Our Case Number: ACP-323742-25

An Coimisiún Pleanála

Michael Duffy
1 Clós Na hEaglaise
Kilfenora
Co. Clare

Date: 12 November 2025

Re: Proposed development comprises the development of an extension to the existing Burial Ground at Drumcliff Burial Ground located at the Townland of Drumcliff, Ennis, Co. Clare
Drumcliff, Ennis, Co. Clare

Dear Sir / Madam,

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

Please note that the proposed development shall not be carried out unless the Commission has approved it with or without modifications.

If you have any queries in relation to the matter 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,

Kevin McGettigan

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

AA02

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From: Michael Duffy <duffycivileng@gmail.com>
Sent: Tuesday, November 11, 2025 3:59 PM
To: LAPS <laps@pleanala.ie>
Subject: JP03.323742 s177AE submission Clare County Council

A Chara,

Please find attached my submission on the above file.

Regards,

Michael Duffy BE CEng MIEI

1 Clós Na hEaglaise,
Kilfenora,
Co. Clare.

11th November 2025

Submission on s.177AE application JP03.323742 for proposed development comprises the development of an extension to the existing Burial Ground at Drumcliff Burial Ground located at the Townland of Drumcliff, Ennis, Co. Clare.

I wish to make the following submission in respect of the above application.

1. This is a disingenuous assessment in a karst environment where surface water and groundwater regularly interact.
2. The submitted Natura Impact Statement completely ignores fundamental likely impacts from direct connectivity between the subject site and the Lower River Shannon SAC Site No: 002165 and the Ballyallia Lough SPA Site No: 004041. The designated Ground Water body IE_SH_G_080 is at risk of not achieving its WFD status.
3. The subject site is located contiguous to SAC: 002165 - Lower River Shannon SAC and connected directly by a recorded subterranean conduit.
4. As can be seen from the WFD Cycle 2 Catchment Shannon Estuary North Sub-catchment Fergus_SC_030 (appended) one of the significant pressures identified in the sub-catchment is Anthropogenic Pressures with sub-pressures stated to be unknown. A potential pressure is leachate from the proposed graves to the subterranean conduit which is the direct feed to the downstream Drumcliff Spring a 30,000m^3 per day potable water source.
5. The interaction between surface water and groundwater in this karst environment means that there is potential for this pollution, and other construction stage or operation stage impacts to contiguous Natura 2000 sites.

Article 7 Abstraction for Drinking Water

DIRECTIVE 2000/60/EC Article 7

Waters used for the abstraction of drinking water

3. Member States shall ensure the necessary protection for the bodies of water identified with the aim of avoiding deterioration in their quality in order to reduce the level of purification treatment required in the production of drinking water. Member States may establish safeguard zones for those bodies of water.

Extract from Stage 1 screening

The Hydrological and Hydrogeological Assessment concludes:

- *'There are no direct hydrological connections between the site and down gradient surface water bodies. Standard separation distances (50m) to surface water features are maintained by the proposed cemetery;*

6. This is a disingenuous assessment in a karst environment where surface water and groundwater regularly interact over short distances. Groundwater can regularly re-emerge as surface water and *visa versa.*
    - *The drainage design incorporated into the proposed development will ensure that surface water will be collected, treated and retained within the site, with infiltration to ground via 5 no. proposed soakaways;*
7. There is no assessment of infiltration, potentially directly to the karst conduit, feeding the potable source at Drumcliff Spring.
    - *The conceptual site model of the site is outlined in Section 4.1 and in summary is conceptualised as a sloping site, underlain by thick clay-rich subsoils (8.5-13.5m) which form a drumlin feature overlying the limestone bedrock which forms the primary groundwater aquifer within the region. Low/moderate permeability rates indicate*

slow potential infiltration to groundwater within these subsoils into the underlying aquifer.

8. There is no factual basis for this perception that there is 8.8-13.5m of "*thick clay-rich subsoils*". Grave diggers in Drumcliff regularly encounter rock. There was no assessment of the depth of the karst conduit to Drumcliff Spring.
    - *From this conceptual model, surface water is considered to be the main potential pathway for potential effects, rather than groundwater;*
9. The basis for the conceptual model is flawed. The clear risk from this development is to groundwater within a source protection area. While this may primarily be a WFD issue it is also an AA issue.

