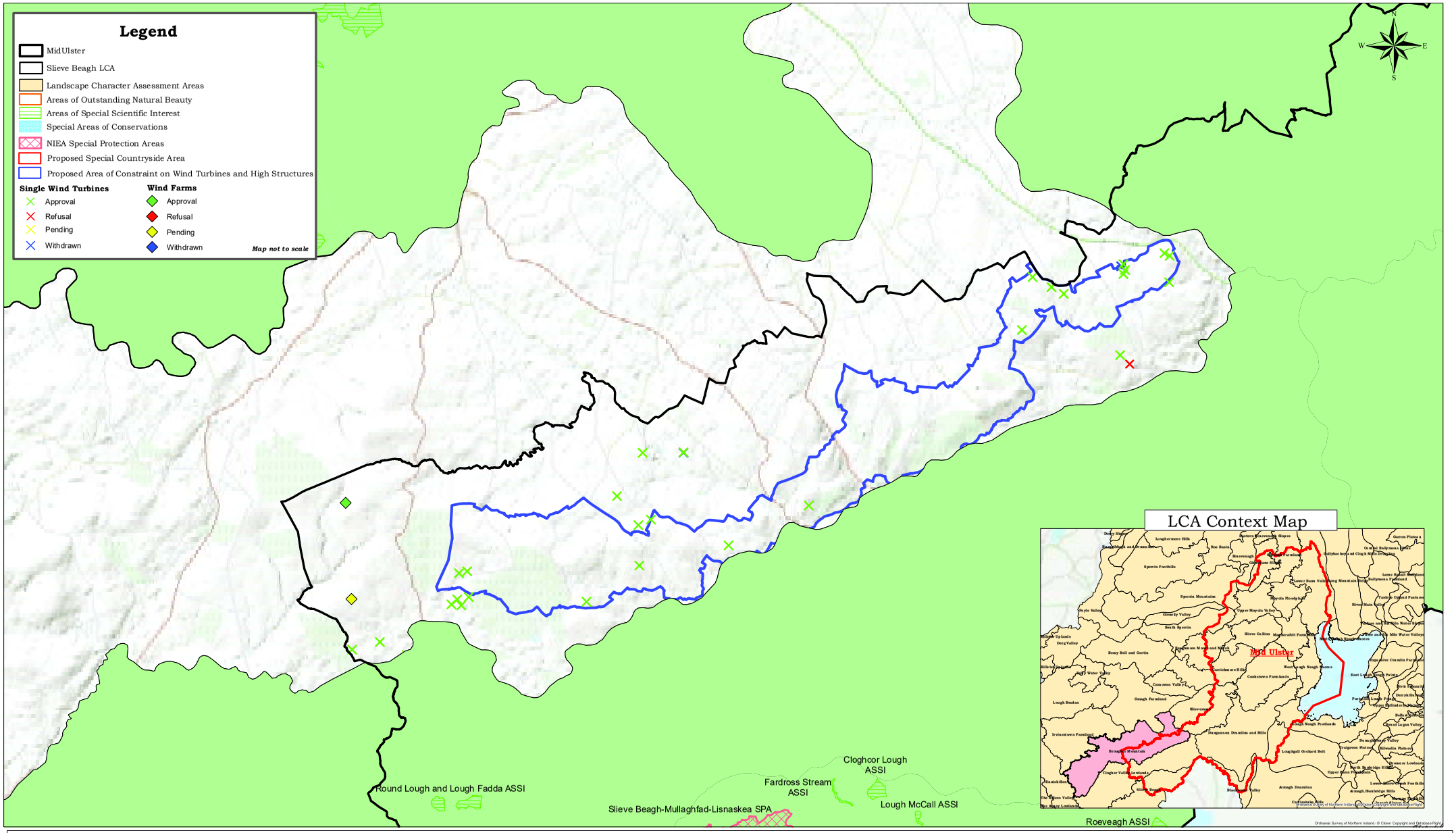
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Brougher Mountain

