Karen Byrne

LD-22/6

From: Riain McLaughlin <riain.McLaughlin@loughs-agency.org>
Sent: Friday 16 October 2026 16:41
To: Appeals2
Subject: SU05E.324433 Meenbog Wind Farm
Attachments: SU05E.324433 Meenbog wind farm (R).pdf

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Dear sir/madam,

Please find attached Loughs Agency consultation response for SU05E.324433 Meenbog Wind Farm.

Thanks,

Riain

Loughs Agency
Gníomhaireacht na Lochanna
Factrie fur Loughs

Riain Mc Laughlin
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Ar mhaithe le cleachtas na gcáipéisí leictreonacha a chur chun cinn agus le bheith níos boige ar an chomhshaol, iarrtar ort a mheas an gá duit an r-phost seo a chló amach. Tá an r-phost seo faoi rún agus tá a úsáid beartaithe don duine ar cuireadh chuige é amháin. Is leis an údar amháin aon dearcthaí nó barúlacha atá léirithe ann agus ní gá gurb ionann iad agus dearcthaí de chuid Ghníomhaireacht na Lochanna. Más amhlaidh nach tú an faighteoir atá beartaithe, bí ar an eolas go bhfuair tú an r-phost seo de bhotún agus go bhfuil dianchosc ar aon úsáid, craobhscaoileadh, seoladh ar aghaidh, cló amach, nó cóipeáil a dhéanamh ar an r-phost seo. Má tá an r-phost seo faighte agat de bhotún, iarrtar ort dul i dteagmháil leis an tseoltóir. D'fhéadfadh ábhar an r-phoist seo agus aon cheangailteáin nó freagraí a bheith faoi réir nochtadh poiblí faoi Shaoráil Faisnéise (Cód Cleachtais) nó faoi na Rialacháin um Fhaisnéise ar an Chomhshaol, ach amháin i gcás díolúine.

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Loughs Agency
Gníomhaireacht na Lochanna
Factrie fur Loughs

Strategic Infrastructure Development
An Coimisiún Pleanála
64 Marlborough St,
Rotunda,
Dublin 1,
D01 V902,
Ireland

16th October 2026

Dear Sir/Madam

Case Reference: SU05E.324433 Meenbog wind farm

Thank you for your recent correspondence in relation to the above-mentioned proposed development. Loughs Agency is the statutory body charged with the conservation, protection and development of inland fisheries within the Foyle and Carlingford systems, the promotion of development of Loughs Foyle and Carlingford, and catchments for commercial and recreational purposes in respect of marine, fisheries and aquaculture issues and the development of marine tourism.

Loughs Agency has considered the information provided with the Environmental Impact Assessment Report (EIAR) and the remedial Environmental Impact Assessment Report (rEIAR). This consultation response will address the remedial application followed by the updated planning application.

Remedial Environmental Impact Assessment

Loughs Agency have reviewed rEIAR, in particular the remedial Natura Impact Statement (rNIS). Loughs Agency, as the competent authority for the protection of Atlantic salmon in the Foyle and Carlingford areas, does not agree with the determination of the rNIS that:

"Therefore, it can be objectively concluded that the Existing Development, individually or in-combination with other plans or projects, has not and will not adversely affect the integrity of any European Site."

Loughs Agency have carried out extensive survey works in the Mournebeg river following the landslide as part of a dedicated short term remediation project, which incorporated a number of joint surveys with consultants working on behalf of the applicant. Loughs Agency continues to carry out monitoring on the river. The Agency would state that we do not have any contention with the quality of the survey works carried out by the applicant's consultants nor the data presented. Loughs Agency's contention is with the interpretation of the data and how the determination that there was no adverse impact was reached.

The applicant relies on five-minute semi-quantitative electrofishing surveys carried out by Loughs Agency and their consultants to state that there was an increase in juvenile Atlantic salmon during the 2021 surveys over the 2020 pre-landslide results. Since 2011 Loughs Agency has run a program of juvenile electrofishing monitoring. This program surveys approximately 450 sites annually across the Foyle and Carlingford catchments using a 5-minute

timed semi-quantitative electrofishing method (Crozier & Kennedy, 1994). This relatively simple method is utilised to enable a large number of sites to be surveyed annually over a large spatial area. The resulting data are most appropriately interpreted as indices of relative juvenile abundance rather than direct estimates of absolute population density. These data provide a useful index of juvenile salmonid recruitment and abundance when considered over a spatial and temporal scale.

