



Fermanagh & Omagh Draft Plan Strategy - Counter Representations Form

Hard Copies of the Draft Plan Strategy, all Representations received and our 'Guidance note for Making Counter Representations' are available for inspection during normal opening hours at the Council's offices at: 7 Shore Road, Enniskillen, BT74 7EF; Strule House, 16 High Street, Omagh BT78 1BQ; The Grange, Mountjoy Road, Lisnamallard, Omagh, Co Tyrone, BT79 7BL and; Townhall, 2 Townhall Street, Enniskillen, Co Fermanagh, BT74 7BA or may be viewed at <https://www.fermanaghomagh.com>

How to make Counter Representations

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All Counter Representations must be received by Thursday 27th June 2019 at 5pm.

SECTION 1. Contact Details

Agent or Personal Submission - Are you submitting on behalf of someone or in an individual capacity?

☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

[REDACTED]

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS029

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Date

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DPS030

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DPS031

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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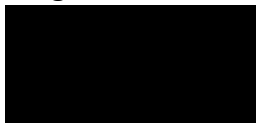
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Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS033

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

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The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Date

26th June 2019



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[REDACTED]

Last Name

[REDACTED]

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Director

Organisation (Where relevant)

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DPS034

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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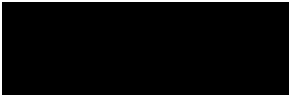
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| 26 th June 2019 |
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Organisation (Where relevant)

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DPS035

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature



Date

26th June 2019



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DPS036

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Date

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| 26 th June 2019 |
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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Comhairle Ceantair
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Last Name

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Job Title (Where relevant)

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Organisation (Where relevant)

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DPS038

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DPS039

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS040

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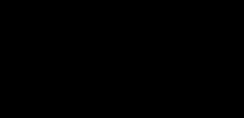
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Signature

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Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS042

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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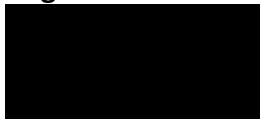
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DPS043

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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END

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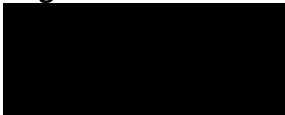
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DPS044

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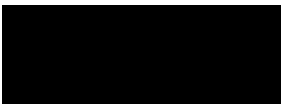
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Signature

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Date

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| 26 th June 2019 |
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Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[Redacted]

Last Name

[Redacted]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[Redacted]

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS046

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS054

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS071

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Cont...

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The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

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DPS072

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS073

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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And...

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Are directly contradictory.

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The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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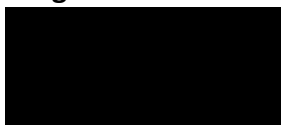
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Signature

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Date

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DPS077

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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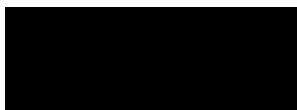
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DPS078

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Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Signature

| | |
|---|--|
|  | |
|---|--|

Date

| |
|----------------------------|
| 26 th June 2019 |
|----------------------------|



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

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Postcode

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Telephone Number

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS080

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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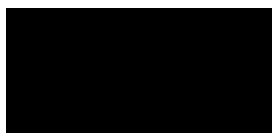
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Signature

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Date

26th June 2019



Fermanagh & Omagh Draft Plan Strategy - Counter Representations Form

[Redacted content]

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DPS081

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Last Name

[REDACTED]

Job Title (Where relevant)

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Organisation (Where relevant)

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Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS082

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS083

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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

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Have you submitted a representation to the council regarding the Draft Plan Strategy?

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS084

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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END

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DPS085

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature

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Date

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DPS086

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS087

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Agent or Personal Submission - Are you submitting on behalf of someone or in an individual capacity?

☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[Redacted]

Last Name

[Redacted]

Job Title (Where relevant)

Director

Organisation (Where relevant)

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If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS088

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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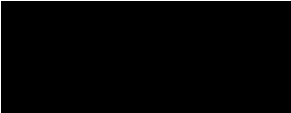
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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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|---|--|
|  | |
|---|--|

Date

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|----------------------------|
| 26 th June 2019 |
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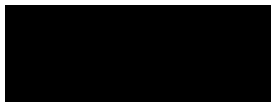
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Postcode Click or tap here to enter text.

Telephone Number Click or tap here to enter text.

Email Address Click or tap here to enter text.

SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS092

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Signature



Date

26th June 2019



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[REDACTED]

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Organisation (Where relevant)

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The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS094

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Signature

Date

26th June 2019



Fermanagh & Omagh
District Council
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| | |
|---|--|
|  | |
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Date

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|----------------------------|
| 26 th June 2019 |
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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

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Signature

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Date

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| 26 th June 2019 |
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Fermanagh & Omagh
District Council
Comhairle Ceantair
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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

[REDACTED]

Postcode

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SECTION 2. Counter Representation

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☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS098

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature

A black rectangular box redacting the signature, followed by a horizontal line for the signature.

Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
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Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS100

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Last Name

[REDACTED]

Job Title (Where relevant)

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Organisation (Where relevant)

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Details of Your Counter Representation

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DPS101

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS102 SOS

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Consent to Publish Response

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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[Redacted]

Last Name

[Redacted]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[Redacted]

Address

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Postcode

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS103 McConnell

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

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Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

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The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

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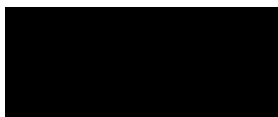
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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS107

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

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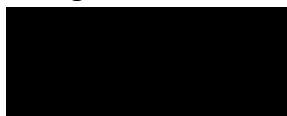
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DPS114

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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Signature

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Date

| |
|----------------------------|
| 26 th June 2019 |
|----------------------------|



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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS122

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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26th June 2019



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Fhear Manach agus na hÓmaí

Fermanagh & Omagh Draft Plan Strategy - Counter Representations Form

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Agent or Personal Submission - Are you submitting on behalf of someone or in an individual capacity?

☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

[REDACTED]

Postcode

[REDACTED]

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS136

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Signature



Date

26th June 2019



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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS143

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature

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|---|--|

Date

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|----------------------------|
| 26 th June 2019 |
|----------------------------|



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DPS144

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS146

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

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Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

Cont...

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

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Signature

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Date

| |
|----------------------------|
| 26 th June 2019 |
|----------------------------|



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[Redacted]

Last Name

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Job Title (Where relevant)

Director

Organisation (Where relevant)

[Redacted]

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Have you submitted a representation to the council regarding the Draft Plan Strategy?

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS147

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature



Date

26th June 2019



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SECTION 2. Counter Representation

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Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS148

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Consent to Publish Response

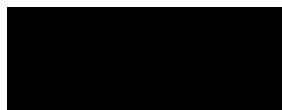
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Signature



Date

26th June 2019



Fermanagh & Omagh
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Organisation (Where relevant)

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DPS149

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS150

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Consent to Publish Response

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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

[REDACTED]

Postcode

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS151

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS152

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature

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Date

26th June 2019



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District Council
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Organisation (Where relevant)

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DPS153

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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| | |
|---|--|
|  | |
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Date

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|----------------------------|
| 26 th June 2019 |
|----------------------------|



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DPS155

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Signature

| | |
|---|--|
|  | |
|---|--|

Date

| |
|----------------------------|
| 26 th June 2019 |
|----------------------------|



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

Fermanagh & Omagh Draft Plan Strategy - Counter Representations Form

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Agent or Personal Submission - Are you submitting on behalf of someone or in an individual capacity?

☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

[REDACTED]

Postcode

[REDACTED]

Telephone Number

[REDACTED]

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Telephone Number Click or tap here to enter text.

Email Address Click or tap here to enter text.

SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS171

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

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Signature

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Date

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DPS185

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

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Date

26th June 2019



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Job Title (Where relevant)

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Organisation (Where relevant)

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Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS186

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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Cont...