Potential topographically down gradient receptors include –

- *1 no. karst feature (Poulacorey swallow hole) mapped 250m north of the proposed development site. The Poulacorey swallow hole is connected to the Drumcliff Spring PWS (1km south). The recommended separation distance to drinking water supplies is 250m (SEPA Guidelines, refer to Footnote 3), which is maintained in this instance; and,*

10. There is no recognition of the karst conduit between Poulacorey swallow hole is connected to the Drumcliff Spring. This completely ignores the vertical separation to the conduit which is likely to be less than 10m as opposed to the 250m requirement. There is no geological testing of this site and therefore there is a lacuna in the information provided to the decision maker.
    - *The Ballyalia Lake pNHA and SAC and Ballyalia Lough SPA are situated ~200m north of the site.*
    - *An assessment of potential impacts on down gradient receptors has been completed within Section 4 of this report. Proven and effective drainage management techniques have been incorporated into the design, to ensure surface water impacts on down gradient receptors will not occur. All surface water runoff generated from hard standing areas within the site will be retained on-site and allowed to recharge to ground via 5 no. soakaways;*
    - *The impact assessment process has concluded that there will be no significant effects on down gradient surface water bodies as a result of the proposed development;*
    - *An impact assessment of potential groundwater effects has also been completed. Due to the underlying thickness of subsoils, which provide a substantial protective layer to the*

underlying aquifer and the geophysical inference of good, clean, non-karstified limestone underlying the proposed extension site, the conclusion of the assessment process is that there will be no significant effects on groundwater quality as a result of the proposed development; and,

- *During the operational phase, the hydrological regime at the site will be controlled by a range of sustainable drainage measures. There will be no cumulative impacts on surface water quality or quantity, with respect to the existing Drumcliff cemetery (Section E) as a result of the proposed development. In terms of groundwater cumulative impacts, the burial and natural breakdown of remains within the proposed extension will lead to increased levels of certain nutrients such as Ammonia and Nitrate within the grave plots. Due to the thickness of subsoils (8.5-13.5m) and the low moderate permeability of the subsoil, cumulative impacts, with respect to the existing Drumcliff cemetery, are not expected to occur.'*

11. There is no evidence provided in the assessment to support this outcome. In the absence of a full geological assessment, including an accurate location of the karst conduit, the decision maker does not have the required information.
12. I refute the conclusions arrived at in this NIS. There are numerous lacunae in the geological and hydrogeological information submitted.
13. There is no assessment for bats in this rural wooded location. While this location is well within the foraging area for bats identified to be roosting in local Natura 2000 sites the species are separately protected and there was no assessment for foraging, roosting or resting places within this proposed development.
14. There is no reference to potable source in the entire NIS notwithstanding that an incredible volume of 30,000m^3 per day is extracted from Drumcliff Spring 650m from the site and treated in the contiguous water treatment plant approximately 15m from the site boundary.
15. We are referred twice in the NIS to section 4 and 4.1 but there are no such sections in the report.

16. Notwithstanding the sensitivities associated with the use of this development there is a crucial environmental matter to be considered for the protection of potable drinking water the town of Ennis and the Mid-Clare region. In many cases patients are being treated with highly toxic chemicals prior to their demise. These chemicals do not simply vanish. There is a very legitimate

concern about burial which connectivity to a drinking water source which may not be sampling for potential chemicals, toxins and viruses.

17. The following Prescribed Bodies have been notified with respect to the application for the proposed development in terms of Section 177AE(4)(b) of the Planning & Development Act 2000 (as amended):

1. Minister for Housing, Local Government & Heritage
2. Minister for Climate, Energy and the Environment
3. An Taisce
4. Uisce Eireann
5. The Heritage Council
6. Inland Fisheries
7. The Arts Council
8. Fáilte Ireland
9. Clare County Council

18. While it appeared to Clare County Council to use its discretion to notify itself of the application it did not "*appear*" to it to notify the HSE. A reasonable observer, given the substantive use proposed for this development, could conclude that the HSE should have been notified.

    Art 121(1)(o) Planning and Development Regulations 2001Amended by Art 8(1)(q) by S.I. No. 520/2013 - Planning and Development (Amendment) (No. 2) Regulations 2013.

    (q) where it appears to the authority that the development might have significant effects on public health — to the Health Service Executive.

