

Our Case Number: ACP-323980-25



An
Coimisiún
Pleanála

Limerick City & County Council
Corporate Headquarters
Merchant's Quay
V94EH90
Co. Limerick

Date: 04 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 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 in respect of this matter.

Please be advised that a copy of all submissions/observations received in relation to the application will be made available for inspection on the Commission's website at the following link:

<https://www.pleanala.ie/en-ie/case/323980>.

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,


Eimear Reilly
Executive Officer
Direct Line: 01-8737184

PA09

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Eimear Reilly

From: LAPS
Sent: Wednesday 22 July 2026 10:26
To: Eimear Reilly
Subject: FW: PA92.323980 - Water Supply Project for the Eastern and Midlands Region
Attachments: ACP-323980 - Director General Response to UE Submissions Response.pdf; Cllr. Beasley_Submission_ACP-323980-25_17-07-26.pdf; Cllr Sean Hartigan Response.pdf

Follow Up Flag: Follow up
Flag Status: Completed

From: SIDS <sids@pleanala.ie>
Sent: Wednesday 22 July 2026 08:56
To: LAPS <laps@pleanala.ie>
Subject: Fw: PA92.323980 - Water Supply Project for the Eastern and Midlands Region

Hi all,

I believe this email is relating to one of your cases.

Thank you!
Alba

From: O'Brien, Majella <Majella.O'Brien@limerick.ie>
Sent: Tuesday, July 21, 2026 4:50 PM
To: SIDS <sids@pleanala.ie>
Cc: O'Connell, Nuala <nuala.oconnell@limerick.ie>; O'Keeffe, Grainne <grainne.okeeffe@limerick.ie>; Fennessy, Brigid <brigid.fennessy@limerick.ie>
Subject: PA92.323980 - Water Supply Project for the Eastern and Midlands Region

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To whom it may concern,

Please find attached the following in relation to ACP-323980-25, Strategic Infrastructure Development for Water Supply project for the Eastern and Midlands Region:

Director General's Response

Views of Elected Members – 1. Councillor Sarah Beasley

Please note a hard copy will issue in today.

I would be much obliged if you would acknowledge receipt of the attached.

Best Regards,

Majella.

Majella O'Brien

Administrative Officer | Planning Department | Limerick City and County Council

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[Limerick City & County Council Disclaimer](#)



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An Coimisiún Pleanála
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21st July 2026

Re: PA92.323980 – Úisce Éireann Proposed Water Supply Project for the Eastern and Midlands Region in the counties of Clare, Limerick, Tipperary, Offaly, Kildare and Dublin

Dear Sir/Madam,

I refer to your correspondence of 24th June 2026, and to Úisce Éireann's 'Response to Submissions Report'.

Background

I wish to reiterate and emphasise the key matters raised in the Director General's Report submitted by Limerick City and County Council on 30th March 2026, including the appended Meeting Administrators Report and Views of Elected Members.

In this regard, it also should be noted that at a Special Meeting of the Council, held on 23rd March 2026, the Elected Members established consensus that Limerick City and County Council should object to this project.

The Council does not consider the response made by Uisce Eireann has addressed the planning, environmental and ecological concerns raised in the submissions made and it is respectfully submitted that these aspects need robust and independent assessment.

Having reviewed the Uisce Eireann's response and following a briefing with the Elected Members on the 16th July, the following additional observations are made:

Appraisal of Alternatives

The Council remains concerned that a sufficiently robust assessment of alternatives has not been undertaken. Given the scale of the investment proposed and the strategic importance of the resource involved, greater weight should be given to alternatives

including leakage reduction, demand management, desalination and other measures capable of reducing or delaying the need for abstraction at the scale proposed.

The planning process and environmental assessment must be capable of demonstrating that all reasonable alternatives have been rigorously and transparently examined. In this regard, all information and associated analysis that informed the alternatives should form part of the public documents for this project and be available for public review and examination.

Balanced Regional Development / Security of Water Supply for Limerick

Under the National Planning Framework, Limerick is identified as a key city for population and economic growth, and in the national interest it is targeted to grow and accommodate significant population and employment growth.

