

# TBR13 – Landscape & Visual

## Curraghinalt, Gortin

December 2025

### Response to Transboundary Consultation Representations – [REDACTED] (LUC)

Representation Ref	Comment/Issue	Addressed in applicant's submissions to date?	Applicant's Response
TBA1493 - An Taisce Pg 18, footnote 10	Reference to Government of Wales. 2025. Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies in Wales	No TR8 of SoC	It is understood that all elements of the submitted LIA information follow the principles for minimising light pollution and therefore the submitted lighting scheme, shown in TR8 Appendix 2, adheres to the Government of Wales Good Practice Guidance in terms of objective criteria. The work undertaken on lighting has determined that there will not be a significant effect on the Dark Sky Park, and that the effects of lighting, including upon the sense of tranquillity, will be localised. Detailed information about the lighting proposals, and consideration of the effect of lighting is provided by Hoare Lea at TR8 of the SoC. The use of modern appliances means that light spill will be very limited.
Pg 22	"A recent and relevant decision by the Planning Appeals Commission is that of the Doraville Wind Farm, proposed also for the Sperrin Mountains. The PAC recommended the planning application be refused, with a material consideration being 'dinnseanchas' - <i>"meaning the spirit of a place, which results from interactions of natural and human processes over time."</i> In	Not directly albeit a comparison with Doraville is considered in Socio Economic evidence	The landscape character of the area is described in The Northern Ireland Regional Landscape Character Assessment (LUC and others, for

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the decision they draw on the 2015 Northern Ireland Regional Landscape Character Assessment (NIRLCA), where they state that this concept should be a 'prime consideration' for 'substantial development' projects in an area which includes the Sperrin Mountains.

The PAC concludes in the Doraville case: *"Whilst the landscape must be viewed as a dynamic entity, the scale of this proposal and the magnitude of change that it would affect thereon has the potential to detract from local peoples' sense of place and connection to the land."*

at RR14, p18-21, inc. Table 3-1 and in the Transboundary Statement by Turley at Appendix 6

Northern Ireland Environment Agency, 2015)<sup>1</sup>. This document states in its introduction that: *"It provides a strategic overview of the landscape, which can be complemented by more detailed local studies in future. The NIRLCA aims to draw together information on people and place, and the combinations of nature, culture and perception which make each part of Northern Ireland unique. This local identity can be referred to by the Irish term dinnseanchas, meaning the spirit of a place. This spirit results from the interactions of natural and human processes over time – processes which continue today since landscape must be viewed as a dynamic entity."*

For LCA 12, Carrickmore Plateau and Pomeroy Hills, the extensive mineral workings are noted as being a feature of the area. For LCA 7, Sperrins, the historical extraction of gold in the Sperrins is noted. There is also ongoing extraction of gold in LCA 5 West Tyrone Hills and Valleys, to the west.

The 'spirit of the place' in this area of the Sperrins includes its association with gold and its extraction, as well as the extraction of other minerals and natural materials such as rock, aggregate, sand and gravel.

The Sperrin AONB Management Plan *"Consultation to Inform the Sperrin AONB Management Plan"* (The Sperrins Partnership) August 2024 describes this from page 31 Section 4.4.3, stating that *"the presence of gold in the Sperrin AONB has long been known, with small*

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<sup>1</sup> <https://storymaps.arcgis.com/stories/a95a995d2c64474ab8a2cc48f906807d>. This study was undertaken by LUC (Land Use Consultants), supported by Kennedy Fitzgerald Architects, Pete Mullin of Mullin Design Associates and Julie Martin of Julie Martin Associates. The study was commissioned in December 2014 by the Northern Ireland Environment Agency, and was guided by a steering group led by Mansil Miller and Neil Rainey, NIEA Landscape Architects. Contributions to the study were made by John Lennon (NIEA Landscape Architects), John Murphy and Dr Claire Foley (NIEA Historic Environment) and Dr Claire Hempsey (NIEA Natural Environment). The document was peer-reviewed for the NIEA by Christine Tudor of Natural England. In addition, a number of individuals and organisations contributed to the study through the consultation process including Dr Liam Campbell, Dr Sue Christie OBE and Dr Stephen McCabe.