    Clare County Council is well aware of the issue of the conduit as I have raised it in the past in relation to a previous Part 8 application subsequently withdrawn.

19. The Planning Report and Statement of Consistency submitted by Consultants McCabe Durney Barnes makes no reference to potable water source or the Water Framework Directive. As with the NIS the application is flawed and deficient.
20. As to be expected the Ecological Impact Assessment (EcIA) is largely a cut & paste operation and makes no reference to the potable source or potential impacts on it.
21. The Hydro Environmental Services Report recognises the connectivity of the conduit under the proposed site and the potable source at Drumcliff Spring. However is does not properly address

the likely impacts from the proposal on potable water quality. In 2.4.2 is states an extraction of 12,000 m^3/d. My information is that this is 30,000m^3 per day and that figure is approximately 15 years old. This should be easily clarified by the Coimisiún and in fact as a notified body UE should be providing this information.

2.4.4 Water Resources

The Drumcliff Spring PWS is situated ~1km southwest of the proposed development site. The Drumcliff Spring PWS supplies ~ 12,000 m^3/day to Ennis and the surrounding area.

The nearest mapped karst feature to the site is the Poulacorey swallow hole, located ~200m north of the existing burial grounds, and ~250m north of the proposed development site.

A dye tracer test was performed at the Poulacorey swallow hole, with a positive detection at Drumcliff Springs, indicating a direct groundwater connection from this swallow hole to the Drumcliff Spring.

The existing Drumcliff burial ground and the proposed extension site are located within the Source Protection Zone for the Drumcliff Spring PWS.

Consultation with respect to the proposed development has been made with Uisce Éireann.

4.4.2 Potential Impacts from Extension to Burial Ground

The burial of human remains within the proposed Section G burial ground extension can pose a risk to groundwater quality, through the natural breakdown of human remains, leading to elevated concentrations of certain nutrients, including ammonia and nitrates.

The existing burial ground, which has been in operation for many years, does not appear to have had any effect on local groundwater quality. The average annual nitrate levels at Poulacorey swallow hole is 1.8 mg/L and it is 2.0 mg/L at Drumcliff Springs2. Ammonia was measured at the Drumcliff Springs (2003-2004) and the data indicates low reported values ranging between 0.01 – 0.04 mg/L. The thick subsoils present at the site, as part of the drumlin formation have been investigated.

The soils/subsoils have been logged during site investigations, with subsoils described as reddish brown slightly sandy gravelly CLAY with occasional cobbles or grey/brown slightly sandy gravelly CLAY. Soakaway tests have demonstrated a low-moderate infiltration range of 2.7x10-6 to 6.25x10-6 m/s. The geophysical interpretation describes 3 no. subsoil layers of increasing strength/compaction to a depth of 8.5-13.5m. Good, fresh Limestone is interpreted below this, with no karst anomalies identified below the proposed extension site.

Groundwater inflows were not recorded during any of the trial pit investigations, and as such the 1m unsaturated zone beneath the base of a grave site is expected to remain throughout the year.

The ability of the proposed development site to impact on groundwater quality is limited due to the site's quaternary geology, which overlies the limestone aquifer system. This thick layer of subsoils, with low-moderate infiltration rates, provides an adequate buffer to the underlying aquifer.

Pathway: Groundwater Flow paths, groundwater infiltration through subsoils. Groundwater base flow to nearby down gradient surface water bodies (this is included as a pathway but in reality, the transit times for groundwater base flow to any surface water body will be very slow due to the site geology, any potential sources will likely be attenuated by dilution/diffusion before reaching a surface water body).

22. An unsubstantiated observation such as this would not be accepted in a wastewater site suitability assessment. The water table level is crucial in this assessment. The "thick layer of subsoil" has not been substantiated. The relevant "thickness" is below 2m BGL. There is no assessment of potential preferential flow paths. The trial holes are limited in extent and identification of the actual conduit is fundamental tom the assessment.

4.4.2(Continued) Receptor:

➢ Poulacorey karst feature (and associated link with Drumcliff Spring PWS);

➢ Underlying groundwater aquifer (Ennis GWB) and the WFD objectives associated with maintain the WFD quality status, i.e. Good quality;

➢ Down-gradient rivers including the River Fergus and the WFD objectives associated maintain the WFD quality, i.e. 'Good' status;

➢ Ballyallia Lake, downgradient of the River Fergus and the WFD objectives associated maintain the WFD quality, i.e. 'Good' status; and,

➢ Topographically down-gradient designated sites i.e. Ballyallia Lough SPA, Ballyallia Lake SAC & pNHA.