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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Signature



Date

26th June 2019



Fermanagh & Omagh
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Director

Organisation (Where relevant)

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS145

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Organisation (Where relevant) Click or tap here to enter text.

Address Click or tap here to enter text.

Postcode Click or tap here to enter text.

Telephone Number Click or tap here to enter text.

Email Address Click or tap here to enter text.

SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS188

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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END

SECTION 3. Data Protection and Consent

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature

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Date

| |
|----------------------------|
| 26 th June 2019 |
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District Council
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DPS191

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Signature

Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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First Name

[REDACTED]

Last Name

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Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

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DPS194

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And...

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DPS196

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Signature

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Date

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|----------------------------|
| 26 th June 2019 |
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Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS198

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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END

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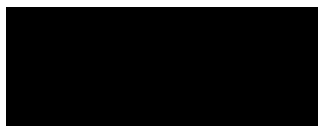
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Signature

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Date

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First Name Click or tap here to enter text.

Last Name Click or tap here to enter text.

Job Title (Where relevant) Click or tap here to enter text.

Organisation (Where relevant) Click or tap here to enter text.

Address Click or tap here to enter text.

Postcode Click or tap here to enter text.

Telephone Number Click or tap here to enter text.

Email Address Click or tap here to enter text.

SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS202

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

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Signature

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Date

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Fermanagh & Omagh
District Council
Comhairle Ceantair
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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

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Postcode

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Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS203

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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END

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Signature



Date

26th June 2019



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District Council
Comhairle Ceantair
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First Name

[Redacted]

Last Name

[Redacted]

Job Title (Where relevant)

Director

Organisation (Where relevant)

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SECTION 2. Counter Representation

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☐ **Yes** ☒ **No**

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Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS204

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Cont...

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

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Signature

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First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS205

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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Organisation (Where relevant)

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS206 MeenaghP

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

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The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

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While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Consent to Publish Response

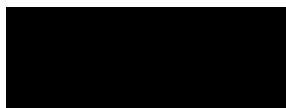
The Council is required by law to publish your representation and make it available for inspection. Unless otherwise stated by yourself, this will include your name and postal address. Your personal telephone number, personal email address and signature will not be published.

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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[Redacted]

Last Name

[Redacted]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[Redacted]

Address

[Redacted]

Postcode

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Telephone Number

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS207

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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Signature

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|---|--|

Date

| |
|----------------------------|
| 26 th June 2019 |
|----------------------------|



Fermanagh & Omagh
District Council
Comhairle Ceantair
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Organisation (Where relevant)

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DPS208

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
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Last Name

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Details of Your Counter Representation

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DPS209

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature

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Date

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DPS210

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Consent to Publish Response

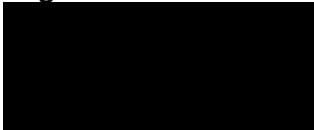
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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

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Postcode

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Have you submitted a representation to the council regarding the Draft Plan Strategy?

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If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS211

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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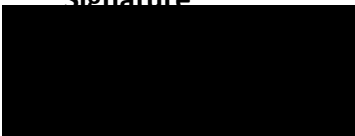
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Details of Your Counter Representation

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DPS212

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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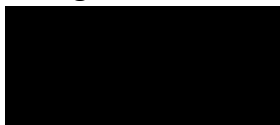
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DPS213

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS214

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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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[Redacted]

Last Name

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Job Title (Where relevant)

Director

Organisation (Where relevant)

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS215

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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END

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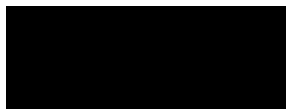
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DPS216

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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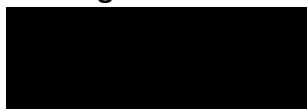
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DPS217

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Signature

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Date

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

[REDACTED]

Postcode

[REDACTED]

Telephone Number

[REDACTED]

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[REDACTED]

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Address Click or tap here to enter text.