While water is proposed to be abstracted from the River Shannon system, the project provides no direct water supply benefit to Limerick despite the significant role assigned to Limerick under the National Planning Framework.

Limerick's anticipated and necessary expansion over the coming decades requires certainty regarding future water supply capacity to support housing delivery, indigenous enterprise, foreign direct investment, and broader regional development.

As the proposal seeks to abstract from the same water catchment that supplies Limerick, the consequent impact should be fully dealt with in the EIAR as part of a cumulative assessment. It is considered these impacts have not been acknowledged or sufficiently analysed as part of the project assessment or in Uisce Eireann's latest response.

Ecological Impacts

The environmental implications of the proposed abstraction also warrant careful and ongoing scrutiny. In particular, the potential effects on the Lower River Shannon SAC and the River Shannon and Fergus Estuaries SPA must continue to be assessed regarding changing climate conditions, future river flows, ecological resilience, migratory fish populations, and cumulative pressures on the Shannon catchment.

It is considered that the hydrological model has not informed the natural impact statement and has not fully taken into consideration the likelihood of rapid hydrological changes and pressures during the lifetime of the project and the inevitable increased demand for water in climate altered future.

Any abstraction regime must remain adaptive and responsive to evolving hydrological and ecological conditions over the lifetime of the project and ensure that the ecological integrity of Lough Derg and its catchment is fully protected.

Community Benefit

Given the scale, duration and strategic significance of the project, consideration should be given to expanding both the geographical reach and duration of the fund to recognise the wider communities along the Shannon, downstream of the Parteen basin, that may be affected by the project.

View of Elected Members

As outlined above, the Elected Members have raised very strong objections to the proposed development, from a planning, environmental and ecological perspective. The views and submissions reflect in-depth local knowledge, ecological and environmental research and wider community concerns.

Additional submissions have been prepared by Elected Members and are attached to this correspondence. It is requested that these additional submissions are fully acknowledged and evaluated by An Coimisiún Pleanála.

Conclusion

It is essential that the objective of securing a water supply for the Eastern and Midlands Region is not achieved at the expense of the future development potential, environmental integrity, and security of water supply for Limerick and the Mid-West Region.

It is respectfully requested given the national importance and potential impact of the project, that an oral hearing is facilitated and that all submissions made to date by Limerick City and County Council are fully considered by An Coimisiún Pleanála in the determination of this project.

Yours faithfully,



Dr. Pat Daly,

Director General,

Limerick City & County Council.



Cllr Sarah Beasley
Limerick City North, Aontú
sarah.beasley@limerick.ie

17th July 2026

Planning Department
Limerick City and County Council
Merchant's Quay, Limerick, V94 EH90

Re: ACP Case 323980 — Proposed Water Supply Project for the Eastern and Midlands Region

Submission of Cllr Sarah Beasley, for attachment to the Council's response to An Coimisiún Pleanála on Úisce Éireann's response to submissions, on or before 21st July 2026

A Chara,

Further to the Elected Members' briefing held on 15th July 2026 in relation to the above case, and Úisce Éireann's response to the 114 submissions received on the proposed Water Supply Project, I am submitting the following observations as an Elected Member, pursuant to Section 37E of the Planning and Development Act 2000 (as amended), for attachment to the Council's response to An Coimisiún Pleanála.

1. Overall Position

I do not accept that this project should proceed in its current form. The proposed abstraction of up to 300 million litres per day from the Parteen Basin, and the construction of a 172km pipeline to Dublin, represents a permanent transfer of a strategic regional resource out of the Mid-West, at a project cost now put at between €4.58 billion and €5.96 billion, to address a shortfall that has not been shown to be irreducible.

Dublin's own leakage rate has improved in recent years, falling from 37% to approximately 29%, and national leakage now stands at around 35–36%, down from 49% in 2014. That progress is welcome, but it also means more than a third of treated water nationally, and close to three in ten litres in Dublin specifically, is still being lost before it reaches a customer. Building a pipeline of this scale to supply a network that continues to lose that much water through disrepair is not, in my view, sound infrastructure planning, and the pace of further leakage reduction has not been properly weighed against the case for abstraction on this scale. It should not fall to Limerick, Clare, Tipperary, Offaly and Kildare to bear the environmental and social cost of that shortfall while leakage remains at this level.

