

Uisce Éireann Water Supply Project Eastern and Midlands Region

Statutory Consultation:

**Supplementary Response to
Submission Report**

Version: Final

June 2026

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Contents

1	Introduction.....	1
1.1	Overview of the Statutory Consultation Phase	1
1.2	Review of Submissions	2
1.3	Response to Submissions.....	2
2	Response to South Dublin County Council.....	3
2.1	Introduction.....	3
2.2	Response to Issues Raised	4
3	Response to Environmental Trust Ireland	21
3.1	Introduction.....	21
3.2	Response to Issues Raised	22
	References	27
	Appendix A Submissions Identification Table	28

Acronyms and abbreviations

Acronym	Meaning
ACP	An Coimisiún Pleanála
BNG	Biodiversity Net Gain
BPS	Booster Pumping Station
BPT	Break Pressure Tank
CEMP	Construction Environmental Management Plan
CIEEM	Chartered Institute of Ecology and Environmental Management
CIRIA	Construction Industry Research and Information Association
CPO	Compulsory Purchase Order
CWBMP	Construction Waste and Byproduct Management Plan
ECow	Ecological Clerk of Works
EIAR	Environmental Impact Assessment Report
FCV	Flow Control Valve
FRA	Flood Risk Assessment
GWDTE	Groundwater Dependent Terrestrial Ecosystem
IFI	Inland Fisheries Ireland
KER	Key Ecological Receptor
NRA	National Roads Authority
NIS	Natura Impact Statement
pNHA	proposed Natural Heritage Area
RWI&PS	Raw Water Intake and Pumping Station
RPA	Root Protection Area
SAC	Special Area of Conservation
SPA	Special Protection Area
SID	Strategic Infrastructure Development
SPA	Special Protection Area
SWMP	Surface Water Management Plan
TMP	Traffic Management Plan
TPR	Termination Point Reservoir
WFD	Water Framework Directive
WSIAR	Water Status Impact Assessment Report
WTP	Water Treatment Plant
ZoI	Zone of Influence

1 Introduction

1. Uisce Éireann (hereafter referred to as the Applicant) acknowledges receipt of the letters sent by An Coimisiún Pleanála (ACP) on 19 May 2026 and 20 May 2026, in respect to the Strategic Infrastructure Development (SID) planning application for approval for the proposed Water Supply Project Eastern and Midlands Region (hereafter referred to as the Proposed Project), under ACP reference number 323980.
2. The letter related to additional submissions received by ACP from the following:
 - South Dublin County Council; and
 - Environmental Trust Ireland.
3. The letter from ACP invited the Applicant to make a submission, as follows:

“The Commission hereby considers it appropriate to invite you to make a submission on the above-mentioned observations. Please be advised that any response to the Commission's invitation should not contain any additional reports or supplementary reports and should be confined to the issues raised in the observations received by the Commission.”
4. This Supplementary Response to Submissions Report (hereafter referred to as this Report), and its supporting appendix (Appendix A), comprise the response of the Applicant to the issues raised in these additional submissions and observations received by ACP. This Report is supplementary to, and therefore should be read alongside, the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026.
5. The Applicant notes that, should ACP consider it necessary, further clarification or information requests on any of the responses provided within this Report can be facilitated by the Applicant. The Applicant reserves its entitlement to further expand on its reply to these issues as may be appropriate at an Oral Hearing which may be held in relation to the planning application for the Proposed Project under ACP reference number 323980.

1.1 Overview of the Statutory Consultation Phase

6. The application for planning approval for the Proposed Project was submitted to ACP on 19 December 2025. The application documentation was placed on display during the period 6 January to 25 February 2026 (a seven-week period). Additionally, the application documentation was made available to view and download on a dedicated website (www.watersupplyproject.ie).
7. Prescribed bodies, the general public, landowners and other interested parties were able to make submissions / observations on:
 - The implications of the Proposed Project for proper planning and sustainable development;
 - The likely effects on the environment of the Proposed Project, if carried out; and
 - Impacts of the Proposed Project on the integrity of European sites, if carried out.
8. A total of 114 submissions / observations were received, comprising 17 from prescribed bodies and 97 from general observers. These submissions were addressed in the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026. A further two submissions were received and provided to the Applicant on 19 May 2026. These were from South Dublin County Council and the Environmental Trust Ireland and are addressed in this supplementary Report.
9. The Applicant is cognisant and appreciative of the time spent by all third parties in preparing these submissions. Each submission has been considered, and the Applicant has sought to ensure that the

substantive matters raised in each are appropriately addressed in this Report. The matters raised by a single submission may be addressed in different parts of this Report, and Appendix A - Submissions Identification Table provides a summary of which sections of the Report each submission is addressed under.

1.2 Review of Submissions

10. For ease of reference, a unique identification number has been assigned to each submission. In this Report, submission WSP_SUB_43B and WSP_SUB_115 are considered, as listed in Appendix A, together with the name of the observer(s) and the ACP submission ID.
11. An initial review of the submissions was undertaken to identify the main issues raised. This process grouped submissions into themes, based on the overall structure of the planning application documentation, including the various aspects of the Environmental Impact Assessment Report (EIAR) (e.g. planning, consultation, noise and vibration, traffic and transport, air quality etc.).
12. The purpose of this process was to collate the issues relevant to each specialist / project team member to allow for a more refined analysis to be undertaken. This resulted in each submission undergoing two reviews (the initial theming review and a focused specialist review).
13. This approach allowed for similar types of issues to be grouped together under the relevant topic headings of the EIAR / other documents to provide a comprehensive response overall. This has also enabled the Applicant to respond to the substantive material issues, rather than a line by line response to each submission.
14. It is noted that a separate Compulsory Purchase Order (CPO) Application (ACP Ref: 323982) has been submitted to ACP and is running in parallel to the SID Application (ACP Ref: 323980) to which this submission relates. Twenty-nine submissions were made in relation to the CPO application and were addressed separately through the CPO application. No additional CPO submissions were received from ACP on 19 May 2026.

1.3 Response to Submissions

15. A significant number of issues raised in the additional submissions from South Dublin County Council and Environmental Trust Ireland have already been addressed in the Planning Report, EIAR, Natura Impact Statement (NIS) and other supporting documentation submitted to ACP as part of the SID planning application for the Proposed Project. In addition, many issues raised have already been responded to in the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026. To avoid significant replication of text, the Applicant has addressed the substance of the issues raised and provides references to the relevant sections of the planning application documentation and the Statutory Consultation: Response to Submissions Report throughout this Report.
16. The Applicant notes that some of the submissions raise issues that are directed towards ACP, and the Applicant is not in a position to respond to same.

2 Response to South Dublin County Council

2.1 Introduction

17. The submission from South Dublin County Council (WSP_SUB_115) raised a variety of points in relation to the Proposed Project. This includes the interaction of the Proposed Project with other developments (such as the Grand Canal Greenway and future development at Grange Castle Business Park), potential biodiversity impacts (including hedgerow removal, Golden Plover and biodiversity net gain (BNG)) and impacts on watercourses, flood risk, townlands and historic boundaries in South Dublin. South Dublin County Council also suggested planning conditions for noise and vibration, traffic and transport, air quality, human health, landscape and visual and resource and waste management.
18. Assessments relating to the issues raised were carried out and reported in the EIAR submitted as part of the SID Planning Application. The assessments complied with the relevant legislation, standards and guidance as set out in each Chapter of the EIAR and were prepared by a team of competent experts as set out in Chapter 2 – The Environmental Impact Assessment Process, in the EIAR. The planning application documentation which covers the issues raised in this submission are:
- Planning Statement;
 - EIAR Chapter 4 – Proposed Project Description;
 - EIAR Chapter 5 – Construction and Commissioning;
 - EIAR Chapter 6 – Noise and Vibration;
 - EIAR Chapter 7 – Traffic and Transport;
 - EIAR Chapter 8 – Biodiversity;
 - EIAR Chapter 9 – Water;
 - EIAR Chapter 12 – Air Quality;
 - EIAR Chapter 15 – Human Health;
 - EIAR Chapter 16 – Landscape and Visual;
 - EIAR Chapter 17 – Cultural Heritage;
 - EIAR Chapter 19 – Resource and Waste Management; and
 - Natura Impact Statement.
19. A number of the issues raised in the South Dublin County Council submission have already been responded to in full in the Statutory Consultation: Response to Submissions Report submitted to ACP on 6 May 2026. To avoid duplication, cross references to the relevant sections of the Statutory Consultation: Response to Submissions Report are provided in Table 2.1.

Table 2.1: Issues Raised by South Dublin County Council Where Response is Provided in the Statutory Consultation: Response to Submissions Report (6 May 2026)

Issue Raised	Relevant Section of the Statutory Consultation: Response to Submissions Report Where the Response to the Issue is Located
Potential impact on bats and the mitigation and monitoring measures that will be required	Section 10.4.11 – Potential Impact of the Proposed Project on Bat Species

Issue Raised	Relevant Section of the Statutory Consultation: Response to Submissions Report Where the Response to the Issue is Located
Habitat and species surveys were undertaken more than 18 months prior to the project's submission, with some being over five years old. This is considered to be beyond the period for best practice in ecological surveying	Section 10.4.23 – Reliance on Outdated Ecological Survey Data
Potential impacts to Peamount Hospital during the construction phase	Section 8.3.2 – Potential Noise and Vibration Impacts from the TPR on Peamount Hospital Section 8.4.1 – Potential Noise Impacts at Peamount Hospital Section 15.3.2 – Potential Construction Dust Impacts on Peamount Hospital Section 18.3.2 – Potential Health Impacts on Patients at Peamount Hospital

20. Responses to new issues raised in the submission, or issues only partially covered in the Statutory Consultation: Response to Submissions Report, are provided in Section 2.2 of this Report. Where appropriate, cross references are provided in the following responses to relevant sections of the Statutory Consultation: Response to Submissions Report and planning application documentation.

2.2 Response to Issues Raised

2.2.1 Planning

2.2.1.1 Interaction with Zoned Development Lands and Strategic Employment Areas

21. The prescribed body submission from South Dublin County Council recognises the importance of the Proposed Project for supporting national and regional growth objectives. However, it also highlights that it is essential that the planning and implementation of the project fully recognise the economic role, zoning objectives and strategic importance of Enterprise and Employment lands within South Dublin County, including Grange Castle Business Park. From an economic development standpoint, infrastructure proposals affecting this area should be demonstrably coordinated with these frameworks. This includes aligning infrastructure layouts with planned road and utility corridors where possible, facilitating co-location of services to reduce spatial inefficiency, and engaging with the Planning Authority at detailed design stage to ensure consistency with economic development objectives.

