



Iascach Intíre Éireann
Inland Fisheries Ireland

Strategic Infrastructure Development Applications,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

Issued via email to sids@pleanala.ie

20th August 2026

RE: Planning Reference: ACP-324290-26 (10 year planning permission for Lissinagroagh Wind Farm consisting of 14 no. wind turbines and all associated infrastructure located in the townlands of Boleyboy, Cashelaveela, Cherrybrook, Killea, Coolodonnell, Faughary, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle and Tullyskeherny, County Leitrim)

Dear Sir/Madam,

Inland Fisheries Ireland (IFI) is a statutory body established on the 1st of July 2010. Under Section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) the principal function of IFI is the protection, management, and conservation of the inland fisheries resource.

On review of the planning application, the following observations are of relevance in relation to the above project:

The application site overlaps three sub catchments and seven sub-basins within those; DROWES_SC_010 including LATONE_010, ROSFRIAR_010, and BALLAGH_010 sub basins, BONET_SC_010 including OWENMORE (Manorhamilton)_020, OWENMORE (Manorhamilton)_010 and BRACKARY_010, and MACNEANLOUGHSCONNECTOR_010 including CORNAVANNIGE_010. A number of watercourses traverse the application site.

The Drowes sub catchment forms part of Lough Melvin SAC and includes Lough Melvin, its inflowing tributaries, the Drowes River which flows out to Donegal Bay; it is considered a very important and sensitive system within the Ballyshannon fisheries district, as it supports a unique and internationally important assemblage of fish species, including:

- Arctic char (*Salvelinus alpinus*),
- Atlantic Salmon (*Salmo salar*), listed in Annex II of the EU Habitats Directive (92/43/EEC), and
- Three distinct species of trout: gillaroo (*Salmo stomachicus*), sonaghan (*Salmo nigripinnis*), and ferox (*Salmo ferox*).

Lough Macnean Upper provides habitat for perch and roach. The Owenmore River provides salmon and trout spawning and nursery habitat for the Bonet River/Lough Gill fisheries and forms part of Lough Gill SAC which is designated for the protection of Atlantic salmon, white-clawed crayfish and lamprey species.

The overall ecological status of each of the waterbodies within the application site have been determined as "Good" in the most recent EPA report. It is imperative that water quality, habitat and species diversity are protected within this waterbody during any development or construction projects.

Appendix 5-4 (Aquatic Report, dated 6th January 2026) of the EIAR outlines that several watercourses within the site are inhabited by salmonids. The document details 11 crossings are proposed including 10 new clear span crossings and the extension of 1 bottomless culvert, with an additional two crossings proposed using Horizontal Directional Drilling.

Significant forestry clearing will be required to facilitate the commencement of the construction phase of this proposal. The Natura Impact Statement makes reference to current forestry operations operating within the application site which drain into adjacent waterbodies, and goes on to summarise that *"these WFD river waterbodies have received a "good" water quality status (TOBIN, 2026, see Table 4). This demonstrates the effectiveness of current water protection mitigation measures implemented within the within the Survey Area of the proposed Wind Farm Site as part of the current forestry operations."* The categorisation of "good" does not on its own indicate that forestry activities have not had a negative impact on local watercourses', furthermore, several of the waterbodies which traverse the site are categorised based on modelling rather than monitoring.

Numerous karst features have been identified within the site, which can act as potential groundwater pathways. Chapter 7 (Land Soils and Geology) of the EIAR outline that all turbine base locations and substation footprint are mapped as having 'Low' landslide susceptibility, except for T3, T4, T5, T7 and T8 turbine base locations mapped as having 'Low to Moderately High' landslide susceptibility. All construction, including roads, positioned outwidth areas classified as low landslide susceptibility poses an increased risk to adjacent sensitive receptors.

A substantial number of mitigation measures are proposed within several documents, including the Natura Impact Statement, Chapters 5 (Biodiversity) and 8 (Hydrology and Hydrogeology), and Appendices 2-4 (Construction Environmental Management Plan) and 2-5 (Surface Water Management Plan) of the EIAR; without the adequate implementation of such measures, the NIS outlines there is potential for adverse effects on several attributes which determine the conservation condition of Atlantic Salmon.

