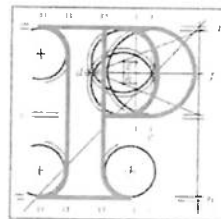


Our Case Number: ACP-323980-25



An
Coimisiún
Pleanála

Castleconnell River Association (CRA)
c/o Pat O'Connor
Glebe House
The Tontine
Castleconnell
Co. Limerick
V94 PXR3

Date: 13 August 2026

Re: Proposed Water Supply Project for the Eastern and Midlands Region
in the counties of Clare, Limerick, Tipperary, Offaly, Kildare, and Dublin.

Dear Sir / Madam,

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

The Commission will revert to you in due course with regard to the matter.

Please be advised that those who have already paid €50 are not required to pay a €50 fee at this time, a refund will be issued to the debit/credit card used to make payment for this submission

More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

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An
Coimisiún
Pleanála

SID Online Observation

Online Reference
SID-OBS-005790

Online Observation Details

Contact Name
Pat O'Connor

Lodgement Date
21/07/2026 16:42:21

Case Number / Description
323980

Payment Details

Payment Method
Online Payment

Cardholder Name
Patrick O'Connor

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€ 50.00

Lodgement No

LDG— 089951-26

Reason for Refund

No fee required for second round submission

Documents Returned to Observer

☐

Yes

☒

No

Request Emailed to Senior Executive Officer for Approval

☒

Yes

☐

No

Signed

lauren giffin

EO

Date

13/8/26

Finance Section

Payment Reference

ch_3Tvf0HB1CW0EN5FC06geXd4Q

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board
Member

Date

Date

Castleconnell River Association (CRA)
Objection to Uisce Eireann Water Supply Project,
Eastern & Midlands Region planning application

Case reference: PA92.323980

Name of Objector/Observer:
Castleconnell River Association (CRA)
C/O Pat O'Connor (Chair),
Glebe House,
The Tontine
Castleconnell
Co Limerick
V94PXR3

Contact: Castleconnell River Assoc: patoc5422@gmail.com

CRA consider that many of our original statements remain valid, but we will provide some clarification on the calculations we used, and to the Shannon Connectivity/Fish Passage Project. Unfortunately, due to the time allowed for response, we cannot at this time make a fuller response.

Section 11.2.3

This should read "Protecting the absolute minimum flow rate of 10 cumec". The ORS needs more than 10 cumec (so we don't want to "maintain" it), but let there be no doubt that anything less than 10 cumecs, even temporarily, is an ecological disaster.

An unchanging steady flow is not good for any river, and that is why the ORS badly needs the eFlow regime proposed by the Shannon Connectivity/Fish Passage project, to help with environmental welfare, fish passage and flood relief. However, the entire ORS since construction of Parteen 100 years ago has been carefully fine-tuned to make the most of the minimum 10 cumecs, with numerous lateral rock weirs constructed to guide flow and sediment to spawning beds and nursery streams. By their nature, these streams are on the lateral margins of the ORS, and so in the few cases that the ORS flow has dipped slightly below 10 cumecs, these vital lateral streams are the first to lose water, with disastrous results for the young salmonid population. We cannot risk this happening in the future. This is protected by statute, but we do not feel this is adequate given the pressure the water project may come under in times of drought (see below).

Section 24.3.1 of Applicants response. Response of the Applicant to the Shannon Connectivity project (aka Fish Pass Project).

The Applicants response to its failure to consider the impact of it's own twin project (which was to be well advanced or completed before the Water Supply Project for obvious technical, heritage and community reasons), is as follows:

None of the above elements (of the Fish passage project) have been adopted, have planning consent or are in the planning system awaiting approval. These future projects and plans can be considered as reasonably foreseeable, however they are still at the study/concept/feasibility stage and as such there are no publicly available plans, design information or environmental assessment information. On this basis, the Shannon Fish Passage Study does not meet the criteria for inclusion in the cumulative impact assessment.