2.2.1.1.1 Applicant's Response

22. The Applicant notes the local authority's support for the project in aligning with development plan policy and objective and is happy to work with South Dublin County Council at detailed design stage and through the construction stage as required.

2.2.1.2 Potential Material Contravention

23. The prescribed body submission from South Dublin County Council states that the Applicant has outlined potential material contraventions to the South Dublin County Development Plan 2022-2028 in relation to impact on the Grand Canal potential Natural Heritage Area (pNHA) and removal of hedgerows and trees as a result of the proposed development. The Applicant's Material Contravention Statement indicates that it does not consider potential contraventions to be material. This is considered to be reasonable, subject to implementation of mitigation measures outlined in the EIAR and further mitigation measures which can be agreed via a Biodiversity Management Plan for the local area during construction and operational stages.

2.2.1.2.1 Applicant's Response

24. The Applicant notes the local authority's agreement in respect of the Proposed Project's compliance with the development plan. The Applicant has responded to issues raised by the council on hedgerows in Section 2.2.6.3 of this report, and on the Biodiversity Management Plan in Section 2.2.6.2.

2.2.1.3 Community Benefit Scheme

25. The prescribed body submission from South Dublin County Council welcomes the proposed community benefit fund and considers itself best placed to act as fund administrator for the allocation to South Dublin. The Council recommends the inclusion of a condition by ACP in relation to the establishment of the Community Benefit Scheme, in consultation with the local authorities, prior to the commencement of development.

2.2.1.3.1 Applicant's Response

26. The Applicant acknowledges the recommended conditions and requirements within the submission from South Dublin County Council. The Applicant is committed to ongoing consultation with South Dublin County Council throughout the development of the Proposed Project, and accepts the principle, spirit, and intent of the suggested conditions and requirements. The Applicant will comply with the conditions attached to any grant of planning approval, in addition to those already included as mitigation or monitoring measures in the EIAR and the Construction Environmental Management Plan (CEMP) which are all included in the planning application documentation. The Applicant has provided a general response to conditions, including how the Applicant proposes to manage pre-commencement conditions, in Section 2.9 – Consent Condition of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026.

27. As set out in Section 3.2.3 of the Community Benefit Scheme document submitted with the SID planning application, the proposal is that the hosting Local Authorities, including in South Dublin, will be the Fund Administrators with the primary responsibility of managing the distribution of funding to recipients in local communities in proximity to the proposed project.

2.2.2 Project Description

2.2.2.1 Agreeing Design Details with the Local Authority

28. The prescribed body submission from South Dublin County Council states that details with regards to building finishes and design features shall be agreed with the planning authority, prior to the commencement of development.

2.2.2.1.1 Applicant's Response

29. The Applicant is fully committed to ongoing and proactive engagement with Local Authorities throughout the entire planning, construction and reinstatement phases, maintaining regular communication, coordinating activities where required, and working collaboratively to address any issues that arise in order to minimise disruption and ensure the successful delivery of the works.

30. The Applicant responded in relation to pre-commencement conditions in Section 2.9 – Consent Condition of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026. In summary, the Applicant recommends that the following be considered for a condition:

“The proposed development spans a number of local authorities and will take place over an estimated 5 year period of time. Pre commencement conditions should be linked to the work being undertaken in the relevant local authority area. Prior to commencement of construction in the relevant local authority area, Uisce Éireann will provide each relevant local authority with a ‘Compliance Framework’, notifying the local authority how Uisce Éireann will comply with the conditions included in its planning permission that relate to that local authority area. The Compliance Framework will address the full project, in that local authority area, noting that works may be taking place at different times. In the event the Compliance Framework requires updating, or a document noted within that Compliance Framework, Uisce Éireann will notify the relevant local authority.”

2.2.3 Construction and Commissioning

2.2.3.1 Interaction Between the Proposed Project and a New Surface Water Sewer

31. The prescribed body submission from South Dublin County Council highlights that it is constructing a new 900mm diameter surface water sewer on Hazelhatch Road to facilitate development at Newcastle. Should project timelines overlap, the Applicant should ensure coordination with the construction of the surface water sewer.

2.2.3.1.1 Applicant's Response

32. The Applicant acknowledges the potential interaction with the surface water sewer. The Applicant will work with the local authority to coordinate developments should construction periods coincide. In the event that the sewer is constructed before construction of the Proposed Project commences, then the mitigation measures for utilities and services in EIAR Chapter 18 – Material Assets will apply.

2.2.3.2 Interaction with the Grand Canal Greenway

33. The prescribed body submission from South Dublin County Council states that elements of the proposed development are located in close proximity to the Grand Canal corridor and the recently opened Greenway. While the Grand Canal itself is identified within project documentation as an environmental and infrastructural constraint, the Grand Canal Greenway, as an operational public amenity, is not explicitly referenced within available planning summaries associated with the proposal.

34. The proximity of the proposed development to the Grand Canal could result in potential indirect effects on the enjoyment and usability of the Greenway during construction, such as noise, visual disturbance or perceived disruption. Consideration is also required in relation to the continuity of use of the Greenway during construction works, including whether temporary restrictions may be necessary and how any such restrictions would be managed, minimised and communicated. The interface between construction activity and a recently opened public amenity also highlights the importance of appropriate safety measures, signage and coordination with relevant stakeholders.

2.2.3.2.1 Applicant's Response

35. The Applicant acknowledges the observations of South Dublin County Council. The Grand Canal Greenway forms part of the wider canal corridor which has been assessed within the EIAR. The proposed canal crossing, within the South Dublin County Council area, will be undertaken using trenchless technology, ensuring no physical interaction with the Canal or adjacent Greenway and no disruption to its continuity or use. Any temporary, localised construction effects such as noise, dust or visual disturbance will be managed through the CEMP (Appendix A5.1 of the EIAR). Given the absence of works within the Greenway corridor, no closure or diversion is anticipated.

2.2.4 Noise and Vibration

2.2.4.1 Recommended Planning Conditions for Noise and Vibration

36. The prescribed body submission from South Dublin County Council recommends the following planning conditions in relation to noise and vibration:

- No equipment or machinery shall be operated on or adjacent to the construction site before 07:00 hours on weekdays and 09:00 hours on Saturdays nor after 19:00 hours on weekdays and 13:00 hours on Saturdays, nor at any time on Sundays, Bank Holidays or Public Holidays;
- Where intrusive machinery is required to be used at short notice, the main contractor shall ensure that nearby sensitive locations are informed prior to works commencing. Special consideration and consolation must be given to Peamount Hospital;

- Operational noise levels from the proposed development shall not be so loud, so continuous, so repeated, of such duration or pitch or occurring at such times as to give reasonable cause for annoyance to a person in any residence, adjoining premises or public place in the vicinity;
- Noise due to the normal operation of the proposed development, expressed as L_{Aeq} over 15 minutes at the façade of a noise sensitive location, shall not exceed the daytime background level by more than 3 dB(A) and shall not exceed the background level for evening and night-time;
- Clearly audible and impulsive tones at noise sensitive locations during evening and night shall be avoided irrespective of the noise level; and
- The Applicant shall ensure that the design of the noise sources at the facility and the associated abatement measures will ensure that tonal or nuisance noise will not arise at the Noise Sensitive Locations due to the facility operation.

2.2.4.1.1 *Applicant's Response*

37. The Applicant acknowledges the recommended conditions and requirements within the submission from South Dublin County Council. The Applicant is committed to ongoing consultation with South Dublin County Council throughout the development of the Proposed Project, and accepts the principle, spirit, and intent of the suggested conditions and requirements. However, the Applicant notes that the recommended conditions are not wholly consistent with the measures outlined in the EIAR, as explained in the following paragraphs. The Applicant will comply with the conditions attached to any grant of planning approval, in addition to those already included as mitigation or monitoring measures in the EIAR and the CEMP which are all included in the planning application documentation. The Applicant has provided a general response to conditions, including how the Applicant proposes to manage pre-commencement conditions, in Section 2.9 – Consent Condition of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026.
38. The working hours suggested by South Dublin County Council are not consistent with the working hours set out in the Proposed Project EIAR. The working hours for the Proposed Project are set out within EIAR Chapter 5 - Construction & Commissioning and are 07:00 – 19:00 Monday to Friday and 08:00 – 16:30 on Saturdays. Certain construction activities would need to be undertaken outside these typical working hours. These activities are detailed in Section 5.6 of EIAR Chapter 5.
39. As per Section 1.5.4 of the Noise and Vibration Management Plan (Annex D of EIAR Appendix A5.1 – Construction Environmental Management Plan), local residents will be contacted prior to any particularly noisy activities in order to reduce the perceived noise impact. A designated noise liaison officer will be appointed by the Contractor(s) during construction works. The Applicant has responded in relation to the noise effects, mitigation, monitoring, and liaison with Peamount Hospital in Section 8.3.2 - Potential Noise and Vibration Impacts from the Termination Point Reservoir (TPR) on Peamount Healthcare, and Section 8.4.1 - Potential Noise Impacts at Peamount Hospital, of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026.
40. Section 6.2.6.3 in EIAR Chapter 6 – Noise & Vibration outlines the guidance and limits applicable during the Operational Phase of the Proposed Project, including defined operational noise criteria for all infrastructure sites. There would be no likely significant effects during the Operational Phase. Notwithstanding this conclusion, appropriate consideration will be given to the selection of plant and facade elements during the detailed design so that the operational noise associated with any infrastructures site will operate within the proposed criteria set out in Section 6.2.6.3 of EIAR Chapter 6 – Noise & Vibration. On this basis, the operational noise assessment within the EIAR is founded on compliance by design, rather than on the adoption of operational noise monitoring.
41. The operational noise thresholds suggested by South Dublin Council are not consistent with the thresholds set out in the Proposed Project EIAR. The operational noise thresholds adopted for the

Proposed Project, while differing slightly from those set out in the submission, are derived from established guidance documents and reflect current best practice and are therefore considered acceptable and appropriate for the Proposed Project. Table 6.11 in EIAR Chapter 6 – Noise & Vibration sets out the operational noise thresholds applicable to the Proposed Project infrastructure sites (note that the TPR is not included in this table on the basis that there would be limited noise generating plant at the TPR, however the same thresholds would apply).