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*particles of gold found in the Moyola River as early as 1652.” Under Section 6.7.2 Heritage on page 56, there is a reference to “minerals discovered in the AONB taking on Irish names” and “the extensive geodiversity in the area.”*

Quarries are commonplace in this area (see list of active quarries in the AONB in Section 4.4.2 on page 30), and part of the landscape character. As they close, they leave a print on the land which becomes part of the history and cultural associations in the area in the future. These land uses are relatively short lived and temporary, when considering them in the context of the evolution of the relationship with humans and the land, in the longer term. The proposed mine will be similarly short lived, and its legacy will become part of the cultural association between humans and the landscape in the future. Historical extraction of gold in the Sperrins is referenced by DAERA in their description of the Sperrin AONB (<https://www.daera-ni.gov.uk/articles/sperrin-area-outstanding-natural-beauty>). This reference lists the following points, many of which focus upon the Glenelly Valley, and other areas which will not be affected by the proposed project. There is no specific reference made to areas which will be affected by the proposed development:

**“Cultural Heritage of Sperrin AONB”** including:

**“Inspiration and aesthetic values:”**

*“Providing a sense of place, thriving rural communities with a very strong sense of local identity, particularly within Plumbridge, Gortin and Glenelly; strong identification with the Sperrin AONB and across neighbouring areas. The Wild and rugged mountains and pastoral valleys; scenic qualities of Glenelly and other valleys; long views from highest peaks; inspiration for traditional stories and songs; important dark sky area.”*

**“Perceptual Effects of AONB”**

*“The Sperrin range incorporates the wildest and most remote of*

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*Northern Ireland's landscapes. Glenelly Valley is seen as one of the most idyllic settings in Northern Ireland and is famed as a scenic drive. The main ridge of the Sperrins, defined by its rocky summits including Sawel, dominates much of the surrounding landscape and provides the backdrop for many of the views.*

*There are expansive vistas and sights in all directions from the high points of the Sperrin AONB: east over the lower lying lands surrounding Lough Neagh; north along the Roe Valley to Lough Foyle and Inishowen; south across the central Tyrone farmlands; and west across the River Foyle to the hills of Donegal.*

*Settlements and main transport routes are mainly confined to the valley areas and the more elevated areas feel particularly desolate and isolated given the prevalence of windswept moorland and bogs at these locations.*

*Given its inaccessible nature, many parts of the area are highly tranquil, especially the more sheltered areas towards Glenelly Valley. The higher peaks towards the east have a wilder character resulting from the rugged terrain, high level of exposure and remoteness.”*

*“Moor Lough to the north of Owenreagh Hill is the setting of the traditional song, The Moorlough Shore, which refers to the “hills and dales and flowery vales” of the area.”*

*“The poet, historian and naturalist George Barnett (1876–1965) spent his life studying and writing about the Sperrins. His topographical poems include “Life in Glenelly”:*

*The hill of Mary Gray, located in the southwest of the AONB, and Bessy Bell (located just beyond the western boundary of the AONB) were named after the - "twa bonnie lassies" - who feature in the ballad of the same name. Named by Scottish immigrants who passed through Ireland to make passage to America. The ballad is reportedly based on the death of two Perthshire ladies who died of the plague in 1645.”*

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It is noted that the proposed development would not significantly affect the Glenelly Valley area, which lies further north, or the areas referred to above, in terms of their spirit of place. It would continue the association with gold in the Sperrins AONB.

It should be noted however, that given sense of place is vulnerable to landscape and visual impacts, the LVIA concludes that there will be localised significant adverse effects. As such, these localised adverse effects will extend to some degree of harm of the sense of place/dinnseanachas of the particular locality where the project is proposed. However, the main features which contribute to the 'integrity' of the AONB and which contribute more strongly to sense of place lie elsewhere, and will not be altered by the project (including the upland which forms Special Countryside Areas and the intervening deep valley areas).

Solastalgia is also referred to and described as meaning "*ecological grief*". It relates to emotional distress due to adverse environmental change.

The two concepts of dinnseanachas and solastalgia do not highlight an omission in the landscape and visual impact assessment, as the issues they encompass are addressed in so far as relevant to this discipline. The proposed changes to the landscape and to the views are set out in the landscape and visual impact assessment. The changes to other environmental disciplines are addressed elsewhere, as appropriate, by others.