2. Úisce Éireann's Treatment of Leakage Reduction as "Not an Alternative"

Section 5.2.1 of Úisce Éireann's response states that leakage reduction "is not an alternative option" and that the project is needed "from an overall supply perspective." I reject that position. Far from having exhausted this alternative, Úisce Éireann was fined €31 million by the Commission for Regulation of Utilities (CRU) as recently as July 2026 for missing its 2020–2024 leakage reduction target by a wide margin, achieving a reduction of only 59 million litres per day against a target of 177.5 million litres per day. Dismissing leakage reduction as "not an alternative," while the utility's own regulator has just penalised it for underperformance on that very measure, does not amount to a proper consideration of alternatives under the planning process.

3. Vague Assurances on Abstraction Volumes and Monitoring

Úisce Éireann has confirmed there is "no intention" to abstract more than 300Mld and "no planned expansion," and separately states it will adopt an "adaptive approach" to abstraction rather than a fixed rate (Sections 6.2.2, 6.4.2 and 11.4.3). At the same time, in Section 11.2.11, the Applicant states plainly that it will not commit to water-level monitoring or to monitoring the flow to the Old River Shannon.

These two positions sit uneasily together. An adaptive approach to abstraction that is not backed by an enforceable, independently monitored commitment is not a safeguard — it is a statement of intent that could be revised at any point once permission is granted. I am recommending binding conditions requiring independent water-level and flow monitoring, published on a regular basis, as a minimum precondition of any grant of permission.

4. Security of Supply for Limerick — Treated as Out of Scope

Section 3.4.2 of Úisce Éireann's response states that issues relating to Limerick's reliance on a single water treatment plant, THM compliance, and local capacity constraints "fall outside the scope of this SID application." I do not accept that this can simply be set aside. The Applicant's own response acknowledges that Limerick's security of supply is a live and material issue, while declining to address it because it falls outside the four corners of this application. That gap needs to be resolved separately and in parallel — it is not somebody else's problem while the abstraction proceeds regardless.

5. Community Benefit Scheme

The Community Benefit Scheme, as described in Section 3.4.5, provides for a fund lasting five years within a 5km radius of affected works. Given that the abstraction and associated infrastructure are intended to operate indefinitely, and the impact — hydrological, environmental and reputational — extends well beyond a 5km construction corridor, the scale and duration of this scheme are not proportionate to a project of this magnitude and permanence.

6. Cost Uncertainty and Public Accountability

Úisce Éireann's Preliminary Business Case puts the project cost at €4.58–5.96 billion, and the utility told the Oireachtas Joint Committee on Infrastructure and National Development Plan Delivery in June 2026 that it was confident of delivering within that range. The same evidence disclosed a separate, modelled "in extremis" worst-case figure of €10.3 billion, built on some €7 billion of contingency for the possibility that the project encounters conditions well beyond what is currently anticipated. Úisce Éireann has described that worst case as unlikely. I am not treating the higher figure as the true cost, but a contingency allowance of that size, on a project of this national significance, still warrants independent scrutiny of the assumptions behind both figures before this project receives the Council's support in any form. I am recommending an independently verified cost-benefit analysis, setting out clearly what would need to go wrong for the cost to move materially beyond the €4.58–5.96 billion range, be published and made available for public and elected member scrutiny before the application proceeds further.

7. Alternative Sources and Desalination

Úisce Éireann's dismissal of desalination and alternative regional sources (Sections 5.2.2 and 5.2.4) rests on cost and energy-intensity grounds that are reasonable as far as they go, but the response does not weigh those costs against the very significant capital cost of this project, nor against the environmental cost of a

172km cross-regional pipeline. A fuller, comparative assessment of alternatives — including accelerated leakage reduction, demand management, and regional sourcing — is needed rather than the Applicant's summary treatment of each option in isolation.

