



Magheramore Wind Farm

Further Information - August 2024

Planning Appeals Commission

PAC Ref: 2023/A0099

Local Authority Ref: LA01/2019/0922/F

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1 Introduction

- 1.1 The planning application for the proposed Magheramore Wind Farm was submitted to Causeway Coast and Glens in August 2019, along with an Environmental Impact Assessment. In December 2023, the Planning Authority refused the application. RES, the applicant, has appealed this decision to the Planning Appeals Commission under reference PAC Ref: 2023/A0099.
- 1.2 The proposed wind farm is located on lands opposite the entrance to 59 Maghermore Road Dungiven BT47 4SW in the townlands of Carnanbane and Maghermore Approx 4km south of Dungiven.
- 1.3 This Further Information (FI) has been prepared in support of the Magheramore Wind Farm, PAC Ref: 2023/A0099 (Planning Authority Ref: LA01/2019/0922/F).
- 1.4 The refusal reasons pertain to Archaeology and the visual amenity and landscape character of the proposal. Since the initial assessments were conducted in 2019, this additional information has been prepared to update the baseline assessments where necessary and to offer clarification and support to the Commission.
- 1.5 This further Information has been prepared by RES in collaboration with the specialists outlined below:

Table 1.1 - Technical Specialists:

Technical Specialism	Author
Archaeology and Cultural Heritage	Headland Archaeology
Landscape and Visual	Shanti McAllister

Background of the Planning Application

- 1.6 In August 2019, RES submitted a planning application (ref: LA01/2019/0922/F) to the Causeway Coast & Glens BC (Planning Authority) for permission to erect a 6 turbine wind farm located on lands opposite the entrance to 59 Maghermore Road Dungiven BT47 4SW in the townlands of Carnanbane and Magheramore Approx 4km south of Dungiven.
- 1.7 The application was subject to an Environmental Impact Assessment (EIA), which was prepared by RES and was conducted in accordance with the Planning (Environmental Impact Assessment) Regulations, 2017. A full project description, including a range of technical and environmental studies was prepared to allow the Planning Authority to assess the environmental impacts, and these were reported in the Magheramore Wind Farm Environmental Statement (ES) which was submitted to support the application in August 2019. A Design and Access Statement and a Pre-Application Community Consultation Report were also submitted in August 2019. The planning application was validated.

- 1.8 Further information was submitted to Causeway Coast & Glens Borough Council, the purpose of the further information was to update and complement, where appropriate the environmental information previously submitted.
- 1.9 Below is a summary of the additional information that was provided:
- In November 2021, Further Environmental Information was submitted by way of Addendum to provide additional information in relation to the 3rd Party representations received, Archaeology and Cultural Heritage, provision of a preliminary CEMP and Traffic and Transport.
 - In February 2022, Further Environmental Information was submitted by way of Addendum to provide additional information in relation to Battery Energy Storage, the Battery Energy Storage element has been subsequently removed from the proposal.
 - In March 2022, RES updated the site entrance drawing in order to provide clarification as requested by DFI Roads.

Purpose of this Further Information

- 1.10 Since the submission of the Magheramore Wind Farm planning application in 2019 we are aware that there has been some minor changes to the cumulative baseline within the 30 km Study Area for the Landscape and Visual Impact Assessment. The majority of these changes are relatively minor in relation to the assessment of effects of the Proposed Development and are included in this submission. Please refer to Section 3 of this report for the updated Landscape and Visual Impact Assessment.

Project Description

- 1.11 On 9th May 2024, Carson McDowell wrote to the Planning Appeals Commission to propose a minor amendment to the wording of the Project description. The description that was included in the Planning application proposed that the Development includes “6 no. Wind Turbines (Max of 149.9m to blade tip with a max rotor of 112m and a max hub height of 94m)”. The request was that the words “with a max rotor diameter of 112m and a max hub height of 94m” should be deleted. This request was made having regard to the principles set down by Commissioner Rue in a preliminary ruling dated 09.07.2015 in an Appeal ref: 2014/A0062 (proposed Wind Farm).
- 1.12 The appellant received an email from the PAC on 22nd July 2024, in which it was advised that this matter will be considered by the Commissioner when the case is allocated and the statements of case are received.