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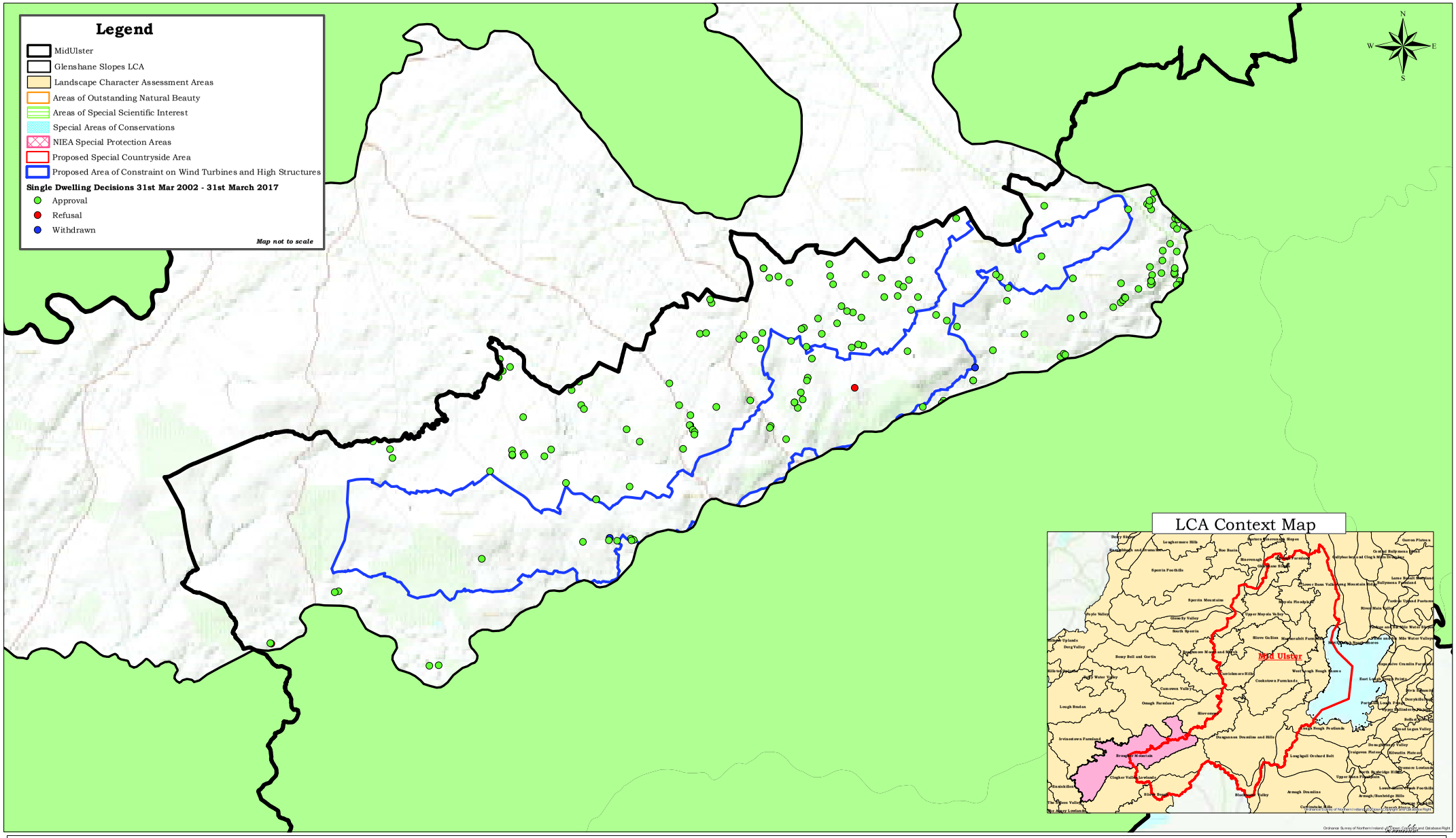