This is a completely unacceptable response. The Applicant itself (incorporating Department of HousingLGH and ESB) is responsible for not progressing the Fish Pass Project to design, planning, and environmental assessment in the timely manner promised in 2016, to be in the construction or completion stage before the Water Supply Project was to be brought to planning. The Applicant cannot now contend that the Fish Pass Project cannot be considered because the partners involved in the Water Supply Project did not make it ready for consideration. The Fish Pass Project is a precursor project to the Water Supply Project. It is obvious that since the Fish Pass Project must use water from the mooted “reservoir”, that it's effect must be properly calculated, and included in the design of the Water Supply Project.

While there may not be freshets during any period of actual meteorological drought, freshets must be a natural feature before a drought formally begins, and when the drought ends, regardless of whether the “reservoir” is full or not at any point. This is a necessary feature that needs to be taken into account.

In Section 2530 of the Applicant's Response, it seems that the Applicant considers that rather than the Water Supply project taking account of the Fish passage project (the needs of the river, the environment, and migrating species), it should be the other way around; i.e. the Fish Passage Project will have to take account of the Water Supply Project when it eventually goes for design and planning. This means that they consider that the Water Supply Project has precedence to environmental wellbeing of the river. We consider that this is unacceptable, and contrary to Water Framework Directive requirements.

Under the Water Framework Directive, “good” status in a waterbody requires that there are “no significant barriers to fish migration”. This is supposed to be achieved in all Irish waterbodies by 2027. The Shannon drains over 20% of the Republic of Ireland, so if the Shannon cannot claim “good” status, we have already failed significantly in our third WFD.

Response to 11.3.3 Availability of water in a drought

The Applicant is not sure how we calculated availability of water in a drought.

A crude calculation is as follows:

- (a) Area of Parteen Basin in m^2 is 3,600,000.
- (b) Normal operating band (depth in M); 0.86m
- (c) Volume of Parteen Basin: (a) x (b) = 3,096,000 m^3 .

- (d) Area of Lough Derg in m^2 is 118,000,000.
- (e) Normal operating band (depth in M); 0.46m
- (f) Volume of Lough Derg: (d) x (e) = 54,280,000 m^3 .

Total long term static impoundment during drought = 57,376,000 m^3 .

Water Extraction calculation:

Pipeline Minimum water extraction rate; (4.52cumec); 390,528 m^3 per day
Limerick Water Treatment Plant taken from Shannon; 50,000 m^3 per day
Water for Ardnacrusha and Headrace maintenance; (1 cumec); 86,400 m^3 per day
Nominal (minimal) estimate of berm leakage: 25,000 m^3 per day

Sum of extraction per day during drought conditions: 551,928 m^3 per day.

Assuming a) minimal berm leakage and b) constant supply to Lough Derg to provide 10cumec to Old River Shannon, local use, evaporation etc:

Long term drought impoundment divided by daily extraction:

57,376,000 m^3 divided by 551,928 m^3 = 104 days.

This is obviously quite conservative, as the entire area of impoundment will not accommodate the NOB, and there is only a cursory inclusion of berm leakage – the extent of which is unknown to us, but we understand it to be significant.

If the average extraction rate per day included freshets, the daily extraction rate would be 701,214 m^3 , which would reduce the number of days supply to 82.

We consider that the above maximum days supply (104 – 82) cannot be adequate for the duration of droughts that are likely to occur in the near future.

Considering the above, and the surfeit of water during floods, we must reiterate the original declaration when the scheme was first mooted; that a reservoir of untreated water be constructed for processing during drought conditions.

25.3.2 In-Combination Assessment with the Fish Passage Project

We note again that it is not sensible to continue with a major project without considering the design of another major environmental project that will share a location on the same side of the Parteen berm and weir system, and use water from the same reservoir. This may even affect the inflow to the fish pass, and hence will affect the downstream fish migration pattern. This needs to be modelled before planning and design of the Water Extraction facility.

25.3.8

We note again that the major threat to salmon welfare occurs in drought conditions, and the drought modelled (2018) does not qualify within the top ten droughts of the last century (see reference below).

Here is our original Statement

Following the initial public consultation of the Water Supply Project, Eastern & Midlands Region (WSPem), a number of serious shortcomings still render the project unacceptable to watercourse users in this region. As presently designed, the project presents a continuing and increased threat to Atlantic Salmon, Sea lamprey and other migrating fish species including the European eel, which are protected by the European Habitats Directive, and compromises long-standing efforts by our organisation and others to protect the ecology and environment of the Lower Shannon SAC.