Pre-Controls/Design Potential Impact:

➢ Negative, indirect, imperceptible, medium-term, very unlikely impact on Poulacorey karst feature and Drumcliff Spring PWS;

➢ Negative, imperceptible, medium term, very unlikely impact on groundwater quality in the underlying aquifer (Ennis GWB) and the associated WFD objectives;

➢ Negative, indirect, imperceptible, medium-term, very unlikely impact on downstream surface water quality in the River Fergus and the associated WFD objectives; and,

➢ Negative, indirect, imperceptible, medium-term, very unlikely impact on Ballyallia Lake and associated designated sites - Ballyallia Lough SPA, Ballyallia Lake SAC & pNHA.

Control Measures:

As discussed above, the ability of the proposed development to impact on groundwater quality is limited by the thick subsoils present at the site, which act as a protective buffer between the burial area and the underlying limestone aquifer.

The surface water drainage system will provide soakaway areas for runoff from paved areas and roads to infiltrate through, bypassing any grave areas. The diversion of this surface water to the soakaway pits reduces the volume of water infiltrating through any grave areas, thus diminishing any potential effect further.

Further control measures are not considered necessary due to:

• The thickness of subsoils present at the site (8.5-13.5m), which places the site within an area of Low-Moderate groundwater vulnerability (as per Plate A);

• The low-moderate infiltration rate;

• The elevated nature of the extension site relative to surrounding surface water bodies;

• The lack of groundwater presence at grave base depth (~1.8m); and,

• The historical data on groundwater quality at Pouladower swallow hole, indicates good quality water, with no increased levels of Ammonia (Poulacorey swallow hole ammonia rates were lower than Drumcliff Spring).

Residual Effects: The residual effect is – Negative, imperceptible, indirect, medium-term, highly unlikely impact on the above listed receptors.

Significance of Effects: For the reasons outlined above, no significant effects on the following receptors will occur as a result of the proposed development:

➢ Poulacorey karst feature (and associated link with Drumcliff Spring PWS);

➢ Underlying groundwater aquifer (Ennis GWB) and the WFD objectives associated with maintaining the WFD quality status i.e. Good quality;

➢ Down-gradient rivers including the River Fergus and the WFD objectives associated maintain the WFD quality i.e. 'Good' status;

➢ Ballyallia Lake, down gradient of the River Fergus and the WFD objectives associated maintain the WFD quality i.e. 'Good' status; and,

➢ Topographically down-gradient designated sites i.e. Ballyallia Lough SPA, Ballyallia Lake SAC & pNHA.

23. These are exactly the outcomes the Applicant required and commissioned.

Ground Investigations Ireland - Ground Investigation Report - April 2022

4.2. Groundwater

No groundwater was noted during the investigation however we would point out that these exploratory holes did not remain open for sufficiently long periods of time to establish the hydrogeological regime and groundwater levels would be expected to vary with the time of year, rainfall, nearby construction and other factors. Surface water was present in close proximity to IF3, however this likely due to the impermeable nature of the Topsoil in that area.

5.0 Recommendations & Conclusions

5.1. General

The recommendations given and opinions expressed in this report are based on the findings as detailed in the exploratory hole records. Where an opinion is expressed on the material between exploratory hole locations, this is for guidance only and no liability can be accepted for its accuracy. No responsibility can be accepted for conditions which have not been revealed by the exploratory holes. Limited information has been provided at the ground investigation stage and any designs based on the recommendations or conclusions should be completed in accordance with the current design codes, taking into account the variation and the specific details contained within the exploratory hole logs.

24. The Appendix 3 soakaway results are incomplete and do not provide appropriate information for the making of a decision. For example, if a site suitability assessment was submitted such as this for on-site wastewater treatment it would be summarily rejected. A site suitability assessment would have been a better option for this site but might not have provided the information to suit the applicant's cause. The results achieved are not consistent with the T value of 18 achieved in

planning permission **P20/297** which is 630m away. Neither are they consistent with what must have been achieved in order to grant permission in **P03/1047** includes an on-site wastewater treatment system located 120m from subject site. This 2003 file is not available on-line but should be available to or sought by the Coimisiún.