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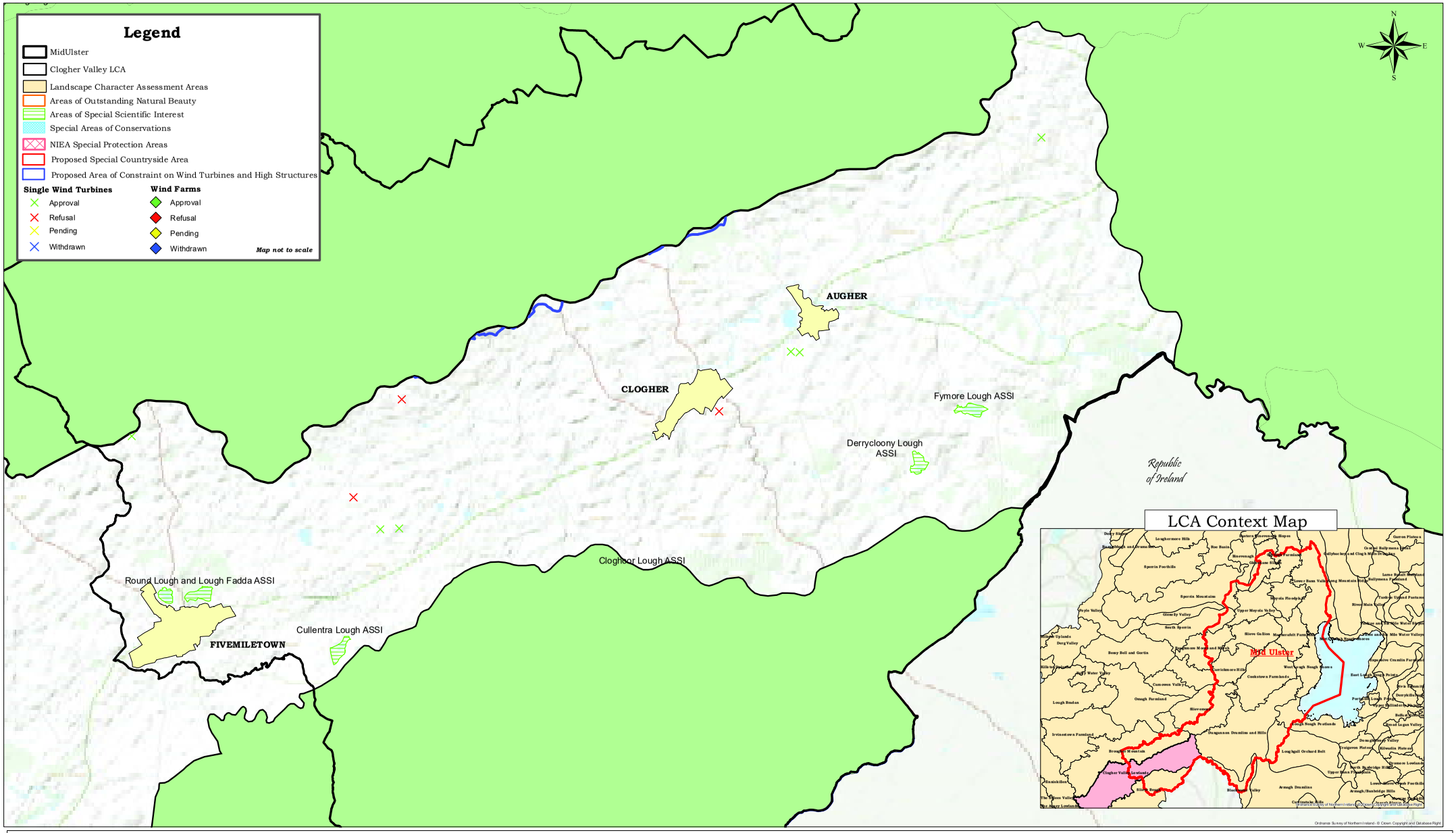
