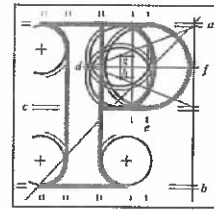


**Our Case Number: ABP-316178-23**



**An  
Bord  
Pleanála**

Inland Fisheries Ireland Ballina  
Aisling Donegan  
Ardnaree House  
Abbey Street  
Ballina  
Co. Mayo  
F26 K029

**Date:** 26 May 2023

**Re:** Proposed development of Oweninny Wind Farm Phase 3 consisting of 18 wind turbines.  
Within the townlands of Laghtanvack, Croaghaun (also known as Croaghaun West), Moneynieran,  
Corvoderry, Shanvolahan, Dooleg More, Shranakilly, Bellacorrick and Shanvodinnaun, Co. Mayo

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

Yours faithfully,

  
\_\_\_\_\_  
Sarah Caulfield  
Executive Officer  
Direct Line: 01-8737287

PA09

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
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An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01V902



Iascach Intíre Éireann  
Inland Fisheries Ireland

26<sup>th</sup> May 2023

316178-23

**Re: Section 37E Planning Application to An Board Pleanála for the Oweninny Wind Farm Phase 3, Bellacorick, Co. Mayo – 10889-04-04**

Dear Sir/Madam,

Inland Fisheries Ireland (IFI) is the state body responsible for the protection, management and conservation of the inland fisheries and sea angling resource in Ireland. Protection of the aquatic environment and habitat is a vitally important element of IFI's work.

The proposed site spans the Muing River, Oweninny River, Cloonaghmore River and Deel River catchments. The Oweninny River provides valuable salmon and trout spawning and nursery habitat for the Owenmore River fishery with crayfish and lamprey also found in this catchment. The Muing River also flows into the Owenmore River and provides nursery habitat for these species. The Owenmore River is a valuable salmon and sea trout fishery attracting recreational anglers to the area and supporting commercial salmon harvesting in the Owenmore Estuary. IFI have installed a fish counter on the Owenmore River at Bangor Erris to support sustainable fisheries management. IFI have also invested in habitat monitoring and restoration projects in the catchment. Fish stock monitoring has shown this catchment is under environmental pressure with salmon stocks declining to below their conservation limit; the number of adult salmon returning to the river to spawn, required for a sustainable fishery. As a result, the fishery was closed to exploitation for commercial and recreational angling for a period of two years. Salmon stocks recovered sufficiently to allow the fishery to reopen in 2021. It is imperative that no activity or development is permitted in this catchment that may negatively impact on the Owenmore River system, aquatic habitat or water quality. The Oweninny River has been allocated high ecological status in the River Basin Management Plan and this status requires robust protection. The Muing River has been allocated good ecological status and requires protection to maintain this status.

The Cloonaghmore River provides important salmon and trout spawning and nursery habitat with eel and minnow also found in the catchment. This catchment is under environmental pressure and salmon stock have declined below their conservation limit. As a result of this decline the fishery is open for catch and release angling only. This measure is in place to support the recovery of the salmon stocks in the Cloonaghmore River system. This catchment has been allocated good ecological status in the River Basin Management Plan and this status must be protected.

The eastern section of the site is within the catchment of two tributaries of the Deel River the Fiddaunagosty River and the Shanvolahan River. Both of these rivers provide habitat suitable for salmonids and are under environmental pressure. The Deel River is an important salmon and trout spawning and nursery habitat for the Lough Conn and River Moy fisheries and supports a population of freshwater pearl mussel (*Margaritifera margaritifera*), downstream of this site. The Fiddaunagosty River and the Shanvolahan River have been allocated moderate ecological status in the River Basin management Plan and this status must be improved to good comply with the Water Framework Directive. These catchments have been identified as being at risk of not achieving this objective due to pressures from the impacts from extractive sites, such as peat harvesting, include sediment/siltation pollution and alteration to the physical environment, hydromorphology and forestry activity. No activity is to be carried out in these catchments which may prevent or delay the achievement of good ecological status.



