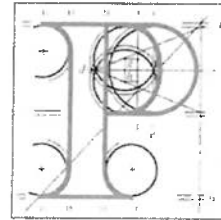


Our Case Number: ACP-324568-26



An
Coimisiún
Pleanála

Inland Fisheries Ireland
c/o Eoghan Cross
IFI Ballyshannon
Station Road
Ballyshannon
Co. Donegal
F94 WV76

Date: 01 October 2026

Re: Proposed Development of the Barnesmore Gap Greenway Project
County Donegal

Dear Sir / Madam,

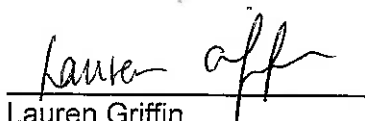
An Coimisiún Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Commission has approved it or approved it with modifications.

If you have any queries in the meantime, please contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,


Lauren Griffin
Executive Officer
Direct Line: 01-8737244

HA02

Teil
Glao Áitiúil
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
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(01) 858 8100
1890 275 175
www.pleanala.ie
communications@pleanala.ie

64 Sráid Macilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: Lauren Griffin
Sent: Thursday 1 October 2026 10:39
To: 'Eoghan.Cross@fisheriesireland.ie'
Subject: RE: 324568 - Donegal County Council - Barnesmore Greenway

A Chara,

The Commission acknowledges receipt of your email; official correspondence will issue in due course.

Kind regards,
Lauren

From: Eoghan Cross <Eoghan.Cross@fisheriesireland.ie>
Sent: Wednesday 30 September 2026 22:43
To: LAPS <laps@pleanala.ie>
Subject: 324568 - Donegal County Council - Barnesmore Greenway

You don't often get email from eoghan.cross@fisheriesireland.ie. [Learn why this is important](#)

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Good evening,

Please find attached Inland Fisheries Ireland's observations in relation to 324568 (Barnesmore Greenway).

Please acknowledge receipt of this email.

Best wishes,
Eoghan Cross
Eoghan Cross
Fisheries Environmental Officer

✉ Eoghan.Cross@fisheriesireland.ie • ☎ +353 (0) 71 9851435 • 🌐 www.fisheriesireland.ie • 🏠 F94 WV76



The banner features the Inland Fisheries Ireland logo on the left, which consists of a stylized fish shape with the letters 'IFI' inside. To the right of the logo is the text 'Iascach Intire Éireann' and 'Inland Fisheries Ireland'. In the center is a circular inset image of a woman talking on a mobile phone. On the right side of the banner, the text 'beolaine / hotline' is written above the large number '0818 34 74 24'. Below this number, it says 'Oscailte 24 uair an lae / 7 lá in aghaidh na seachtaine' and 'Open 24 hours a day / 7 days a week'.

Help us protect Ireland's rivers, lakes and coastlines by reporting illegal fishing, water pollution or invasive species. Our confidential phone number is 0818 34 74 24, which is open 24 hours a day / 7 days a week.

To read our Privacy Policy and Email Disclaimer Notice, Please visit www.fisheriesireland.ie

Lauren Griffin

From: LAPS
Sent: Thursday 1 October 2026 09:30
To: Lauren Griffin
Subject: FW: 324568 - Donegal County Council - Barnesmore Greenway
Attachments: 324568 - Donegal County Council - Barnesmore Greenway - 30.09.26.pdf

From: Eoghan Cross <Eoghan.Cross@fisheriesireland.ie>
Sent: Wednesday 30 September 2026 22:43
To: LAPS <laps@pleanala.ie>
Subject: 324568 - Donegal County Council - Barnesmore Greenway

You don't often get email from eoghan.cross@fisheriesireland.ie. [Learn why this is important](#)

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Good evening,

Please find attached Inland Fisheries Ireland's observations in relation to 324568 (Barnesmore Greenway).

Please acknowledge receipt of this email.

Best wishes,

Eoghan Cross

Eoghan Cross

Fisheries Environmental Officer

✉ Eoghan.Cross@fisheriesireland.ie • ☎ +353 (0) 71 9851435 • 🌐 www.fisheriesireland.ie • 🏠 F94 WV76



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Iascach Intíre Éireann
Inland Fisheries Ireland

Local Authority Projects,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

Issued via email to laps@pleanala.ie

30th September 2026

RE: Planning Reference: ACP-324568-26 (Proposed Development of the Barnesmore Gap Greenway Project)

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 the Foyle catchment, which is within Loughs Agency's jurisdiction, and the Eske sub catchment, which is within Inland Fisheries Ireland's jurisdiction. As such comments below are exclusively in relation to the application site within the Eske sub catchment, which overlaps five sub-basins within it; *ESKE_020*, *ESKE_010*, *CLOGHER (DONEGAL)_010*, *LOWERYMORE_030* and *LOWERYMORE_020*. A number of watercourses traverse the application site.

