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**Subject:** Ref 318372 Muingmore Windfarm Inland Fisheries Ireland Submission  
**Date:** Thursday 6 August 2026 12:53:58  
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Dear Sir/Madam,

Please see attached Inland Fisheries Ireland submission in relation to the proposed Muingmore Windfarm project Ref no. 318372.

I would be grateful if you could acknowledge receipt of this submission.

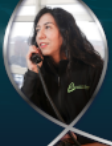
Kind regards

**Philip Thornton**  
**Fisheries Environmental Officer (Galway & Ballina)**

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The Secretary  
64 Marlborough Street,  
Dublin 1,  
D01 V902  
6th August 2026

Ref No: 318372

Dear Secretary,

Having reviewed the planning application and accompanying documentation for the Muingmore Windfarm project, IFI wishes to make the following observations:

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 site is in proximity to both the Doolough and Tristia rivers. The rivers provide good habitat for Annex 2 species wild Atlantic Salmon, also brown trout, sea trout, eel and stickleback. The Doolough channel is not achieving its target of Good Ecological Status as set in the Water Framework Directive. Robust protection of the aquatic habitat including the riparian habitat is required to ensure this catchment reaches its Good Ecological Status. The Tristia stream is achieving its good ecological status and Robust protection of the aquatic habitat including the riparian habitat is required to ensure this catchment maintains its Good Ecological Status. 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.

Please find below IFI's 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 excavations. IFI notes that the application proposes incorporating a setback distance of 100 meters from lakes, 50 meters from rivers and streams and a 10-meter buffer from main drains where possible within the site.
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 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. IFIs 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.

11. IFI also require that any instream structures or bridge crossings are approved by IFI. Clear span bridges or bottomless culverts are the preferred option for all crossings especially in upland areas. These must not present a barrier to fish passage.

12. The 2016 Inland Fisheries Ireland publication, 'Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites', should be consulted and all relevant provisions and guidance observed.

13. All instream works or other works which may impact directly on a watercourse should only be 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.

IFI's 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.

IFI would be grateful if An Coimisiún Pleanála could acknowledge receipt of this submission.

Yours sincerely

*Philip Thornton*

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