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS219

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

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The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

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Signature

Date

26th June 2019



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District Council
Comhairle Ceantair
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DPS220

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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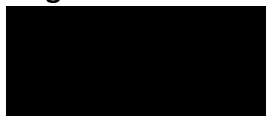
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Signature

A black rectangular box redacting the signature, followed by a large empty rectangular box for the signature.

Date

26th June 2019



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District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

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DPS221

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

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Are directly contradictory.

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Cont...

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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Signature

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Date

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|----------------------------|
| 26 th June 2019 |
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District Council
Comhairle Ceantair
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Details of Your Counter Representation

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DPS222

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

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Consent to Publish Response

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Signature

| | |
|---|--|
|  | |
|---|--|

Date

| |
|----------------------------|
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Fermanagh & Omagh Draft Plan Strategy - Counter Representations Form

[Redacted content]

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Agent or Personal Submission - Are you submitting on behalf of someone or in an individual capacity?

☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[Redacted]

Last Name

[Redacted]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[Redacted]

Address

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Postcode

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS224 Standing Our Ground

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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END

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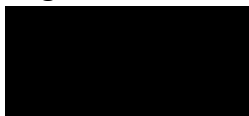
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Signature

A black rectangular box redacting the signature, followed by a horizontal line for the signature area.

Date

| |
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Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

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SECTION 2. Counter Representation

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☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS225

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

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Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

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Cont...

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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END

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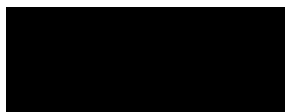
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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
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If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS226

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Fermanagh & Omagh
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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS230

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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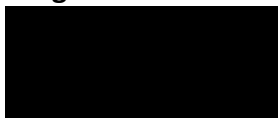
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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[Redacted]

Last Name

[Redacted]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[Redacted]

Address

[Redacted]

Postcode

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Telephone Number

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Email Address

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS231

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

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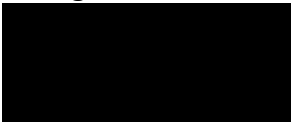
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Signature

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Date

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District Council
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Organisation (Where relevant)

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DPS232

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The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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Date

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DPS233

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The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS234

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In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

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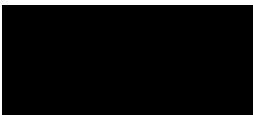
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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

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Postcode

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS235

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

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However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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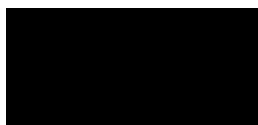
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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS240

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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END

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Organisation (Where relevant)

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DPS241

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Date

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS242

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| | |
|---|--|
|  | |
|---|--|

Date

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|----------------------------|
| 26 th June 2019 |
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Telephone Number

[REDACTED]

Email Address

[REDACTED]

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First Name Click or tap here to enter text.

Last Name Click or tap here to enter text.

Job Title (Where relevant) Click or tap here to enter text.

Organisation (Where relevant) Click or tap here to enter text.

Address Click or tap here to enter text.

Postcode Click or tap here to enter text.

Telephone Number Click or tap here to enter text.

Email Address Click or tap here to enter text.

SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS243

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

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Consent to Publish Response


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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

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Postcode

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Telephone Number

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS259

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

[the Sperrins AONB] is one of the most scenic natural valleys in our district yet.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

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Signature

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Date

| |
|----------------------------|
| 26 th June 2019 |
|----------------------------|



Fermanagh & Omagh
District Council
Comhairle Ceantair
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First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

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Postcode

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS262

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
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First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

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Postcode

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Telephone Number

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Email Address

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS263

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

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Cont...