8. My Recommendations

On the basis of the above, I am putting forward the following recommendations for attachment to the Council's submission to An Coimisiún Pleanála:

- That my opposition to the project proceeding in its current form be recorded;
- That Úisce Éireann's dismissal of leakage reduction as "not an alternative" be rejected, noting the utility's recent CRU fine for missing its own leakage reduction target, and that a strengthened, published leakage-reduction trajectory for the Dublin network be sought;
- That binding conditions requiring independent, published monitoring of abstraction volumes and Shannon flow levels be sought;
- That Limerick's security-of-supply concerns be recorded as unresolved, with a parallel commitment required to address them;
- That a materially expanded and extended Community Benefit Scheme be sought, reflecting the permanence and regional scale of the project;
- That an independently verified cost-benefit analysis be sought, given the scale of the contingency built into the Applicant's own worst-case cost modelling; and
- That a fuller comparative assessment of alternatives be sought before any further step in the process.

I am asking that these recommendations be attached to the Council's response in accordance with Section 37E.

Is mise, le meas,

A handwritten signature in black ink, appearing to read 'Sarah Beasley', with a stylized flourish at the end.

Cllr Sarah Beasley
Limerick City North, Aontú

Introduction

I welcome the opportunity to respond to Uisce Éireann's submissions response documents for the Water Supply Project. While Uisce Éireann has sought to address a number of concerns raised during the consultation process, significant issues remain unresolved, particularly in relation to projected future water demand, cumulative impacts with the Shannon Fish Passage Project, ecological flow requirements, hydrological modelling assumptions, and compliance with obligations under the Water Framework Directive and Habitats Directive.

My observations focus on areas where the response appears to rely on outdated assumptions, incomplete modelling, or an underestimation of future environmental constraints. In particular, I am concerned that the project continues to be assessed against current operational conditions in the Lower Shannon system, despite an acknowledged need for substantial ecological restoration measures, including increased flows to facilitate fish migration and recovery of protected species. Any assessment of the proposed abstraction must fully account for these future requirements and demonstrate that the project will not compromise the achievement of environmental objectives or the restoration of favourable conservation status within the Lower River Shannon SAC.

6.2.2 Capacity of the Proposed Pipeline

There is nothing to stop UE applying to increase the abstraction licence or the capacity of the water treatment plant in the future. The full capacity of the pipe without the current limiting factors of water treatment and abstraction licencing needs to be divulged. The demand for water beyond 2050 will undoubtedly increase. An Fóram Uisce has expressed concerns in their submission that the demand for water in Dublin to 2050 is not accurately calculated as it is based on 2016 census data and the 2022 census has revealed a significantly greater increase in population. The ESRI1 also highlighted that the 2022 Census data indicated that many previous population scenarios for Ireland have underestimated population growth over the short term, largely due to net migration in recent years. The total pipe capacity and projected increases in population beyond 2050 needs to be factored into modelling/calculations and water demand for the Eastern and Midlands Region needs to be recalculated using both the 2022 Census data and the population projections from the draft National Planning Framework (2024) to properly account for growing water demand.

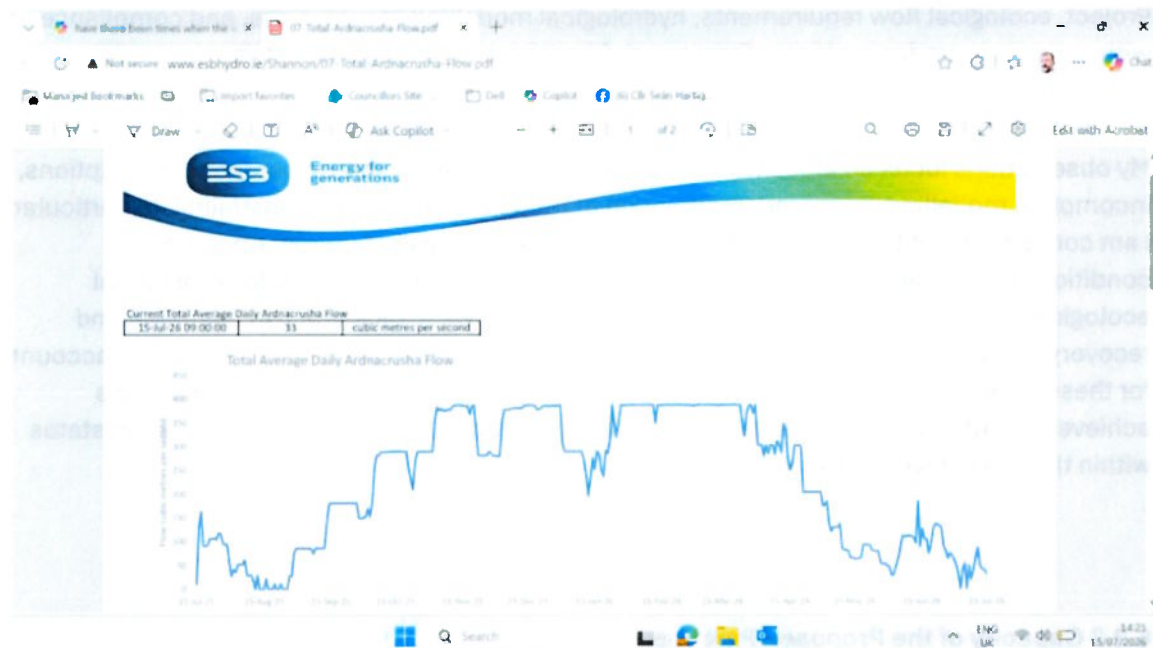
6.2.5 Adequacy of Designed Storage Capacity