25. The times used in the BRE assessments are interpolated and the trial holes were not left open long enough to see if the water table established itself. Furthermore there was no assessment or comment on mottling in the trail holes which would indicate seasonal water table levels. The assessment was carried out in April 2022 which would not be representative of the most elevated groundwater levels.

Minerex Geophysics Limited

1.4 Geology

Online geological maps of Ireland (GSI, 2022) give the following information: The overburden geology consists of till derived from limestones. In terms of rock the survey area is underlain by the Burren Formation, described as pale grey clean skeletal limestone. The Burren formation is karstifiable and there is a swallow hole noted just north of the cemetery. The path of the underground watercourse is towards the south and it is shown as passing under the survey area. The connection has been proven by tracer tests by the Geological Survey of Ireland. There are no faults or shallow rock recorded near the site.

The interpretative nature and the non-invasive survey methods must be taken into account when considering the results of this survey and Minerex Geophysics Limited, while using appropriate practice to execute, interpret and present the data, give no guarantees in relation to the existing subsurface.

26. There was no proper geological assessment of these lands. Neither the water table level nor the bedrock level were established. Both the Poulacorey swallow hole and Drumcliff Spring are relatively shallow with extensive outcropping of bedrock in the wider area. It is inconceivable that the suggested depths of 13.5m of soil/subsoil are available in this area. This requires proper geological borehole assessment in circumstances where graves must be excavated to a minimum 2m depth (as per CCC bye-laws). The relevant invert level is 2m BGL and the cover from this level to rock/bedrock/ conduit is critical to protect the potable water supply.

27. Conclusion:

The Coimisiún has not been provided with the required information to make proper determinations in advance of making a planning decision on this proposal.

Michael Duffy.

Electronic submission

Appendix A

WFD Cycle 2 Catchment Shannon Estuary North Sub-catchment Fergus_SC_030

Appendix B

Map of traced conduit.

