Gemma McAuley

From:

Lonan McLaughlin

Sent:

15 March 2022 00:39

To:

Planning

Subject:

Rigged Hill windfarm application

Attachments:

Objection March 22.docx

To Planning Department at Causeway Coast and Glens

Please find attached my objection to planning application – LA01/2019/0890/F

Yours sincerely, Lonan McLaughlin

Planning Office RECEIVED

16 MAR 2022

File No. Causeway Coast and Glons Borough Council I wish to object to planning application - LA01/2019/0890/F

Planning Office RECEIVED

16 MAR 2022

File No...
Causeway Coast and Glens Borough Council

1) Issue of Perpetuity & Local Community Consultation.

The newly proposed Rigged Hill windfarm has been given permission to exist in perpetuity. This permission was obtained in the latter stages of the planning application in 2021. Therefore, this major component of the planning application was not consulted with nearby residents and local communities. This I believe is wrong and results in the planning process of this application losing transparency as the information given in previous local consultations of 2019 does not reflect the current application and therefore should not be considered adequate.

This should result in the planning application being refused planning permission.

It is not only the issue of perpetuity but other up to date information contained within the planning application (including conditions agreed) that has not been given public consultation. The last information days in 2019 is almost 3 years ago and are most definitely out-dated.

Furthermore, the information days of 2019 were not held in the Drumsurn area despite the development being situated here. The Drumsurn area is an electoral ward in itself and has the sufficient population to warrant this. There is at least three community centres where info days can be held, i.e., Drumsurn Community Hall, St Matthews Primary School & Balteagh Church Hall.

The following recent windfarm developments in the Drumsurn area did not give any consultation whatsoever to the local community of Drumsurn: (Located in comparison to the proposed application)

- Craiggore windfarm (consented) 3 km south-east of the Development;
- Upper Ballyrogan windfarm (consented) 3.5 km south-east of the Development;
- Evishagaran windfarm (consented) 10 km south of the Development; and
- Smulgedon windfarm (under construction) 4 km south of the Development.

This I believe was a major lack of transparency with aforementioned previous planning applications. Therefore, it is very important that this current windfarm planning application be given current consultation to residents of the Drumsurn area. To date this has not occurred and should be reflected in the decision of the application.

In conclusion, it is against public interest that a private corporation should have the right to control land in perpetuity. Especially so when no public consultation has been given to the local community.

2) Out of scale and character for the North Sperrins and Roe Valley:

The current turbines stand at a height of 57m upon Rigged Hill, which I believe, were designed to blend in with the local landscape. However, this new planning application is seeking to increase the size of the turbines to 137m. Combining the height of Rigged Hill (being 377m); this will mean the peak of the turbines will stand at a height of 514m. In comparison, the nearby Benbradagh Mountain (Sperrins 2nd highest peak) is 465m in elevation. So effectively with the construction of this new windfarm, Rigged hill will be the second highest peak in the Sperrins. Obviously, this is not a natural

occurrence, but a man-made industrial choice. Furthermore, Rigged Hill is highly visualised to the rest of the Roe Valley and beyond. The site falls within Landscape Character Area (LCA) Binevenagh which has been assessed to have a high – medium landscape sensitivity to impact from wind energy development. Although the site does not fall within the Binevenagh AONB, it is contained with its Landscape Character Area and therefore should be protected. It is also located very close to Sperrin's AONB.

This planning application is a clear example of a windfarm which if passed will be completely out of scale and character to the local and wider area. It is in direct conflict to Policy CTY 13 of PPS 21, which states that planning permission will be granted for a building in the countryside where it can be visually integrated into the surrounding landscape, and it is of an appropriate design. Also, CTY 14 of PPS 21 which states that planning permission will be granted for a building in the countryside where it does not cause a detrimental change to, or further erode the rural character of an area.

3) Lack of Cumulative Impact Studies

In terms of the environment, there needs to be a study into the accumulative impact of all the wind farms/ turbines in the North Sperrins impacting on hill dwelling fauna, i.e., deer, hare, bat, insect, and bird species including migratory birds. In terms of landscape, in the Roe Valley itself, there is literally wind turbines upon almost every hill and mountain. The impact of wind energy development is only amplified with the construction of wind turbines over 130m high. The current Rigged Hill planning application cannot be considered justified until an independent study is obtained from the relevant public bodies.

4) Viability of the newly proposed windfarm:

As well as the environment and landscape, a separate cumulative study needs to be obtained in relation to studying the viability of a new windfarm application. Residents of NI are currently seeing their electricity costs continue to rise exponentially, even though NI has seen a large increase of wind energy production in recent years. This is particularly relevant for residents of the Roe Valley / North Sperrins.

All major planning applications of renewable energy should contain their accompanying infrastructure to ensure viability. Why pass a major windfarm planning application when the grid is already at near/full capacity in the area? A renewable windfarm application should only be passed when it is guaranteed that the infrastructure is in place to ensure a windfarm can function at its full capacity.

For example, the newly proposed Rigged Hill windfarm in retrospect to the SONI published document 'Transmission Development Plan Northern Ireland (TDPNI)' (2020).

This document describes the current energy situation in Northern Ireland and the projects the SONI are planning to support the transmission and distribution system. Please see Section 7.3, which says of the North and West Planning Area, "There is limited high capacity 275 kV infrastructure in this area and currently little or no spare capacity for generation on the 110 kV system. The planning area has considerably more generation than demand".

Furthermore, the document describes in section 7.3, that there is currently major issues of overloading the grid in the North and West Planning areas. The document lists planning developments which aim to help the transmission and distribution system. However, as we can read, most of these are at an early planning stage and are not scheduled to be finished until "after 2026." Will these projects actually be financed and passed? If so, how much will these projects actually alleviate the issues of

transmission and distribution? Furthermore, how much constraint payments will be paid to windfarm companies to turn off their turbines?

Reading this published document of the SONI, one can assume that the newly proposed Rigged Hill windfarm application is currently not viable. There has been no cost / benefit analysis in relation to the proposed windfarm and therefore it is over-riding public interest to construct a windfarm that is not actually economically viable.

References:

Causeway Coast & Glens Borough Council. 'Planning Committee Report – LA01/2019/0890/F.' (26/01/2022). Planning Portal NI.

SONI 'Transmission Development Plan Northern Ireland (TDPNI)' (2020). https://www.soni.ltd.uk/media/documents/SONI-Transmission-Development-Plan-Northern-Ireland-2020-2029.pdf