It would be sensible to have increased storage capacity at the end of the pipeline to mitigate against pollution incidents, power outages and demand for water to facilitate fish passage during times of low flow/drought.

10.2.3 Potential Impact of the Proposed Abstraction on Habitats and Species

It is not possible that "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.” as water is not used for generation on a continuous year-round basis. The ESB's published "Total Average Daily Ardnacrusha Flow" data show multiple recent days with a value of 0 cubic metres per second through Ardnacrusha, including: 3 July 2026: 0 m³/s and 6 July 2026: 0 m³/s. There are many days where generation is not possible and when flows are increased for the fish passage project the number of these days will increase, See below the ESB's own published flow record on 15/07/26. <http://www.esbhydro.ie/Shannon/07-Total-Ardnacrusha-Flow.pdf>



UE admits that Lake level regimes will be affected by the proposed abstraction during extreme drought periods (1995 and 2018) and in the days immediately after the drought, the likelihood is that climate change will increase the frequency of these drought periods and with increased flows needed for fish passage will also impact lake levels. The ESB already cease power generation at Ardnacrusha to prioritise the statutory compensation flow, water will also need to be managed to increase flow to improve fish passage there will be no capacity during drought conditions (when demand is highest) to facilitate abstraction for the water supply project.

UE cannot base their calculations on the current inadequate, ecological damaging flows down the Old River Shannon which are contributing to the extinction of critically endangered species and qualifying interest species of the Lower Shannon SAC. Increased flows down the Old River Shannon need to be factored into modelling and planning applications.

If the water supply project is granted planning either before the implementation of the fish passage project or without considering the eflows needed to facilitate improved fish passage it will present a mortality risk and barrier to some of the qualifying interests of the Lower River Shannon SAC, namely Sea Lamprey (*Petromyzon marinus*), Brook Lamprey (*Lampetra planeri*), River Lamprey (*Lampetra fluviatilis*) and Atlantic Salmon (*Salmo salar*)

11.2.6 Whether Environmental Recovery may be Constrained

The Fish passage project & water supply project Uisce Eireann will impact each other, UE cannot disregard its obligations under the Water Framework Directive, habitats directive, European Communities (Birds and Natural Habitats) Regulations and Conservation Objectives for the Lower River Shannon. it is legally required to demonstrate that water abstraction, altered flow regimes, drought-related effects, cumulative impacts and associated works will not adversely affect the conservation objectives and integrity of the Lower River Shannon SAC. To say that the fish passage project "is not for the Proposed Project to resolve" does not devolve them of their obligations.

If the WSP proceeds without consideration of the FPP it may make it impossible to advance the FPP and make recovery of the Shannon to a good ecological status impossible and lead to further declines/local extinction of critically endangered salmon & eels.

The assessment needs to accept current scientific knowledge that the historic origin of the 10 m³/s flow is determinative for WFD/Habitats Directive compliance. See CDM SMITH pg 128 "The minimum flow provision at Parteen Weir represents European and international best practice for hydropower schemes, in general. However, the comparatively low and uniform compensation flow practice does not present current best practice."

