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Broughderg
Omagh [REDACTED]

Fermanagh and Omagh District Council
Development Plan Team
Planning Department
Strule House
16 High Street
Omagh BT78 1BQ

20. December 2018

Dear Development Plan Team

In response to Local Development Plan 2030 Draft Plan Strategy issued recently by FODC I am requesting that the area of the Sperrins AONB already indicated as having no capacity for wind energy development is extended to include the area proposed to become an ASAI (Area of Significant Archaeological Interest) as an extension of Beaghmore ASAI. This area includes the townlands of Aghascrebba, Crock, Carnanrancy, Keerin, Teebane East and Muninamale.

The introduction of turbines to these townlands would have a distinctive negative visual impact on the setting of the unique features of cultural heritage and high scenic value of this unique landscape.

That this scenic historic landscape is unsuitable for wind development has been recognised by the planning authorities in recent years when a number of applications for turbines were refused.

All of the following applications - LA10/2015/0048/F, K/2013/0523/F, K/2013/0355/F, K/2013/0048/F, K/2012/0652/F, K/2011/0506/F, K/2011/0112/F and K/2011/0470F proposed to be located within these townlands, were refused by planners. And with the exception of K/2011/0506/F they were subsequently dismissed by the Planning Appeals Commission (PAC).

The visual impact that a large scale wind turbine would have on the landscape was highlighted in all the refusals. Another issue which was given consideration was that development would, if permitted, result in an unacceptable adverse impact on biodiversity and nature conservation interests, by reasons of impacts on habitats (upland heathland) and species (bats). The decisions to refuse wind turbine applications within these townlands indicate that already there is no capacity for wind energy in this area.

However appeal application K/2013/0523/F is of particular relevance to this representation. K/2013/0523/F was dismissed by the PAC. The Appeal Decision contained a specific reference to how the then proposed turbine would impact on the integrity of the setting of the historic landscape as the following extract indicates:-

The amplification text of Policy BH 1 at paragraph 3.6 states that particular attention will be paid to the impact of proposals on critical views of and from monuments. The proposed turbine would not feature in views south from Dun Ruadh as it would be located further north and west of this monument or any of the nine non-scheduled archaeological sites also spread across the southern slopes of Crockyneill Hill (Crock and Carnanrancy). However in the views northwards from the Ogham stone and the nearby standing stone (Aghascrebba) over the relatively open Crockyneill hillside, I accept that a 45m high turbine on higher land to the NW, a short distance away in the background to Dun Ruadh and its associated henge, would be a visually disruptive feature and have an adverse impact on the overall setting of the monuments. This would be particularly significant as the Ogham stone is part of a Historic Heritage Trail and was considered to be the key archaeological monument in terms of visitor numbers due to the ease with which it can be accessed and its use as a focal point to understand and enjoy the historic landscape. The understanding and appreciation by visitors of the archaeology could be impaired to a significant extent by the visual disruption of the wind turbine's presence. When account is taken of a historical functional relationship between the two clusters of monuments, the proximity of the proposed turbine to the focal monument in the grouping and its intrusion into critical views between them, I conclude that the integrity of the setting of the scheduled monuments would be adversely affected and that the proposal would be contrary to Policy BH1. 19.

This paragraph conveys the sense that this landscape has a wealth of archaeology. In reality this historic landscape stretches from the Aghascribba Ogham Stone in FODC to the world renowned Beaghmore Stone Circle Complex in the adjoining Mid Ulster District Council already designated as Beaghmore ASAI.

This region, which stretches across both Council Districts, to date has upwards of 100 surveyed sites (many scheduled) and recorded by the Historic Monuments Unit of NIEA.

This is an area that contains the most diverse and most intensive examples of archaeological remains in Ireland from the Neolithic period right down to the Christian period.

Aghascribba has the Ogham Stone. Carnanrancy has the easily accessible Clochmore Megalithic tomb. Crock hosts one of the most important monuments in Ireland - the Dun Ruadh Fort. In the same field as Dun Ruadh there are the remains of a Megalithic Tomb. Equally the other townlands in the ASAI candidate area have numerous examples of archaeological monuments.

Crock also hosts a Mass Rock which dates back to Penal times and a Clan Inauguration site exists at the highest place in the townland, on a summit known as Crockyneill.

This landscape has evolved over thousands of years. Its inhabitants, having lived with their environment for in excess of the last 7,000 years, give us the unique landscape of today. Inconspicuous dwellings and farm buildings blend into the patchwork of fields and boundaries which form the landscape in the valley of the Owenkillew River. With this, scenic, archaeological, cultural and natural heritage Aghascrebba and its surroundings is a destination of choice for numerous visitors from all over the world.

The introduction of turbines within this landscape would change its visual character and diminish the value of this heritage for residents and visitors alike forever. Such prominent constructions would be totally out of place. They would corrupt the historic setting for this landscape's wealth of heritage and archaeology.

This landscape having high visual sensitivity, wild character and important heritage sites is of high value to society. It is totally unsuitable for wind turbines. The installation of such high structures would have a negative and detrimental impact on its unique character. As such the landscape merits protection to ensure that it is preserved for future generations to enjoy.

So in conclusion I am requesting that FODC contributes to ensuring that the character of this historic landscape is preserved by indicating that the townlands of Aghascrebba, Crock, Carnanrancy, Keerin, Teebane East and Muninamale, are designated as having no underlying capacity for wind development.

Yours sincerely

A large black rectangular redaction box covering the signature and name of the sender.