Mr Keith Irwin

Department of the Environment

Strategic Planning Division

Millennium House

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Date 25th June 2013 Planning Ref: K/2013/0181/F

**Proposed Wind Farm at Lisnaharney Mountain, Omagh**

I refer to the above and wish to voice my strong objection to same for the following reasons:

* Full medical assessment needs to be carried out on the impact of wind turbines upon human, animal and wildlife health. Independent medical research needs to be commissioned by the Northern Ireland Assembly as a matter of urgency. Then, and only then, will the relevant authorities be in a position to consider fully the health impact of wind farm and single wind turbine development on rural communities.
  + Reference: British Medical Journal 10/03/2012 Dr C.D. Hanning/Prof. A Evans
* The applicable guidelines for the wind industry are ETSU-97; they are significantly out of date, not fit for purpose and in urgent need of review.
* The proposal is contrary to Policy RE1 of Planning Policy 18 ‘Renewable Energy’, in that it has not been demonstrated that the proposal will not result in an unacceptable adverse impact on human health or residential amenity.
* The proposal is contrary to Policy CTY1 of Planning Policy Statement 21 ‘Sustainable Development in the Countryside’ in that the development would, if permitted, have an unacceptable adverse impact on visual amenity and landscape character due to its siting and scale and given its location is likely to impact on biodiversity and nature conservation.
* The proposed wind farm would be located within an Area of Outstanding Natural Beauty and would be clearly visible from the Ulster American Folk Park, one of Northern Ireland’s most popular tourist facilities.
  + Reference: ”The Impact of Wind Turbines on Tourism” prepared for the Isle of Anglesey County Council February 2012.
* The Proposal is contrary to Policy RE1 of PPS18, Renewable Energy, and Policy DES4 of PSRNI in that the development will;
  + have an unacceptable impact on the visual amenity and landscape character of the Sperrins Area Outstanding Natural Beauty through the scale, siting and size of the development;
  + have an unacceptable impact on the visual amenity and landscape character of the Sperrins Area Outstanding Natural Beauty due to the cumulative visual impact of the proposal and other proposed wind turbine developments in the vicinity.
* The proposal is contrary to the Department’s Planning Policy Statement 18: Renewable Energy, Policy RE1, in that the proposal is likely to have an adverse impact on the amenity of nearby noise sensitive receptors by way of noise and shadow flicker.
* The proposal is contrary to Policy DES4 of the Department’s Planning Strategy for Rural Northern Ireland in that the site lies within the designated Sperrins Area of Outstanding Natural Beauty and the development would, if permitted be detrimental to the environmental quality of the AONB by reason of lack of sensitivity to the distinctive character and landscape quality of the area.
* The proposal is contrary to Policy BH1 of the Department’s Planning Policy Statement 6: Planning, Archaeology and the Built Heritage in that the build if permitted, adversely affect the setting of a standing stone (Location Irish Grid H460 835) and Robbers Table (Location Irish Grid H446 845) two sites of regional importance.
* Wildlife habitats would be adversely affected during the construction phase and on a permanent basis if the wind farm were to be fully operational. There is strong evidence that a significant number of endangered species of wildlife currently exist in the area.
* The construction of the proposed wind farm will have a permanent adverse effect on the market value of property in the immediate area. Is the developer of the wind farm prepared to indemnify local residents for such inevitable loss?
  + Reference: Council Tax Appeal Farmhouse Greys Farm North Drove Bank Spalding Lincs PE11 3JX reassessment of Council Tax band due to proximity to wind Turbines
* The construction of the proposed wind farm will have a permanent adverse effect on the rainwater attenuation properties of this area of raised bog-land thus increasing the flood risk in local streams and rivers. The burns that collect rainwater from this catchment area namely Lisnaharney and Cappagh Burns are of special interest to the Loughs Agency and have been listed as of high importance with Salmon/Sea Trout and Brown Trout Spawning areas, areas that would have a high sensitivity to pollutants and changes to the water ph. and other such qualities.
* The Cutting and drainage associated with the development of, in particular, wind turbines and their associated infrastructure, has the potential to severely impact on the hydrology of this large area of active bog.
  + In addition development in this area involves a risk of a mass of peat or bog movement, resulting in landslide or bog burst.
* The applicant would need to produce an Environmental Impact Assessment that adequately and fully assesses that there will be no damage from the proposal upon the local ecology.
* The Robbers Table walk (Highlighted in the Amenity and Recreation area of Julie Martin Associates guidance to the PPS18 Document) is popular with walkers and there is risk of injury from ice throw during cold weather and higher level of malfunction during high winds. That risk of injury will also affect livestock grazing in the vicinity. The walk is well advertised and promoted via Outdoor NI, Local Council, Mountaineering Ireland and various outdoor platforms. It incorporates 2 public rights of way that would be seriously compromised due to the proximity of the turbines.
* The proposal is contrary to Policy TOU2 of A Planning Strategy for Rural Northern Ireland in that, if permitted, the development would have a detrimental and adverse impact on the landscape setting of Lisnaharney and Gortin Glens landscape which are important tourist attractions in this locality.
* At present there is a memorandum of understanding between the Department Of Agriculture (Forestry Service) and the Omagh District Council in regard to the proposed future tourist development of the Gortin Glens area including the Robbers Table walk. They are actively involved in public consultations in regard to this which would be in direct conflict to the negative tourism impact of proximity of a large industrial wind farm. (Reference: ”The Impact of Wind Turbines on Tourism” prepared for the Isle of Anglesey County Council February 2012.)
* The proper development of this area for outdoor recreation in our opinion would be more sustainable, bringing social and economic benefits to this rural area by creating a spirit of entrepreneurship, with long term job creation potential.
* NIEA Wind Energy Development in Northern Irelands Landscapes- Supplementary Guidance to Accompany Planning Policy Statement 18 'Renewable Energy', August 2010- carried out by Julie Martin Associates in their assessment of this area stated that:

**Scenic quality**

This is a highly scenic landscape that is very popular and accessible for recreation. Themajority of the LCA lies within the boundaries of the Sperrin AONB.

**Wildness and tranquillity**

The upland tops, especially on the east where they are not afforested, have a strong wild

character.

**Amenity and recreation**

Notable series of countryside attractions, including Gortin Glen Forest Park - and Robber's Table Walk.

**In the Assessment for Wind Energy Development they summarised the following:**

**Overall sensitivity**

The majority of this landscape is highly sensitive to wind energy development,

notwithstanding the presence of existing and consented wind farms. This is an iconic and

widely visible Sperrin landscape, whose summits and steep upper slopes are particularly

sensitive to the introduction of any new structures. Sensitivity is further increased by the

LCA’s popularity for outdoor recreation.

**Location, siting, layout and design considerations:**

Care should be taken to avoid adverse impacts on skylines.

At the time of assessment there was one existing wind farm at Bessy Bell and a further consented wind farm. These give rise to issues of cumulative impact.

I trust that Strategic Planning Division will take my very genuine concerns seriously and refuse to grant approval for this proposal.

*Please write your own individual concerns here:*

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Signature

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