

Tara Spain  
Inland Fisheries Ireland  
IFI Macroom  
Sunnyside House  
Macroom  
Co. Cork

**Date:** 11th March 2022

**Re:** Wind farm development of 20 turbines with 110kV electrical substation and all related site works and ancillary development.

Townlands of Annagannihy, Aughinida, Ballynagree East, Ballynagree West, Bawnmore, Caherbaroul, Carrigagulla, Carrigduff, Clonavrick, Derryroe, Drishane More, Dromagh, Drominahilla, Dromskehy and other townlands, Co. Cork.

Dear Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Cork County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned officer of the Board.

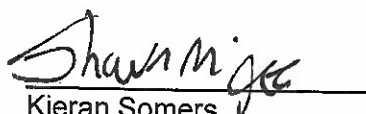
Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde  
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D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Kieran Somers  
Executive Officer  
Direct Line: 01-873 7250

PA09

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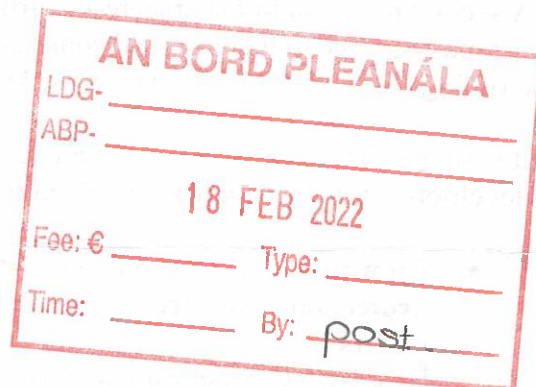
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Iascach Intíre Éireann  
Inland Fisheries Ireland

An Bord Pleanála  
64 Marlborough Street  
Dublin 1



11 February 2022

RE: Strategic Infrastructure Development, Case Number ABP- **PC04.306948**  
Ballinagree Wind DAC. The construction of up to 24 wind turbines, 110kV on  
site substation and connection to the national grid. Ballinagree, Co.Cork

A chara,

I refer to the above-mentioned application.

Inland Fisheries Ireland (IFI) is the state agency responsible for the conservation, protection, management, marketing, development and improvement of our inland fisheries and sea angling resources. While IFI recognises the strategic significance of the proposed development it is essential it is undertaken in a manner that does not result in negative impacts on fisheries or water quality.

The overall project is located within the greater Munster Blackwater and Sullane River basins, both significant salmonid fisheries. The Environmental Impact Assessment (EIA) Report submitted with the application recognises the sensitivity of both rivers. More specifically, it is recognised therein that the Nadanuller Beg Stream which ultimately drains into the Nad Stream is part of the Blackwater River (Cork/Waterford) SAC.

The proposed windfarm and associated works pose significant risk of negative impact on fisheries primarily during various elements of the construction phase including site clearance(felling), construction and upgrading of access roads and crossings and the installation of the grid cable.

IFI considers the dominant threat to fisheries should the development proceed is the potential for the escapement of suspended solids (or other polluting matter) to waters. Such escapement would impact both on general water quality and fisheries habitat.

IFI Macroom, Sunnyside House, Macroom, Co. Cork  
026-41221 [macroom@fisheries.ie](mailto:macroom@fisheries.ie) [www.fisheriesireland.ie](http://www.fisheriesireland.ie)

The Aquatic Ecological Assessment submitted with the EIA clearly details the intensive hydraulic network of salmonid bearing good and high status waters within the work zone and the hydraulic area to which it contributes. These waters must be protected to meet Water Framework Directive requirements. Strictly in terms of fisheries, any escapement of solids has the potential to have both short- and long-term effects due to the sedimentation of spawning gravels.

A secondary threat to fisheries results from the risk of impediment or prevention of fish passage due to the proposed construction of new or upgraded watercourse crossings to facilitate access to the works.

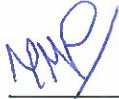
It is in the above context, that should permission be granted for the proposed development, IFI would ask that planning conditions ensure

- All works are carried out in accordance with the IFI **“Guidelines on protection of fisheries during construction works in and adjacent to waters”**.  
<https://www.fisheriesireland.ie/media/guidelines-on-protection-of-fisheries-during-construction-works-in-and-adjacent-to-waters>
- Contaminated (suspended solids, hydrocarbon, cement products etc) construction runoff must be collected and disposed of in a manner so that pollution of surface waters cannot occur.
- On commencement and for the duration of construction a daily ongoing inspection programme of surface waters in the vicinity of the site should be undertaken, with any escape of contaminants notified immediately to IFI.
- There is no physical interference with the bed or bank of any watercourse without prior consultation with IFI.
- All watercourse instream works should be carried out in the dry.
- Instream works are limited to the period July to September inclusive.
- Provision is made for the advance removal and relocation of fish stocks by means of electro-fishing as necessary when instream works occur.
- All new or upgraded watercourse crossings (bridges/culverts), in fish bearing waters, are constructed in a manner the permits the free passage of fish both at the construction phase and upon completion. The works upon completion should not, because of design or construction, represent an obstacle to fish passage. IFI should be notified on completion of works at each crossing point to ensure the works meet fishery requirements.
- In terms of grid connection ducting, unless shown to be unavoidable watercourse crossing should be carried out by non-invasive means such as spanning or directional drilling. Open trenching of watercourses must be a

measure of last resort. Where open trenching of watercourses occurs the bed and banks of the crossing point should be reinstated to pre-works condition.

Should you require any clarification please contact the undersigned.

Yours sincerely



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Michael McPartland  
Fisheries Environmental Officer.