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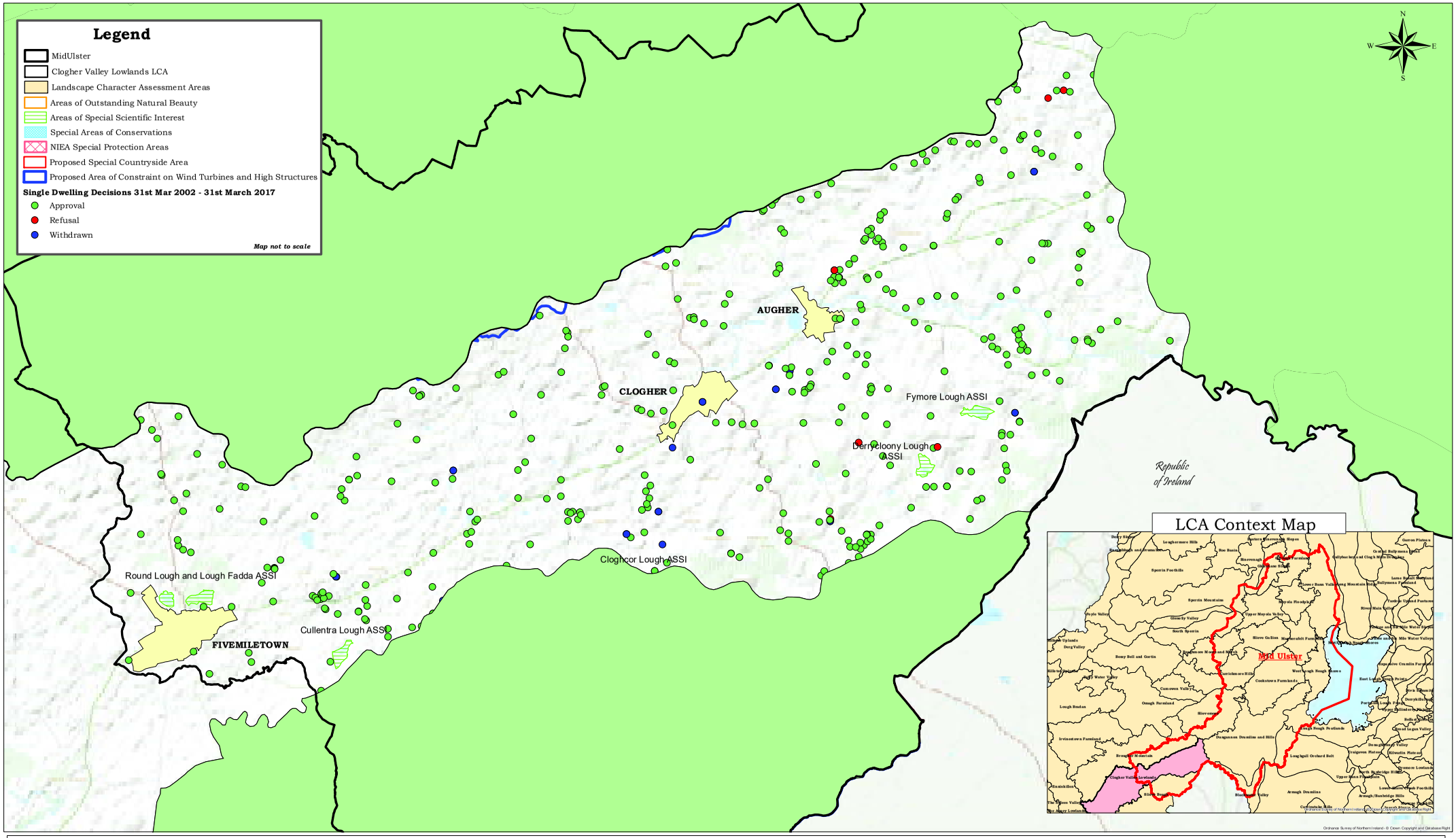
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