- The Parteen/Ardnacrusha barrier system, which the WSPem proposes to use as a water reservoir system, is unfit for purpose as a modern impoundment system. This is fully acknowledged and accepted by Uisce Eireann, Dept of Housing, Planning and Local Government, and ESB (see reference report DHPLG June 2021). This barrier system is almost 100 years old, and was built without regard for the ecology of the region. This resulted (among other effects) in truncating the migratory routes of Atlantic salmon, sea lampreys, and varieties of trout and flatfish. This resulted in collapse of salmon stocks above the barrier from at least 150,000 migrating salmon per year to approximately 1,250 salmon today, a fall of 99 %. Effects were similar on other migrating fish, leading for instance to the apparent extinction of gillaroo trout in Lough Derg.
- In order to be used as a water reservoir for WSPem, this Parteen/Ardnacrusha barrier system and Parteen Basin impoundment must in advance apply for

planning permission for change of use, with separate Screening, Appropriate Assessment, and Environmental Impact Statement for use as such within an SAC.

- The Parteen/Ardnacrusha barrier system and Parteen Basin impoundment, which forms the proposed reservoir for the WSPem, is within the Lower Shannon SAC, and must have a permit/licence to operate, which should be reviewed on a regular annual or biennial basis.
- It was clearly indicated and understood by all at the very first public discussions (11th February 2016, and 23rd February 2016) with Irish Water of what is now the WSPem, that a remediation of the Parteen/Ardnacrusha barrier system and Parteen Basin impoundment was a prerequisite for any effort at designing or applying for planning of any water abstraction facility associated with the Parteen/Ardnacrusha barrier system and Parteen Basin impoundment. This is a purely sensible approach from fiscal, engineering, logistical, and ecological points of view since the “Barrier Mitigation” and “Extraction” projects must of necessity share the same location, and the same resource. This Barrier Mitigation effort was extensively discussed and agreed (2016-2018); a RFT issued by the Dept of Housing, Planning and Local Government (01/02/2019) to begin the planning; consultants were appointed; and a satisfactory final report and overall plan issued and accepted (June 2021, see reference). This report contained a timeline for work to begin, culminating in a new fish pass by 2025 (see detail below). Unfortunately this has not happened. A RFT has only recently been issued (15/01/2026, by the Dept of Housing, Planning and Local Government) to implement this plan, but this is a 5-year project, and it is necessary that this plan be designed, accepted, and constructed before the WSPem may apply for planning permission, as the two projects are interlinked, and occupy the same physical space and resource. Even if one was not contingent on the other, it makes absolutely no sense to design the WSPem project without incorporating the Barrier Mitigation project, as each will affect the water-flow of the other, and also the migration behaviour of protected fish. Furthermore, the reservoir volume assumptions upon which the calculations for the WSPem are made are invalid until the Barrier Mitigation project is incorporated. At present, no account is taken of this necessity.
- Flow rate in the Old River Shannon (ORS) i.e. the remaining 10 cumec flow in the original channel below the Parteen weir, needs to be specifically protected. The ORS has been remediated as best possible in the last decades for the purpose of preserving now-endangered fish species. This is vital for heritage, economic, and cultural reasons. But it is in an extremely sensitive situation. The river morphology had been optimised since the 1930s to make best use of the remaining statutory minimum water flow, but the few remaining protected species are extremely sensitive to water height as all the nursery streams are by necessity at the margins of the old channel. Therefore even the most minimal decrease in the ORS level would be an actual disaster. It is apparent that the WSPem will come into conflict with the natural Shannon system during times

of drought, and any interference in the ORS statutory minimum water flow needs to be explicitly forestalled. This particular sensitivity needs to be fully acknowledged, and seen to be incorporated into the legal, engineering, and operational protocols of the WSPeM before the planning application can be acceptable.

