

# Statement of Case

## Curraghinalt Project (Dalradian)

This statement of case is being submitted in response to the Planning Appeals Commission decision to conduct a Public Inquiry into the Curraghinalt Project (Dalradian) which combines a number of conjoined applications as detailed below: -

Dalradian Gold Ltd LA10/2017/1249/F (PAC Ref: C005)

Dalradian Gold Ltd LA10/2019/1386/F- NIE Networks (PAC Ref:C006)

NIE Networks LA11/2019/1000/F-NIE Networks (PAC Ref:C007)

Dalradian Gold Ltd TrC 080/20\_1-DAERA (PAC Ref: WHR01)

Dalradian Gold Ltd TrC 081/20\_1-DAERA (Pac Ref: WHR02)

Dalradian Gold Ltd AIL 2020 0105-NIEA (PAC Ref: WHR03)

Dalradian Gold Ltd AIL 2020 0106- NIEA (PAC Ref: WHR04)

Dalradian Gold Ltd Road Abandonment Application (PAC Ref: DR001)

Dalradian Gold AIL/2024/0008

Dalradian Gold AIL/2024/0009

From: [REDACTED]

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## **Introduction**

Curraghinalt Project (Dalradian) is the collective title for all the applications associated with the proposal to construct a massive goldmine and processing plant on an extensive mountain site in the Southern Sperrins. Geographically the proposed site location is described as Crockanboy Hill, Crocknamoghill and Mullydoo. This upland landscape has many features which make it totally unsuitable for the construction of a goldmine. This Statement of Case is being submitted to highlight the environmental and archaeological issues which make this area totally unsuitable for the construction of a goldmine.

## **Owenkillev ASSI and SAC**

This upland landscape is located on a Southern Sperrin's summit between the Owenreagh and Owenkillev river valleys which converge to become the Owenkillev. Due to the unpolluted water quality of this watercourse, this has been designated as the Owenkillev Area of Special Scientific Interest (ASSI) and has been assigned as a Special Area of Conservation (SAC).

The unpolluted water of these rivers provides the natural habitat for a number of endangered species; the most notable being the freshwater pearl mussels. The Owenkillev has by far the largest population of the endangered freshwater pearl mussels surviving in any river in Northern Ireland.

Should the construction of the goldmine be permitted pollution of these rivers would be unavoidable. Pollution could occur with or without an accident at all stages during the lifetime of the proposed goldmine. This area has high rainfall so the volume of water would create hazards right from the initial excavation, during the construction stage and during the lifetime of the working mine and afterwards. The discharge of contaminated water is an inevitable consequence of this proposal, it would be calamitous for the endangered pearl mussels and the entire health of the river environment. Water pollution is an inevitable consequence of this goldmine proposal should the project be allowed to go ahead. According to information provided at the pre-inquiry meeting Dalradian Gold Ltd. has already been found guilty of discharging contaminated water from its exploratory mining operation.

## **Area of Outstanding Natural Beauty (AONB)**

Crockanboy Hill, Crocknamoghill and Mullydoo area is renowned for its unspoilt scenery and natural beauty as the overarching objectives of the AONB indicate. These objectives are as follows:

*Conserve and enhance the natural and cultural heritage of the UK's Areas of Outstanding Natural Beauty ensuring they meet the challenges of the future*

*Support the economic and social well-being of local communities in ways which contribute to the conservation and enhancement of natural beauty*

*Promote public understanding and enjoyment of the nature and culture Areas of Outstanding Natural Beauty and encourage people to take action for their conservation*

*Value, sustain and promote the benefits that the UK's Areas of Outstanding Natural Beauty provide for society, including clean air and water, food, carbon storage and other services vital to the nation's health and well-being.*

The designation of AONB status clearly indicates that the natural beauty of the Sperrins was recognised by the Government Departments as far back as the 1960s. These objectives if applied should be adequate to prevent the approval of the goldmine planning applications.