Northern Ireland Energy Policy

- 1.13 The transition to decarbonisation in Northern Ireland is closely linked with broader UK-wide goals. After reaching the 40% renewable electricity target set by

the Strategic Energy Framework, the Department for the Economy initiated the development of a new Energy Strategy for Northern Ireland, starting with a Call for Evidence in 2019. This was part of a broader public engagement process aimed at shaping a long-term strategy for decarbonising the energy sector by 2050 while minimising costs to consumers.

- 1.14 The new Energy Strategy, titled "The Path to Net Zero Energy," was released in December 2021. It aligns Northern Ireland's objectives with the UK's goal of achieving net zero carbon emissions by 2050, emphasising the urgency of accelerating the transition to renewable energy. The strategy outlines targets for 2030, including a 56% reduction in energy-related emissions, a 25% increase in energy efficiency across buildings and industry, and a doubling of the low-carbon and renewable energy economy to surpass a £2bn turnover. Additionally, the strategy aims for at least 80% of electricity consumption to be sourced from a diverse mix of renewables by 2030, aligning with the Republic of Ireland's targets.
- 1.15 This strategic approach is further supported by the UK Government's renewed focus on renewable energy, as highlighted in recent Westminster policies. The UK government is rolling out several significant policies and initiatives to support renewable energy and achieve net-zero goals by 2050, including:
- **Energy Act 2023:** This legislation introduces measures to increase competition in onshore electricity networks and modernise the energy sector, aiming to reduce consumer costs by £1 billion by 2050. The Act will facilitate the transition to a low-carbon energy system.
 - **Mission Control Taskforce:** This newly established clean energy taskforce aims to accelerate the UK's transition to clean power by 2030. It will tackle critical issues such as planning policy and grid connectivity, essential for decarbonising the UK's electricity system.
 - **Onshore Wind Industry Taskforce:** This taskforce is dedicated to revitalising the onshore wind sector, which had been significantly hindered by previous government policies. Their goal is to streamline the planning process and remove barriers to expanding onshore wind capacity, with an aim to double the current capacity by 2030. A specific sub-group of the Task Force will be looking at overcoming unnecessary planning barriers to further deployment.
- 1.16 These initiatives form a comprehensive strategy to expand renewable energy, strengthen energy security, and advance the UK's progress toward its net-zero targets, while also supporting Northern Ireland's efforts to double its renewable energy capacity.
- 1.17 In this context, recent data from the Department for the Economy's Analytical Services Unit, published in June 2023, shows that renewable energy is playing an increasingly significant role in Northern Ireland's energy mix. For the 12-month period ending March 2023, 52.3% of total electricity consumption in Northern

Ireland was generated from renewable sources, up from 46.8% between April 2019 and March 2020.

- 1.18 Between April 2022 and March 2023, electricity consumption was approximately 7,890 GWh, with around 4,120 GWh generated from renewable sources. Wind energy remained dominant, accounting for 86.2% of renewable electricity generation during this period, up from 85.4% in the 2019-2020 timeframe.
- 1.19 The legislative framework supporting these ambitions was strengthened by the passage of the Climate Change (No.2) Bill in March 2022 by the Northern Ireland Assembly. This bill enshrines the target of achieving 80% renewable electricity by 2030 and commits Northern Ireland to reaching net zero carbon emissions by 2050. These targets contribute to the UK's overall climate goals and position Northern Ireland as a leader in renewable energy within the region.