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Pg 22	We would have concerns over the ability of the subject site to be visually remediated in the decommissioning phase of the proposal.	Yes. This is addressed as part of the Closure Plan and in Rebuttal Statements RR13 Landscape and Visual	As addressed, the proposed shape of the DSF is designed to tie in visually with the shapes seen in the wider landscape, in so far as possible. It will be smoothed, rounded and revegetated, both progressively and upon completion, along with the rest of the site, across which the infrastructure will be removed. The proposed vegetation is planned to help tie the site back into the landscape - with species to be native and of local provenance (planned
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			in liaison with the project ecologist). This includes reflecting the shape of the ladder fields as part of the proposed hedgerow planting. The landform and vegetation of the DSF will reflect that of the glacial features found in the Gortin area.
TBA0008; 0017; 0021; 0040; 0041; 0056; 0060; 0072; 0074; 0077; 0081; 0103; 0113; 0123; 0132; 0138; 0141; 0146; 0159; 0160; 0167; 0179; 0196; 0202; 0208; 0212; 0219; 0220; 0225; 0238; 0250; 0251; 0259; 0264; 0270; 0288; 0302; 0303; 0308; 0314; 0328; 0333; 0337; 0344; 0350; 0358; 0362; 0367; 0378; 0382; 0393; 0418; 0437; 0444; 0455; 0458; 0480; 0485; 0489; 0495; 0501; 0504; 0512; 0517; 0521; 0527; 0531; 0535; 0548; 0552; 0558; 0563; 0577; 0581; 0610; 0611; 0617; 0624; 0638; 0643; 0646; 0650; 0653; 0659; 0661; 0665; 0669; 0674; 0679; 0686; 0702; 0704; 0715; 0719; 0723; 0725; 0732; 0765; 0788; 0797; 0803; 0804; 0808; 0811; 0823; 0836; 0844; 0846; 0880; 0888; 0890; 0897; 0901; 0915; 0920; 0953; 0957; 0964; 0973; 0976; 1000; 1005; 1013;	The heavy-duty powerline that would accompany the mine would result in significant negative visual and landscape impacts from 322 poles being erected 11-20 metres in height and a 10 metre clearance around them, going through the Sperrins Area of Outstanding Natural Beauty (AONB). People from Donegal & the Republic of Ireland (RoI) travel to Derry, Strabane, Omagh & through other parts of Tyrone regularly and would object to such an obtrusive construction on the AONB, as it would be like a scar on the beautiful landscape. It would damage the attractiveness of the Sperrins as a tourist destination and thus negatively impact tourism as a revenue source for the Sperrins AONB.	Yes. Chapter 5 of the RPS EIA for the Power Line - Landscape and Visual. Section 5.5.1 page 5/1.	The statement does not reflect the findings of the LVIA for the proposed power line, which was prepared by RPS, and to which reference should be made for the detailed findings. It reports minor and not significant effects during the operational phase (minor to moderate during construction).

1026; 1057; 1080; 1084;  
 1090; 1099; 1100; 1104;  
 1110; 1123; 1129; 1133;  
 1148; 1152; 1154; 1163;  
 1176; 1188; 1192; 1225;  
 1233; 1242; 1254; 1256;  
 1273; 1284; 1292; 1314;  
 1315; 1321; 1325; 1341;  
 1343; 1372; 1386; 1388;  
 1397; 1404; 1417; 1442;  
 1447; 1460; 1469; 1474;  
 1509; 1510; 1538; 1544;  
 1560; 1571; 1579; &  
 1589 – Pg 2

