

**From:** [Kenneth Reid](#)  
**To:** [SIDS](#)  
**Subject:** An Coimisiún Pleanála - Case reference: PAX92.324279 Ballincor Wind Farm  
**Date:** Tuesday 30 June 2026 09:06:26  
**Attachments:** [email\\_852418dc-7261-46bd-8cad-0f5cfb922b46.png](#)  
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[IFI submission Ballincor Wind Farm .pdf](#)

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Dear SIDS office,

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

Kind Regards,

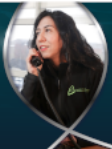
Kenneth Reid

**Kenneth Reid**  
**Fisheries Environment Officer**

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



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**0818 34 74 24**  
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An Coimisiún Pleanála  
64 Marlborough Street,  
Dublin 1  
D01V902

**Date: 30/06/2026**

**Re: Ballincor Wind Farm – Strategic Infrastructure Development (SID) application under S.37E of the Planning and Development Act 2000, as amended, in relation to a proposed wind farm and related works across Co. Offaly and Co. Tipperary**

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 in respect of the proposed Ballincor Wind Farm development, including the Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), Hydrology and Hydrogeology assessments, Aquatic Ecology assessments and associated appendices.

The proposed development includes substantial construction activity within the wider River Brosna catchment, including extensive drainage infrastructure, forestry clearance, internal access roads, turbine hardstands, watercourse crossings and associated Grid Connection Route (GCR) infrastructure. The proposed GCR includes a total of three EPA mapped watercourse crossings and four drainage ditch channel crossings, together with numerous minor forestry, field and roadside drains.

The Little Brosna\_SC\_010 catchment, including the Little Brosna\_040 waterbody, Wingfield Stream, Holy Well Clohaskin River, Pallas Stream, Kyleneamuck Stream and associated tributaries and drainage channels within the Little Brosna\_SC\_010 waterbody catchment, currently support waters of high ecological and fisheries value. Sections of the Little Brosna River system currently maintain very good water quality status under the Water Framework Directive monitoring programme. The protection of these waters is of critical importance and every effort must be made to ensure that construction activities associated with the

proposed development do not contribute to any deterioration in ecological status, sediment loading, hydrological instability or fisheries habitat degradation.

IFI notes that the proposed development will involve significant excavation, drainage and ground disturbance works within peatland and commercial conifer plantation areas. The clearance of conifer forestry and associated ground preparation has the potential to mobilise fine sediments and increase surface water runoff to receiving waters if not carefully managed. Such activities can result in siltation of spawning gravels, degradation of aquatic habitat, increased turbidity and impacts on macroinvertebrates and fish populations downstream.

The EIAR identifies the loss and alteration of a number of habitat types associated with the proposed development footprint, including commercial conifer plantation, drainage ditches, wet modified bog, heath habitat, scrub vegetation and riparian habitat associated with existing drainage networks and watercourses. IFI considers that the cumulative impact of habitat disturbance, drainage alteration and increased runoff pathways requires particularly robust mitigation and monitoring measures throughout all phases of the development.

IFI further notes that the development includes several proposed watercourse crossing structures, including open-span bridge crossings, culvert crossings and one Horizontal Directional Drill (HDD) crossing beneath the Little Brosna\_040. While HDD methodologies can reduce direct instream disturbance, they nevertheless pose a risk of drilling fluid release, sediment losses and hydrological disturbance if not appropriately designed, monitored and supervised. Clear span bridge crossings must also be designed and constructed in a manner that avoids alteration of natural channel morphology, bank instability and sediment input to receiving waters.

In response to the above application, IFI has the following comments to make:

1. All mitigation measures identified within the EIAR, NIS, Construction Environmental Management Plan and associated technical documentation shall be implemented in full throughout the construction, operational and decommissioning phases of the development.
2. All watercourse crossings, drainage crossings and associated instream works shall be designed and constructed in accordance with Inland Fisheries Ireland's *Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters* (2016).

3. Particular attention shall be paid to the protection of the Little Brosna\_040 river and the associated watercourses during all phases of construction. No deterioration in water quality or ecological status shall occur as a consequence of the proposed development.
4. The proposed forestry clearance and associated excavation works shall be undertaken in a phased and controlled manner to minimise sediment loss and runoff to receiving waters. Forestry felling and ground disturbance activities should avoid periods of prolonged rainfall and saturated ground conditions.
5. Appropriate buffer zones shall be established and maintained adjacent to all watercourses, drains and aquatic receptors. Existing riparian vegetation shall be retained wherever feasible to protect bank stability and reduce sediment transport pathways.
6. Clear span bridge crossings shall be designed to avoid impacts on natural channel morphology, hydrological connectivity and fisheries habitat where they shall have edge protection to prevent loss of silt from the bridge to waters below. Construction methodologies shall ensure that no material enters receiving waters during installation works.
7. Detailed method statements in relation to instream works, bridge construction and HDD crossings should be made available to IFI for review in advance of commencement of these works.
8. The EIAR and aquatic ecology documents acknowledge the presence of modified drainage channels, forestry drains and watercourses that are not identified on EPA mapping datasets. These drainage features remain hydrologically connected to downstream receiving waters within the wider Little Brosna\_SC\_020 catchment and therefore maintain the potential to transport sediment and pollutants to fisheries-sensitive waters. IFI considers that all modified drainage channels and unmapped watercourses should be subject to the same environmental protection measures, mitigation requirements, and regulatory controls as mapped watercourses throughout all phases of the proposed development.

9. Surface water management infrastructure, including settlement ponds, silt traps and drainage controls, shall be installed in advance of major earthworks and maintained for the duration of the construction phase. Monitoring shall be undertaken throughout construction works to ensure mitigation measures remain effective.
10. An appropriately qualified Ecological Clerk of Works with fisheries and aquatic ecology experience shall be appointed for the duration of the development works to oversee compliance with all aquatic mitigation measures.
11. IFI shall be consulted at detailed design stage regarding all proposed watercourse crossings, drainage infrastructure and any modifications to existing aquatic features.
12. Concrete washout shall only be undertaken within designated washout areas located at least 50 m from the nearest watercourse. Washout areas shall be located and managed so that there is no discharge to surface waters or watercourse. All waste concrete and washout materials shall be collected and removed off-site for disposal at an appropriately authorised facility.
13. The Surface Water Monitoring Programme detailed in Appendix 9-4 should be fully implemented throughout the construction phase. All monitoring records, inspection reports and details of any corrective measures undertaken should be retained and made readily available to regulatory authorities upon request.
14. The protection of the ecological integrity and fisheries value of the Little Brosna catchment must remain a key consideration throughout the assessment and determination of this application. Given the scale of the proposed drainage, excavation and forestry clearance works, IFI considers that robust mitigation, monitoring and environmental supervision measures are essential in order to prevent adverse impacts on aquatic habitats and downstream fisheries resources.

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