However, the Crozier & Kennedy (1994) method is generally less reliable for estimating site specific absolute population density than fully quantitative electrofishing conducted using Water Framework Directive (WFD) monitoring methodologies. The principal reason is that a fixed-duration electrofishing sample measures the catch obtained within a defined period, whereas a fully quantitative survey is designed to estimate the fish population within a defined sampling area, accounting for capture efficiency and the number of fish remaining after successive passes.

Consequently, the number of fish captured during five minutes cannot necessarily be translated into an unbiased estimate of population density (e.g. fish per unit area). Catchability varies with species, body size, habitat structure, water conditions and fish behaviour, meaning that two sites with identical underlying fish densities may yield substantially different catches. Fully quantitative methods seek to reduce this uncertainty through standardised spatial sampling, repeated removal passes and, where appropriate, estimation of capture efficiency.

The five-minute method was developed by Crozier and Kennedy (1994) as a semi-quantitative technique for assessing the abundance of 0+ salmonids, particularly Atlantic salmon (Salmo salar) and brown trout (Salmo trutta), in stream riffle habitats. The authors demonstrated that catches from standardised five-minute surveys could be related statistically to quantitative population estimates. This makes the method useful for rapid assessment and catchment-scale comparisons, but it does not mean that every five-minute catch represents a direct measurement of population density.

Fully quantitative electrofishing is required to estimate population density. This is the standard applied across Ireland and the United Kingdom in carrying out Water Framework Directive electrofishing surveys. Fully quantitative, area-delineated electrofishing generally involves isolating a defined river section, typically with stop nets, and conducting repeated electrofishing passes. Fish captured on each pass are removed from the sampling section, and the decline in catches across successive passes can be used to estimate the population initially present. Population estimates can then be expressed relative to the sampled area. This approach is consistent with established quantitative electrofishing principles, including those described in CEN EN 14011 and used in WFD-related river fish monitoring programmes.

Accordingly, the five-minute method should primarily be interpreted as a semi-quantitative index of relative abundance, whereas fully quantitative electrofishing is generally the more appropriate method for estimating site specific absolute population density. The distinction is especially important

when results are used to compare sites with different habitat characteristics or to support quantitative ecological assessment.

Five-minute electrofishing cannot be relied upon to make determinations on an adverse impact of the Atlantic salmon population of the Mournebeg River. Loughs Agency used the five-minute electrofishing to identify that juvenile Atlantic salmon had been displaced spatially within the river to more oxygenated riffle areas. Additionally, the redox surveys (Appendix 1 Aquatic Survey Reports - 4.2 Meenbog Aquatic & Fisheries Assessment) carried out by the consultants working on behalf of the applicant demonstrate an impact which degraded substrate conditions:

"Detailed observations made in June 2021 suggest that whilst shallower, faster-flowing areas of river may recover over time, the deep glide and depositional pool areas (salmonid holding habitat) supported significant sediment loads. Given the high volumes of sediment (peat) within the system, the longitudinal resuspension of fines downs the Sruhangarve and Mourne Beg River is anticipated to last, and cause impacts, in the medium term, e.g. covering/smothering of dug redds."

Gregarious or congregating behaviour in salmon rivers may lead to increased intraspecific competition as well as increasing the potential for predation.

The applicant's consultants also rely on redd (Atlantic salmon spawning) data to determine that there has been no adverse impact. At 3.1.3.2.7 of the rNIS the author states:

"The 2024 and 2025 surveys were undertaken four seasons after the November 2020 Peat Slide event and showed no signs of reduced productivity. Such a reduction would be expected if there had been a significant effect on productivity in 2020. This would have led to a reduction in adults returning from migration four years later and a resultant impact on productivity."

Loughs Agency redd data for the 2023/2024 spawning season has a total of 56 redds dispersed throughout the entire reach of the Mournebeg River. Redd data for 2024/2025 has a total of 27 redds with 19 confined to a single stretch of the river. This would suggest an impact on the distribution of Atlantic salmon within the Mournebeg River. Additionally, any recovering of redd counts in the years following the peat landslide benefited from Loughs Agency intervention. A dedicated remediation project was set up to focus on habitat restoration works both instream and along the riparian corridors of the Mournebeg River and a section of the River Derg. Any determinations on this data must be cognisant of this.

Loughs Agency remains available to assist the Coimisiún with any further technical clarifications or ecological data regarding the protection of fisheries and aquatic habitats within the catchment

Environmental Impact Assessment Report

Loughs Agency have reviewed the updated EIAR including the Natura Impact Statement (NIS) and Construction Environmental Management Plan (CEMP) in particular. The Agency are content with the determinations of the NIS and the mitigation measures it and the CEMP puts forward. Loughs Agency notes the lesson learned from the 2020 peat landslide as vital to the project should it gain planning permission.