UE accepts that "The historic pressures salmon and eel populations at Ardnacrusha are long standing and arise from the operation of the hydropower scheme" and that mitigation measures including ecological flow regimes are necessary. UE also accept that the Conservation Objectives for the Lower River Shannon SAC set out a number of measures required to restore favourable condition of the qualifying interests of the SAC, including removal of barriers to fish movement. The current greatest barrier to fish movement is the 10 cumec flow for 11 months of the year on the Old River Shannon. If the WSP is granted permission before these increased flows are in place or factored into modelling/calculations it may rule out the possibility of ever implementing these increased flows.

Regarding UE's statement that "The single largest pressure acting on adult sea lamprey is that of artificial physical barriers to passage for upstream migrating adult fish..... Barrier removal or modification to permit upstream migration would permit a greater penetration of river channels by adult fish" Increasing flows are modification/mitigation measures to address the impact of barriers. Reduced flows are physical barriers (to fish migration), increasing flows to facilitate flow is removal of a barrier.

I cannot see reference to no freshets during droughts in CDM Smith, UE make the mistake here of assuming that the statutory compensation flow is the natural drought flow, the 'natural drought flow' prior to the Shannon scheme would historically have been considerably higher than the current 10m³/s. CDM smith recommend freshets are released during periods when droughts are possible.

See page 119 CDM smith

" c) Freshet

March - September:

- once per week, 24 hrs duration, max. 21-31 m³/s (M2 scenario for 0.3 m/s, 45 m³/s at confluence)
- 30x 343,000 m³ (March - May) and 1,045,000 m³/s (June - September) per freshet"

In its Hydrological Modelling Report UE has not considered the requirements for freshets during periods of drought, the need for freshets is strongest during low flow conditions. There is international precedent for the release of managed freshets or pulse flows during drought conditions to support salmon migration and survival. During California's 2014–2015 drought emergency, flow augmentation and pulse-flow releases were specifically implemented to aid coho salmon migration and maintain stream connectivity despite severe water scarcity https://www.waterboards.ca.gov/water_issues/programs/swamp/docs/cabw2015/36_collab_flow_salmonids.pdf

UE's Hydrological Modelling Report needs to be redone taking into account the recommendation from CDM smith for March to September

11.2.7 Downstream Effects on the River Shannon

I believe that the reference to “0.5m³/s passing through the Ardnacrusha fish pass” (3 times in this report) displays a lack of knowledge from UE on fish passage on the Shannon scheme, are they confusing Ardnacrusha power station and the Borland fish lock with Parteen weir and its fish pass?

See below pg. 18 CDM Smith

“The fish lock was retrofitted at Ardnacrusha Station and is located about 50 m away from the main (hydropower) flow. This location is not best practice and may result in either delay or failure of the fish to detect the fish lock. The attraction flow is provided by a separate bypass pipe system into the base of the lock shaft and at the lock entrance. However, currently there is no attraction flow during the filling and exit phases at Ardnacrusha because the lower bypass pipe branch valves have been manipulated and permanently closed. During the fishing phase we observed minimal attraction flow (Figure 5) and it is unclear if the upper bypass pipe branch is working correctly. The lack of attraction flow most certainly adversely affects the effectiveness of the fish lock.

Even if the attraction flow system was working properly, the flow volume would be too low relative to best practice. Also, the attraction flow velocity would vary depending on the tailwater level at the entrance and could drop to low velocities. The pattern of the attraction flow changes, and the plume distance reduces with rising tailwater levels, which reduces fish pass attraction.”

24.3.1 Potential Cumulative Impact with the Shannon Fish Passage Study

Considering the critically endangered status of Salmon and eels and the risk they will become locally extinct in the Shannon, as well as obligations to protect other fish species, it is necessary that the FPP be designed, accepted, and constructed before the Proposed Project may apply for planning.

25.3.2 In-Combination Assessment with the Fish Passage Project

Hymo 7: Water Action Plan 2024 states Implementation of the roadmap of actions, including the use of state-of-the-art technical solutions, to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate. Granting of pp for the WSP may make this impossible.

