



**Iascach Intíre Éireann
Inland Fisheries Ireland**

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

20th November 2025

Re: Strategic Infrastructure Development (SID) Planning Application for the development of a Wind Farm consisting of 9 no. turbines (and all associated works) in the townlands of Cloondahamper (Blake), Cloonascragh, Elmhill, Cooloo, Lecarrow, Dangan Eighter, Lissavally and Slievegorm, Co. Galway - Neoen Renewables Ireland Ltd.

Dear Secretary

I refer to the above referenced planning application submitted by MKO Consultants on behalf of their client, Neoen Renewables Limited, for a proposed wind farm development (9 no. wind turbines) which is being made directly to An Coimisiún Pleanála in accordance with section 37E of the Planning and Development Act 2000 (as amended).

Inland Fisheries Ireland (IFI) is the statutory body with responsibility under the provisions of the Fisheries Acts for the management, conservation and protection of Ireland's fishery resource. This includes the protection of both the instream and riparian habitat and the water quality of the watercourses across the proposed site and their associated catchments.

The proposed development site is located within both the Grange and Abbert River sub catchments, which form part of the Clare River catchment and ultimately Lough Corrib Special Area of Conservation (SAC), supporting Atlantic salmon, brown trout and lamprey populations.

The EU Water Framework Directive (WFD) (2000/60/EC) which entered into force in December 2000 requires the protection of the ecological status of river catchments – this encompasses water quality and requires the conservation of habitats for ecological communities. One of the primary objectives of the Directive is to establish a framework which prevents further deterioration and protects and enhances the status of aquatic ecosystems. Protection of aquatic ecosystems requires that river systems be protected on a catchment basis. Protection of the aquatic environment/habitat not only requires the protection of water quality but also necessitates the protection and maintenance of physical habitat and hydrological processes/regimes.

Wild brown trout and salmon ascend the tributaries of these catchments annually to spawn and utilise as nursery habitat. Prime water quality and instream habitat is key to salmonids completing this stage of their lifecycle.



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Grange River

The Grange River has been classified as being of good ecological status (Water Framework reference; Grange (Galway)_010), falling to a moderate ecological status downstream of the site (Water Framework reference; Grange (Galway)_020), a status that needs to be improved.

Abbert River

The Abbert River has been classified as being of good ecological status (Water Framework reference; Abbert_030).

Fisheries River Enhancement Works

Significant fisheries enhancement works have been completed in recent years on both of these rivers to improve the available habitat primarily for salmon and sea trout at all life stages, but also for lamprey and other freshwater species. These projects fundamentally aimed to enhance the quality of the local habitat within the Clare River catchment to achieve the conservations objectives for the Lough Corrib Special Area of Conservation.

In the case of the Grange River, works included the installation of bankside protection, berm management, pools with boulders, stone deflectors and thalwegs, as well as gravel and boulder introduction. Fencing and a cattle drinker were also be put in place as part of these works. The installation of these features aims to provide deep pools for adult and juvenile salmonids to take cover from predation and drought events, whilst a clean gravel bed will provide substrate for adult salmonid and lamprey spawning.

Similar works were undertaken with Cairde an Chláir on the Abbert River in 2020. This project included over 900m of river habitat enhancement, 520m protective fencing and the installation of a solar powered drinking water pump to reduce livestock damage to the river.

Please find below IFIs observations and recommendations in relation to the proposed planning application.

1. All watercourses that will receive drainage from the construction sites of the turbines or the access roads must be assessed before and after the construction phase (should the project be permitted) in terms of aquatic biodiversity with particular emphasis on fish, fish spawning grounds and fish habitat in general.
2. Particular attention should be paid to the hydrology within the site where excavations including excavations for road construction are being undertaken. It is important that natural flow paths are not interrupted or diverted in such a manner as to give rise to erosion or instability of soils caused by an alteration in water movement either above or below ground.
3. Attention should be paid to drainage during both the construction phase and the operational phase. This includes waters being pumped from foundations or other



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excavations. IFI notes that the application proposes incorporating a setback distance of greater than 50 meters from sensitive hydrological features and a 30-meter buffer to all potential karst features/enclosed depressions within the site. Double silt fences are also proposed to be placed within drains down-gradient of all construction areas inside the 50m hydrological buffer zones.