As stated within Chapter 5 of the EIAR, mitigation measures are expected to reduce, but not eliminate pressures on sensitive receptors. All measures must be adequately designed to efficiently mitigate impact on receiving ground and surface waters during "normal" weather conditions, prolonged dry spells and intense wet periods, in a karst landscape with varying susceptibilities to landslide.

Should this project be approved, the following recommendations and guidance must be followed and adhered throughout the entirety of the project:

1. This proposal should be undertaken in accordance with the relevant sections of the following publications:
 - "A Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning": <https://www.fisheriesireland.ie/sites/default/files/migrated/docman/IFIUrbanWatercoursesPlanningGuide.pdf>
 - "Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters": <https://www.fisheriesireland.ie/sites/default/files/migrated/docman/2016/Guidelines%20Report%202016.pdf>

Section 6 of the latter document outlines specific requirements for the design and construction of permanent crossings which the proposal should adhere to, including but not limited to the positioning of foundations to ensure the impact to the riparian habitat is minimised, design to consider 1 in 100 year fluvial floods, culverts' positioning in relation to upstream and downstream levels and consultation with OPW.

2. The preferred method of installing pipeline crossings under fisheries waters is by way of trenchless crossings e.g. using directional drilling. This works method is not confined to the in stream works window (July – September), and avoids negative impacts on fisheries resources when works adhere to mitigation measures outlined in Section 11.3. of *"Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters"*.
3. Within fish bearing watercourses, prior to dewatering any works area, it will be necessary to temporarily remove fish from the area involved using electrofishing equipment. The electro-fishing must only be carried out by nominated personnel with training and experience in such operations, and with Section 14 authorisation from the Department of Climate, Energy and the Environment (<https://www.gov.ie/en/department-of-climate-energy-and-the-environment/services/apply-for-a-section-14-authorisation/>).
4. Inland Fisheries Ireland must be notified at least one month before works are to commence, as well as before electrofishing is to commence, so that site visits can be carried out by IFI personnel.
5. No watercourse diversions are to be carried out to facilitate the development including site roads.
6. All instream works associated with extension of culverts must be completed between 1st July and 30th September. It would be important that this is included in the contract for construction. Upon completion of works at each crossing, the riverbed must be sensitively restored and flow diversions removed immediately, where feasible within 48 hours of the instalment of the associated flow diversion.
7. The use of cement/concrete on site will require careful management; such materials are extremely toxic to aquatic life, and construction staff must be made fully aware of this. This will be especially important during the construction of the turbine bases. Cement and wet concrete must be kept out of all watercourses and drains. Concrete trucks must not wash out on site.
8. During the construction phase there must be no run-off of fuels, oils, concrete or from stockpiles of materials or general run-off from the site. Fuels, oils or other hazardous substances on site must be stored in lockable bunded containers. Vehicle maintenance should not occur within 100m of any watercourse and all machinery must be in good working order, free from any leakage of fuel, oil or hydraulic fluid.
9. Appropriately sized spill kits should also be kept on site and staff trained in their use in case an incident occurs. Where temporary diesel or petrol driven pumps are required, they should be located within bunded units. Waste oils, empty oil containers and other hazardous wastes should be disposed of in accordance with the requirements of the Waste Management Act, 1996.
10. 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.
11. Roadside drains should not intercept large volumes of water from ground above. Any watercourse, however small that is intercepted by the access routes should preferably be bridged or culverted at that point. The use of fords must be avoided. Culverts should be of a size sufficient to avoid overloading, blocking or washout. The profile of any stream that is crossed must remain the same and any fish movement remain unhindered. Shooting velocities must be avoided.
12. Floating roads must be considered where any peat encountered is one metre or more in depth. Piling may be considered for turbine bases at deep peat locations and these bases should be a minimum 50 metres from watercourses. This separation distance must be increased where fisheries sensitive waters occur.