42. Section 6.2.6.3 of EIAR Chapter 6 – Noise & Vibration outlines the guidance to apply during the Operational Phase of the Proposed Project with specific comment on tonality and impulsivity included – *‘The Proposed Project will be designed so that the operational noise levels will not have clearly audible tonal or impulsive noise characteristics at any NSL during night-time periods.’*

2.2.5 Traffic and Transport

2.2.5.1 Recommended Planning Conditions for Traffic and Transport

43. The prescribed body submission from South Dublin County Council recommends the following planning conditions in relation to traffic and transport:

- Prior to commencement of any works in the public domain, and in order to comply with The Roads Act 1993 Section 13 Paragraph 10, a Road Opening Licence must be secured from South Dublin County Council, Roads Maintenance Department;
- The road carriageway construction details shall be in accordance with Appendix 6 of the South Dublin County Council Taking in Charge Recommendations for road construction. The depth and specification of road materials still apply irrespective of whether the road is to be Taken in Charge;
- The Applicant shall submit the relevant construction traffic management plans, visibility splays at entrances, where required, and details of road construction details;
- The Applicant/developer shall make visibility splay of 2.0m x 45m in both directions from the entrance. Sightlines should be to the near side edge of the road to the right-hand side of entrance and to the centreline of the road to the left-hand side of the entrance (when exiting); and
- Prior to construction, construction detail drawings shall be submitted and agreed by the roads department. The construction details of the roads and parking spaces shall be in accordance with the South Dublin County Council Appendix 6 Taking in Charge Standards.

2.2.5.1.1 Applicant’s Response

44. The Applicant acknowledges the recommended conditions and requirements within the submission from South Dublin County Council. The Applicant is committed to ongoing consultation with South Dublin County Council throughout the development of the Proposed Project, and accepts the principle, spirit, and intent of the suggested conditions and requirements. The Applicant will comply with the conditions attached to any grant of planning approval, in addition to those already included as mitigation or monitoring measures in the EIAR, CEMP and Traffic Management Plan (TMP) which are all included in the planning application documentation. The Applicant has provided a general response to conditions, including how the Applicant proposes to manage pre-commencement conditions, in Section 2.9 – Consent Condition of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026.
45. The Applicant provides the following response for consideration:
- As outlined in Section 6.2 of EIAR Appendix A7.2 – Traffic Management Plan, the appointed Contractor(s) must apply for key licenses such as a Road Opening Licence for the proposed works;

- The appointed Contractor(s) will liaise with South Dublin County Council and, where required, any road carriageway construction details will be in accordance with Appendix 6 of the South Dublin County Council Taking in Charge Recommendations for road construction;
- A TMP has been developed and is included in EIAR Appendix A7.2 and will be implemented by the appointed Contractor(s). As is normal construction practice, an overall Traffic Management Plan will be developed in consultation with, and subject to the agreement of, all relevant local / roads authorities;
- As shown in EIAR Figure 4.71, the visibility splay has been provided at the TPR entrance exceeding the minimum visibility splay of 2.0m x 45m, has been provided in both directions from the entrance. In order to allow for overtaking, sightlines have been shown to the near side edge of the road in both directions; and
- The Applicant will, prior to construction, submit detailed construction drawings to the Roads Department for agreement. The design of roads and parking spaces will be in accordance with Appendix 6 of the South Dublin County Council Taking in Charge Standards.

2.2.6 Biodiversity

2.2.6.1 Potential Impact on the Grand Canal Potential Natural Heritage Area

46. The prescribed body submission from South Dublin County Council states that the proposal to route the pipe underneath the canal is welcome; however, the Applicant does not appear to have paid special attention to the ecological features that make up the Grand Canal pNHA. The submission continues that further setback is required in order to protect the biodiversity, ecological, geological and landscape value of the pNHA. The submission recommends several planning conditions related to this:
- A 50-metre setback from the banks of the canal to the west and east, with trenchless excavation extended to achieve the setback, and the future wayleave for the pipeline being wholly outside of this setback area;
 - The CEMP and a Biodiversity Management Plan are developed with specific measures to enhance and protect the ecological corridor of the Grand Canal at this location, to ensure construction activity does not interfere with local natural assets, and to prevent degradation arising from future maintenance activity; and
 - Tree Protection measures be produced and agreed either as a separate compliance item or incorporated into the above, and that no removal of trees would be provided for at the Grand Canal as part of any grant of permission. The plan for protection of trees should address how the excavation can be undertaken without the necessity for removal of trees at this location.

2.2.6.1.1 Applicant's Response

47. The proposed development will cross the Grand Canal, within the South Dublin County Council area, using trenchless technology, ensuring there will be no physical interaction with the Canal, pNHA or the adjacent Greenway and no disruption to its continuity or use. The shafts required to facilitate the trenchless crossing will be backfilled following construction, and no permanent above-ground infrastructure (apart from an air valve either side of the crossing) will be present. The Planning Application Boundary for the Proposed Project is located approximately 30m from the banks of the canal and the proposed pipeline alignment runs approximately 60m from the banks of the canal, with limited scope for further separation within the confines of the Planning Application Boundary. While temporary, localised effects such as noise or dust may arise during construction, these will be appropriately managed through established mitigation measures set out in the CEMP (EIAR Appendix A5.1), including specific noise and dust control strategies.
48. The Applicant notes that extensive mitigation and protection measures have already been incorporated into the Proposed Project design, EIAR Chapter 8 - Biodiversity, and the CEMP (EIAR Appendix A5.1))

to avoid, minimise and mitigate potential ecological impacts associated with the canal crossing and surrounding habitats.

49. The Proposed Project has been specifically designed to avoid direct impacts on the Grand Canal through the use of trenchless excavation techniques beneath the canal corridor. The detailed design of the launch and reception shafts will ensure that these areas are located away from the riparian habitat (retained habitat) and engineered such that surface water runoff falls away from the waterbody (as per the Surface Water Management Plan, which is Annex A of the CEMP). Temporary stockpiles will be located away from the watercourse (as noted in EIAR Chapter 8 - Biodiversity, not “*within 50m of a sensitive watercourse*”). The final buffer distances will be confirmed by the Ecological Clerk of Works (ECoW), taking account of land topography, soil type, habitat sensitivities and consultation with Inland Fisheries Ireland (IFI).
50. In addition, as outlined in Section 8.8.3.1.2 in EIAR Chapter 8 - Biodiversity, measures proposed to protect water quality and ecological receptors include the use of secured bunded containers for all chemicals and fuels stored in the compounds at the launch and reception shafts, installation of silt fencing where required, and maintaining fuel storage a minimum of 10m from watercourses in accordance with Construction Industry Research and Information Association (CIRIA) guidelines (CIRIA 2006). These measures would reduce the risk of contamination of the canal arising from silty runoff, bentonite slurry, dewatering activities or accidental spillages.
51. All construction activities will be undertaken in accordance with the CEMP, the methodologies outlined in EIAR Chapter 5 - Construction & Commissioning, and the mitigation measures identified throughout the EIAR. These measures will be implemented by the appointed Contractor(s) under the supervision of an ECoW to ensure that all ecological protection measures are fully implemented and effective throughout the Construction Phase and during reinstatement works.
52. The Applicant further notes that the Proposed Project follows the mitigation hierarchy of avoidance, minimisation and restoration. Sensitive ecological areas have been avoided where feasible through the design process. Where temporary disturbance is unavoidable, all lands will be reinstated on a “like-for-like” basis following completion of works, including reinstatement of soils, drainage, fencing and vegetation. Habitat reinstatement and planting proposals will be developed in consultation with the ECoW and will incorporate locally appropriate native species in accordance with the All-Ireland Pollinator Plan 2021–2025 and Pollinator Friendly Planting Code.
53. With regard to trees and vegetation adjacent to the canal corridor, comprehensive tree protection measures are already incorporated into the Proposed Project. All retained trees within or adjacent to the working area whose Root Protection Areas (RPAs) extend into the site boundary will be protected prior to commencement of construction works through the installation of protective fencing around the RPAs for the duration of the works. Where fencing is not feasible due to space constraints, alternative protective measures such as hessian wrapping and timber cladding will be employed. No vehicle parking, material storage, or hazardous substance storage will be permitted within RPAs, and hazardous materials will not be stored within 10m of retained trees, hedgerows or treelines. These are included in the Register of Environmental Actions and Commitments (Annex G of the CEMP) under measure B3 (Protection of hedgerows and trees during the construction).
54. Accordingly, the Applicant considers that the Proposed Project incorporates robust and comprehensive mitigation measures to protect the biodiversity, ecological, geological and landscape value of the Grand Canal pNHA, and that the measures proposed within the EIAR, CEMP and associated reinstatement strategy appropriately address the concerns raised in the submission.

2.2.6.2 Protection of Biodiversity and Biodiversity Net Gain

55. The prescribed body submission from South Dublin County Council states that the protection of biodiversity and biodiversity net gain should be integrated into the construction and operational phases of the proposed development through a final agreed CEMP and Biodiversity Management Plan.

2.2.6.2.1 Applicant's Response

56. The Applicant notes the prescribed body submission from South Dublin County Council which recommends that biodiversity protection and biodiversity net gain measures be secured through the preparation of a final CEMP and Biodiversity Management Plan for the Proposed Project.

57. There is currently no statutory requirement to deliver biodiversity net gain as part of the planning process. While policies encourage biodiversity enhancement and nature-positive measures, these are policy objectives rather than binding legal requirements and the provision of Biodiversity Net Gain is not a statutory objective for development plans.

58. Notwithstanding this, as noted in Section 10.4.24 - Biodiversity Net Gain of the Statutory Consultation: Response to Submissions Report issued on 6 May 2026, the design of the Proposed Project has been developed in accordance with the mitigation hierarchy of avoidance, minimisation, and restoration, with best practice measures embedded throughout. Sensitive ecological areas have been avoided where feasible, and where impacts cannot be fully avoided, reinstatement will be undertaken on a 'like-for-like' basis following construction, including the restoration of soils, drainage, fencing and vegetation consistent with pre-commencement conditions.

59. Topsoil and subsoil management and reinstatement planting are incorporated into the design, with replanting to be informed by an ECoW and guided by the All-Ireland Pollinator Plan (2021–2025) and the Pollinator Friendly Planting Code, ensuring the use of appropriate locally sourced native species consistent with existing genetic stock.

60. Furthermore, a range of habitat reinstatement and enhancement measures are also included across project elements, including woodland, scrub, hedgerow and species-rich grassland creation and retention at the Raw Water Intake and Pumping Station (RWI&PS), Water Treatment Plant (WTP), Break Pressure Tank (BPT), Booster Pumping Station (BPS), Flow Control Valve (FCV) and Termination Point Reservoir (TPR) sites, alongside native screen planting, mosaic planting, and targeted hedgerow planting in accordance with Uisce Éireann Biodiversity and Tree Protection Guidance. These measures will be subject to ecological oversight and monitoring during implementation.