### **Tourism**

Government Departments, Local Councils, Community Groups and many individuals have worked tirelessly to develop and showcase the magic of the scenery and the history and the heritage of the Sperrins. Nowadays the Sperrins are a key destination for tourists and visitors alike. And they are promoted as such with the catchy slogan 'Embrace the giant experience'. Separate scenic driving and cycle routes have been developed and are signed-posted and mapped. Many walking and cycle trails have been developed. Walking festivals are a regular feature throughout the year. Night walks are held in Davagh International Dark Sky Park. Crockanboy Hill is featured as an ideal walking venue on the web page [myomagh.com](http://myomagh.com)

### **Davagh International Dark Sky Park**

There is a very significant tourist destination known as Davagh International Dark Sky Park and OM Observatory a short distance from Crockanboy Hill. It was developed by Mid Ulster District Council who in collaboration with the International Dark Sky Association was able to establish that due to the lack of light pollution Davagh fulfilled the criteria required for designation as a dark sky area. The OM Observatory is known to be one of the best places in the world for stargazing.

Constructing a multi-story above ground infrastructure at Crockanboy Hill, Crocknamoghill and Mullydoo complete with round-the-clock lighting would threaten the status of the prestigious Davagh Forest Dark Sky Park. Davagh Forest Dark Sky Park is one of two Dark Sky Parks on the Island of Ireland; there are six in the United Kingdom, and it is Dark Sky Park number 78 in the World.

## **Sperrins Sculpture Trail**

The Sperrin Sculpture Trail was installed recently. It is a driving trail which contains three giant sculptures located at separate destinations within the Sperrins.

Sculpture 1- Nowanous: The Storytellers is in the Glenelly Valley near Cranagh . The drive though the Glenelly Valley has been featured in National Geographic's top 101 scenic drives in the world.

Sculpture 2 - Daragh: The Guardian is located at the top of Mullaghcarn Mountain in the Gortin Glens. There are great views of Mullaghcarn Mountain from Crockanboy Hill Scenic Route. The Guardian looks down on the proposed Gold Mine site.

Sculpture 3 – Ceoldan: The Stargazer is in Davagh Forest. Being located within Davagh Dark Sky Park. Ceoldan is in one of the best places in the world to experience well- preserved night sky darkness.

Davagh Dark Sky Park and the Sperrins Sculpture trail are just two examples of key attractions in the locality. Crockanboy Hill, Crocknamoghill and Mullydoo has numerous key nearby tourist destinations including Gortin Glens Forest Park, Glenelly Valley, An Creggan Visitors Centre, Davagh Forest Bike Trails and Beaghmore Stone Circles.

## **Media Coverage**

Repeatedly the beauty and the magic of the Sperrins is screened on major TV channels. Just recently (April 19<sup>th</sup> 2024) RTE 1 show-cases Gortin Glen Forest Park during episode three of the RTE Tracks & Trails series.

Another recent BBC TV broadcast entitled 'Bara on the Foyle' featured the the Foyle River system from one of its sources in the Sperrins to where the river joins the Atlantic Ocean. The significance of archaeology was included in the Programme.

Tourism is a key economic driver in this area. This is quite apparent from the increased provision of overnight accommodation. The need for further accommodation is quite obvious judging by the fact that Times newspaper named the Sperrins as one of the UK's 'most underrated' beauty spots.

## **Crockanboy Hill Mass Rock**

Included within the site of the proposed gold mine is a Mass Rock. This is an important spiritual and sacred place which dates to a time in Ireland when Catholics were forbidden to attend Mass. At that time a practice emerged where the faithful gathered together in a remote area at a flat-topped rock which was used by a Priest as an altar to celebrate Mass. I was made aware

of the existence of this Mass Rock from the 1960s onwards ██████████ In conversation he often talked about the Mass Rock on Crockanboy Hill. An Irish News Report of October 21st, 2016 confirmed that locally the Mass Rock was a known location. The news item included a photograph of a number of named local residents gathered around the actual flat stone or altar where the Mass was celebrated. From that report it is quite evident that the actual location of this Mass Rock is identifiable to the present day.