2 Archaeology and Cultural Heritage

Introduction

- 2.1 The decision taken by Causeway Coast and Glens Borough Council on 5/12/23 to refuse the application for Magheramore Wind Farm was justified by two reasons. The second reason, which relates to Archaeology and Cultural Heritage, refers to “unacceptable adverse impacts on the settings of Banagher Old Church State Care Monument and upon two scheduled monuments.” The two scheduled monuments (as stated in the objection by HED) are: Magheramore Court Tomb (LDY-030-064) and Magheramore Portal Tomb (LDY-030-079).
- 2.2 Following the decision by RES to appeal against the Causeway Coast & Glens decision, the opportunity was taken to review the existing six visualisations in the ES and FEI that illustrate the predicted visual change in the setting of Banagher Old Church and the Magheramore Tombs. It was decided that it would be informative to produce one additional photomontage that shows the view standing at the Portal Tomb and looking south-east upslope towards the Court Tomb.
- 2.3 This new photomontage is reproduced here as Figure 5.26 and supports the analysis of the two tombs presented in the FEI 2021, Volume 2, paras 5.10 to 5.28. Specifically, the photomontage illustrates the limited ability to experience the visual relationship between the two tombs along the axial alignment of the court tomb, due to the heavily robbed condition of the tombs (see FEI paras 5.18 to 5.22 for details).
- 2.4 The opportunity has also been taken to bring together all seven relevant visualisations in one document for ease of reference during the appeal. ES Figures 5.5, 5.7 and FEI Figures 5.21, 5.22, 5.23 and 5.24 are reproduced here exactly as originally presented in the ES and FEI. Additional location plans (Figures 5.27 and 5.28) have been provided to assist in understanding the precise location of viewpoints at the church and tombs.

Figures

- Figure 5.5 - MAGHERAMORE COURT & PORTAL TOMBS
- Figure 5.7 - Wireline & Photomontage, LDY 030:029 Banagher Old Church & Stone Cross (Revision B, May '24)
- Figure 5.21 - (FEI) WIRELINE & REFERENCE PHOTOGRAPH LDY 030:031 BANAGHER OLD CHURCH AT PARKING LAY-BY
- Figure 5.22 - (FEI) WIRELINE & REFERENCE PHOTOGRAPH LDY 030:032 BANAGHER OLD CHURCH APPROACH LANE
- Figure 5.23 - (FEI) WIRELINE & PHOTOMONTAGE LDY 030:029 MAGHERAMORE CROSS LOOKING TOWARDS BANAGHER OLD CHURCH
- Figure 5.24 - (FEI) WIRELINE & PHOTOMONTAGE LDY 030:064 & 079 MAGHERAMORE PORTAL TOMB LOKING S.E. TOWARDS COURT TOMB
- Figure 5.26 - (Page 1 & 2) Wireline & Photomontage, LDY 030:064 & 030:079, Magheramore Portal Tomb looking sout-east towards Court Tomb (Revision D, May '24)
- Figure 5.27 - Bangher Old Church Viewpoint Locations
- Figure 5.28 - Magheramore Court & Portal Tombs Viewpoint Locations

3 Landscape and Visual Impact Assessment

Introduction

- 3.1 Since submission of the Environmental Statement in 2019 there have been some changes to the cumulative baseline within the 30 km Study Area for the Landscape and Visual Impact Assessment. The majority of these changes are relatively minor in relation to the assessment of effects of the Proposed Development and are included in this submission primarily for clarity. They are not considered to be of a magnitude that will influence the overall significance of landscape or visual effects. Causeway Coast and Glens Borough Council Planning Committee Report (25.10.23) also refers to critical views along the A6 road corridor and this is initially addressed by the preparation of an additional drawing (Figure 4.34) because the realignment of the A6 has been carried out since the original submission. The submission of revised LVIA information therefore comprises the following items:

Technical Appendix Table A5:

- 3.2 This table provides a summary list of all wind farms within the 30 km Study Area including their status / change in status, distance from the Proposed Development, turbine dimensions and which LVIA viewpoints they are visible from. There were 19 operational/ existing wind farms within the Cumulative Baseline at the time of the ES submission. This has increased to 21. There were 11 consented wind farms which has reduced to 9 and 7 proposed/ in-planning wind farms and this has increased to 8. Details of these changes are shown in Table A.5. Mullaghclogher wind farm is a RES project which has undergone public consultation but for which an application has not yet been submitted. However, it is expected that it would be submitted by the time of any hearing of the appeal for the Proposed Development and has been included in the baseline for this reason.

