



Rossinver Fishery

Paul Bradley

Secretary Rossinver Fishery

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An Bord Pleanála

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Dear Sir,

RE: ROSSINVER FISHERY OBJECTION TO THE PROPOSED LISSINAGROAGH WIND FARM CASE PA12.324290

Overview

As Secretary, I am writing to you on behalf of the Shareholders of the Rossinver Fishery.

Rossinver Fishery, which owns the fishing rights on approximately one third of Lough Melvin, is located within 6 km of the proposed Lissinagroagh Wind Farm. Lough Melvin is internationally recognised in scientific literature as one of the finest remaining examples of a post-glacial salmonid community. ¹

Moreover, Lough Melvin has been celebrated in Irish angling literature for more than a century and a half, with anglers still travelling from all over the world to experience this exceptional lough. Visiting anglers are a significant driver of economic activity in the area, which suffers the continuing legacy of the conflict, ongoing rural depopulation and is geographically isolated from the centres of power in both jurisdictions.

Lough Melvin is a highly designated cross-border site reflecting the importance of the salmonid assemblage: Lough Mevin Special area of Conservation (SAC) RoI/NI and Area of Special Scientific Interest (ASSI) in NI. ²

¹ Lough Mevin Catchment Management Plan, June 2008.

www.fisheriesireland.ie/sites/default/files/migrated/docman/2%20The%20Lough%20Melvin%20CMP%20Executive%20Summary.pdf

² Lough Melvin SAC <https://www.daera-ni.gov.uk/publications/lough-melvin-sac> & <https://www.npws.ie/protected-sites/sac/000428>

Also Lough Melvin ASSI <https://www.daera-ni.gov.uk/protected-areas/lough-melvin-assi>



The SAC designation explicitly states, “the main interest of the site is the unique fish community which the lake supports. Lough Melvin is an excellent example of a natural, post-glacial salmonid lake. A relict population of the Arctic Char (*Salvelinus alpinus*), which constitutes an arctic alpine element of the Irish fauna, occur there, as does the Atlantic Salmon (*Salmo salar*). Both of these species are listed in the Irish Red Data Book, and Salmon is listed on Annex II of the E.U. Habitats Directive.

Lough Melvin has three races of Brown Trout (*Salmo trutta*) - Ferox, Sonaghen and Gillaroo - which have distinctive characteristics and separate spawning grounds. The lake’s inflowing and outflowing streams which are used for spawning by these Brown Trout races are included in the site.”³

Pioneering genetic profiling work led by Professor Andrew Ferguson at Queens University Belfast (QUB) identified that Ferox, Sonaghen and Gillaroo are genetically distinct and likely should be classified as full species.^{4,5}

Regardless of taxonomic classification, sonaghen are endemic to Lough Melvin (no other populations occur anywhere else in the world) and their conservation is of the utmost importance (alongside the other salmonid species in the catchment). It is also worth noting that the Arctic Char in Lough Melvin are also endemic to the catchment - there are no other known populations of these fish.

Of particular relevance to the proposed development of Lissinagroagh Wind Farm is the potential impact on salmonid habitat, especially sonaghen spawning and nursery areas in the Ballagh River and County River (both part of the cross- border SAC)

Recent research by Inland Fisheries Ireland (the statutory agency for salmonid conservation in Ireland) and QUB highlighted that the Ballagh River contributed approximately 24% of all sonaghen samples genetically analysed in the past two decades.⁶ Any negative impacts on the Ballagh/ County Rivers (primarily in terms of water quality) arising from the construction, operation and decommissioning of the proposed wind farm could have severe consequences for the unique sonaghen populations of these rivers and wider lough.

Rossinver Fishery summarises its position on the proposed Lissinagroagh Wind Farm as follows:

³ Lough Melvin SAC, Site Synopsis <https://www.npws.ie/protected-sites/sac/000428>

⁴ Origins and differentiation of three sympatric species of trout in Lough Melvin. Ferguson, A. 1988. https://www.researchgate.net/publication/260088216_Origins_and_differentiation_of_three_sympatric_species_of_trout_in_Lough_Melvin

⁵ Identifying and conserving sympatric diversity in trout of the genus *Salmo*, with particular reference to Lough Melvin, Ireland. Ferguson, A. & Prodohl, P. 2022.

⁶ Bradley¹, C.; Delanty², Hynes, R. and Prodöhl¹, P. A. (2025). Population Structure and Genetic Stock Identification of the Lough Melvin trout. Inland Fisheries Ireland, 3044 Lake Drive, Citywest Business Campus, Dublin 24, Ireland. www.fisheriesireland.ie/sites/default/files/2025-05/population-structure-and-genetic-stock-identification-of-the-lough-melvin-trout-2025.pdf



1. Protection of the unique salmonid populations of the Melvin catchment.

It is critical that the importance of the unique trout, Arctic char and Atlantic salmon populations in the Melvin catchment are fully considered in relation to any proposed wind farm development. The precarious local, national and international status of these species means their conservation should be treated as a matter of the utmost importance.

2. Risks associated with any development of the proposed Lissinagroagh Wind Farm

Recent wind farm developments in Ireland and further afield have caused severe damage to freshwater aquatic and terrestrial habitats. In a number of cases, problems have arisen from poor site selection and screening, inadequate management, and failure to prevent fine sediment escaping from sites during both construction and operation.

This has led to degradation of water quality and the substrate habitat required to support healthy fish and invertebrate populations, with catastrophic impacts in some cases. Examples include Derrybrien Wind Farm in Co. Galway, Tullynamoyle Wind Farm in Co. Leitrim, Meenbog Wind Farm in Co. Donegal, and Viking Wind Farm in Shetland, where bog slides and fine sediment runoff into nearby watercourses were recurring concerns.

Escape of sediment associated with any wind farm activities is the primary concern of Rossinver Fishery and the potentially severe consequences on salmonid populations. It has not been demonstrated that the risk of diffuse (ongoing) sediment pollution into watercourses and/ or catastrophic acute pollution (bog burst) can be discounted nor mitigated against at this site.

3. Rossinver Fishery's overall objection to the proposal

We recognise the need to develop sustainable sources of energy. However, one aspect of the environment must not be sacrificed for another. Renewable energy can only be considered genuinely green if it is delivered without unacceptable environmental detriment. For these reasons, the proposed development raises serious concerns, particularly where it is located close to Ballagh & County Rivers, and the wider Melvin catchment

We urge that the proposed wind farm is rejected in this current form. If, despite this objection (and those of many others from the local area), the development does proceed, it is critical that it is subject to rigorous screening, robust oversight and strict management measures (properly sited and maintained silt traps etc. for the lifetime of the development) to ensure there are no deleterious impacts on the Melvin catchment and its biodiversity.

Sincerely,

Paul Bradley, Secretary

On behalf of Rossinver Fishery



**Rossínver
Fishery**