61. Having regard to the above, it is considered that the matters raised by South Dublin County Council are already comprehensively addressed through the embedded design, mitigation, and monitoring commitments set out within the EIAR and NIS. The preparation of an additional standalone Biodiversity Management Plan would therefore duplicate measures already integral to the Proposed Project. On this basis, the attachment of such a plan is not considered necessary or proportionate. Should it be considered that further conditions or plans are required, the scope and wording of same would be a matter for determination by ACP.

62. In relation to a final agreed CEMP, this is covered in Section 2.8 – Mitigation Measures in the Environmental Impact Assessment Report and the Natura Impact Statement, of the Statutory Consultation: Response to Submissions Report issued on 6 May 2026. The CEMP will be provided to the relevant Local Authorities for consultation and approval in advance of any construction works on site, in line with the proposed approach to pre-commencement conditions set out in Section 2.9 – Consent Condition of the Statutory Consultation: Response to Submissions Report issued on 6 May 2026. Biodiversity mitigation measures are included in the CEMP, within the Register of Environmental Actions and Commitments (Annex G of EIAR Appendix A5.1).

2.2.6.3 Potential Impact of Hedgerow Removal

63. The prescribed body submission from South Dublin County Council states that the EIAR has underestimated the value, particularly to South Dublin County, of the extensive hedgerow network in this area. It states that the assessment has underestimated the impact of their disturbance, loss, and habitat fragmentation, particularly when the cumulative impacts arising along the full length of this project are taken into account. The submission notes this is particularly relevant to South Dublin County where the rural landscape and its hedgerow network are central to providing opportunities for biodiversity while also contributing to Landscape Character. While it is accepted, by the Council, that mitigation efforts are proposed through replanting, it must be noted that this does not represent a like-for-like benefit. Newly planted hedgerows require many decades to establish and to develop the ecological layers and species interactions that make these older, historic linear features such a critical natural habitat feature in the landscape.

2.2.6.3.1 Applicant's Response

64. EIAR Chapter 8 - Biodiversity addresses the ecological importance of the hedgerow and treeline network along the Proposed Project corridor, including within South Dublin County. In accordance with the National Roads Authority (NRA) guidelines (NRA 2009) and the Chartered Institute of Ecology and Environmental Management (CIEEM) guidelines (CIEEM 2018), all hedgerows and treelines within the Proposed Project were evaluated as being of local importance (higher value) and were assessed as Key Ecological Receptors (KERs).

65. Habitat loss and habitat fragmentation within the Proposed Project were specifically assessed within EIAR Chapter 8 - Biodiversity (Section 8.5.2.1.1 and Section 8.5.2.1.2, respectively), and a range of embedded and additional mitigation measures have been incorporated into the design and construction methodology to avoid or minimise impacts and reinstate habitats where feasible.

66. The assessment accepts that reinstated hedgerows and treelines cannot immediately replicate the full ecological complexity of mature habitats. However, the mitigation strategy has been specifically designed to restore landscape connectivity and accelerate ecological recovery to the greatest extent practicable. Linear habitats will be reinstated on a like-for-like basis where feasible, in accordance with the Biodiversity Guidance for Uisce Éireann Developments (UÉ-AMT-GL-021), using locally sourced native species appropriate to the receiving habitat.

67. In addition, reinstatement proposals go beyond standard whip planting. Hedgerows and treelines will be replanted using a mix of feathered whips and advanced nursery stock to establish an immediate structural hierarchy and enhance habitat function at an earlier stage. Where gaps within an existing hedgerow/treeline are to be bolstered, it will also be done so using a combination of mainly feathered whips and occasional advanced nursery stock (minimum 10cm to 12cm girth trees to fill gaps). This method employs the principles of 'under-planting' feathered whips to the inside of the existing hedgerow and 'inter-planting' of whips and advanced nursery stock within gaps. This will seek to improve continuity and resilience within the wider landscape network.

68. In relation to Construction Phase impacts, the works will be implemented on a phased basis. Although the overall construction programme spans approximately three years, individual sections of the pipeline will be completed over shorter durations, typically within a single year, and land will generally be affected for no more than 18 to 24 months. Replanting will occur progressively as sections of works are completed, thereby reducing the duration and extent of habitat fragmentation. As such, habitat fragmentation effects are temporary and spatially limited in nature, with reinstatement of linear habitats commencing progressively as works are completed in each section. With regards to the TPR, which is the only infrastructure site within South Dublin County Council area the main construction activities are expected to take place over an eighteen month period, as described in EIAR Chapter 5 – Construction and Commissioning, albeit there would be lower intensity activities over a longer period. Hedgerows around

the perimeter of the site would be retained, where reasonably practicable and proposed landscape planting within the site would be undertaken at the end of the construction period.

69. The design of the Proposed Project has also sought to avoid unnecessary disturbance to hedgerows and treelines wherever practicable. Existing farm entrances, gates and gaps in hedgerows will be utilised for access in preference to creating new openings, and retained hedgerows and trees will be protected in accordance with NRA guidelines (NRA 2006) through fencing, root protection measures and ECoW supervision. As outlined in Table 8.95 of EIAR Chapter 8 – Biodiversity, mature trees, treelines and hedgerows will be retained, where feasible.
70. EIAR Chapter 8 – Biodiversity is transparent in identifying those impacts that remain significant following mitigation. This includes likely significant residual effects associated with permanent habitat loss at infrastructure sites and temporary habitat fragmentation effects during construction. Residual effects are acknowledged in Section 8.11 of EIAR Chapter 8 and were not understated. However, the assessment concludes that, with the implementation of the proposed mitigation and restoration measures, impacts on the overall integrity and functioning of biodiversity within the receiving environment will be limited in extent, duration and geographic scale.
71. Accordingly, the EIAR does not conclude that replacement planting provides an immediate equivalent ecological value to mature hedgerows; rather, it recognises the time required for habitat establishment while demonstrating that the Proposed Project incorporates best-practice measures to minimise fragmentation, restore connectivity and support the long-term recovery of the hedgerow network across the affected landscape.
72. The Applicant has provided a detailed response on hedgerow mitigation in Section 10.3.2 - Potential Biodiversity Impact of Hedgerow Removal on Specific Landowner Lands, of the Statutory Consultation: Response to Submissions Report issued on 6 May 2026.

2.2.6.4 Biodiversity Methodology Focused on Annex I Habitats

73. The prescribed body submission from South Dublin County Council states that the EIAR employed a methodology of selected targeted surveys of habitats that were deemed to be particularly ecologically significant or which aligned to Annex 1 habitat types. While this approach may be justified given the nature and the length of the current project, it poses a risk that smaller areas of possibly unknown locations of important habitat may be missed. It is suggested also that surveys should have a wider focus, to include all features of biodiversity likely to be impacted by the project which may be important for green infrastructure purposes at local levels.

2.2.6.4.1 Applicant's Response

74. The Applicant notes that the targeted habitat survey methodology applied in EIAR Chapter 8 - Biodiversity did not result in smaller areas of important habitat being omitted from assessment. Rather, these areas were included as part of the habitat surveys for the Proposed Project, and for previous iterations of the project which remain relevant, which were undertaken between 2016 and 2025, as outlined in Table 8.5 of EIAR Chapter 8 - Biodiversity. The assessment was therefore informed by a substantial body of baseline ecological data collected over multiple survey years.
75. In addition, detailed botanical surveys were undertaken between 2017 and 2024 at locations identified as having the greatest potential ecological sensitivity. These included areas assessed as being of potential national importance or higher, areas identified as having potential to support rare or protected flora, as well as at the infrastructure sites which would be subject to permanent habitat loss. The identification of these target areas was based on interpretation of orthophotography, together with the collation and review of information obtained through the wider habitat surveys undertaken for the Proposed Project.

76. Accordingly, while a targeted survey methodology was applied in relation to detailed botanical assessment, this approach was underpinned by extensive habitat survey coverage and existing ecological datasets collected over an extended period. Smaller habitat areas were not excluded from the survey effort, but were captured as part of the comprehensive habitat surveys undertaken across the Proposed Project corridor (the recorded habitats were mapped and are shown on EIAR Figure 8.4 to Figure 8.108). The methodology adopted was therefore considered proportionate and appropriate to the nature, scale and linear extent of the Proposed Project, while ensuring that habitats of elevated ecological value and areas with potential to support protected or notable flora were comprehensively assessed.
77. Repeat ecological surveys will continue, where appropriate, to ensure that baseline data remains current and valid. Pre-construction surveys would also be carried out, having regard to the approach outlined in Section 8.8 of the EIAR.

2.2.7 Water (General)

2.2.7.1 Potential Impact on Watercourses from the Pipeline Crossings

78. The prescribed body submission from South Dublin County Council states that the Liffey_170 watercourse is within 1km of the TPR. The assessment concludes that no likely change is envisaged to either the ecological status/potential or supporting chemistry of the watercourse at construction stage. This should be supported by a CEMP for the TPR site and associated construction compound.
79. The submission continues that the assessment identifies small risks relating to the operation of the TPR but concludes that would not be sufficient impact to cause degradation to habitat or species number/quality and chemistry. The proposed Biodiversity Management Plan should address how any risks at this site can be mitigated, including if necessary by measures to enhance the bank conditions and riparian buffer around the watercourse.
80. The submission highlights that there is an additional active watercourse located close to where trenchless excavation is proposed which does not appear on Environmental Protection Agency mapping. The impact of the development on this watercourse should be addressed and where relevant mitigated prior to commencement of development.

2.2.7.1.1 Applicant's Response

81. The effect on the Liffey_170 watercourse from the construction and operation of the TPR was assessed in EIAR Appendix A9.3 – Non-linear Principal Infrastructure and 38 kV Uprate Works. This identified potential impacts from changes to flow pathways and volume, and increases in silty runoff from construction works and discharge of construction and operational drainage. The assessment concluded that there would be no likely significant effects from the construction or operation of the TPR on this watercourse after the application of mitigation measures within the Surface Water Management Plan (SWMP) (Annex A of EIAR Appendix A5.1 – Construction Environmental Management Plan).
82. The Applicant acknowledges that there are other watercourses crossed by the Proposed Project that are not shown on EPA mapping. These were identified as part of the baseline conditions, and shown on the Proposed Project Component Overview Maps (EIAR Figures 4.59 and 4.60 show the watercourse crossings in South Dublin, including multiple crossings of the watercourse in the Hynestown Townland mentioned in the submission). For the purposes of the Proposed Project assessment, these were described as 'other water bodies', which were defined as water bodies not designated by the EPA as river water bodies under the Water Framework Directive, and include field drains or ditches (identified in the EIAR with a 'WBP' prefix) as well as larger rivers not designated by the EPA ('WBX' prefix). These watercourses were assessed in EIAR Appendix A9.2 – Pipeline Assessment. This concluded that there would be no likely significant effects from the construction of the pipeline on these watercourses after the

application of mitigation measures within the SWMP (Annex A of EIAR Appendix A5.1 – Construction Environmental Management Plan).

