
Submission for Lemanaghan Wind Farm Co Offlay

From Kenneth Reid <Kenneth.Reid@fisheriesireland.ie>

Date Fri 5/22/2026 3:00 PM

To SIDS <sids@pleanala.ie>

1 attachment (71 KB)

Lemanaghan Wind Farm .docx;

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Hi,

Please find attached Inland Fisheries Ireland's submission to An Coimisiún Pleanála in relation to the above proposed development

Kind Regards,

Kenneth Reid

Kenneth Reid
Fisheries Environment Officer

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An Coimisiun Pleanála
64 Marlborough Street
Dublin 1
D01V902

Date: 22 May 2026

Re: Proposed wind farm development comprising 15 no. wind turbines, a permanent 220kV on-site substation, and associated infrastructure and works, located in the Lemanaghan Bog area of County Offaly, within the townlands between Ferbane, Ballycumber and Ballinahown, Co. Offaly.

To whom it may concern,

Inland Fisheries Ireland (IFI), established under the Inland Fisheries Act 2010, has statutory responsibility for the protection, management and conservation of inland fisheries and associated aquatic habitats. IFI has reviewed the documentation submitted for the proposed development, including the Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), Aquatic and Fisheries Assessment, Surface Water Management Plan and associated technical appendices.

The proposed development site lies within the River Brosna catchment and has hydrological connectivity to the wider River Shannon system, including downstream designated European sites such as the River Shannon Callows SAC (000216) and Middle Shannon Callows SPA (004096).

The aquatic surveys carried out as part of the EIAR identified several watercourses within the Brosna_SC_060 and Shannon [Lower]_SC_010 sub-catchments, including the Ballynahown River, Lemanaghan Stream, Fortified House Castlearmstrong Stream, Kilcolgan Beg Stream, Ferbane Stream and the River Brosna. The submitted assessments indicate that these rivers and streams support fisheries habitats. Surveys undertaken included fisheries assessments, electrofishing surveys, macroinvertebrate sampling, white-clawed crayfish assessment and water quality monitoring.

The EU Water Framework Directive (2000/60/EC) requires the protection of the ecological status of river catchments and the conservation of habitats supporting aquatic 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 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.

IFI notes that a number of receiving waters within the wider catchment are currently classified as moderate or poor ecological status waters under the Water Framework Directive and may therefore be particularly vulnerable to additional sedimentation, hydrological alteration and any pollutant loading associated with the proposed development.

Given the scale of the proposed development, the peatland characteristics of the site, the extent of excavation and drainage works proposed and the direct hydrological connectivity to downstream fisheries waters, IFI considers that there is significant potential for adverse impacts on the aquatic environment unless robust mitigation and monitoring measures are implemented throughout all stages of the development.

In respect of this application, IFI wishes to make the following observations:

1. All mitigation measures identified within the Natura Impact Statement, EIAR and Construction Environmental Management Plan shall be implemented in full throughout the construction, operational and decommissioning phases of the development.
2. Inland Fisheries Ireland shall be consulted at detailed design stage regarding all proposed watercourse crossings and any modifications to existing crossings. All proposed crossings shall be designed in accordance with IFI's Guidelines on Protection of Fisheries during Construction Works in and adjacent to Waters (2016). Pipe culverts are generally not considered acceptable on fish bearing streams unless agreed beforehand with IFI.

3. Detailed method statements shall be submitted to IFI for review in relation to all proposed instream works, watercourse crossings and culvert installations. Method statements shall be submitted a minimum of ten working days in advance of works commencing and shall include details of construction methodology, timing, duration and proposed mitigation measures.
4. No instream works shall commence without written agreement from Inland Fisheries Ireland. Should instream works be required, such works shall only take place between 1 July and 30 September and during periods of low flow unless otherwise agreed with IFI. Where dewatering is required, electrofishing surveys shall be completed in advance under the appropriate statutory authorisation.
5. Proposed clear-span crossings shall minimise disturbance to instream hydrology, channel morphology and riparian habitat. Crossing structures shall be designed to ensure surface runoff is directed away from receiving waters and appropriate side protection measures shall be incorporated to prevent accidental discharge of material into watercourses.
6. The construction of 17.1km of new internal roads, temporary access tracks and associated drainage infrastructure may create flow paths for surface waters and therefore considerable attention should be paid to the interception and management of runoff throughout the site. Particular attention should be paid to peat stability and the prevention of peat runoff entering receiving waters during all phases of the development.
7. Construction materials, spoil, fuels and associated substances shall be stored and managed in a manner that prevents the entry of deleterious material into any surface water drainage network. Water abstraction from watercourses within or adjoining the site shall not take place unless otherwise agreed with IFI.

8. Aquatic buffer zones shall be established and clearly demarcated in advance of construction works. Existing riparian vegetation shall be retained and protected throughout the development and construction machinery shall not enter aquatic buffer zones except where necessary for approved crossing works.
9. Borrow pits, spoil deposition areas, stockpiles and settlement ponds shall not be located within aquatic buffer zones and such buffer zones shall remain in place for the duration of the construction phase.
10. The removal of woodland and vegetation associated with the development has the potential to increase runoff, sediment and hydrological instability within the catchment. Any clearance or felling operations should avoid periods of prolonged rainfall or saturated ground conditions in order to minimise sediment transport to receiving waters.
11. Hardstanding areas associated with wind turbines and secondary infrastructure shall be located a minimum of 50 metres from aquatic zones where feasible. Electrical substations and temporary construction compounds shall be located outside flood risk areas and an appropriate distance from watercourses.
12. Road drainage design shall ensure runoff is directed away from receiving waters and shall not increase erosion and pollution risk. Imported stone and construction materials shall be clean and shall not contribute fine sediment to watercourses. Surface water drainage systems, including roadside drains and silt traps, shall be designed to reduce flows and minimise erosion potential.
13. Settlement ponds shall provide adequate retention time for settlement of suspended solids prior to discharge. Monitoring of water quality and mitigation measures shall be undertaken throughout construction works and records maintained for inspection by relevant statutory authorities. Where monitoring identifies exceedances of trigger thresholds, additional mitigation and increased monitoring frequency shall be implemented immediately.

14. Surface water monitoring locations shall include watercourses directly hydrologically connected to the development footprint. An appropriately qualified Ecological Clerk of Works with fisheries and aquatic ecology experience shall be appointed for the duration of the development works.
15. Given that parts of the proposed development area include agricultural grasslands and with relatively more stable soil type, it is submitted that temporary compounds, material storage areas, laydown areas and associated construction infrastructure should, where possible be located within these more stable ground conditions rather than within deeper peat areas that are more susceptible to runoff and may contribute to sediment release, water pollution and downstream hydrological impacts.
16. Refuelling of machinery shall not occur within 50 metres of any watercourse, drain or aquatic receptor unless otherwise agreed with IFI. Spill response equipment shall be always kept on site, and all personnel shall be trained in emergency spill response procedures. Inland Fisheries Ireland shall be notified immediately in the event of any discharge, pollution incident or other occurrence with the potential to impact receiving waters or fisheries habitat.

All works should be carried out as per Guidelines:

IFIs guideline documents on the protection of fisheries during construction work in and around waters.

[Guidelines on protection of fisheries during construction works in and adjacent to waters | Inland Fisheries Ireland](#)

Yours sincerely,

Kenneth Reid

Fisheries Environmental Officer

Inland Fisheries Ireland- Limerick