WFD Cycle 2

Catchment Shannon Estuary North

Subcatchment Fergus_SC_030

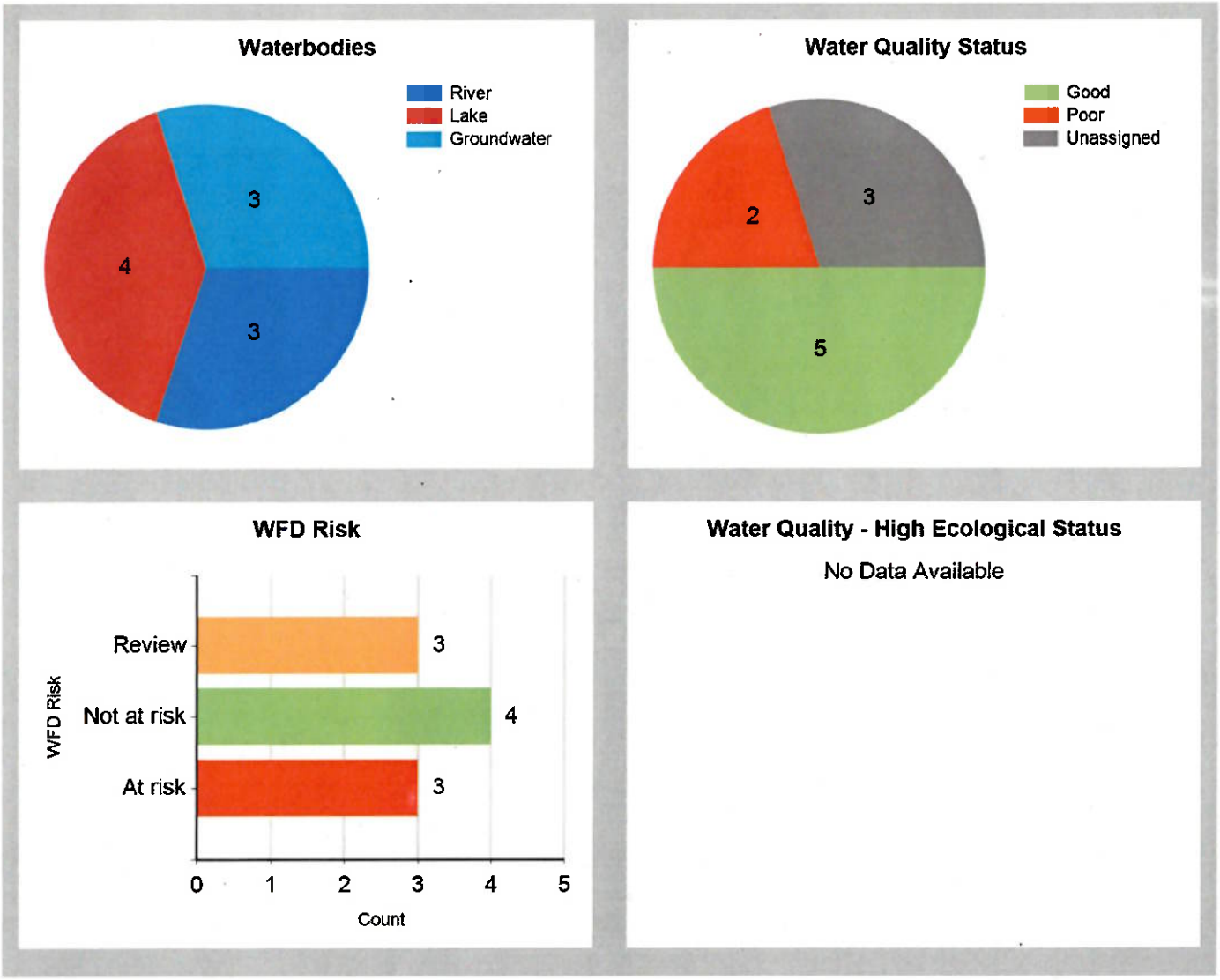
Code 27_3

Generated on: 20 Sep 2022

Assessment Purpose

This assessment has been produced as part of the national characterisation programme undertaken for the Water Framework Directive river basin management planning. It has been led by the EPA, with input from Local Authorities and other public bodies.

The characterisation assessments are automatically generated from the information stored in the WFD Application. The assessments may change as information is updated in the WFD application. Users should ensure that they have the most up to date information by downloading the latest assessment before use.



Evaluation of PrioritySubcatchment Issues

Two out of three river water bodies are At Risk: Fergus_030 due to Poor 2010-2015 ecological status and Shallee_010 due to Moderate 2010-2015 ecological status. Status in both water bodies is driven by invertebrates. Out of the four lake water bodies in this subcatchment, Dromore Lake is under Review; whilst it has Good ecological status (driven y macrophytes), elevated total phosphate concentrations have been noted.

Siltation is an issue within Fergus_040 and agriculture and forestry were identified as the likely significant pressures. Siltation from agriculture was also identified as a likely significant pressure within Shallee_010 and for Dormore Lake.

Map Subcatchment Risk

River And Lake Waterbodies: WFD Risk

The following river and lake waterbodies are in the subcatchment.

Code	Name	Type	WFD Risk	Significant Pressure
IE_SH_27F010500	FERGUS_040	River	At risk	Yes
IE_SH_27S010500	SHALLEE_010	River	At risk	Yes
IE_SH_27_82	Dromore	Lake	Review	No
IE_SH_27_246	Black CE	Lake	Not at risk	No
IE_SH_27_63	Ballyline	Lake	Not at risk	Yes
IE_SH_27_72	Ballyallia	Lake	Not at risk	No
IE_SH_27F010600	FERGUS_050	River	Not at risk	No

Map Subcatchment Water Quality Status

River And Lake Waterbodies: Water Quality Status

The water quality status of river and lake waterbodies in the subcatchment is as follows.

Name	2007-09	2010-12	2010-15	2013-18
Ballyallia	Unassigned	Unassigned	Unassigned	Unassigned
Ballyline	Unassigned	Unassigned	Unassigned	Unassigned
Black CE	Unassigned	Unassigned	Unassigned	Unassigned
Dromore	Moderate	Good	Good	Good
FERGUS_040	Moderate	Moderate	Poor	Poor
FERGUS_050	Good	Good	Good	Good
SHALLEE_010	Poor	Moderate	Moderate	Poor

Potentially Dependent Transitional and Coastal Waterbodies

The Transitional and Coastal waterbodies listed below intersect spatially with river and lake waterbodies in the subcatchment ...