## **Archaeology**

The rich natural unspoilt rugged hills, summits, valleys and streams provide the setting for varied examples of archaeological monuments. The proposed site within this upland landscape adjoins a region designated as an area Area of Significant Archaeological Interest (ASAI). This designation, the ASAI adjoins Crockanboy Hill in the Fermanagh and Omagh District Council area and stretches to the iconic Beaghmore Stone Circle complex in the neighbouring Mid Ulster District Council. The world-renowned Beaghmore Stone Circles is the best-known example of archaeological monuments which feature in this ASAI. However, this complex is only one element in a wide range of recorded archaeology

This landscape contains a great variety of monuments including the first field boundaries of the first farmers who tilled the soil through to the Court Tombs, Dolmens, Wedge Tomb, probable Passage Tomb, Stone Alignments, Cairns, Standing Stones, early dwelling sites, the Ogham Stone in Aughascribba, Dun Ruadh Henge in Crock and much more. This is one of the richest and most diverse archaeological regions within the Island of Ireland or anywhere throughout the British Isles.

The range of archaeological monuments includes more than 100 sites (some with multiple features) recorded to date by Historic Monuments Unit of the Northern Ireland Environment Agency. Many of these are scheduled for protection. Such is the significance of this archaeology that the Ulster Archaeology Society has visited the area for study days on numerous occasions. Their members regard this district as having a unique iconic archaeological landscape of world class.

This proliferation of major and important sites is way beyond the importance, age and variety of such as the Boyne Valley region. It is beyond comprehension that an application for a goldmine would ever have been considered. In fact, throughout this whole South Sperrins region there are indications that there are many more sites of undocumented archaeology concealed within the cover of active peat. These monuments were constructed by pre-historic man as far back as 7000 thousand years ago. This summit (Crockanboy Hill Crocknamoghill and Mullydoo) forms the immediate backdrop setting for this archaeological landscape.

The proposed 100 feet high Mine Waste Storage Facility just illustrates the ridiculous nature of this proposal. Firstly, adding 100 feet or 34 metres to this Sperrin Mountain summit would change the whole contour of the mountain. Visually it would have a negative impact on this historic landscape.

The industrial infrastructure would for example have a totally negative impact on the setting of the local pre-historic monument - Dun Ruadh. The cairn of Dun Ruadh on the nearby Crockyneill Hill is a site of immense archaeological importance. Around 1900 Professor Kuno Meyer (1858-1919), a German Scholar who at that time was a lecturer at the then New University College, Liverpool visited Dun Ruadh. He described it as being by far the most important archaeological monument in Europe, except for one in Bavaria. Dun Ruadh is sometimes translated as Royal Fort.

It is difficult to understand how such a proposal was ever considered to be suitable adjacent to this pre-historic, archaeological landscape. In essence this application is proposing to construct a massive industrial complex adjacent to the richest and most diverse archaeological region within the Island of Ireland or anywhere throughout the British Isles.

## **Conclusion**

The environmental and archaeological designations-, ASSI, the SAC, the Sperrin AONB and the ASAI provide a strong indication of the environmental and archaeological sensitivity of the proposed goldmine site. Such a development would negatively impact on this landscape character, tourism and residential amenity of this historic landscape.

The collective suite of applications associated with the proposal to construct a massive goldmine and processing plant on Crockanboy Hill, Crocknamoghill and Mullydoo are ridiculous considering the sensitive nature of the landscape.

In conclusion I am urging the Planning Appeals Commission to refuse to approve the suite of applications for a goldmine on Crockanboy Hill, Crocknamoghill and Mullydoo.

Yours sincerely

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