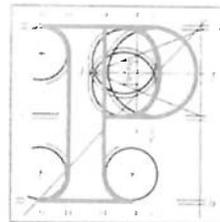


**Our Case Number:** ACP-323950-25



An  
Coimisiún  
Pleanála

Inland Fisheries Ireland  
Clonmel  
Tipperary  
E91 RD25

**Date:** 12 February 2026

**Re:** Flood Relief Works at Graiguenamanagh, Co. Kilkenny & Tinnahinch, Co. Carlow  
Graiguenamanagh, Co. Kilkenny & Tinnahinch, Co. Carlow

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 or approved it with conditions.

If you have any queries in relation to the matter please do not hesitate to contact the undersigned officer of the Commission at [laps@pleanala.ie](mailto: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

JA02

Teil (01) 858 8100  
Glao Áitiúil LoCall 1890 275 175  
Facs (01) 872 2684  
Láithreán Gréasáin www.pleanala.ie  
Ríomhphost Email communications@pleanala.ie

64 Sráid Maoilbhríde 64 Marlborough Street  
Baile Átha Cliath 1 Dublin 1  
D01 V902 D01 V902

## Lauren Griffin

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**From:** LAPS  
**Sent:** Thursday, 12 February 2026 10:50  
**To:** Lauren Griffin  
**Subject:** FW: IFI submission re Graiguenamanagh/Tinnahinch Flood relief Scheme  
**Attachments:** Submission re Graiguenamanagh Flood relief scheme.doc

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**From:** Donnachadh Byrne <Donnachadh.Byrne@fisheriesireland.ie>  
**Sent:** Wednesday, 11 February 2026 15:00  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** IFI submission re Graiguenamanagh/Tinnahinch Flood relief Scheme

You don't often get email from [donnachadh.byrne@fisheriesireland.ie](mailto:donnachadh.byrne@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.

Dear Sir/Madam

FAO Lauren Griffin

Please see attached a submission by Inland Fisheries Ireland to the Graiguenamanagh/Tinnahinch Flood relief Scheme, case ref 323950.

Would you mind please confirming receipt of this submission.

Kind regards

Donnachadh

**Donnachadh Byrne**  
**Senior Fisheries Environmental Officer**

✉ [Donnachadh.Byrne@fisheriesireland.ie](mailto:Donnachadh.Byrne@fisheriesireland.ie) • ☎ +353 (0)52 6180 055 • 🌐 [www.fisheriesireland.ie](http://www.fisheriesireland.ie) • 🏠 E91 RD25



Iascach Iníre Éireann  
Inland Fisheries Ireland



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**0818 34 74 24**  
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An Coimisiun Pleanala  
64 Marlborough Street  
Dublin 1  
D01 V902

9<sup>th</sup> February 2026

## **Graiguenamanagh/Tinnahinch Flood Relief Scheme**

**Case Reference: 323950**

Dear Sir/Madam,

Inland Fisheries Ireland (IFI) is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the protection, management, and conservation of the inland fisheries resource. In respect of the proposed Graiguenamanagh/Tinnahinch Flood Relief Scheme IFI wish to make the following observations:

The Barrow is a large 3000km<sup>2</sup> SAC system and is the sixth largest catchment in Ireland in terms of fluvial habitat accessible to salmon.

Article 5 of the Surface Water Regulations (SI 272 of 2009) states that there should be no deterioration in Ecological Status of a water body. Article 28(2) of the Regulations states that a surface water body whose status is determined to be less than Good shall be restored to at least Good status. The proposed surveys / reports must demonstrate how this project would cause no deterioration to the above surface water bodies and is consistent with their restoration to Good ecological status.

Among the qualifying interests for the Barrow-Nore SAC are Atlantic Salmon and Lamprey species. Regarding Atlantic Salmon, the Barrow constantly fails to reach its Salmon Conservation Limit. The Conservation Limit (CL) is the minimum number of adult spawning fish required to maintain a healthy and sustainable stock in a river. Since 2015, the salmon population has consistently fallen below 20% of the CL on the Barrow. The Conservation Objective for the Barrow SAC relating to Atlantic Salmon is "To restore the favourable conservation conditions of salmon in the River Barrow SAC" and this is defined by a list of targets the most important of which is that the "Conservation limit (CL) is consistently exceeded".

The table below shows the percentage of the salmon conservation limit achieved in the Barrow from 2011 to 2022, indicating the status of salmon stocks in the catchment. The Suir and Nore are displayed for comparison.

**Table 1. Percentage of CL by River by Year**

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
<b>Barrow</b>	<b>40</b>	<b>41</b>	<b>29</b>	<b>29</b>	<b>17</b>	<b>18</b>	<b>18</b>	<b>17</b>	<b>16</b>	<b>15</b>	<b>14</b>	<b>14</b>
Nore	129	140	153	121	91	60	70	77	80	84	84	68
Suir	116	112	117	83	80	68	79	100	102	102	91	60

The reason that the Barrow numbers are so much lower than the Suir and Nore relates mainly to extensive hydro-morphological damage to the upper/mid catchment of the Barrow in the recent past where significant loss and degradation of habitat occurred due to extensive widening and deepening of watercourses by the Barrow Drainage Board/Bord na Mona.

