

Annex 2

Doraville/Curraghinalt Mine Comparison

	Doraville	Curraghinalt Mine
Nature of Proposal	33 x 140m (tip height) wind turbines	Underground mine with associated above ground infrastructure including plant and dry stack
Location/ Context	Within the Sperrin AONB Within the High Summits of the Sperrins Special Countryside Area (SCA): an upland area of exceptional landscape with unique, pristine and unspoiled amenity value, where the quality of the landscape and unique amenity value is such that development should only be permitted in exceptional circumstances (SPPS, para 6.75) Falls within the upland area of South Sperrins Landscape Character Area, of which the application site occupies 25-33% (according to DfI)	Within the Sperrin AONB Outside the High Summits of the Sperrins SCA Falls across South Sperrins LCA and Beaghmore Moors and Marsh LCA
Zone of theoretical visibility	ZTV stretches for 40km +. The development is visible from almost all directions. More of the development is visible from further away.	ZTV extends 15km +. Extent of visibility largely contained to the south of the site. Development become less visible with distance.
NIEA NED Landscape Position	‘NED Protected Landscapes Team consider that the scale and nature of this proposal, which is located in the heart of the Sperrin AONB, would have an unacceptable and significant adverse effect on the visual amenity and landscape character of this part of the AONB and that the proposal is contrary to associated planning policy.’ ‘In addition, the extent of the visual envelope around this proposal indicated that a wind farm of this size could not be accommodated without significant	‘NIEA NED Connecting People to Nature Team consider that whilst this proposal would have a significant negative impact on the designated landscape, particularly from the visual envelope to the south of the site and surrounds, the impacts will be most prominent in the preparatory and construction phase and will lessen as the operational phase which includes phased landscape mitigation progresses. We do not consider that the proposal would unduly undermine the Sperrin AONB as a

	negative landscape and visual impacts, this being contrary to para 6.222-6.224 of the SPPS.’ ‘The net result would be an overall negative impact on the AONB’	Whole (DfI Mine Statement of Case para 2, page 31)’
PAC consideration	<u>From Doraville PAC Report: 2018/C007:</u> When considering the application site the PAC concluded that this part of the South Sperrins was widely visible, particularly from Mullaghturk and Carnanelly. Para 10.41 of PAC Report: Nevertheless, despite rising landform to the north and south and the backdrop of Mullagbane and Carnanelly, the proposed wind farm, by virtue of its scale, extent, verticality and movement would have an overwhelming impact on the character and amenity of Glenlark, even when seen in the much wider landscape context than the valley itself. Para 10.110 of PAC Report: The proposed development’s impact on VI&LC has been assessed against its environs’ baseline characteristics. Its significant and unacceptable impact would not be limited to Glenlark and the Coneyglen Burn valleys. Paragraph 10.115 of PAC Report: The proposed development would not be visible from the bulk of the AONB. However, from the majority of the numerous and geographically extensive VPs considered above, the receiving landscape does not have the carrying capacity to accommodate development of the size and scale proposed without significant detriment to VI&LC. Accordingly, from these vantages, the AONB’s scenic quality would be compromised and the proposed development would be inconsistent	<u>From Doraville PAC Report: 2018/C007:</u> When considering viewpoint 24 of the proposed Doraville windfarm where, the Commissioner specifically commented on the features of and change in landscape character at or around the application site, noting that: Para 10.42 of PAC Report: 2 of the 3 approved 74m high turbines at Crockanboy have been built (January 2020) and are seen to the south-west of the application site about 6km removed. Whilst they are located on the periphery of the cultivated fields where they march the moorland, one extends above the Mullydoo ridge. However, coniferous forestry aside, the uncultivated higher lands have a distinct character to the lower lands with their field boundaries and numerous instances of dwellings and associated buildings. <u>From Appeal 2012/A0010:</u> Para 12 of PAC Report: The considerable concentration of roadside development along stretch of the Crockanboy Road was identified as a further critical viewpoint from where both turbines would be visually linked. The considerable concentration of roadside development along that public road including dwellings and farm groups, enclosed by mature vegetation would restrict visibility of the appeal proposal and the approved wind turbine when travelling along that public road..... Para 14 of PAC Report:

