

Uisce Éireanns Ref: PN26000040751

ACP Planning Ref: 323780

Bosca OP 448
Oifig Sheachadta na
Cathrach Theas
Cathair Chorcaí

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Proposed Development:

10 year planning permission for Ballinlee Wind Farm consisting of 17 no. wind turbines, a permanent 110kV substation and ancillary development located in Ballincurra, Ballingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.

A Chara,

Thank you for your recent referral and invitation to make a submission on the above referenced development

Uisce Éireann has the following comments for your consideration.

The proposed development is located in the drinking water abstraction catchment (DWAC) for:

- Adare Water Supply – the proposed development is located approx. 17 km upstream of the abstraction point on the River Maigne (MAIGUE_080)
- The Proposed Grid connection route is also located in the DWAC for the Adare Water Supply, and at its closest approx. 22 km from the abstraction point
- The proposed development is not located within a Groundwater Zone Of Contribution (ZOC) / DWAC – the closest point of the proposed development to a Groundwater Water Supply ZOC is the proposed grid connection, which comes within 1.4 km, to the east, of the Bruff Water Supply (borehole abstraction).

The drinking water receptor river is discussed in Section 9.2.10.2 of the EIAR which notes that there are no “*surface water drinking water sources, under Article 7 of the Water Framework Directive, identified by the EPA (EPA, 2025) at the site or within a 2km radius of the main development site and / or route of the proposed grid connection.*” However, the Maigne_080 waterbody, which is ~10.3km downstream of the Site, is designated as a DWPA.

There are good mitigation measures outlined in the EIAR and supporting documents to protect surface water and given the distance to the abstraction point, the risk is likely to be low, however, the potential risk / impact to the downstream abstraction has not been fully assessed as would be expected. The EIAR has identified the Maigne_080 as a drinking water protected river and establishes the hydrological connectivity to the proposed development site, but the potential impact has not been assessed, quantified or documented.

Should An Coimisiun Pleanala see fit to grant the proposed development, Uisce Éireann respectfully requests that the following conditions be attached to any grant of permission:

1. Downstream Drinking Water Protection Plan

Prior to the commencement of development, the applicant shall submit for written agreement of the Planning Authority, in consultation with Uisce Éireann, a Downstream Drinking Water Protection Plan. This plan shall identify the River Maigue abstraction at Adare Water Treatment Plant as a sensitive receptor and demonstrate how the proposed construction activities will not give rise to deterioration in water quality for this abstraction point.

2. Surface Water Monitoring Programme

It is noted in Section 9.5.1 of the EIAR that surface water monitoring to include Turbidity, pH/EC and colour will be undertaken daily upstream and downstream of the works areas and where required, at the outlets from settlement ponds. The developer shall implement this surface water monitoring programme for the duration of the construction phase of the project. This shall include:

- a. Monitoring of parameters (e.g. Turbidity, pH/EC, colour and suspended solids) upstream and downstream of the site discharge points*
- b. Establishment of trigger levels for action*
- c. Increased monitoring frequency during periods of heavy rainfall and high-risk construction activities*

3. Notification and Communication

The developer shall agree a notification protocol with Uisce Éireann prior to construction. This shall include, but not limited to:

- UÉ to be added to the list of authorities to be notified in the event of an environmental incident as per Section 7.2 of CEMP, given the presence of the downstream drinking water abstraction point on the River Maigue.*
- Liaison with the Adare Water Treatment Plant in the event of any potential risk to water supply*

4. High-risk construction activities (e.g. excavation, soil disturbance, concrete pouring etc.) shall be prohibited during period of heavy rainfall or when Met Éireann rainfall warnings are in place (Yellow or higher) in order to minimise sediment mobilisation and pollutant transport to receiving waters.

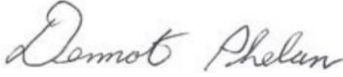
5. Given the presence of the downstream drinking water receptor, the CEMP and SWMP shall be updated prior to the commencement of construction to identify the downstream Adare abstraction as a sensitive receptor, and include any additional mitigation measures (where required) to protect downstream water quality.

6. The mitigation measures to protect surface water quality outlined within Chapter 9 of the EIAR, Construction Environmental Management Plan (CEMP) and Surface Water Management Plan (SWMP) shall be strictly implemented for the duration of the construction, operation and decommissioning of the project.

7. The Grid Connection Route crossing important and strategic Uisce Éireann infrastructure. The applicant / developer shall obtain a Confirmation of Feasibility from Uisce Éireann, through engagement with Diversions@water, for a schedule of crossings and safe separation distances from Uisce Éireann infrastructure along the route the proposed grid connection, prior to commencement of works for this element of the proposed development.

Queries relating to observations above should be directed to planning@water.ie.

Yours sincerely,



Dermot Phelan
Connections and Developer Services