According to CDM Smith Table 15: Generation model results for EFlow scenario the annual generation loss to the ESB under an eflow scenario is 9,164 MWh. Assuming 15,000 m³ ($E = \rho g H V \eta$) of water is required to produce one MWh, annual diversion of water down the old River Shannon to facilitate fish passage requires 9,164 X 15,000 m³ i.e. 137,460,000 m³. This represents an average cumec flow of 4.36 cumecs. This is more than the 3.47 cumecs required for the water supply project. For June, a month when we have historically had droughts the generation loss is 1,151 MWh, equating to 6.66 cumecs. Uisce Éireann cannot continue to ignore this fact and must incorporate the water requirement for fish passage into its modelling.

Conclusion

In conclusion, Uisce Éireann has not adequately demonstrated that the proposed Water Supply Project can operate in combination with the ecological restoration measures that are required for the Lower River Shannon. The responses provided continue to treat future fish passage and environmental flow requirements as separate matters, despite clear legal, hydrological and ecological links between the two projects.

The evidence available, including findings from the Shannon Fish Passage investigations and CDM Smith reports, indicates that significantly greater volumes of water may be required to restore effective fish passage, support qualifying interest species, and meet Water Framework Directive objectives. These requirements have not been properly incorporated into demand forecasts, drought assessments or hydrological modelling. Furthermore, future population growth beyond 2050, potential increases in abstraction demand, and the project's interaction with climate-driven drought conditions remain insufficiently addressed.

Given the scale of the uncertainties identified, it would be premature to grant consent for the Water Supply Project before the design, water requirements and operational implications of the Shannon Fish Passage Project are fully established and incorporated into all relevant assessments. The precautionary principle, together with Ireland's obligations under European environmental law, requires that these matters be resolved before any decision is made. Failure to do so risks constraining future ecological restoration of the Shannon system, undermining conservation objectives for the Lower River Shannon SAC, and compromising the recovery of already vulnerable and critically important migratory fish populations.

Councillor Sean Hartigan.



Comhairle Cathrach
& Contae Luimnigh
Limerick City
& County Council

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64 Marlborough Street
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AN COIMISIÚN PLEANÁLA	
LDG- _____	
ACP- _____	
23 JUL 2026	
Fee: € _____	Type: _____
Time: 9:15	By: POS7

21st July 2026

Re: PA92.323980 – Úisce Éireann Proposed Water Supply Project for the Eastern and Midlands Region in the counties of Clare, Limerick, Tipperary, Offaly, Kildare and Dublin

Dear Sir/Madam,

I refer to your correspondence of 24th June 2026, and to Úisce Éireann's 'Response to Submissions Report'.

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Any abstraction regime must remain adaptive and responsive to evolving hydrological and ecological conditions over the lifetime of the project and ensure that the ecological integrity of Lough Derg and its catchment is fully protected.

Community Benefit

Given the scale, duration and strategic significance of the project, consideration should be given to expanding both the geographical reach and duration of the fund to recognise the wider communities along the Shannon, downstream of the Parteen basin, that may be affected by the project.

View of Elected Members

As outlined above, the Elected Members have raised very strong objections to the proposed development, from a planning, environmental and ecological perspective. The views and submissions reflect in-depth local knowledge, ecological and environmental research and wider community concerns.

Additional submissions have been prepared by Elected Members and are attached to this correspondence. It is requested that these additional submissions are fully acknowledged and evaluated by An Coimisiún Pleanála.

Conclusion

It is essential that the objective of securing a water supply for the Eastern and Midlands Region is not achieved at the expense of the future development potential, environmental integrity, and security of water supply for Limerick and the Mid-West Region.

It is respectfully requested given the national importance and potential impact of the project, that an oral hearing is facilitated and that all submissions made to date by Limerick City and County Council are fully considered by An Coimisiún Pleanála in the determination of this project.

Yours faithfully,



Dr. Pat Daly,

Director General,

Limerick City & County Council.