83. The Applicant has provided detailed responses in relation to watercourse crossings and pollution prevention mitigation in the following sections of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026:

- Section 12.4.2 - Risk of Potential Impacts to Watercourses due to Required Watercourse Crossings;
- Section 12.4.4 - Mitigation Measures for Watercourse Crossings; and
- Section 12.4.5 - Potential Surface Water Runoff Impacts.

84. In summary, the Applicant considers that the EIAR, CEMP and SWMP provide a robust, multi-layered enforceable framework that prevents sediment-laden runoff, avoids pollution, and avoids hydromorphological impacts. The proposed measures exceed standard industry practice and fully address the concerns raised. The preparation of an additional standalone Biodiversity Management Plan would therefore duplicate measures already integral to the Proposed Project. On this basis, the attachment of such a plan is not considered necessary or proportionate. Should it be considered that further conditions or plans are required, the scope and wording of same would be a matter for determination by ACP.

2.2.7.2 Flood Risk at Grand Canal Crossing

85. The prescribed body submission from South Dublin County Council states that some of the development in lands east of the Grand Canal, where there is a proposed trenchless excavation under the Grand Canal, is within designated flood zones.

2.2.7.2.1 Applicant's Response

86. The Applicant acknowledges the designated flood zones in the vicinity of the grand canal crossing. This was considered in the Flood Risk Assessment (FRA) (EIAR Appendix A9.4). Section 6.1.3 details the pipeline water body crossings by trenchless construction techniques, including the Grand Canal, and states - *'Trenchless crossings would involve tunnelling under the watercourse or canal so as not to disrupt the flow, meaning there would be no impact on flood risk. No in-channel works of any form are required as part of these works.'*

87. Section 6 of the FRA describes the potential flood risk from construction works generally, and the measures for mitigating construction flood risk. Measures include, but are not limited to:

- Temporary runoff storage and attenuation features will be implemented within all active working areas, including the infrastructure sites, to store and attenuate any additional runoff that is generated during construction;
- Use of combined filter drains, soakaways or similar to receive and attenuate site runoff within active working areas;
- Careful placement of excavated fill to avoid stockpiles in areas prone to flooding or overland runoff;
- Where material stockpiles need to be built in the floodplain, the following measures will be implemented to ensure there is no increase in the risk of flooding:
 - Minimise the length of stockpiles so they can be bypassed by overland flows;
 - Provide culverts through them so they do not block overland flows; - Sequence works to avoid lands subject to seasonal flooding; and
 - Provide runoff attenuation and control along the Treated Water Pipeline trench to prevent it from acting as a flow conveyance route.

88. In relation to operational flood risk of the pipeline, this is covered in Section 12.2.5 – Flood Risk of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026. In summary, there would be no flood risk from the pipeline during operation as the pipe would be underground, would not affect in-channel or floodplain flow conveyance or overland flood conveyance routes, and would not form an impenetrable barrier to flows between ground surface and underlying bedrock.
89. The FRA demonstrated that, based on the design of the Proposed Project developed to date, there is a low overall risk of flooding to, and arising from, the Proposed Project.
90. The Applicant confirms that the FRA findings are robust, have been fully integrated into the design and ensure that flood risk effects remain within those predicted in the EIAR. The FRA demonstrates that the Proposed Project will not increase flood risk to people, property or the environment.

2.2.8 Air Quality

2.2.8.1 Recommended Planning Conditions for Air Quality

91. The prescribed body submission from South Dublin County Council recommends the following planning conditions in relation to air quality:
- During the construction of the development, Best Practicable Means shall be employed to minimise air blown dust being emitted from the site. This shall include covering skips and slack-heaps, netting of scaffolding, daily washing down of pavements or other public areas, and any other precautions necessary to prevent dust nuisances; and
 - The development shall be so operated that there will be no emissions of malodours, gas, dust, fumes or other deleterious materials on site as would give reasonable cause for annoyance to any person in any residence, adjoining premises or public place in the vicinity.

2.2.8.1.1 Applicant's Response

92. The Applicant acknowledges the recommended conditions and requirements within the submission from South Dublin County Council. The Applicant is committed to ongoing consultation with South Dublin County Council throughout the development of the Proposed Project, and accepts the principle, spirit, and intent of the suggested conditions and requirements. The Applicant will comply with the conditions attached to any grant of planning approval, in addition to those already included as mitigation or monitoring measures in the EIAR and the CEMP which are all included in the planning application documentation. The Applicant has provided a general response to conditions, including how the Applicant proposes to manage pre-commencement conditions, in Section 2.9 – Consent Condition of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026.
93. The Applicant considers that the Dust Management Plan (Annex E of EIAR Appendix A5.1 – Construction Environmental Management Plan) fully addresses the requirements set out by the Council by providing a robust suite of mitigation measures to control construction dust.
94. The Applicant notes that there would be no impact on air quality during the operational phase, including from malodours, gas, dust, fumes or other deleterious materials, in line with the conclusions of EIAR Chapter 12 – Air Quality. The Applicant is therefore of the opinion that no condition is required in relation to operational air emissions.

2.2.9 Human Health

2.2.9.1 Recommended Planning Condition for Human Health

95. The prescribed body submission from South Dublin County Council recommends the following planning conditions in relation to human health:

- The Applicant shall put in place a pest control contract for the site for the duration of the construction works.

2.2.9.1.1 Applicant's Response

96. As set out in EIAR Chapter 15 – Human Health, the Applicant considers health risks related to the disturbance of vermin extremely unlikely. There is no reason why there would be any change in the underlying vermin population as a result of the Proposed Project and, as such, there would be an imperceptible effect.

2.2.10 Landscape and Visual

2.2.10.1 Landscape and Visual Effects from the Proposed Termination Point Reservoir

97. The prescribed body submission from South Dublin County Council states that the location of the Proposed Project in South Dublin is judged to be Medium Sensitivity Landscape Character, due to its rural landscape, agricultural base, and its network of field and hedgerows. The low-lying nature of the land means that development can be visible from surrounding hills. Overall, it is considered that the impact of the project on landscape character arises from those visible changes to the lowlands, being: the delivery of the Termination Point Reservoir; and impact on field boundaries and hedgerows in the area. These changes merit a developed mitigation strategy of avoidance and mitigation of losses, but are otherwise considered acceptable interventions in the landscape.

2.2.10.1.1 Applicant's Response

98. Landscape and visual effects have been assessed and reported in EIAR Chapter 16 – Landscape and Visual, and appropriate mitigation measures proposed.

99. As described in Section 16.4.4.7 of EIAR Chapter 16 – Landscape and Visual, the proposed TPR would add to the intensity of engineered/built development in the immediate landscape context of the rural hinterland of Peamount Hospital, the existing Peamount Service Reservoir and the wider context of south-west Dublin. The TPR facility is likely to be recognisable as a large-scale water infrastructure development rather than hospital-related or typical industrial infrastructure already present within the TPR study area. The main visual aspect of the facility would be the engineered embankments surrounding the three storage cells, which would extend up to approximately 11.2m above existing ground levels at a slope angle of 1:2. These embankments, though extensive in footprint (approximately 250m x 120m), have a simple form and would be grassed. In this respect, the proposed TPR would serve, in terms of scale, function and form, as a transitional form of utilitarian land use between Peamount Hospital, the urban fringe business/industrial parks and the rural landscape proper. In this respect, the TPR would provide little sense of urban fringe progression into the rural edge of the city and would not appear out of place in this hinterland setting. This legible sense of transition is aided by the established presence of the adjacent Peamount Hospital and existing Peamount Reservoir, which would help to anchor the TPR facility within this landscape setting.

100. In terms of mitigation screen planting at the TPR, the strategy is to blend aesthetically and functionally with the existing coniferous treeline that runs along the southern boundary of the Peamount Hospital site by extending this westward. The existing hedgerows would be bolstered and a new section proposed to substantially screen the Stilling Basin and Distribution Chamber structure and the berm surrounding the main reservoir as viewed from the west. Likewise, bolstering on the south-east of the site parameter would blend with the mature broadleaf trees that substantially screen the hospital from eastward views of the TPR. Once established, such planting along the western boundary of the TPR would screen the long elevation of the reservoir berm from view (EIAR Figure 4.97 and Figure 4.98).

101. It is not considered that the TPR is at odds with the prevailing hinterland landscape character and it would not unduly contribute to the progression of the urban edge into a predominantly rural landscape. As such,

the assessment concludes that there would be no likely significant effect on the landscape or views from the TPR.

2.2.10.2 Recommended Planning Conditions for Landscape and Visual

102. The prescribed body submission from South Dublin County Council recommends the following planning conditions in relation to landscape and visual:

- Signage or lighting to be used on site during the construction of the development must not be intrusive to any light sensitive location including residential properties in close proximity to the development.

2.2.10.2.1 Applicant's Response

103. The Applicant acknowledges the recommended conditions and requirements within the submission from South Dublin County Council. The Applicant is committed to ongoing consultation with South Dublin County Council throughout the development of the Proposed Project, and accepts the principle, spirit, and intent of the suggested conditions and requirements. The Applicant will comply with the conditions attached to any grant of planning approval, in addition to those already included as mitigation or monitoring measures in the EIAR and the CEMP which are all included in the planning application documentation. The Applicant has provided a general response to conditions, including how the Applicant proposes to manage pre-commencement conditions, in Section 2.9 – Consent Condition of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026.

104. The Applicant notes that Section 5.6 of EIAR Appendix A5.1 - Construction Environmental Management Plan requires the contractor to adopt a proactive approach to reduce light pollution and trespass. Details of construction lighting will therefore be developed as part of the CEMP in line with the following principles:

- Construction lighting will be installed in accordance with best practice standards and guidance, including: GN01:2020, BS EN 12464-2-2014 (Outdoor Workplaces). It will be required to meet G45 performance, which have the lowest lux levels, and adopt the requirements of Guidance Note 08/23 (Bat Conservation Trust 2023);
- Lighting will be positioned and directed to mitigate the impact on neighbouring adjacent properties and habitats;
- The use of construction lighting will be limited to the authorised working hours; and
- Security lighting will only be activated when a motion sensor is triggered by an intruder so that live CCTV records any such activity.