Code	Name	Type	Local Authority	WFD Risk

Potentially Dependent Groundwater Waterbodies

The groundwaters listed below interset spatially with river and lake waterbodies in the subcatchment ...

Code	Name	Type	Local Authority	WFD Risk
IE_SH_G_069	Craggaunboy	Groundwater	Clare County Council	Review
IE_SH_G_080	Ennis	Groundwater	Clare County Council	At risk
IE_SH_G_080	Ennis	Groundwater	Clare County Council	Review
IE_SH_G_167	Milltown Malbay	Groundwater	Clare County Council	Review

Protected Areas intersecting River and Lake Waterbodies

The Protected Areas listed below intersect spatially with river and lake waterbodies in the subcatchment ...

Code	Name	Type	Waterbody Name	Association Type
IE0000014	Ballyallia Lake SAC	SAC	Ballyallia	Within Protected Area
IE0000014	Ballyallia Lake SAC	SAC	FERGUS_050	Overlapping / partly within Protected Area
IE0000016	Ballycullinan Lake SAC	SAC	FERGUS_040	Overlapping / partly within Protected Area
IE0000032	Dromore Woods And Loughs SAC	SAC	Black CE	Within Protected Area
IE0000032	Dromore Woods And Loughs SAC	SAC	Ballyline	Within Protected Area
IE0000032	Dromore Woods And Loughs SAC	SAC	Dromore	Within Protected Area
IE0000032	Dromore Woods And Loughs SAC	SAC	FERGUS_040	Overlapping / partly within Protected Area
IE0002165	Lower River Shannon SAC	SAC	FERGUS_050	Overlapping / partly within Protected Area
IE0002246	Ballycullinan, Old Domestic Building SAC	SAC	FERGUS_040	Overlapping / partly within Protected Area
IEPA1_SH_27F010500	FERGUS_040	Drinking Water	FERGUS_040	Within Protected Area
IEPA1_SH_G_069	Craggaunboy	Drinking Water	FERGUS_040	Within Protected Area
IEPA1_SH_G_069	Craggaunboy	Drinking Water	SHALLEE_010	Within Protected Area
IEPA1_SH_G_071	Crusheen	Drinking Water	FERGUS_040	Within Protected Area
IEPA1_SH_G_080	Ennis	Drinking Water	Black CE	Within Protected Area
IEPA1_SH_G_080	Ennis	Drinking Water	Ballyline	Within Protected Area
IEPA1_SH_G_080	Ennis	Drinking Water	Ballyallia	Within Protected Area
IEPA1_SH_G_080	Ennis	Drinking Water	Dromore	Within Protected Area
IEPA1_SH_G_080	Ennis	Drinking Water	FERGUS_040	Within Protected Area
IEPA1_SH_G_080	Ennis	Drinking Water	FERGUS_050	Within Protected Area
IEPA1_SH_G_080	Ennis	Drinking Water	SHALLEE_010	Within Protected Area
IEPA5D0013	River Fergus	Salmonid	Ballyline	Overlapping / partly within Protected Area
IEPA5D0013	River Fergus	Salmonid	Ballyallia	Overlapping / partly within Protected Area
IEPA5D0013	River Fergus	Salmonid	FERGUS_040	Overlapping / partly within Protected Area
IEPA5D0013	River Fergus	Salmonid	FERGUS_050	Overlapping / partly within Protected Area
IESHBWL27_72_0100	Ballyallia Lake, Ennis	Bathing Water	Ballyallia	Overlapping / partly within Protected Area