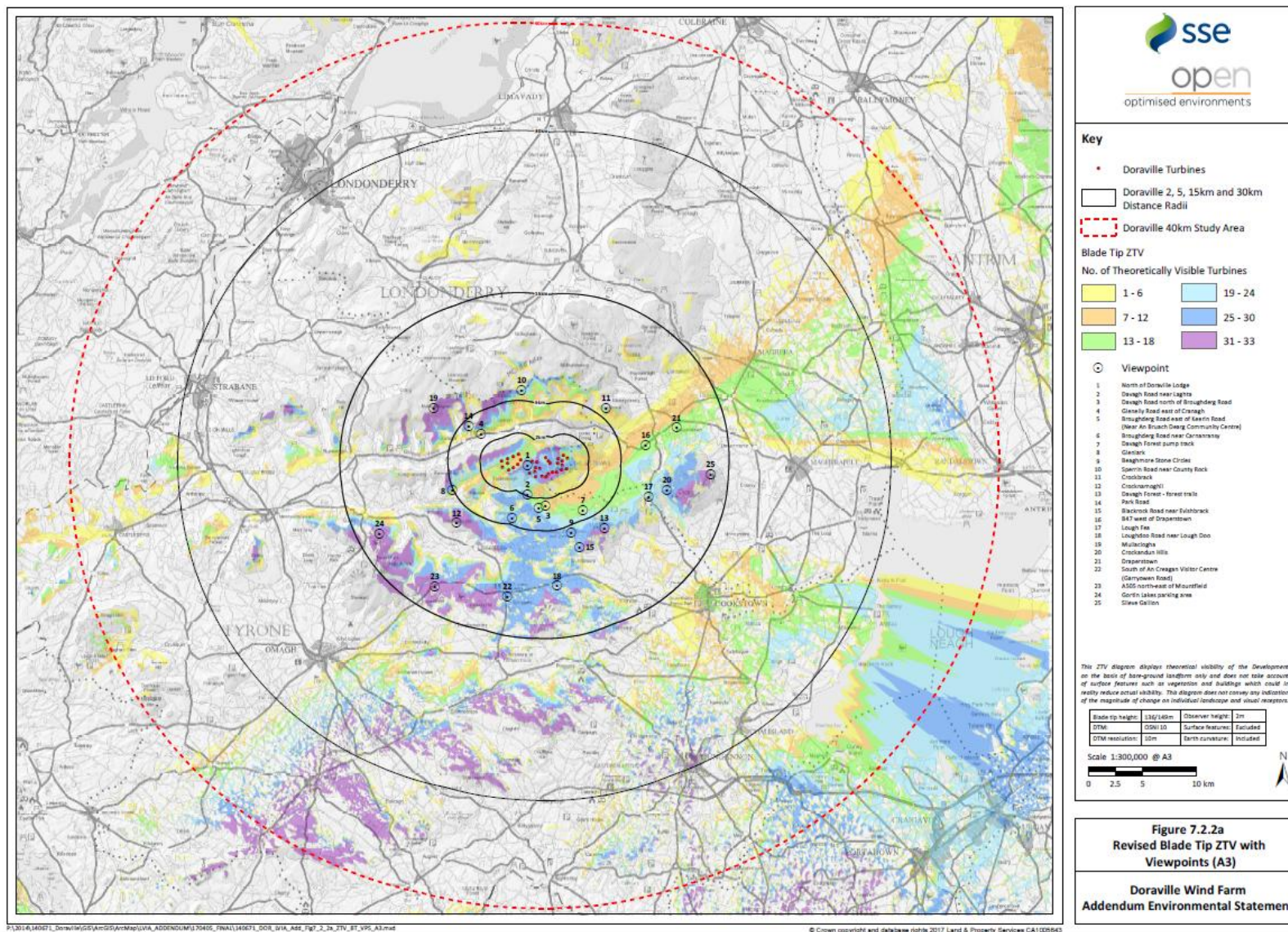
	with the cautious approach to wind energy development therein. Paragraph 12.47 of PAC Report The archaeological value of this site was covered extensively in the previous chapter of this report where I concluded that the proposed development would adversely affect the integrity of its setting. The reasons for that assessment also lead to the conclusion that the adverse impact that the proposed development would have on this TA would significantly compromise its tourism value contrary to Policy TSM 8. Paragraph 12.51 of PAC Report Significant and unacceptable harm to the VI &LC of the AONB results in an adverse impact on the AONB as a tourism asset	The approved turbine will introduce a new and distinctive feature into this landscape. However I am not persuaded that the introduction of a 2nd turbine of identical proportions, aligning with that approved, would alter the feeling of wildness and unspoilt landscape which the Department considers is characteristic of this part of the AONB. The proposal would not impact on any striking natural features in this area which is characterised by rushy pasture and scrub but would be read in the same visual context as the belt of trees on the crest of Mullydoo. The most dominant feature in this landscape is the considerable concentration of roadside development along Crockanboy Road with several tiers apparent from the critical viewpoints identified which detract from any feeling of wilderness in this locality. In this context and given the long distant views available, I am not persuaded that the introduction of a 2nd turbine would lower the landscape value or introduce a more industrial appearance. I am satisfied that this landscape has the capacity to absorb an additional turbine without having an unacceptable adverse impact on the visual amenities and landscape character of the area. The Department has not therefore sustained its Reason for Refusal based on Policy RE1 of PPS18.
ASAI	Outwith extent of ASAI but found to be visually prominent when viewed from Beaghmore Stone Circles Scheduled Monument in State Care which would be unacceptably adversely impacted by the development. Paragraph 12.47 of PAC Report The archaeological value of this site was covered extensively in the previous chapter of this report where I concluded that the proposed	ASAI extended to within the site with adoption of FODC Plan Strategy (HED/PHM having previously returned no objection/with conditions consultation response). HED identify this as a new material consideration, along with research by [REDACTED] (DfI Mine Statement of Case LA10/2017/1249/F Appendix 5– Historic Environment Division (Listed Building and Historic Monuments).