TBA0412 - Pg 1	The mine threatens ancient archaeological sites and the natural beauty of the Sperrins already saturated with wind turbines.	Yes	The statement regarding natural beauty does not reflect the findings of the LVIA for the proposed mine. The existing wind turbines are accommodated in the landscape.
TBA0750 - Pg 1	The OM Dark Skies observatory is about 10km from the site and according to impact assessments the Dark Skies will be negatively affected by the construction of the mine and the powerlines. This is contrary to maintaining the special character of the AONB	Yes. See SoC at TR13	No views will be possible from the Dark Skies Observatory, given it is surrounded by mature forest.
Pg 1-2	Given the tourism concentrated in and around the OM Dark Sky and Beaghmore SC the mining project is wholly at odds with the integrity of the landscape and any future tourism in the area. Most of the tourism in the area is linked to outdoor recreation, astronomy, cultural heritage, archaeology, hill walking, fishing, walking and cycling. The sheer scale of the mine will have a devastating impact on the tourism of this part of the island.	Yes. See SoC at TR13	No view will be possible from the Dark Skies Observatory, which is surrounded by mature forest, or from Beaghmore SC, from which the proposed development would not be seen.
TBA0872 - Pg 1	The Sperrins is renowned for its breathtaking natural beauty. Any expansion or development of the goldmine site would irreparably damage our pristine environment	Yes ES	The statement regarding natural beauty does not reflect the findings of the LVIA for the proposed mine.
		FEI 1, Appendices C	
		FEI 2, Appendices C	

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SoC TR13

Rebuttal Statement  
RR13

TBA1019 - Pg 1	Application for mining for gold in an otherwise unspoiled area of natural and scenic beauty	Yes As above	The statement regarding natural beauty does not reflect the findings of the LVIA for the proposed mine.
Pg 1	The Sperrin Mountains are also rich in cultural heritage, archaeology, historical sites, oral history, Irish language and the value we place on owning our land and waters.	Yes As above	The statement does not reflect the findings of the LVIA for the proposed mine.
TBA1429 - Pg 1	Given the area's designation as an AONB I would have grave concerns about the impact on the overall landscape including the suggestion that a 'stack of mine spoil up to 17 meters high would be contoured into the local landscape and replanted' as reported by the BCC in January 2025	Yes As above	The LVIA for the proposed mine describes and illustrates the landscape and visual effects, including upon the AONB, enabling impacts to be understood and considered as part of the decision-making process.
TBA1487 - Pg 2	In the beautiful area of the Sperrins any development requires the protection of its AONB status, this requirement particularly so because of its archaeological heritage, its ecological value, its cultural identity, its beauty, its unspoiled nature, fresh air and its tourist potential.	Yes As above	The LVIA for the proposed mine describes and illustrates the landscape and visual effects, including upon the AONB, enabling impacts to be understood and considered as part of the decision-making process.
TBA1492 - Pg 7-8	Proposal to spoil the visual amenity of the AONB and massive associated infrastructure would destroy the character and amenity of this historic landscape that makes this an AONB, SAC and ASSI.	Yes As above	The LVIA for the proposed mine describes and illustrates the landscape and visual effects, including upon the AONB, enabling impacts to be understood and considered as part of the decision-making process.
Pg 8 -13	Presents a series of photos visualising the impact of goldmining on the immediate area.	Yes ES Appendix C16 - Landscape and Visual Impact Assessment  FEI 1 C Appendices  FEI 2  C Appendices	The LVIA for the proposed mine describes and illustrates the landscape and visual effects, including upon the AONB, enabling impacts to be understood and considered as part of the decision-making process.

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SoC TR13

TR13 Landscape  
and Visual

Rebuttal  
Statements RR13

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TBA1494 – Pg 10	The Sperrin mountains are also rich in Cultural Heritage for the whole island, in terms of ancient archaeology, historical sites, stories and the Irish language and more. The landscape is very much part of people’s religion, culture, heritage and history, as outlined in the Dr Strecker and Dr Cifefice report.	Yes As above	The LVIA for the proposed mine describes and illustrates the landscape and visual effects, including upon the AONB, enabling impacts to be understood and considered as part of the decision-making process.
TBA1495 - Pg 3	Impact of powerline on AONB	Yes. Chapter 5 of the RPS EIA for the Power Line - Landscape and Visual. Section 5.5.1 page 5/1.	The statement does not reflect the findings of the LVIA for the proposed power line, which was prepared by RPS, and to which reference should made for the detailed findings. It reports minor and not significant effects during the operational phase (minor to moderate during construction).
TBA1583 - Rights of Nature Donegal - Pg 6	The sheer visual impact of the proposed 322 poles listed as part of the powerline structure in an AONB is unacceptable.	Yes. Chapter 5 of the RPS EIA for the Power Line - Landscape and Visual. Section 5.5.1 page 5/1.	The statement does not reflect the findings of the LVIA for the proposed power line, which was prepared by RPS, and to which reference should made for the detailed findings. It reports minor and not significant effects during the operational phase (minor to moderate during construction).
TBA1576 - Save Inis Eoghain - Pg 8	The sheer visual impact of the proposed 322 poles listed as part of the powerline structure in an AONB is unacceptable.	Yes. Chapter 5 of the RPS EIA for the Power Line - Landscape and Visual. Section 5.5.1 page 5/1.	The statement does not reflect the findings of the LVIA for the proposed power line, which was prepared by RPS, and to which reference should made for the detailed findings. It reports minor and not significant effects during the operational phase (minor to moderate during construction).
TBA1514 - Pg 9	The LVIA is insufficient to justify the significant visual intrusion into the Sperrins AONB.	Yes As above	The LVIA for the proposed mine describes and illustrates the landscape and visual effects, including upon the AONB, enabling