Pressures

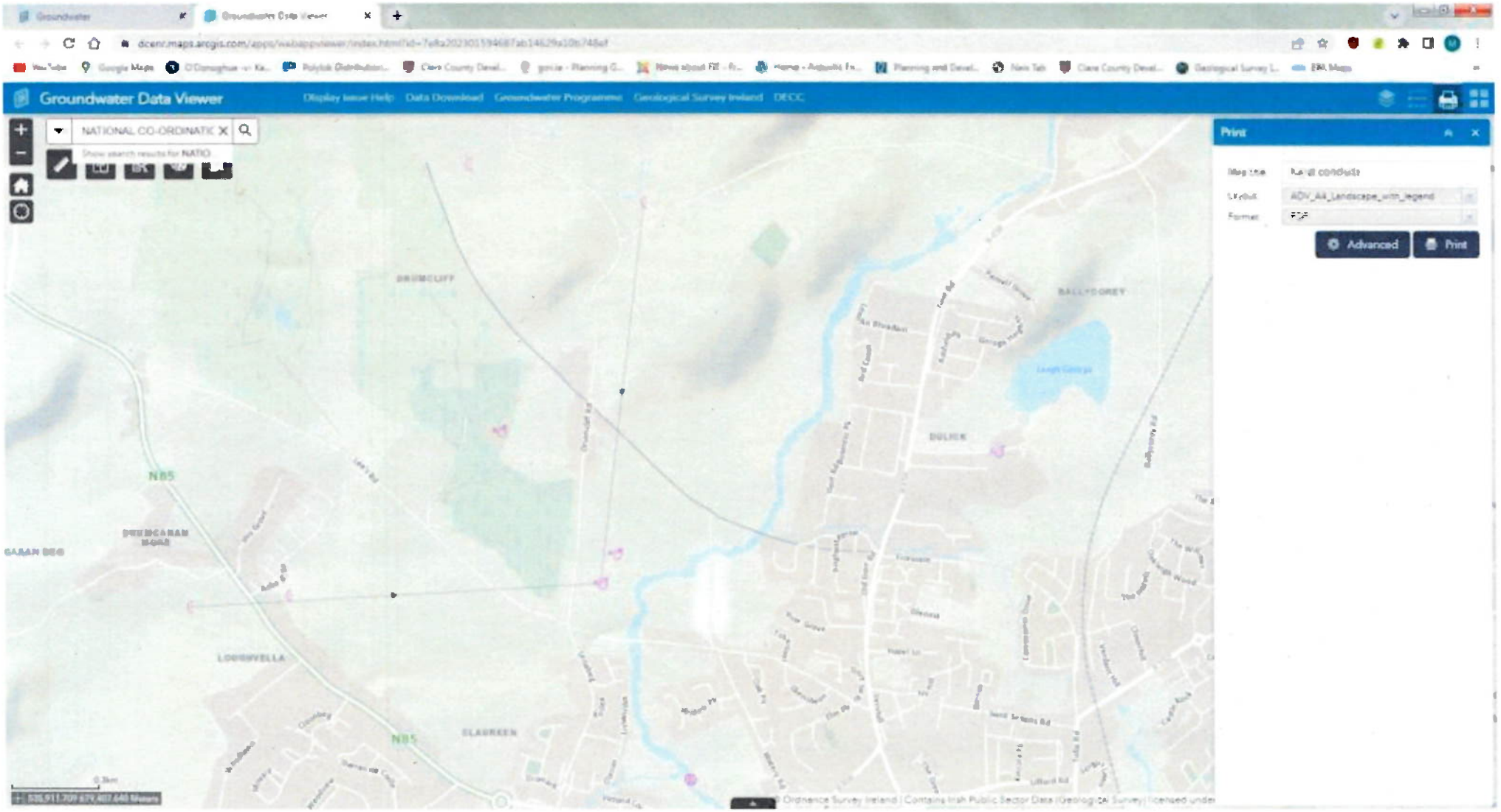
Below is a list of all significant pressures identified in the subcatchment.

Code	Name	WFD Risk	Pressure Category	Pressure Sub Category	Created In
IE_SH_27F010500	FERGUS_040	At risk	Agriculture	Agriculture	WFD Cycle 2
IE_SH_27S010500	SHALLEE_010	At risk	Anthropogenic Pressures	Unknown	WFD Cycle 2
IE_SH_27F010500	FERGUS_040	At risk	Forestry	Forestry	WFD Cycle 2

Further Characterisation Actions

The following further characterisation actions have been identified. These are necessary to help understand more fully issues in the subcatchment and their likely cause.

Code	Name	Action	Responsible Organisation	Created In
IE_SH_27F010500	FERGUS_040	IA5 Multiple Sources in defined rural area (1km) or waterbody or rural town	Clare County Council	WFD Cycle 2
IE_SH_27_82	Dromore	IA9 Lake pressures	Clare County Council	WFD Cycle 2
IE_SH_27S010500	SHALLEE_010	IA7 Multiple Sources in Multiple Areas	Local Authority Waters Programme (LAWPRO)	WFD Cycle 2



Karst conduit directly beneath subject site for development with direct connectivity to Drumcliff Spring