13. Existing drainage channels should remain untouched. Erosion of roadside embankments and cuttings should be avoided by using intercepting trenches or terracing. Embankments and cuttings should be kept at no greater slope than the normal angle of repose to encourage re-vegetation, otherwise added stabilisation may be required.
14. Track rutting by machinery movement must be kept to a minimum and no discharge or run off containing high sediment loads must occur from the site. In this regard a contingency plan should be established and strictly adhered to. Any stockpiling of peat or other site materials will require careful management to ensure that slippage or collapse to any adjacent watercourses will not occur. A construction methodology is recommended prior to any works commencing with a view to, among others, minimising the volumes of excavation that will be required.
15. The proposed site crosses three sub catchments, there must be no diversion of waters from one catchment into another. Consideration should be afforded to the likely increase in surface water flow from the site which has the potential to alter the downstream prevailing hydrological regime and impact on the fisheries resource. In this regard attenuation measures should be identified and implemented in the surface water drainage arrangements. Consideration should be given to rewetting of any existing peatland along with other nature-based solutions to mitigate hydrological impacts of the development.
16. Settlement ponds and other silt treatment/mitigation measures must be engineered to ensure sufficient retention times are provided for sediment settlement. The silt traps should be designed to minimise the movement of silt especially during intense precipitation events where silt traps maybe hydraulically overloaded. It is essential that they are located with good access to facilitate inspection, monitoring, sampling and maintenance. A license to discharge to waters may be required from the local authority.
17. Mitigation measures for the interception of suspended solids must be designed so as to comply with an upper limit of 25mg per litre for the discharge of Total Suspended Solids (TSS) to surface waters as specified in the Salmonid Waters Regulations, SI 293 of 1988. Buffer zones should not be used for the storage of any materials. Works should be suspended during heavy rains or when there is high risk of pollutants entering adjacent surface waters. Run-off volumes should not exceed the assimilative capacity of the receiving waters.
18. The monitoring of all surface flows during construction is essential and remote sensing equipment should be considered as a normal precaution and extended into the post construction phase.
19. Full implementation of the mitigation measures as identified in the Natura Impact Statement (NIS), the Environmental Impact Report (EIAR), the Construction Environmental Management Plan (CEMP) and the Surface Water Management Plan is a requirement and must be referred to by way of condition should a grant of permission be forthcoming in this case.
20. A biosecurity protocol must be implemented to manage invasive alien species where they are found on-site, and to prevent the introduction of new species. The plan should indicate how the contractor will treat machinery, workwear etc that may potentially become a vector for transporting invasive alive species to or from the site.
21. In relation to any wastewater accumulated at the site, the planning authority should ensure that EPA guidelines are adhered to and that the cumulative impact of the new development does not have the potential to negatively impact on ground or surface waters in the vicinity.
22. GSI's Groundwater Vulnerability Classification for the site ranges from Extreme to Low, with either only thin permeable soils, or no soils, overlying the bedrock. The location of turbines and main construction works must avoid high (and above) groundwater vulnerability areas.

23. The GSI Landslide Susceptibility Classification for the site ranges from Low to High, all construction, including roads, must be contained within the areas classified as low landslide susceptibility. The appointed Contractor's Method Statements must be approved by a competent and suitably qualified geotechnical engineer prior to works commencing. Geotechnical monitoring must be in place during construction by competent and suitably qualified personnel.
24. It is recommended that a suitably qualified person as described in the application documentation be on site for the duration of works to ensure:
- a. All mitigation measures identified are implemented prior to and during the construction phase, as appropriate. This is essential in relation to possible peat shear.
 - b. Continual assessment to ensure the mitigation measures are effective including assessment of adjacent peats for cracking/instability.
 - c. Cessation of works should slippage indicators develop and/or settlement arrangements are inadequate for suspended solid removal in surface waters.
 - d. Peat reinstatement is completed according to a detailed restoration plan.
 - e. Arrangements are established in relation to a contact protocol for the relevant statutory bodies on progress of works.

Yours sincerely,

E Cross

Eoghan Cross
Fisheries Environmental Officer, Ballyshannon District,
North Western River Basin District, Inland Fisheries Ireland.