Amended Zone of Theoretical Visibility Diagrams (Figures 4.11 and 4.12):

- 3.3 The Cumulative ZTVs have been amended to include the updated cumulative baseline information as above. An additional ZTV illustrating the comparative visibility of Brishey Wind Farm alongside the Proposed Development has been created (Figure 4.12, page 2/2) because, whilst no specific comments on Brishey have been made in the Planning Committee Report, it is understood that this is one of the concerns of third parties who have objected to the Proposed Development. This ZTV shows that Brishey Wind Farm would be visible across 36.21% of the Study Area for Magheramore whereas the Proposed Development would only be visible across 17.96% which is a relatively small proportion both in

comparison to Brishey, and in comparison with the overall Study Area. There would be 15.30% overlap of visibility (i.e. both wind farms would be theoretically visible in the same view. It is noted that ZTVs are theoretical and based on bare ground topography with no account taken of above-ground features which may provide additional screening. This is explained in the LVIA Methodology, ES Appendix 4.2) but from 20.91% of the Study Area Brishey would be visible without Magheramore, largely in the north and east of the Study Area. Magheramore would only be theoretically visible in 2.66% of the Study Area where Brishey would not be visible and this tends to be across the east to west in the centre of the Study Area. Furthermore, it is noted, that, were a 30 km Study Area to be measured around Brishey Wind Farm rather than the Proposed Development, its visibility is likely to be greater still. Whilst no detailed analysis of the cumulative effects of Brishey has been made at this point, the percentage figures of the ZTV suggest that the contribution that Magheramore would make to visibility of wind turbines within its 30 km Study Area is much less than that made by Brishey wind farm.

Amended Viewpoint Figures:

- 3.4 Twenty-two representative viewpoints were included in the original LVIA. The wirelines for these have been amended to include the updated cumulative baseline information as above (LVIA Figures 4.13 - 4.33). These show the relationship between Magheramore Wind Farm and the proposed wind farm at Brishey. In most instances (9 viewpoints) there would be no visibility of the two wind farms together or it would be visible/ partially visible in the wider view beyond that which is illustrated by the viewpoint figures (these show an 80-degree angle of view). From the remaining 7 viewpoints Brishey would be only partially visible within the same angle of view at a further distance than the Proposed Development or from a nearer distance where it would be more prominent than the Proposed Development.

New Figure 4.34:

- 3.5 This figure has been prepared in response to comments in the Planning Committee Report, particularly referencing views of the Proposed Development from the A6 road corridor, but it is also intended to clarify understanding on the nature of views in the wider Study Area. The Reverse ZTV diagram (LVIA Figure 4.10, which has not been amended or resubmitted) clearly demonstrates that 82.04% of the Study Area would have no theoretical visibility of the Proposed Development based on bare-ground topography. This is a very clear reflection of the strong arc of uplands which combine to form the Binevenagh and Sperrin Areas of Outstanding Natural Beauty and the Loughermore Hills in the northwestern part of the Study Area. Visibility would be further constricted by above-ground features, in particularly large swathes of coniferous forestry, which occur throughout the Study Area.