The Eske sub catchment, which includes Lough Eske & Ardnamona Wood SAC, is considered an important sub catchment within the Ballyshannon fisheries district as it provides valuable habitat and spawning habitat for various species of fish, including:

- Brown trout (*Salmo trutta*),
- Atlantic Salmon (*Salmo salar*), listed in Annex II of the EU Habitats Directive (92/43/EEC), and
- European Eel (*Anguilla anguilla*), which is protected under Evaluation of Council Regulation (EC) No 1100/2007, as well as the Conservation of Eel Fishing Bye-Law No. C.S. 335, 2024.

Atlantic salmon populations are under pressure across their entire North Atlantic range. Recent reports show that many populations are at their lowest levels in decades and urgent, transformative change is required to halt the decline in their populations. In Ireland, Atlantic salmon populations have undergone a significant long-term decline. Annual returns have fallen from over one million in the 1970s to less than 200,000 in recent years.

The decline reflects pressures across the salmon lifecycle. Reduced survival at sea is considered the major driver, while salmon are also affected by pressures in freshwater and coastal environments, including water quality, habitat degradation, barriers to migration, climate change and interactions with aquaculture. In 2023, the International Union for Conservation of Nature (IUNC) reclassified Atlantic salmon globally from 'Least Concern' to 'Near Threatened'.

In the most recent EPA report, the overall ecological status of the subject LOWERYMORE_020 and LOWERYMORE_030 waterbodies have been determined as "High", whilst the ESKE_020 and ESKE_010 have been determined as "Good". The CLOGHER (DONEGAL)_010 has been determined as "Moderate". It is imperative that water quality, habitat and species diversity are protected within these waterbodies during any development or construction projects.

The Natura Impact Statement details that 10 culverts are proposed to cross watercourses with suitable habitat for fish/aquatic fauna, in addition to a number of clear span bridges proposed to be constructed or repaired. It is proposed that culverts are positioned offline, with a channel created and the watercourse realigned. The preferred position from a fisheries perspective is for clear span crossing structures thereby allowing for installation/construction without the need to alter existing watercourses, and without impeding fish passage.

Construction works, particularly those entailing the installation of water crossing structures and the realignment of river channels have the potential to significantly impact fisheries resources in both short and long term if they are not carried out in an environmentally sensitive manner.

Table 7-20 of the EIAR's Chapter 7 (Biodiversity) details the perceived suitability of fisheries habitat at culvert locations, with many categorized as drainage ditches which are prone to drying out. The watercourse where PC09 is proposed has been categorized as unlikely to be suitable habitat for salmon and lamprey due to water quality issues, bedrock substrate and the size of the stream. The stream is 2nd order and water quality is temporary in nature; watercourse crossings should be designed and installed with the precautionary principle and restoration in mind.

A substantial number of mitigation measures are proposed within several documents, including the Natura Impact Statement and the Appended Construction Environmental Management Plan, and Chapters 7 (Biodiversity) and 9 (Hydrology) of the EIAR. All measures must be adequately designed and implemented to efficiently mitigate impact on receiving ground and surface waters during "normal" weather conditions, prolonged dry spells and intense wet periods.

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>

Sections 6 and 9 of the latter document outline 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. 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

3. 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.
4. All instream works 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.
5. 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 may be 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.
6. 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.
7. The use of cement/concrete on site will require careful management; such materials are toxic to aquatic life. The storage, management and conveyance of materials/cement/oils/fuels must not permit any deleterious matter reaching the adjacent watercourse either directly or indirectly.
8. Full implementation of the mitigation measures as identified in the Natura Impact Statement (NIS), the Environmental Impact Report (EIAR), and the Construction Environmental Management Plan (CEMP) is a requirement and must be referred to by way of condition should a grant of permission be forthcoming in this case.
9. It is recommended that a suitably qualified person as described in the application documentation be on site for the duration of works to ensure all mitigation measures identified are implemented prior to and during the construction phase, as appropriate. Continual assessment to ensure the mitigation measures are effective.
10. 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.
11. In advance of works commencing, the appointed contractor must submit Site specific Construction Method Statements for each individual watercourse crossing structure, to Inland Fisheries Ireland for approval. The documents must adopt relevant mitigation measures and procedures, and the above referenced points specific to protecting fisheries. Such measures must be implemented and strictly enforced to ensure that no negative impact occurs on receiving waters.
12. To minimise light pollution, lighting installed should be a warm spectrum, low overall brightness, which incorporates low and fully shielded, downward pointing lights with sensors and trimming schemes. Dark areas immediately adjacent watercourses, including over bridges should be conserved.

13. 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.

Yours sincerely,

E Cross

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