	development would adversely affect the integrity of its setting. The reasons for that assessment also lead to the conclusion that the adverse impact that the proposed development would have on this TA would significantly compromise its tourism value contrary to Policy TSM 8.	See TR15 (particularly 3.2)/RR15 (particularly 2.1, 3.1 and 3.2) and TBR15 for detailed analysis. In summary, a small portion of the ASAI falls within the application site in a location where no above ground development is proposed. The change to the extent of the ASAI makes no material change to the effects which were assessed in the original impact assessment and found acceptable by HED.
Beaghmore Stone Circles	Nearest turbine 5.7 km away to north of Beaghmore Stone Circles. Paragraph 11.27 of PAC Report The proposed development would have a detrimental and unacceptable impact on VI&LC..... On this basis it would be likely to detract from visitors' experience on approaches to this site. Wide-ranging views northwards from the monument contribute to the ambience and enjoyment of the site. It has a sense of remoteness and timelessness notwithstanding human interference within the landscape and its proximity to Blackrock Road. HED's guidance says that the experience of an asset's setting is not wholly visual but may include a site's ambience and tranquillity. Paragraph 3.3 of that guidance identifies examples of issues that should be considered in any analysis of a proposed development's impact on the setting of a HA. The second identifies the presence, extent, character and scale of the existing man-made structures within its surroundings as a consideration. Notwithstanding the changes to the site context since the Bronze Age, the scale, extent and elevation of the proposed development would be out of scale and character even with the modern rural landscape. These considerations, together with the turbines' verticality and rotation, would render them the dominant physical and visual element in	Beaghmore Stone Circles are located 9km to the east of the application site. Whilst of high sensitivity, the LVIA concludes that in practice visibility will be negligible given the project location on the southern flank of Crocknamoghil, below the ridge, as illustrated in the 3D modelling on page 78 of TR13, and there will be no visual impact. See TR13 paragraphs 2.11 to 2.17 for analysis. As confirmed in RR15 section 3.1, with reference to Appendix 2, figures 2-6, 3d modelling demonstrates that the application site and its associated infrastructure do not extend above the existing topographical horizon when observed from the Beaghmore Stone Circles viewpoint (or any others except VP2) and as such there is no visible relationship between them (appendix 2, figures 2-6). In cases of VP1, VP3, VP4 and VP5 localised topography and vegetation cover further reduce the capability of the area of the application site to be observed. As noted above, the exception to this is VP2 which offers unobstructed views across the landscape towards the area of the application site (appendix 3, plate 1). This viewpoint is useful in that it clearly demonstrates the negligible impact the application site will have on the setting of the ASAI.

the wider landscape. Whilst this may not affect visitor's understanding of the function of the site, this significant adverse impact on the wider landscape setting would be likely to detract from their enjoyment of it when considered in the round. As such, the proposed development would be at odds with the SPG for LCA 24 where it advocates that care should be taken to avoid adverse impacts on features of cultural heritage landscape interest.

As confirmed in RR15 section 3.2, the application site will not impact upon the historic landscape identified by [REDACTED] because it is within the Owenkillew valley with particular importance attributed to the areas of Crouck and Aghascrebagh townlands and the archaeological monuments contained within them (Appendix 2-, figure 7). This area is separated from the application site by the existing topography and has no physical or visual relationship with it. The application site has no impact on the setting the monuments identified.

Doraville ZTV



Curraghinalt ZTV