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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END

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| | | |
|---|--|----------------------------|
|  | | Date |
| | | 26 th June 2019 |



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District Council
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Job Title (Where relevant)

Director

Organisation (Where relevant)

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SECTION 2. Counter Representation

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☐ **Yes** ☒ **No**

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS272 McAleer

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

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Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

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Consent to Publish Response

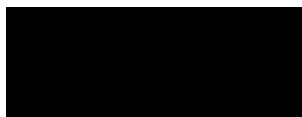
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Signature

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Date

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| 26 th June 2019 |
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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[Redacted]

Last Name

[Redacted]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[Redacted]

Address

[Redacted]

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If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS275

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS276

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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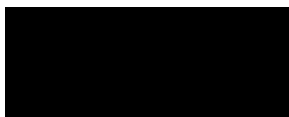
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DPS280 Whitmore

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DPS281

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The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

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Consent to Publish Response

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Signature

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Date

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|----------------------------|
| 26 th June 2019 |
|----------------------------|



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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Agent or Personal Submission - Are you submitting on behalf of someone or in an individual capacity?

☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

[REDACTED]

Postcode

[REDACTED]

Telephone Number

[REDACTED]

Email Address

[REDACTED]

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SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS282 Cooperation Against Mining in Omagh

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

1

and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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26th June 2019



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Last Name

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Director

Organisation (Where relevant)

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Details of Your Counter Representation

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DPS283 Donnelly

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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[Redacted]

Last Name

[Redacted]

Job Title (Where relevant)

Director

Organisation (Where relevant)

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS284

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Cont...

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The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-2

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Signature



Date

26th June 2019



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Details of Your Counter Representation

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DPS285

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

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Last Name

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS286

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

The environmental statement accompanying the planning application (LA10/2015/0292/F) is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area. Unlike the Council's Landscape Character Assessment for Fermanagh and Omagh (Ironsides Farrar, September 2018) (LCA) and Landscape Wind Energy Capacity Study for Fermanagh and Omagh (Ironsides Farrar, January 2018) (LWECS).

Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrar is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

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The Landscape Visual Impact Assessment undertaken as part of the planning application for the Doraville Wind Farm (LA10/2015/0292/F) provides a detailed and thorough assessment of landscape character that demonstrates that the landscape can accommodate future development in Wind Energy. This information was available to the council at the time of the landscape character review but does not seem to have been considered.

Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

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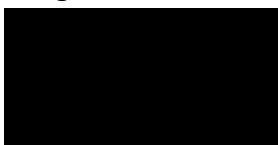
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Signature

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Date

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The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS288

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

Click or tap here to enter text.

Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS290

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

Relatively large scale simple landforms with coniferous plantations are not of the highest scenic value, p.59 LWECS

And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

Cont...

However a detailed study of Landscape Visual Impact Assessment has been submitted and this is summarised:

The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

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Consent to Publish Response

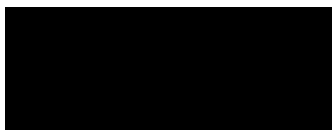
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Signature

A black rectangular box redacting the signature, followed by a horizontal line indicating the signature area.

Date

| |
|----------------------------|
| 26 th June 2019 |
|----------------------------|



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[Redacted]

Last Name

[Redacted]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[Redacted]

Address

[Redacted]

Postcode

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS291

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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26th June 2019



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DPS293 Haughey

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
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Director

Organisation (Where relevant)

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS295

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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DPS296

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Signature

Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

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[REDACTED]

Last Name

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Job Title (Where relevant)

Director

Organisation (Where relevant)

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Postcode

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS297

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS298

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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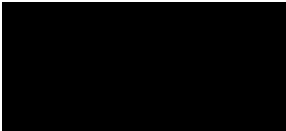
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DPS299

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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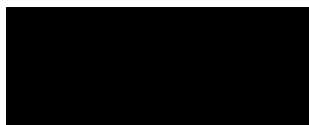
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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

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Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS301

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

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The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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END

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS302

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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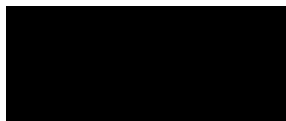
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|---|--|
|  | |
|---|--|

Date

| |
|----------------------------|
| 26 th June 2019 |
|----------------------------|



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District Council
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Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS303

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Date

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Agent or Personal Submission - Are you submitting on behalf of someone or in an individual capacity?