4. It is particularly important during the construction phase that there is sufficient retention time within onsite settlement ponds to ensure no deleterious matter is discharged to any waters. We strongly recommend that settlement ponds are maintained, where appropriate, during the operational phase to allow for the adequate settlement of suspended solids and sediments and prevent any deleterious matter from discharging into any natural waters. In constructing and designing silt traps particular attention should be paid to rainfall levels and intensity. The silt traps should be designed to minimise the movement of silt especially during intense precipitation events where the trap may become hydraulically overloaded. It is essential that they are located with good access to facilitate monitoring sampling and maintenance. A license to discharge to waters may be required from the local authority.
5. The construction of roads will tend to provide preferential flow paths for surface waters. Considerable attention to detail must be provided in relation to the interception of surface water flows. Our concerns in relation to deleterious matter have been referred to above, but IFI also have concerns in relation to the flow patterns and to ensuring that normal flows are maintained both during and after construction. Situations can arise where water transportation is significantly increased in certain watercourses thereby putting additional pressures on watercourses and interfering with the sustained flow of water particularly during dry weather. This should be avoided.
6. Serious consideration must be given to the disposal of all waste materials generated onsite such that they will not give rise to any risk. Furthermore, drainage from disturbed and stockpiled soils will have to be considered in advance. It may be essential to carry out soil stockpiling operations in confined areas only and to ensure vegetation of the soils with suitable plants which will promote stability. Consideration must be given to runoff/leachate from any stockpiles.
7. Details in relation to site offices and the services necessary for the site offices should be considered. In addition, details relating to operations during the construction phase to contain pollutants should also be reviewed. It should be noted that cement leachate, hydrocarbon oils and other toxic poisonous materials will require full containment and should not be permitted to discharge to any waters. Please note that physical pollution of watercourses in terms of dumping of unsuitable gravel material or other construction debris in or stockpiling such materials near watercourses is not acceptable as this will interfere with the aquatic habitat.
8. 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



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thereby releasing fine sediment materials into the drainage system which are difficult to precipitate and may give rise to water pollution. We recommend that specialist expertise should advise on the type of material required for road construction bearing in mind the pressures that will arise during the construction phase and the necessity to avoid pollution due to fines washing out into the roadside drainage.

9. IFI notes that approximately 0.7ha of conifer trees are to be felled within the proposed location for turbine number 9. This part of the site is located within the Grange River catchment. IFI's primary concern relating to forestry harvesting activities is the possibility of suspended solids/nutrients entering local watercourses, posing a significant environmental threat to salmonid spawning gravels and also water quality. Poor water quality will impact upon fish, benthic invertebrates, and aquatic flora and these are the primary biological elements used in the classification of waters in the context of the WFD. Should a felling licence be granted for the activity, it is crucial that the Forestry and Water Quality Guidelines and the Code of Best Forest Practice are strictly adhered to.

IFI would request that no felling activity whatsoever should be carried out when soils are saturated or during/prior to forecasted periods of heavy rainfall for the area.

10. In relation to the proposed watercourse crossings along the proposed access roads and grid connection underground cabling route, please be advised that IFI will require to be consulted well in advance in relation to all crossings of any watercourse or the use of any temporary diversions. It is noted that the application proposes utilising horizontal directional drilling (HDD) where cable crossing cannot be placed in the deck of existing bridges/culverts, thereby negating the need for instream works. We strongly recommend that these crossings should be kept to a minimum.
11. IFI also require that any instream structures or bridge crossings are approved by IFI. It is noted that 5 new watercourse crossings are proposed using clear span structures. Clear span bridges are the preferred option for all crossings especially in upland areas.
12. Chapter 9-86 of the EIAR, Page 13 of Appendix 4-5, the Construction and Environmental Management Plan and Section 18-82 and 18-83 of the Schedule of Mitigation and Monitoring Measures state, "near stream construction work, will only be carried out during the period permitted by Inland Fisheries Ireland for in-stream works according to the Eastern Regional Fisheries Board (2004) guidance document "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites", i.e., May to September inclusive".

All of these application documents should have referenced the 2016 Inland Fisheries Ireland publication, '*Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites*', which should be consulted and all relevant provisions and guidance observed. <https://www.fisheriesireland.ie/documents/624-guidelines-on-protection-of-fisheries-during-construction-works-in-and-adjacent-to-waters/file.html>. All instream works or other works which may impact directly on a watercourse should only be



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carried out during the open season which is from 1st July to 30th of September, unless alternative times are specifically agreed with IFI. This restriction is in place to avoid impacting on aquatic habitat during the fish spawning season and should be included in the contract for construction.

IFIs primary concern is to protect the aquatic species and habitat, including water quality and the related riparian zone. At all times the precautionary principle should be applied throughout for the entire development. Particular attention should be paid to the various environmental directives including the Water Framework Directive. The Fisheries Acts in particular and the Local Government (Water Pollution) Acts and all other environmental legislation should be considered as appropriate.

I would appreciate if An Coimisiún Pleanála could acknowledge receipt of this submission.

Yours sincerely

David Harrington
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IFI Galway
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