- The most significant defect of the WSPeM is that there is no raw water reservoir built into the system. This means that all users of the Shannon system are seeking to use the same limited reservoir capacity in times of drought (see below). In times of drought, there will be very limited water available for the WSPeM, and the dreadful fear is that the WSPeM may eat into the vital minimal drought level of 10cumecs for the ORS.
- From an economic viewpoint, the WSPeM seems designed to take all future development potential (for which water is a prerequisite for both industry and household use) from the SW Ireland/Shannon basin area, and to transfer this potential to the east of the country. This seems to set the needs of Dublin and the east midlands above the needs of the local population, especially Limerick city and environs. The present WSPeM scheme will be an obvious limiting factor on both industrial development and population growth in the SW region, as it proposes to use all the available water in time of drought. There needs to be a clearer legal right to use water locally in time of need i.e. in time of drought.

Our objections are explained in more detail below.

Effect of WSPeM on Shannon drought resilience.

The overall problem with the present WSPeM scheme is that when this region has too much water the scheme doesn't take any of it, and when there is too little water the scheme takes all that is available. This is because there is no raw water reservoir built into the pipeline itself, but rather the scheme uses Lough Derg and Lower Lough Derg/Parteen Basin as the only reservoir, which is the same reservoir the Limerick region relies on. This comes to a head in times of drought, when the SW region relies on the Shannon as a reservoir.

Over the last 160 years in Ireland there have been seven major drought periods (1854–1860, 1884–1896, 1904–1912, 1921–1923, 1932–1935, 1952–1954 and 1969–1977), with individual droughts lasting up to 10 months. This situation is not forecast to improve with climate change. In terms of duration, the 1995 drought analysed in the present study does not make it even into the top ten (Noone and Murphy, *Climate and Society in Ireland* 2021). Even so, reports from 1995 note that water levels dropped in Lough Derg by up to 45cm, not 68mm. Likewise the 2018 drought does not rate, when very little flow went through Ardnacrusha for the whole year.

The drought resilience of a watercourse is dependent on its water-holding ability, which in this case comprises the lakes of the Shannon system bolstered in the lower Shannon by the Ardnacrusha-Parteen Hydroelectric system (the only environmental and ecological benefit of that system). The WSPeM project seeks to take all the advantage of the Shannon's natural drought resilience and transfer it to the east of the country at any time that the Southwest Region would need it most. This means that the Shannon and Lough Derg will provide no drought resilience for the Southwest Region.

A basic calculation shows that at the proposed WSPeM extraction rate of 3.82 cumecs (Tobin Report), plus 0.7 fish pass cumecs (Ardnacrusha fish pass minimum), plus ongoing minimum water extracted for Limerick (50k m³ per day via headrace from Parteen basin and Old River Shannon), that Lough Derg and Lr Lough Derg/Parteen basin Normal Operating Bands combined contain a maximum of 19 weeks supply (130 days), assuming that the Operating Band was at full height at the beginning of the drought. With the Old River Shannon already set permanently at the drought level – 10 cumec defined by statute – we would need to see definite guarantees and inbuilt fail-safes that the Old River system would not be subject to further deterioration, especially at this current time when the river is finally attempting to recover from a century of ecological damage, via the Shannon Connectivity Project. In other words, at times of drought, we would need to be certain that the 10 cumecs reserved for the Old river Shannon was sacrosanct, and was not in any danger of being further diminished by the WSPeM. For instance, in 2018 there would have been very little excess water available to go to the WSPeM, and that is before the Barrier Mitigation flow regime is taken into account (eFlow, Shannon Connectivity Final Report, 2021; see reference).

The present means of maintaining even the constant 10cumec level of water in the Old River Shannon has on several occasions been unsatisfactory in recent years. Water level gauges, on the bridge at O'Briens' Bridge and near Worlds End, have shown many instances of a fall of greater than 5-10cm in river level from the 10 cumec minimum. It must be understood that 10 cumecs is the "Drought Level" in the old channel, the absolute minimum that can be borne, and in the 90+ years since the Ardnacrusha system there have been constant efforts area to preserve at least some water flow through spawning gravels and nursery streams at this flow level. This was been achieved as far back as the 1930's by means of hand built diverting weirs on the margins of the river. These remnant spawning and nursery streams, being mostly on the shallow margins, are the first to suffer if there is any decrease in the 10 cumec minimum statutory flow. The immediate effect of any decrease is that flow ceases, and young salmonids have to abandon the streams for deeper water, which in a mixed river means they are exposed to predation. This is obviously a disaster for the years crop of smolts and fry.