This habitat damage in addition to causing/exacerbating flooding (at sensitive downstream receptors such as Graiguenamanagh) has reduced biological diversity and diminishes the physical and climate resilience of the impacted watercourse. As a result large sections of the Barrow system now produce little or no salmon and other native species of fish.

The table displayed above highlights just how critically low salmon stocks in the Barrow system are. The Duiske River is a small but very important salmon spawning/nursery tributary of the Barrow SAC with much of the Duiske SAC designated because of the importance of salmon spawning/recruitment in the Duiske. The above table also highlights the critical importance of salmon spawning tributaries such as the Duiske in maintaining the low numbers of salmon returning to the Barrow system and why the negative impacts associated with any proposed development in the Duiske catchment must be fully quantified and addressed.

Regarding the proposed flood relief scheme we note that it includes the construction of a large storage area on the Duiske River upstream of Graiguenamanagh. The channel where the storage area is proposed represents some of the best salmon spawning habitat on the Duiske with excellent numbers of salmon fry and parr recorded here previously. Our concerns relating to the proposed storage area here include:

- Approximately 350metres downstream of the proposed storage area is a dam/weir on the Duiske River. This weir/dam is located at the upper end on the Uisce Eireann abstraction and water treatment plant site which provides drinking water for Graiguenamanagh and surrounding areas. This weir/dam is a very significant barrier to the free passage of all fish with upstream salmon migration only possible during very high flow events as there is no fish pass at the structure. The fish migration issues here are further complicated by the diversion of water to a man-made millrace here and overflows from the millrace a short distance downstream. Of serious concern to IFI is the potential that the flood storage area proposed will reduce the scale and frequency of the high flows which represent the only possibility for upstream salmon and other fish migration to the important spawning/nursery habitat here.
- The negative impact of this structure upon upstream fish migration is borne out by the fact that IFI have regularly noted significant salmon spawning concentrated in the section of channel immediately downstream of this barrier because of these fish being unable to migrate upstream. This concentration of spawning related to flow levels in the Duiske not being high enough to allow passage over the weir.
- The waters upstream of the proposed flood storage area and weir/dam on UE property represent the vast majority of the entire Duiske and any proposal which reduces the potential for migratory fish to access these critical areas will have huge negative impacts upon salmon recruitment in the Duiske system.
- To reinforce the above point, the entire Duiske catchment is approx. 24.5km<sup>2</sup>. The catchment area of the Duiske upstream of the weir/dam on UE property is approx. 19.75km<sup>2</sup>. The percentage of the Duiske catchment area upstream of the barrier at the UE site is over 80%.
- Considering the impact of the existing weir at the UE water treatment plant upon upstream fish migration, the focus should not just be on large adult salmon that are

powerful swimmers, but also on other species which because of their physiology and/or size are weak/weaker swimmers and are blocked by relatively small barriers. Brook lamprey and River lamprey are good examples of weaker swimming species. The swimming capabilities of juvenile fish are likely to be significantly less than adults of the same species and this should be considered also.

- Negative impacts upon fish migration flow attraction/flows linked to abstractions/diversions of water should also be considered in relation to the above point.
- The very best salmon spawning habitat on the Duiske system is in the section of channel where the flood storage area is proposed. This is borne out by the fact the site is suitable for flood storage, indicating that the gradient there is not as severe as sections of channel both upstream and downstream of there. Higher velocities/gradients on long sections upstream and downstream rule out the potential for salmon spawning.
- Long sections of the Duiske flowing through Graiguenamanagh are dominated by bedrock. The habitat importance/potential of those sections dominated by bedrock is not as high as the spawning/nursery habitat in the Duiske in the vicinity of the proposed flood storage area.
- The River Duiske and its associated habitat downstream of the weir/dam on the UE site is subject to a significant abstraction by Uisce Eireann at the weir/dam on the UE property. Recruitment for the main native Irish freshwater fish species (Atlantic Salmon, Brown/Sea Trout, Brook Lamprey, River Lamprey and Sea Lamprey) occurs in shallow gravels and silts. This is the dominant habitat found throughout the Duiske system. Because of the very shallow nature of such habitat these spawning and nursery areas are extremely prone to reduction in wetted area (drying out) by abstractions. The net result of any large abstraction regime in such habitat will be a reduction in recruitment for native fish species. None of the UE waters abstracted from the Duiske are returned to the Duiske River system.
- Utilising the impoundment linked to this same weir/dam on UE property additional waters from the Duiske are diverted from the main channel to a man-made mill-race which results in a depleted reach of 1.4km on the Duiske River downstream. This depleted reach downstream of the dam/weir represents almost the entire Duiske river downstream as the abstracted waters are returned to the Duiske only a very short distance upstream of the confluence with the Barrow.
- The two above points reinforce just how critical access by salmon to the habitat upstream of this dam/weir is to sustain salmon populations in the Duiske and wider Barrow system.
- Regarding the operation of the proposed flood storage dam, IFI note from the documentation provided that there will be a loss of 60m of habitat at the dam itself. The EIAR states that residual effects are considered imperceptible as the alteration is to less than 60m of a 23km river. It is not clear what the 23km length of channel referred to here relates to. The Duiske River is not 23km in length. As described above there are significant impacts to the habitat of the Duiske downstream of here linked to abstractions while the extent of suitable salmon spawning habitat upstream of the dam/weir on UE lands is relatively short. IFI question that the assertion that the residual effects are imperceptible.
- The gradient of the catchment of the Duiske River upstream of the proposed flood storage area is high which is in direct contrast to the existing flood storage dam referred to throughout the documents on the Feagle River in Clonakilty, County Cork. The transport of bed material through both these systems is likely to differ greatly in terms of quantity and material type/size. The report refers to periodic necessity to carry out removal of gravels/silt that are deposited in the section of channel upstream of the flood control structure.