2.2.11 Cultural Heritage

2.2.11.1 Impact on townlands and historic boundaries in South Dublin

105. The prescribed body submission from South Dublin County Council states that Townland, Parish and Barony boundaries are most often represented in the landscape by hedgerows, ditches and banks, and that the proposed development has the potential to impact cultural and historic identity and landscape character. The submission continues that significant sections of townland and historic civil boundaries are likely to be impacted by the proposed project route.

2.2.11.1.1 Applicant's Response

106. The Applicant acknowledges that the Proposed Project would impact townland boundaries. This impact was assessed in EIAR Chapter 17 – Cultural Heritage.

107. Due to the linear and large-scale nature of the Proposed Project, multiple townland boundaries would be directly impacted upon due to their removal as part of the pipeline stripping along the Construction Working Width. In cases where the boundaries have been removed (i.e. within commercial bogland), where boundaries have very low or low importance, no effect is predicted. However, where the boundaries are upstanding (medium importance) the direct effect is deemed to be of moderate significance (negative). These effects are not significant in terms of the EIAR.

108. All extant townland boundaries that will be impacted will be subject to a written and photographic record prior to construction. This will be carried out by a suitably qualified heritage specialist. The removal of townland boundaries will be subject to archaeological monitoring.

2.2.12 Resource and Waste Management

2.2.12.1 Recommended Planning Conditions for Resource and Waste Management

109. The prescribed body submission from South Dublin County Council recommends the following planning conditions in relation to resource and waste management:

- A suitable location for the storage of refuse shall be provided during the construction and operational phase of the development so as to prevent a public health nuisance; and
- All waste materials from the project should be detailed and details of waste management to be detailed.

2.2.12.1.1 Applicant's Response

110. The Applicant acknowledges the recommended conditions and requirements within the submission from South Dublin County Council. The Applicant is committed to ongoing consultation with South Dublin County Council throughout the development of the Proposed Project, and accepts the principle, spirit, and intent of the suggested conditions and requirements. The Applicant will comply with the conditions attached to any grant of planning approval, in addition to those already included as mitigation or monitoring measures in the EIAR and the CEMP which are all included in the planning application documentation.

111. A Construction Waste and Byproduct Management Plan (CWBMP) has been prepared for the Proposed Project and forms part of the CEMP (Annex C of EIAR Appendix A5.1). The plan has been written in accordance with the best practice guidance from the EPA. The purpose of the CWBMP is to provide the information necessary to ensure that construction waste is managed in accordance with current legal and best practice requirements.

112. As per Section 5.4 of the CEMP, the Contractor will ensure good housekeeping practices on site to prevent nuisance incidents at nearby property, uncontrolled releases of pollution, accidents and/or general complaints from the public. This will include provision of site layout maps showing key areas such as material and waste storage, and provision of appropriate waste management facilities at each working area. Further information on waste and by-product storage is provided in Section 4.2.3 of the CWBMP.

2.2.13 Natura Impact Statement

2.2.13.1 Potential for Adverse Effects on a Special Conservation Interest or Qualifying Interest Bird Species, Golden Plover

113. The prescribed body submission from South Dublin County Council states that there is a population of Golden Plover that avails of the arable fields in the vicinity of the termination point at Peamount for roosting and possibly for feeding purposes (the Applicant is referred to information contained in SDCC's Planning Reference: SD24A/0087W) which has not been considered in the NIS. It needs to be determined whether these birds are an ex-situ roosting population from the Natura 2000 sites located either in Dublin Bay or

in the adjacent midland areas. Detailed surveying of the area would therefore be required to fully determine the potential for possible ex-situ adverse effects on this Special Conservation Interest or Qualifying Interest bird species. Possible adverse effects might result due to the proposed development disturbing and/or removing foraging and roosting areas for this species.

2.2.13.1.1 Applicant's Response

114. As outlined within the NIS and EIAR Appendix A8.22 - Winter Bird Summary Report, golden plover were recorded within the study area during surveys undertaken between 2015 and 2025. While flocks were only recorded within and surrounding the TPR during the 2020/2021 and 2022/2023 winter survey seasons, the species was absent during the most recent survey in 2024/2025 winter survey season, likely due to the established crop of winter barley and ongoing construction activity (not associated with the Proposed Project) north of the TPR, which made the area unsuitable for golden plover at the time of survey.
115. The submitted baseline data for the Proposed Project demonstrates that the lands surrounding the TPR comprise active arable agricultural fields subject to ongoing management and disturbance, and that usage by golden plover varies depending on habitat suitability and land use practices. On this basis, the area is not considered to represent a stable or regularly used roosting habitat for the species.
116. As stated within the NIS, there are no European sites within the Zone of Influence (Zol) of the Proposed Project/TPR designated for golden plover, with the nearest Special Protection Area (SPA) designated for this species located approximately 20km from the Proposed Project (North Bull Island SPA). While golden plover are known to utilise off-site agricultural lands opportunistically, the submitted surveys indicate that usage of the lands surrounding the TPR is variable and dependent on crop type and disturbance levels, with the species absent during the most recent survey season (winter 2024/2025). No evidence was identified during the baseline survey effort undertaken for the Proposed Project to indicate that the lands within or surrounding the TPR function as regular or established ex-situ supporting habitat for any SPA population, or that any functional connectivity exists between the Proposed Project and an SPA designated for golden plover.
117. Therefore, based on the information submitted, including the nature of the habitats present, the variable use of the area by the species, and the absence of any identified connectivity with a European site designated for golden plover, the conclusions of the NIS for the Proposed Project are unchanged, and remain appropriate and justified.
118. Repeat ecological surveys will continue, where appropriate, to ensure that baseline data remains current and valid. Pre-construction surveys would also be carried out, having regard to the approach outlined in Section 8.8 of the EIAR.

3 Response to Environmental Trust Ireland

3.1 Introduction

119. A submission from Environmental Trust Ireland (WSP_SUB_43) was received from ACP on 9 April 2026, which the Applicant responded to in the Statutory Consultation: Response to Submissions Report submitted to ACP on 6 May 2026. An additional submission was received from ACP on 19 May 2026 from Environmental Trust Ireland (WSP_SUB_43B). This Report addresses the new submission received on 19 May 2026. As explained below, cross references have been provided to the responses in the Statutory Consultation: Response to Submissions Report where relevant and appropriate to avoid duplication.

120. The submission from Environmental Trust Ireland raised a variety of points in relation to the Proposed Project. These points include site notices, the interaction of the Proposed Project with the Ardnacrusha Generating Station, the Appropriate Assessment and Water Framework Directive compliance.

121. Assessments relating to the issues raised were carried out and reported in the EIAR submitted as part of the SID Planning Application. The assessments complied with the relevant legislation, standards and guidance as set out in each Chapter of the EIAR and were prepared by a team of competent experts as set out in Chapter 2 – The Environmental Impact Assessment Process in the EIAR. The planning application documentation which covers the issues raised in this submission are:

- Planning Statement;
- EIAR Chapter 9 – Water;
- Natura Impact Statement; and
- Water Status Impact Assessment Report.

122. A number of the issues raised in the Environmental Trust Ireland submission have already been responded to in full in the Statutory Consultation: Response to Submissions Report submitted to ACP on 6 May 2026. To avoid duplication, cross references to the relevant sections of the Statutory Consultation: Response to Submissions Report are provided in Table 3.1.

Table 3.1: Issues Raised by Environmental Trust Ireland Where Response is Provided in the Statutory Consultation: Response to Submissions Report (6 May 2026)

Issue Raised	Relevant Section of the Statutory Consultation: Response to Submissions Report Where the Response to the Issue is Located
Compliance with the Aarhus Convention in relation to public participation	Section 4.2.2 - Public Participation - Compliance with the Aarhus Directive
Impacts to ecosystems, aquaculture, and habitats and species downstream of the abstraction	Section 10.2.2 - Potential Biodiversity Impacts to the River Shannon Section 10.2.3 - Potential Impact of the Proposed Abstraction on Habitats and Species Section 10.3.5 - Potential Impact of the Proposed Project on Fish Migration and Passage
Surface water and groundwater interactions	Section 10.4.32 - Assessment of Groundwater Dependent Terrestrial Ecosystems
Ecological consequences due to reduced flow regime, including spawning habitat loss, reduced dilution capacity, altered salinity regime in estuary, drying of wet grasslands and fens, and invasive species advantage under altered flow	Section 10.3.5 - Potential Impact of the Proposed Project on Fish Migration and Passage Section 10.3.12 - Potential Impacts to Littoral and Shoreline Habitats Section 10.4.8 - Potential Downstream Effects of the Proposed Project on Tailrace / Old Channel Section 10.4.33 - Impact of Aquatic Invasive Species on Native Fauna

Issue Raised	Relevant Section of the Statutory Consultation: Response to Submissions Report Where the Response to the Issue is Located
The sustainability of the proposed abstraction rate and the downstream impacts of the abstraction	Section 11.2.2 - Reduction in the Flow Down the Old River Shannon Section 11.2.7 - Downstream Effects on the River Shannon
Impacts on tourism and water-dependant festivals downstream of the abstraction	Section 17.2.2 - Potential Impact on Local Tourism and Amenity Impacts of the Proposed Project on Lough Derg and the Lower River Shannon Section 17.3.3 - Potential Impact of the Proposed Project on Limerick Rowing
Adequacy of the Appropriate Assessment of the Lower Shannon SAC	Section 25.4.8 - Consideration of Baseline Conditions for the Conservation Objectives of the Lower River Shannon SAC Section 25.4.19 - Determination of the Risk of Impact on Lower Shannon Special Conservation Area
Adequacy of the Appropriate Assessment of the River Shannon and River Fergus Estuaries SPA and Askeaton Fen Complex SAC	Section 25.4.13 - Potential Impact on Special Conservation Areas and Special Protection Areas in Limerick
Adequacy of the Appropriate Assessment of the River Shannon Callows SAC	Section 25.3.3 - Assessment of Hydrologically Connected European Sites
Compliance with the Habitats Directive and scientific doubt	Section 25.2.1 - Compliance with the Habitats Directive Section 25.3.1 - Adequacy of the Findings of the Appropriate Assessment Section 25.4.9 - Errors in Appropriate Assessment Methodology
Water Framework Directive compliance	Section 26.2.1 - Compliance with the Water Framework Directive Section 26.3.3 - Compliance with Article 4 Requirements Section 26.4.4 - Compliance of the Proposed Abstraction with the Water Framework Directive Section 26.4.5 - Compliance of the Flow with the Water Framework Directive

123. Responses to new issues raised in the submission, or issues only partially covered in the Statutory Consultation: Response to Submissions Report, are provided in Section 3.2 of this Report. Where appropriate, cross references are provided in the following responses to relevant sections of the Statutory Consultation: Response to Submissions Report and planning application documentation.