☐ Individual ☒ Organisation ☐ Agent (complete with your client's contact details first)

First Name

[REDACTED]

Last Name

[REDACTED]

Job Title (Where relevant)

Director

Organisation (Where relevant)

[REDACTED]

Address

[REDACTED]

Postcode

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If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS305

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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DPS306 Tracey

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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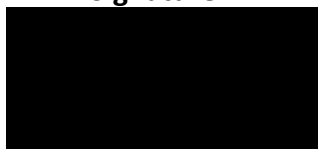
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DPS307 KeenanC

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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DPS308

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Telephone Number Click or tap here to enter text.

Email Address Click or tap here to enter text.

SECTION 2. Counter Representation

Have you submitted a representation to the council regarding the Draft Plan Strategy?

☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS309

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

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Both have a number of flaws and lack detailed evidence and contain contradictions. For example, regarding LCA 24, to where this site refers to:

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

Cont...

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The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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and continues

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

The Draft Plan Strategy is Unsound. Because the evidence base for the proposals are not appropriate or of quality or based on robust evidence.

END

SECTION 3. Data Protection and Consent

Data Protection

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Consent to Publish Response

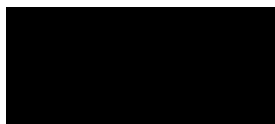
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Signature



Date

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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Last Name

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Organisation (Where relevant)

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS310

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

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The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature

Date

A black rectangular box redacting the signature, followed by a white rectangular box for the signature line.

26th June 2019



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

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DPS311

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Signature



Date

26th June 2019



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District Council
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| | |
|---|--|
|  | |
|---|--|

Date

| |
|----------------------------|
| 26 th June 2019 |
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The assessment has shown that the effect of the Development on the great majority of this study area will be not significant, which means that in these areas the effect of the Development is not material and the existing characteristics of the landscape and views will continue to prevail.

Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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While the assessment indicates that there is potential for the Development to result in some localised significant effects, the Development is considered to be acceptable in landscape and visual terms, with acceptability being an expression of the overall accommodation of the wind farm into the landscape and visual resource, without exceeding its inherent landscape capacity.

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Therefore in relation to Fermanagh and Omagh tests for soundness we do not believe the Draft Plan Strategy is sound. This is in relation to question:

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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END

SECTION 3. Data Protection and Consent

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Date

26th June 2019



Fermanagh & Omagh
District Council
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Last Name

[Redacted]

Job Title (Where relevant)

Director

Organisation (Where relevant)

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☐ **Yes** ☒ **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

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Details of Your Counter Representation

Please provide the reference number of the site-specific representation to which your counter representation relates to:

DPS315

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

In relation to the representation referenced we disagree where it is stated that

The Council District has become overwhelmed with wind turbines and wind turbine farms. [...] The negative impact on visual amenity, [...] are well known now.

However the environmental statement accompanying the planning application (LA10/2015/0292/F) for the Doraville Wind Farm is accompanied by a full landscape and visual impact assessment, which includes a detailed assessment of the area.

In addition in the Draft Plan Strategy L02 /Appendix 7 proposals that LCA 24. South Sperrins has no underlying wind energy capacity are unsound and lack evidence.

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And...

Due to its high value, the landscape has very low capacity for wind energy development, p.62, LWECS

Are directly contradictory.

Therefore we do not believe that the LCA or the LWECS by Ironsides Farrer is of sufficient quality to underpin local planning policy.

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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END

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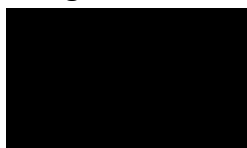
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DPS316 Gilheany

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Doraville Wind Farm Environmental Statement, Appendix 6.3, p1-

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Date

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DPS318

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In relation to the representation referenced we disagree where it is stated that

The introduction of turbines [in the Sperrins AONB] would have a distinctive negative visual impact

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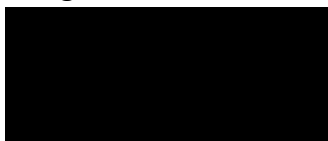
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