- 3.6 Whilst a series of viewpoints were included in the original LVIA to represent the changing nature of views along the old A6 road corridor, the realignment of this road between Dungiven and Derry was completed after the ES submission and was therefore not addressed. A driving survey of this section of road was carried out in April 2024 and observations gathered during this survey are included on this new Figure. Views were found to be clear but only intermittently available from an approximate 4 mile stretch of the new road between Dungiven and Foreglen. These would primarily be experienced to the south side of the direction of travel by drivers in vehicles travelling on or near the national speed limit because there is only one formal parking layby along this stretch of road where cars would be able to stop. Therefore, the duration of these types of views would be less than 5 minutes and would be intermittently screened by roadside cuttings/embankments and vegetation. The latter is newly planted and will mature over time, providing substantially more screening. More detailed analysis of the nature of views is included in the Notes section on Figure 4.34.

Figures

- Figure 4.5 Cumulative Baseline (Revision C, May '24)
- Figure 4.11 Cumulative ZTV, Existing & Consented Wind Farms, 30 km, Blade Tip Height (Revision B, May '24)
- Figure 4.12 Cumulative ZTV, Proposed Wind Farms, 30 km, Blade Tip Height and Cumulative ZTV with Brishey Wind Farm, 30 km, Blade Tip Height (Revision C, May '24)
- Figure 4.13 Viewpoint 1, Wireline & Photomontage, Altnaheglish Dam, Banagher Forest (Revision B, May '24)
- Figure 4.14 Viewpoint 2, Wireline & Photomontage, North Sperrins Scenic Drive, B40 Glenedra Road (Revision B, May '24)
- Figure 4.15 Viewpoint 3, Wireline & Photomontage, Fincarn Crossroads at B40 - B44 Junction (Revision C, May '24)
- Figure 4.16 Viewpoint 4, Wireline & Photomontage, Banagher Old Church (Revision B, May '24)
- Figure 4.17 Viewpoint 5, Wireline & Photomontage, Banagher Road (Revision B, May '24)
- Figure 4.18 Viewpoint 6, Wireline & Photomontage, Magheramore Road near Site Entrance (Revision B, May '24)
- Figure 4.19 Viewpoint 7, Wireline & Photomontage, Creebarky - Teeavan Road Junction (Revision B, May '24)
- Figure 4.20 Viewpoint 8, Wireline & Photomontage, Teeavan Road to North East of Site (Revision B, May '24)
- Figure 4.21 Viewpoint 9, Wireline & Photomontage, Killunaght Road, A6 near Dungiven (Revision B, May '24)
- Figure 4.22 Viewpoint 10, Wireline & Photomontage, Dungiven, Bridge over River Roe (Revision B, May '24)
- Figure 4.23 Viewpoint 11, Wireline & Photomontage, B64, Garvagh Road, Dungiven (Revision B, May '24)
- Figure 4.24 Viewpoint 12, Wireline & Photomontage, A6 at FP McCann Quarry (Revision B, May '24)
- Figure 4.25 Viewpoint 13, Wireline & Photomontage, A6 at Corick Road Junction (Revision B, May '24)
- Figure 4.26 Viewpoint 14, Wireline & Photomontage, A6 at Cashel Road Junction (Revision B, May '24)

- Figure 4.27 Viewpoint 15, Wireline & Photomontage, Benbradagh Mountain (Revision C, May '24)
- Figure 4.28 Viewpoint 16, Wireline & Photomontage, Plantation Road near Park (Revision B, May '24)
- Figure 4.29 Wireline-Only figures for Viewpoint 17, Slieve Kirk Hill and Viewpoint 18, Craignagapple near Owenreagh (Revision C, May '24)
- Figure 4.30 Viewpoint 19, Wireline & Photomontage, Keady Mountain (Revision C, May '24)
- Figure 4.31 Viewpoint 20, Wireline & Photomontage, Binevenagh Scenic Loop at Lisnagrib (Revision B, May '24)
- Figure 4.32 Viewpoint 21, Wireline & Photomontage, Drum Road near Altahullion (Revision B, May '24)
- Figure 4.33 Viewpoint 22, Wireline & Photomontage, Edge of Drumsurn Village (Revision C, May '24)
- Figure 4.34 LVIA Study Area Analysis inc. New A6 Route)Revision A, August '24)