**Iascach Intíre Éireann**  
**Inland Fisheries Ireland**

Having reviewed the proposed application and accompanying documents, IFI request the following to be dealt with through further information or conditions of planning:

- 1 IFI recommend an Environmental Monitoring Committee (EMC) including representatives of IFI, Mayo County Council and other relevant organisations or groups be put in place for the construction phase of this development.
- 2 IFI request that two additional surface water monitoring points be included, one upstream of the development, as a control site, and one downstream of T18. The finalised locations for surface water monitoring are to be agreed with IFI prior to works commencing on site. Daily monitoring checks must include a photo of the monitoring site. Continuous monitoring turbidity metres may be required downstream of active area of the construction site with a telemetry facility in place to notify the contractor of exceedances.
- 3 It is proposed that extraction from borrow pits will be from above and below the water table. IFI request there is no extraction from the borrow pit below the water table to reduce the volume of water required to be treated for silt and the potential for siltation of waters downstream.
- 4 The EIAR Section 3.6.2.5 Culverts states the Indicative locations of the culverts are shown on Planning Drawing 10889-2037. this drawing does not give location but the design of the culverts. IFI request a copy of the location map for the proposed culverts and a table showing each location and proposed design type. All culvert designs must be agreed with IFI before commencement of construction on the site. Following agreement on a crossing design, a method statement with relevant environmental mitigation and control measures should be forwarded to IFI (with minimum 4 weeks prior to commencing) with IFI's agreement required on the method statement before works commence.
- 5 There must be no discharge of silted waters, cement products, hydrocarbons or otherwise polluted waters into any surface watercourse as a result of the proposed works. The IFI Guidelines on Protection of Fisheries During Construction in and Adjacent to Waters, 2016 must be complied with as stated in the EIAR.
- 6 The on-site vehicle wash must use a closed loop system with no discharge of silted waters to surface waters.
- 7 A water source for dust suppression activities must be identified and agreed with IFI.
- 8 All drainage from the borrow pit and the peat and spoil placement areas must be treated to prevent siltation of surface waters. The material encountered in the trial pits excavated at each turbine location was soft sandy peat and silt. Deposition areas surface waters and drainage must be treated with adequately sized silt traps to ensure retention time required to allow for settlement of all materials present.
- 9 Method Statement for all works which may impact on surface waters must be provided to IFI a minimum of two weeks prior to works commencing. Any in-stream works, grid connection cable water crossings, or any other works that may give rise to high suspended solids in close proximity to these watercourses or may impact on the Oweninny River, Cloonaghmore River, Deel River or their tributaries will be subject to the closed season (i.e. they cannot take place from 1st October to 30th June). It is important that appropriate scheduling of works is allowed for.



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- 10 Training must be provided to all contractors and machinery operators on water quality protection and monitoring.
- 11 Details of explosives proposed for use in the borrow pits and their management should be provided.
- 12 Adequate drainage and surface water management must be put in place to ensure that there is no siltation of surface waters as a result of soil erosion this must be carried out for temporary roads and access tracks as well as permanent roads.
- 13 Road construction and surfacing materials used must be of adequate strength so as not to give rise to silt/fine solids discharges due to the action of traffic and erosion. The use of sedimentary rocks, such as shale, in road construction should be avoided. This type of material has poor tensile strength and is liable to be crushed by heavy vehicles thereby releasing fine sediment materials into the drainage system which are difficult to precipitate and may give rise to water pollution.
- 14 A letter must be received from Uisce Éireann to confirm acceptance of site wastewater and adequate capacity is available to treat this waste.
- 15 Amenity signage could be provided with information of local biodiversity including the aquatic environment.
- 16 Areas of wetland /bog holes and ponds must be avoided during construction, where possible.

IFI requests an acknowledgement from An Bord Pleanála of receipt of this submission.

Yours sincerely

Aisling Donegan  
Senior Fisheries Environmental Officer

abp-owf3-0523



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**Inland Fisheries Ireland**