3.2 Response to Issues Raised

3.2.1 Planning

3.2.1.1 Site Notices

124. The general observation submission from Environmental Trust Ireland states that no site notices were displayed in Limerick, Clare, or Kerry. As a result, the application is invalid *ab initio*.

3.2.1.1.1 Applicant's Response

125. The Applicant has responded in relation to site notices in County Limerick and County Clare in Section 3.3.3 - Notification of Planning of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026. In summary, the reason for this is that none of the major permanent infrastructure works as part of the Proposed Project are located within County Limerick or County Clare. Site notices were erected at the major permanent infrastructure sites voluntarily by the Applicant and this approach was presented to ACP during the Pre-Application Consultation process. As such it is considered that the public notification of the proposed development has been carried out in accordance with the requirements of the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended).

126. The Applicant would point out that site notices were not erected in County Kerry as there are no works planned in County Kerry as part of the Proposed Project.

3.2.2 Water (Hydrological Modelling and Water Levels)

3.2.2.1 Interaction with Ardnacrusha Generating Station

127. The general observation submission from Environmental Trust Ireland states that the proposed development cannot be seen in isolation from the existing ESB generating station at Ardnacrusha where up to 90% of the water from the River Shannon is abstracted per day, typically about 285 to 290 million cubic litres leaving about 10% of water in the river. This has resulted in the population of Atlantic salmon now being critically endangered. Uisce Éireann proposes to abstract even more than the ESB.

3.2.2.1.1 Applicant's Response

128. In broad scale terms, approximately 90%–95% of the long-term average annual flow in the River Shannon at Parteen Weir (which is approximately 180m³/s), is directed through Ardnacrusha, with the minimum statutory compensation water flow of 10m³/s directed to the lower Shannon at Parteen Weir. There are often periods of wet weather in the summer when inflows into Lough Derg will rise and increase the level at Lough Derg. As the inflows from Lough Derg arrive at Parteen Basin, ESB takes that additional water to increase generation at Ardnacrusha (up to 400m³/s). In comparison, the Proposed Project would abstract a maximum of 3.47m³/s. This represents the projected peak deficit in a drought period, in 2050. Abstraction rates would vary during normal operation up to this maximum; however, more typical abstraction rates would be represented by the average deficit which is projected to be equivalent to 1.78m³/s. It is therefore not correct to state that the Proposed Project would abstract more than ESB does currently for hydropower generation.

129. The Proposed Project has not been designed in isolation from the operation of Ardnacrusha Generating Station. In fact, the very reason for locating the proposed abstraction in Parteen Basin was that the drinking water abstraction is water that would otherwise be used in hydropower generation. A maximum of 2% of the long term annual average flow at Parteen Basin would be diverted for drinking water supply instead of being used for hydropower generation. This means that potential changes to the natural environment that could otherwise have occurred if overall abstraction rates were increased at Parteen Basin, or elsewhere, can be avoided by changing the use of the same volume of water which is already being abstracted from a lake. It also avoids the need to build a new impoundment and the environmental effects that would arise from doing so.

130. The Applicant has provided detailed responses in relation to the hydrological modelling, water levels, and downstream flow in Chapter 11 – Water (Hydrological Modelling and Water Levels) of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026. In summary, and as stated in EIAR Chapter 4 – Proposed Project Description:

“As part of an overall agreement with ESB, water will be diverted to the Proposed Project abstraction from the flow that would otherwise have been used for electricity generation on a continuous year round basis. At a practical level, this will mean that ESB, in keeping the water level within the Normal Operating Band on Lough Derg and within the upper and lower water level on Parteen Basin, will take account of, and respond to, the volume of water abstracted for the Proposed Project, alongside other relevant considerations such as, maintaining statutory compensation flow of 10m³/s down the Old Shannon channel, predicted rainfall, the demand for power and operating practices. ESB will maintain the water levels within the Normal Operating Band on Lough Derg and within the upper and lower water levels on Parteen Basin, as it does currently. Over longer periods there would be a generalised adjustment of the flow going to Ardnacrusha by ESB to respond to the volume of water used by the Proposed Project. However, the operation of Lough Derg, post works, will feel and look very similar to the way it currently operates, and there will not be a visible day to day difference.”

131. In relation to the Atlantic salmon, the Applicant responded to this issue in Section 10.3.5 - Potential Impact of the Proposed Project on Fish Migration and Passage, and Section 25.3.8 - Degradation of Wild Salmon

Habitat, of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026. In summary, the hydrological model for the Proposed Project demonstrates that any abstraction-related changes to water levels are negligible and largely confined to extreme drought conditions, with no measurable influence on flood magnitude, timing, duration or frequency either upstream or downstream of the Proposed Project (which includes the Old River Shannon), therefore, the proposed abstraction is not predicted to have any effect on the qualifying interest habitats or species (including Atlantic salmon) of the Lower River Shannon Special Area of Conservation (SAC).

3.2.3 Natura Impact Statement

3.2.3.1 Appropriate Assessment of the Tory Hill Special Area of Conservation

132. The general observation submission from Environmental Trust Ireland states that Uisce Éireann has failed to consider Tory Hill SAC in the Appropriate Assessment.

3.2.3.1.1 Applicant's Response

133. In Section 6 of the NIS, European sites within the Zol of the Proposed Project are identified using the source-pathway-receptor approach. There are 78 European sites located within the potential Zol of the Proposed Project (i.e. European sites downstream of the Proposed Project, within the same groundwater body as the Proposed Project, or having another potential pathway for other types of effects) that were assessed in order to determine the actual Zol and whether or not a source-pathway-receptor exists (Table 6.1 in the NIS). Of the 78, 19 are considered to have a source-pathway-receptor to the Proposed Project (see Table 6.1 in the NIS). Examples of relevant pathways include, but are not limited to: surface water, groundwater, disturbance (visual, noise, physical presence) and loss of habitat (including supporting habitat). Table 6.1 in the NIS outlines the qualifying interests and special conservation interest species for each European site and identifies where there are potential source-pathway-receptor links via which likely significant effects on the European sites' qualifying interests and special conservation interest species could potentially occur in light of their conservation objectives.

134. The Tory Hill SAC is designated for semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (* important orchid sites) [6210], calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae* [7210], and alkaline fens [7230].

135. This SAC is located in County Limerick and south of Limerick City. It is located over 30km from the proposed abstraction and in a separate catchment (i.e. the Shannon Estuary South). The Mague_080 watercourse flows through Tory Hill SAC which ultimately flows into the Mague Estuary, downstream of Limerick Dock. As discussed in Section 2.2.1 of the NIS, the 'downstream limit' of the abstraction Zol is the confluence of the Shannon (Limerick Dock) and the Ardnacrusha Tailrace at Limerick Dock. The diurnal tidal influence on water levels and flows at this point mean that any change in the Tailrace flow, resulting from a change in duration of flow through Ardnacrusha Generating Station as a result of the Proposed Project abstraction, would have no hydrological influence beyond the confluence at Limerick Dock. As Tory Hill SAC is located downstream of Limerick Dock, it is beyond the Zol of the Proposed Project.

136. No surface water or groundwater pathway exists. No source-pathway-receptor linkage exists with the Proposed Project, and therefore there is no pathway for effects. Thus, this European site was not considered in the Appropriate Assessment.

137. The submission raised similar issues with regard to the River Shannon and River Fergus Estuaries Special Protection Area (SPA) and Askeaton Fen Complex SAC. These were not assessed in relation to hydrological impacts in the NIS for the same reasons set out above. The Applicant notes that the River Shannon and River Fergus Estuaries SPA was screened into and assessed in the NIS in relation to waterbirds of special conservation interests. A response in relation to these two European sites was

provided in Section 25.4.13 - Potential Impact on Special Conservation Areas and Special Protection Areas in Limerick, of the Statutory Consultation: Response to Submissions Report submitted to ACP on 6 May 2026.

3.2.4 Water Status Impact Assessment Report (WFD)

3.2.4.1 Groundwater Bodies and Water Framework Directive Compliance

138. The general observation submission from Environmental Trust Ireland states that under Article 4 of the Water Framework Directive (WFD) no groundwater body may deteriorate in status; quantitative and chemical status must remain at least “Good”; and abstractions must not compromise associated surface waters or dependent ecosystems. The submission continues that the abstraction at Parteen Basin sits within the Shannon River Basin District, intersecting multiple groundwater bodies, including:

- Limerick City Northwest Groundwater Body;
- Limerick City East Groundwater Body;
- Pallas Greean Groundwater Body;
- Silvermines Groundwater Body;
- Askeaton Groundwater Body; and
- Ballingarry Groundwater Body.

3.2.4.1.1 Applicant's Response

139. The Applicant acknowledges the submission by Environmental Trust Ireland regarding Article 4 of the WFD and the need to prevent deterioration in groundwater bodies and maintain Good status.

140. The Applicant notes that the Proposed Project abstraction at Parteen Basin is from surface water and does not involve groundwater abstraction. A hydrogeological assessment undertaken as part of the EIAR confirmed that there is no significant hydraulic connectivity or impact pathway between the Proposed Project and the groundwater bodies identified in the submission from Environmental Trust Ireland.

141. The hydrological and hydrogeological assessments demonstrate that the abstraction from Parteen Basin does not materially alter groundwater–surface water interactions or existing hydraulic gradients.

142. There is no pathway by which the abstraction would compromise associated surface waters or groundwater-dependent ecosystems, including Groundwater Dependent Terrestrial Ecosystems (GWDTes). The Applicant has further responded in relation to GWDTes connected to Parteen Basin and Lough Derg in Section 10.4.32 - Assessment of Groundwater Dependent Terrestrial Ecosystems, and Section 25.3.3 - Assessment of Hydrologically Connected European Sites, of the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026.

143. On that basis, groundwater effects were scoped out of detailed assessment for the Water Status Impact Assessment Report (WSIAR), as no mechanism was identified by which the Proposed Project could influence groundwater levels, flows, or quality (see Section 4.5 in the WSIAR for the scoping justification). Notwithstanding this, the WFD compliance assessment (as presented in the WSIAR) considered all relevant receptors and concluded that:

- The Proposed Project will not cause deterioration in the status of any groundwater body; and
- It will not prevent the achievement or maintenance of Good quantitative or chemical status.