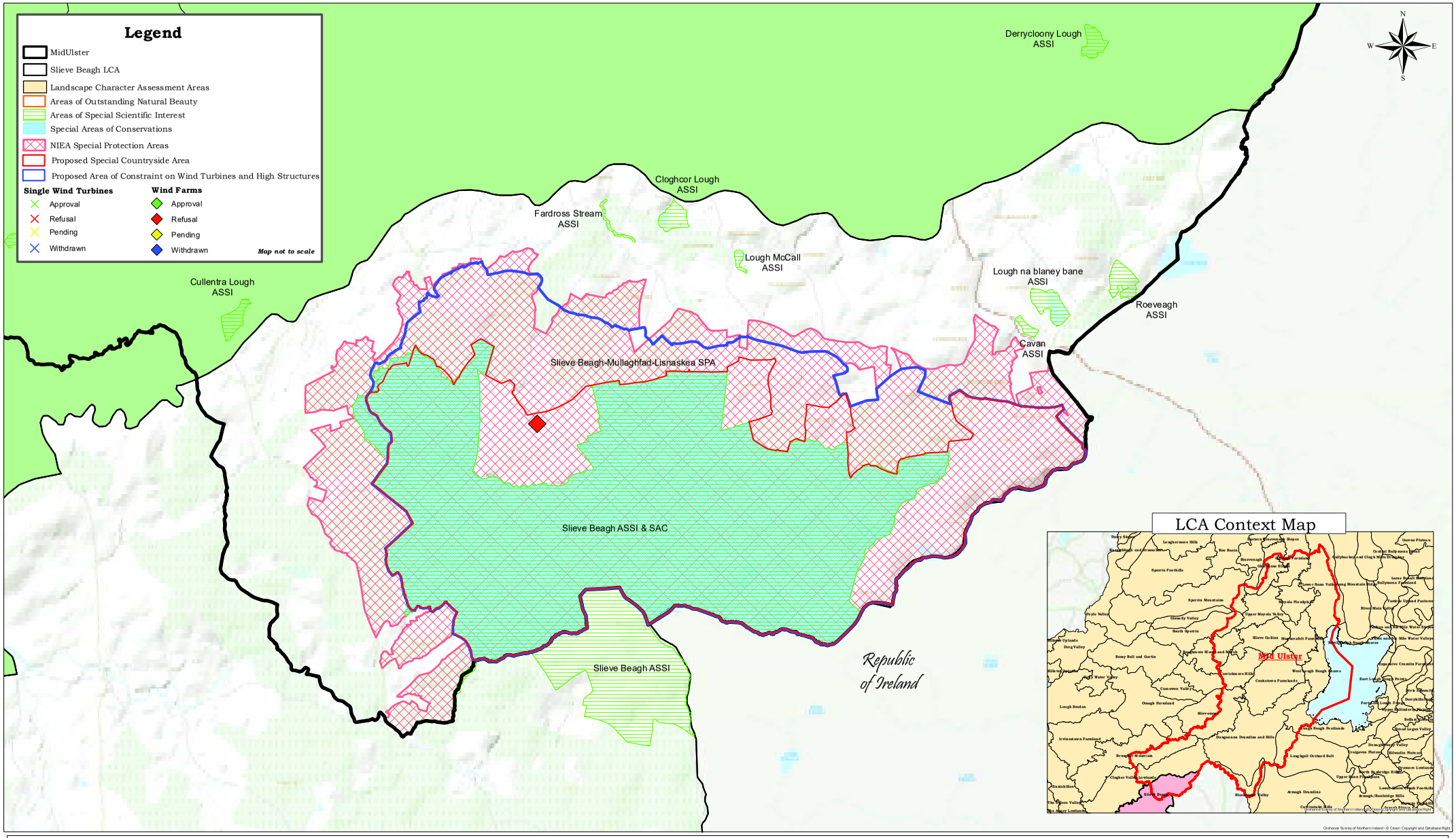
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