- It is important that in the eventuality of large quantities of gravels/silt depositing on the section of channel upstream of the dam that the configuration on-site can be changed to prevent this from happening in the future.
- We ask that the potential for any debris trap in the Duiske upstream of the flood storage dam to contribute to significant settlement of gravels in the section of channel upstream of the dam is fully considered.
- IFI note Figure 4-3 in the EIAR of a debris screen upstream of a hydrobrake. IFI would have very serious concerns regarding a screen like that pictured in figure 4-3 being installed on the Duiske River.
- As detailed above, the Duiske River in the vicinity of the proposed flood storage structure represents some of the best salmon spawning habitat on the Duiske. In the event of significant salmon spawning on the section of channel upstream of the proposed flood storage dam sections of channel with salmon redds will be temporarily in waters that are several metres deep. Several metres deeper than would ever have occurred here naturally, historically.
- IFI request clarification on the length of time/duration that this unnatural level of impoundment occurs.
- It is important that the applicant can demonstrate that the operational phase of the flood storage dam will not negatively impact upon salmonid recruitment in the section of channel where flood waters are stored.
- IFI request clarification on what/if any bed stabilization measures are proposed immediately downstream of the flood storage dam. It is important that the applicant fully quantifies alteration to habitat in the section of channel downstream of this structure.
- Related to the above point we ask that the applicant detail what measures are proposed to ensure that scour/erosion does not occur in the section of channel immediately downstream of the flood storage dam. Of concern to IFI is that if scour does occur there is potential for a barrier to fish passage to develop over time.

Regarding the proposed debris trap in the Duiske upstream of the Clapper bridge IFI request additional information regarding the exact location of this proposed structure, the design of this structure and the nature of the river-bed at the proposed location.

Having reviewed the EIAR accompanying this application IFI believe that the EIAR is deficient in that it does not address the potential for negative impacts upon the ability of fish to migrate upstream to the important spawning/nursery habitat of the Duiske SAC in the vicinity of the proposed flood control structure. Our concerns regarding negative impacts on fish passage do not relate to the proposed flood control structure but to a separate dam on UE land a short distance, where significant fish passage issues already exist. Our concern is that the operation of this structure is likely to exacerbate the existing fish passage issues at that structure where access by migratory fish to this section of the Duiske upstream is already blocked/impeded.

IFI believe that fish migration upstream of this barrier on the Duiske is limited to peak flows and the operation of the proposed upstream storage area flow control will significantly reduce these peak flows when fish can successfully migrate upstream. Given that the majority of the Duiske system is upstream of this structure and also that the most important salmonid spawning/nursery habitat of this small system is also located upstream of this barrier our concern is that the operation of this flow control structure without measures to address the fish passage issues downstream is likely to have a very significant

negative impact upon the recruitment of salmon and other fish species in the Duiske system.

IFI do not have an objection in principle to the proposed operation of a storage area flow control on the Duiske River. Our main concern relates to the fact that the operation of this proposed infrastructure will exacerbate an already serious fish passage issue on the Duiske a short distance downstream which may have very serious long term negative impacts upon salmon recruitment and the recruitment of other species on the Duiske and Barrow River systems. Any negative impacts upon fish migration, fish spawning and recruitment are unacceptable to IFI.

These concerns were not addressed in the application.

IFI request that all the concerns raised above are addressed fully.

Yours faithfully

Donnachadh Byrne  
Senior Fisheries Environmental Officer

**Please note that any further correspondence regarding this matter should be addressed to Mr. Donnachadh Byrne, Senior Fisheries Environmental Officer, Inland Fisheries Ireland, 3044 Lake Drive, Citywest Business Campus, Dublin 24**