Loughs Agency would like to take this opportunity to advise you on the potential impact that wind farm developments can have on water courses, water quality and migratory and other fish species. Such impacts could include:

- Obstruction to upstream and downstream migration both during and after construction.
- Disturbance of spawning beds during construction - timing of works is critical.
- Increases in silt and sediment loads resulting from construction works (including tracks and turbine foundations).
- Point source pollution incidents during construction.
- Drainage issues.

Felling operations can disturb the soil and remove part or all of the intercepting canopy, allowing more precipitation to reach the ground.

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. Loughs Agency would also highlight to the Coimisiún that an incident occurred on another wind farm site hydrologically connected to the Elatagh River, a tributary of the River Finn Special Area of Conservation. This incident involved the collapsing of a berm during wet weather conditions. The berm was created to hold a stockpile of excavated peat. Loughs Agency are currently monitoring the site for impacts.

CONDITIONS

A detailed final Construction Environmental Management Plan must be provided, this should include all methods of control of run-off from working areas, and mitigating measures to prevent pollution of watercourses.
REASON: To prevent pollution of surface waters which is detrimental to fisheries.

All storm water from the development site must not be discharged to nearby watercourses unless first passed through pollution interception and flow attenuation measures. Storm water can carry pollutants into watercourses and high volume discharges can alter the prevailing hydrological regime, both of which can impact on fisheries interests.
REASON: To prevent pollution of surface waters which is detrimental to fisheries.

In the event of the need for dewatering excavations during construction, all water from these excavations must not discharge directly to nearby watercourses unless first passed through pollution interception and flow

attenuation measures. Site excavations can carry pollutants into watercourses and high volume discharges can alter the prevailing hydrological regime, both of which can impact on fisheries interests. **REASON: To prevent pollution of surface waters which is detrimental to fisheries.**

Silt interception (a perimeter fence fitted with a silt barrier membrane and/or interception trenches, earth bunds, straw bales etc.) is recommended to be installed between the site and the adjacent watercourses for the duration of the construction phase. **REASON: To prevent pollution of surface waters which is detrimental to fisheries.**

It is essential that silt traps and settlement ponds are utilised and are capable of settling out materials prior to discharge off site. The traps and ponds must be regularly inspected and maintained accordingly. **REASON: To prevent pollution of surface waters which is detrimental to fisheries.**

Adequate containment should be provided for all chemical and oil storage on the site. The provision of bunds should be in accordance with the appropriate Irish Standards. **REASON: To prevent pollution of surface waters which is detrimental to fisheries.**

Work methods and materials must not impinge upon any nearby watercourses. The use of cement/concrete on site will require careful management. While they are versatile building materials, they are also

highly toxic to aquatic life and therefore must be kept out of all drains and watercourses. **REASON: To prevent pollution of surface waters which is detrimental to fisheries.**

No in-stream works shall be carried out without the consent of the Loughs Agency. **REASON: To ensure fisheries protection during sensitive periods.**

The nature of the works has the potential to spread aquatic invasive species. A biosecurity protocol must be implemented. **REASON: To reduce the spread of aquatic invasive species.**

No works are to commence until the appropriate authority or independent specialist on behalf of the Coimisiún are satisfied with the findings of the peat stability report. **REASON: To prevent catastrophic failure which will result in pollution of surface waters which is detrimental to fisheries.**

If blasting is to take place on the site, this cannot take place until the appropriate authority or independent specialist on behalf of the Coimisiún are satisfied that it will not have an impact on the stability of the site. **REASON: To prevent catastrophic failure which will result in pollution of surface waters which is detrimental to fisheries.**

INFORMATIVES

Loughs Agency request that water quality telemetry is carried out during the construction phase of the project to ensure water quality is being maintained and to alert Loughs Agency of any pollution events.

Consideration should be given to the inclusion of Sustainable Urban Drainage Systems (SuDs) in the proposed development. Construction of SuDS should comply with the standards in the design manual 'Guidance for Construction of SuDS' (CIRIA C768).

It is an offence to remove or disturb any material, including sand or gravel from the bed of any freshwater river within the Foyle and Carlingford Areas without the consent of the Loughs Agency contrary to Section 47 of the Foyle Fisheries Act 1952, as amended by Article 18(3) of the Foyle and Carlingford Fisheries Act 2007.

The applicant should also be aware that it is an offence under section 171(1) of the Fisheries (Consolidation) Act 1959, as extended by Section 10 of the Foyle Fisheries (Amendment) Act, 1961 and as amended, to cause pollution which is detrimental to fisheries interests.

Loughs Agency request being added to the list of emergency contacts if there is a pollution incident on the site.

Environmental Consultation Officer
On behalf of Loughs Agency