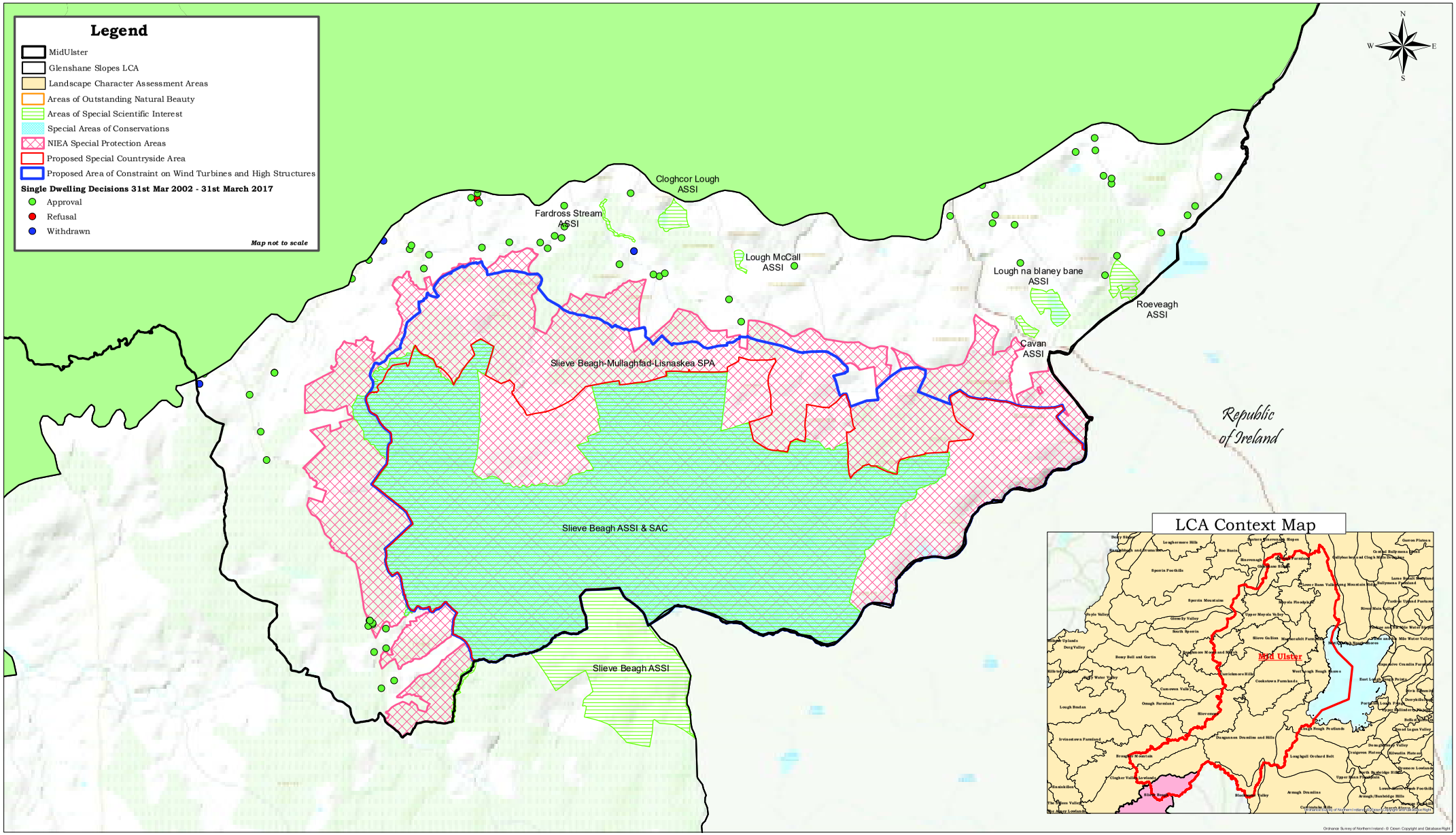
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