Failure to maintain adequate flow is felt by all river users, down as far as Corbally.

Integration with the Shannon Connectivity Project

Since the WSPeM project was first proposed, all water sports and particularly angling organisations and environmental groups in this region have been assured that adverse effects of any potential project would be offset by a long-awaited program to rectify the century-long adverse effects of the Ardnacrusha barrier system, on which the WSPeM project will now depend. This promised rehabilitation program became known as the Shannon Connectivity Project (Final Report 2021; see reference), or the Barrier Mitigation Project. From this perspective, a number of aspects need to be firmly in place before the WSPeM can be accommodated in this region.

- The WSPeM reservoir drought resilience needs to take into account the revised and improved eFlow regime proposed in the Shannon Connectivity project. This eFlow regime is part of a crucial project to bring the entire Ardnacrusha system up to at least a reasonably acceptable ecological standard, and is far less onerous than having a permanent raised compensation flow for the Old River Shannon. This should not be an onerous load on the system, but to be properly assessed by all parties it needs a suitable trial period to begin immediately (4 year suggested in report). This requirement was for immediate inception in 2021 but the decision to begin has been obfuscated. This trial eFlow period needs to begin as a matter of urgency. A successful eFlow water management protocol will have significant implications for the WSPeM, CFRAM, and Shannon Connectivity projects, as well as a prospective Shannon LIFE project to bring water quality to a more acceptable standard. It is absolutely necessary to return the old River Shannon to some resemblance of a natural river system.
- The design and location of the WSPeM intake should be optimised to integrate with and improve the effectiveness of the Shannon Connectivity Project for migrating fish. The intake of 3.82 cumecs during fish migration periods will be significant in the attraction of migrating fish. There is no mention of the Shannon Connectivity Project (Final Report 2021, see reference) in the planning submission, despite that the Shannon Connectivity Project is the biggest and most important ecological project in this region for a century.
- Since the WSPeM and Shannon Connectivity projects share similar fish-exclusion requirements it is necessary to bring these two together, especially in deciding which technology is appropriate, and to ensure that one project does not compromise the other. A major aspect of the Shannon Connectivity project involves shepherding downward-migrating fish to an improved fish-pass on the Parteen Weir, away from intakes to the headrace, and the WSPeM intake will have an effect via change in water flow and via fish-exclusion technology. This effect needs to be assessed, designed, and optimised for both projects together. A properly designed fish-exclusion fence for the WSPeM intake will need to work in tandem with the Shannon Connectivity fish fence, and so they need to be designed and built in tandem.

Local Water treatment

The outlet from the Waterworks at Clareville, which supplies Limerick, has been a significant source of intermittent pollution such that almost no salmonid spawning now takes place in the adjacent traditional spawning area known as The Gravels. We need to be assured that the much larger WSPem treatment plant will never present a similar threat to the Kilmastulla and Lower Shannon. We note that the WSPem water treatment plant does not have a similar process-water outflow, that process water is to be recirculated, and residue is to be caked and removed.

Summary

Local organisations have grave concerns regarding the slow progress of the Shannon Connectivity project and must insist on the following aspects of the Shannon Connectivity project being delivered according to the Roadmap for action 2021 to 2025 before the WSPem can go ahead. This was promised at the beginning of discussions; it is in everyone's interest, especially the WSPem as there are significant implications for water usability.

- Environmental Flow Study period and project communication
- New fish pass at Parteen Weir
- Tailrace Barrier Feasibility Study
- Downstream Fish Passage Feasibility Study
- Lower Shannon Management Plan
- Ardnacrusha New Fish Pass Feasibility Study

Contact: Castleconnell River Assoc: patoc5422@gmail.com

Reference: Dept of Housing, Planning and Local Government. Provision of expert advisory services to assist in the consideration of the impact of barriers to fish migration in the lower Shannon catchment and the formulation of applicable options for the improvement of fish migration. CDM Smith. Final Report 2021.