TBA0195 & TBA0341 - Pg Landscape value 2	Yes As above	impacts to be understood and considered as part of the decision-making process.
	ES	The LVIA for the proposed mine describes and illustrates the landscape and visual effects, including upon the AONB, enabling impacts to be understood and considered as part of the decision-making process.
	Appendix C16 - Landscape and Visual Impact Assessment	Landscape value is considered as part of the assessment (as a requirement of the Guidelines for Landscape and Visual Impact Assessment, third Edition 2013 (GLVIA3), and the Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment (Landscape Institute, August 2024), given judgements on susceptibility and value combine to inform the statements made regarding landscape sensitivity. Judgements on landscape value consider the designation of the area as an AONB, albeit that not all areas of the AONB are of high value, with some areas being more ordinary, and others being exceptional.
	Guidelines for Landscape and Visual Impact Assessment (GLVIA3) – The Landscape Institute LITGN-2024-01- GLVIA3-NC_Aug- 2024.pdf	

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TBA1537 - [REDACTED]  
assertion of Flawed Cultural  
Heritage Impact  
Assessment

The cultural heritage impact assessments undertaken on behalf of the Applicant are based on outdated methodology and fail to include this wider historical importance as well as the intangible cultural heritage and the impact of the Curraghinalt Project on local peoples' sense of place. In the words of the PAC when advising against the Doraville wind farm: "due to widespread negative implications for the character, heritage and appearance of this part of the Sperrins AONB, the unacceptable scale of change that the proposed development would precipitate would harm local peoples' sense of place."<sup>12</sup>

The implications of the Curraghinalt Project are much greater and carry even more widespread negative implications for this part of the Sperrin AONB, and Beaghmore ASAI, due to inter alia, the acknowledged adverse impact on the dark skies,<sup>13</sup> the acknowledged adverse impact on the tranquillity of the Sperrins landscape,<sup>14</sup> an essential and acknowledged feature of this area highlighted in both the NILCA NIRLCA series and the FODC LDP 2030, and the intangible cultural heritage and local peoples' sense of place, which were not assessed in the cultural heritage impact assessment process, as per current best practice.

Cultural heritage has a much broader legal meaning and now incorporates intangible heritage and cultural landscape, recognised in multiple international instruments, including the UNESCO 1972 World Heritage Convention ("Cultural Landscapes"),<sup>15</sup> the 2003 UNESCO Convention on the Safeguarding of the Intangible Cultural Heritage (Article 2),<sup>16</sup> and the 2000 Council of Europe Landscape Convention (Article 1).<sup>17</sup> The intangible cultural heritage and importance of landscape for well-being is not only recognised in the main reference texts of international cultural heritage law but also in the most up-to-date guidance in the UK and Ireland, as evidenced in 'Principles of Cultural Heritage Impact Assessment in the UK', which recognises that "Cultural heritage connects

See comments above and under the Cultural Heritage response, where these points are covered.

Reference to the 2000 Council of Europe Landscape Convention (Article 1) does not add anything to the issues which have been considered above or to the methodology that adopted in the assessment.

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people with place and includes the associations that can be seen, felt and heard. It is a source of memories and associations, and an inspiration for learning and creativity. Cultural heritage contributes to individual, community and national identity as well as our well-being and economic prosperity".<sup>18</sup> Transport Infrastructure Ireland's Guidelines for conducting Cultural Heritage Impact Assessment also includes intangible cultural heritage and landscape.

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