144. There is no risk of indirect effects on groundwater-dependent ecosystems or associated surface waters arising from the Proposed Project.
145. The assessment considered cumulative pressures and concluded that the Proposed Project will not give rise to cumulative effects capable of affecting groundwater status.
146. In addition, standard good practice mitigation and embedded design measures (as set out in the CEMP in EIAR Appendix A5.1 and associated management plans) will ensure the protection of groundwater during the Construction Phase, including pollution prevention controls and management of any temporary excavations.
147. Accordingly, the Applicant is satisfied that the Proposed Project fully complies with the requirements of Article 4 of the WFD in respect of groundwater.

References

Chartered Institute of Ecology and Environmental Management (CIEEM) (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine. Version 1.3. September 2018. Updated September 2024.

Construction Industry Research and Information Association (CIRIA) (2006). C648 Control of Water Pollution from Linear Construction Projects: Technical Guide.

National Roads Authority (NRA; now known as Transport Infrastructure Ireland) (2006). Guidelines for the Protection and Preservation of Trees, Hedgerows and Scrub Prior to, During and Post Construction of National Road Schemes. Environmental Series on Construction Impacts. Available at: <https://www.tii.ie/media/neghtphi/guidelines-for-the-protection-and-preservation-of-trees-hedgerows-and-scrub.pdf>. [Accessed: May 2026].

National Roads Authority (NRA; now known as Transport Infrastructure Ireland) (2009). Guidelines for Assessment of Ecological Impacts of National Road Schemes. Available at: <https://www.tii.ie/media/kzldoawo/guidelines-for-assessment-of-ecological-impacts-of-national-road-schemes.pdf>. [Accessed: May 2026].

Appendix A Submissions Identification Table

Unique ID	ACP Reference Number	Name of Individual or Organisation	Topics Raised (as per Structure of this Report)	Issues Raised Where Response is Provided in the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026	Responses Provided in the Following Sections of this Report
WSP_SUB_115	N/A	South Dublin City Council	Planning	N/A	Section 2.2.1.1 (Interaction with Zoned Development Lands and Strategic Employment Areas) Section 2.2.1.2 (Potential Material Contravention) Section 2.2.1.3 (Community Benefit Scheme)
			Project Description	N/A	Section 2.2.2.1 (Agreeing Design Details with the Local Authority)
			Construction and Commissioning	N/A	Section 2.2.3.1 (Interaction Between the Proposed Project and a New Surface Water Sewer) Section 2.2.3.2 (Interaction with the Grand Canal Greenway)
			Noise and Vibration	N/A	Section 2.2.4.1 (Recommended Planning Conditions for Noise and Vibration)
			Traffic and Transport	N/A	Section 2.2.5.1 (Recommended Planning Conditions for Traffic and Transport)
			Biodiversity	<p>The submission raises potential impact on bats and that mitigation and monitoring measures will be required. This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> Section 10.4.11 – Potential Impact of the Proposed Project on Bat Species <p>The submission raises that many of the habitat and species surveys were undertaken more than 18 months prior to the project's submission, with some being over five years old. This is considered to be beyond the period for best practice in ecological surveying. This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> Section 10.4.23 – Reliance on Outdated Ecological Survey Data 	<p>Section 2.2.6.1 (Potential Impact on the Grand Canal Potential Natural Heritage Area) Section 2.2.6.2 (Protection of Biodiversity and Biodiversity Net Gain) Section 2.2.6.3 (Potential Impact of Hedgerow Removal) Section 2.2.6.4 (Biodiversity Methodology Focused on Annex I Habitats)</p>

Unique ID	ACP Reference Number	Name of Individual or Organisation	Topics Raised (as per Structure of this Report)	Issues Raised Where Response is Provided in the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026	Responses Provided in the Following Sections of this Report
			Water (General)	N/A	Section 2.2.7.1 (Potential Impact on Watercourses from the Pipeline Crossings) Section 2.2.7.2 (Flood Risk at Grand Canal Crossing)
			Air Quality	N/A	Section 2.2.8.1 (Recommended Planning Conditions for Air Quality)
			Human Health	<p>The submission raises potential environmental impacts during the construction phase to Peamount Hospital. This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> • Section 8.3.2 – Potential Noise and Vibration Impacts from the TPR on Peamount Hospital • Section 8.4.1 – Potential Noise Impacts at Peamount Hospital • Section 15.3.2 – Potential Construction Dust Impacts on Peamount Hospital • Section 18.3.2 – Potential Health Impacts on Patients at Peamount Hospital 	Section 2.2.9.1 (Recommended Planning Condition for Human Health)
			Landscape and Visual	N/A	Section 2.2.10.1 (Landscape and Visual Effects from the Proposed Termination Point Reservoir) Section 2.2.10.2 (Recommended Planning Conditions for Landscape and Visual)
			Cultural Heritage	N/A	Section 2.2.11.1 (Impact on townlands and historic boundaries in South Dublin)
			Resource and Waste Management	N/A	Section 2.2.12.1 (Recommended Planning Conditions for Resource and Waste Management)
			Natura Impact Statement	N/A	Section 2.2.13.1 (Potential for Adverse Effects on a Special Conservation Interest or Qualifying Interest Bird Species, Golden Plover)

Unique ID	ACP Reference Number	Name of Individual or Organisation	Topics Raised (as per Structure of this Report)	Issues Raised Where Response is Provided in the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026	Responses Provided in the Following Sections of this Report
WSP_SUB_43B	N/A	Environmental Trust Ireland	Planning	N/A	Section 3.2.1.1 (Site Notices)
			Consultation and Communication	<p>The submission suggests that the Proposed Project is in breach of the Aarhus Convention in relation to public participation.</p> <p>This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> Section 4.2.2 - Public Participation - Compliance with the Aarhus Directive 	N/A
			Biodiversity	<p>The submission raises concerns that the abstraction will result in impacts to ecosystems, aquaculture, habitats and species downstream of the abstraction.</p> <p>This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> Section 10.2.2 - Potential Biodiversity Impacts to the River Shannon Section 10.2.3 - Potential Impact of the Proposed Abstraction on Habitats and Species Section 10.3.5 - Potential Impact of the Proposed Project on Fish Migration and Passage 	N/A
	<p>The submission raises concerns surrounding surface water and groundwater interactions.</p> <p>This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> Section 10.4.32 - Assessment of Groundwater Dependent Terrestrial Ecosystems 				

Unique ID	ACP Reference Number	Name of Individual or Organisation	Topics Raised (as per Structure of this Report)	Issues Raised Where Response is Provided in the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026	Responses Provided in the Following Sections of this Report
				<p>The response raises concerns on ecological consequences due to reduced flow regime, including spawning habitat loss, reduced dilution capacity, altered salinity regime in estuary, drying of wet grasslands and fens, and invasive species advantage under altered flow.</p> <p>This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> • Section 10.3.5 - Potential Impact of the Proposed Project on Fish Migration and Passage • Section 10.3.12 - Potential Impacts to Littoral and Shoreline Habitats • Section 10.4.8 - Potential Downstream Effects of the Proposed Project on Tailrace / Old Channel • Section 10.4.33 - Impact of Aquatic Invasive Species on Native Fauna 	N/A
			Water (Hydrological Modelling and Water Levels)	<p>The submission raises concerns with the proposed abstraction rate including whether the rate is sustainable, and the downstream impacts of the abstraction.</p> <p>This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> • Section 11.2.2 - Reduction in the Flow Down the Old River Shannon • Section 11.2.7 - Downstream Effects on the River Shannon 	Section 3.2.2.1 (Interaction with Ardnacrusha Generating Station)

Unique ID	ACP Reference Number	Name of Individual or Organisation	Topics Raised (as per Structure of this Report)	Issues Raised Where Response is Provided in the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026	Responses Provided in the Following Sections of this Report
			Population	<p>The submission raises concerns that the Proposed Project will lead to impacts on tourism and water-dependant festivals downstream of the abstraction.</p> <p>This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> • Section 17.2.2 - Potential Impact on Local Tourism and Amenity Impacts of the Proposed Project on Lough Derg and the Lower River Shannon • Section 17.3.3 - Potential Impact of the Proposed Project on Limerick Rowing 	N/A
			Natura Impact Statement	<p>The submission raises concerns on the adequacy of the Appropriate Assessment of the Lower Shannon SAC.</p> <p>This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> • Section 25.4.8 - Consideration of Baseline Conditions for the Conservation Objectives of the Lower River Shannon SAC • Section 25.4.19 - Determination of the Risk of Impact on Lower Shannon Special Conservation Area <p>The submission raises concerns on the adequacy of the Appropriate Assessment of the River Shannon and River Fergus Estuaries SPA and Askeaton Fen Complex SAC.</p> <p>This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> • Section 25.4.13 - Potential Impact on Special Conservation Areas and Special Protection Areas in Limerick 	Section 3.2.3.1 (Appropriate Assessment of the Tory Hill Special Area of Conservation)

Unique ID	ACP Reference Number	Name of Individual or Organisation	Topics Raised (as per Structure of this Report)	Issues Raised Where Response is Provided in the Statutory Consultation: Response to Submissions Report issued to ACP on 6 May 2026	Responses Provided in the Following Sections of this Report
				<p>The submission raises concerns for the adequacy of the Appropriate Assessment of the River Shannon Callows SAC.</p> <p>This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> Section 25.3.3 - Assessment of Hydrologically Connected European Sites 	
				<p>The submission raises issues relating to compliance with the Habitats Directive (Article 6) and scientific doubt.</p> <p>This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> Section 25.2.1 - Compliance with the Habitats Directive Section 25.3.1 - Adequacy of the Findings of the Appropriate Assessment Section 25.4.9 - Errors in Appropriate Assessment Methodology 	
			Water Status Impact Assessment Report (WFD)	<p>The submission raises points relating to WFD compliance.</p> <p>This is addressed in the following sections of the of the Statutory Consultation: Response to Submissions Report, submitted to ACP on 6 May 2026:</p> <ul style="list-style-type: none"> Section 26.2.1 - Compliance with the Water Framework Directive Section 26.3.3 - Compliance with Article 4 Requirements Section 26.4.4 - Compliance of the Proposed Abstraction with the Water Framework Directive Section 26.4.5 - Compliance of the Flow with the Water Framework Directive 	Section 3.2.4.1 (Groundwater Bodies and Water Framework Directive Compliance)