Cllr Sarah Beasley

Limerick City North, Aontú
sarah.beasley@limerick.ie

17th July 2026

**Planning Department
Limerick City and County Council
Merchant's Quay, Limerick, V94 EH90**

Re: ACP Case 323980 — Proposed Water Supply Project for the Eastern and Midlands Region

Submission of Cllr Sarah Beasley, for attachment to the Council's response to An Coimisiún Pleanála on Úisce Éireann's response to submissions, on or before 21st July 2026

A Chara,

Further to the Elected Members' briefing held on 15th July 2026 in relation to the above case, and Úisce Éireann's response to the 114 submissions received on the proposed Water Supply Project, I am submitting the following observations as an Elected Member, pursuant to Section 37E of the Planning and Development Act 2000 (as amended), for attachment to the Council's response to An Coimisiún Pleanála.

1. Overall Position

I do not accept that this project should proceed in its current form. The proposed abstraction of up to 300 million litres per day from the Parteen Basin, and the construction of a 172km pipeline to Dublin, represents a permanent transfer of a strategic regional resource out of the Mid-West, at a project cost now put at between €4.58 billion and €5.96 billion, to address a shortfall that has not been shown to be irreducible.

Dublin's own leakage rate has improved in recent years, falling from 37% to approximately 29%, and national leakage now stands at around 35–36%, down from 49% in 2014. That progress is welcome, but it also means more than a third of treated water nationally, and close to three in ten litres in Dublin specifically, is still being lost before it reaches a customer. Building a pipeline of this scale to supply a network that continues to lose that much water through disrepair is not, in my view, sound infrastructure planning, and the pace of further leakage reduction has not been properly weighed against the case for abstraction on this scale. It should not fall to Limerick, Clare, Tipperary, Offaly and Kildare to bear the environmental and social cost of that shortfall while leakage remains at this level.

2. Úisce Éireann's Treatment of Leakage Reduction as "Not an Alternative"

Section 5.2.1 of Úisce Éireann's response states that leakage reduction "is not an alternative option" and that the project is needed "from an overall supply perspective." I reject that position. Far from having exhausted this alternative, Úisce Éireann was fined €31 million by the Commission for Regulation of Utilities (CRU) as recently as July 2026 for missing its 2020–2024 leakage reduction target by a wide margin, achieving a reduction of only 59 million litres per day against a target of 177.5 million litres per day. Dismissing leakage reduction as "not an alternative," while the utility's own regulator has just penalised it for underperformance on that very measure, does not amount to a proper consideration of alternatives under the planning process.

3. Vague Assurances on Abstraction Volumes and Monitoring

Úisce Éireann has confirmed there is "no intention" to abstract more than 300Mld and "no planned expansion," and separately states it will adopt an "adaptive approach" to abstraction rather than a fixed rate (Sections 6.2.2, 6.4.2 and 11.4.3). At the same time, in Section 11.2.11, the Applicant states plainly that it will not commit to water-level monitoring or to monitoring the flow to the Old River Shannon.

These two positions sit uneasily together. An adaptive approach to abstraction that is not backed by an enforceable, independently monitored commitment is not a safeguard — it is a statement of intent that could be revised at any point once permission is granted. I am recommending binding conditions requiring independent water-level and flow monitoring, published on a regular basis, as a minimum precondition of any grant of permission.

4. Security of Supply for Limerick — Treated as Out of Scope

Section 3.4.2 of Úisce Éireann's response states that issues relating to Limerick's reliance on a single water treatment plant, THM compliance, and local capacity constraints "fall outside the scope of this SID application." I do not accept that this can simply be set aside. The Applicant's own response acknowledges that Limerick's security of supply is a live and material issue, while declining to address it because it falls outside the four corners of this application. That gap needs to be resolved separately and in parallel — it is not somebody else's problem while the abstraction proceeds regardless.

5. Community Benefit Scheme

The Community Benefit Scheme, as described in Section 3.4.5, provides for a fund lasting five years within a 5km radius of affected works. Given that the abstraction and associated infrastructure are intended to operate indefinitely, and the impact — hydrological, environmental and reputational — extends well beyond a 5km construction corridor, the scale and duration of this scheme are not proportionate to a project of this magnitude and permanence.

6. Cost Uncertainty and Public Accountability

Úisce Éireann's Preliminary Business Case puts the project cost at €4.58–5.96 billion, and the utility told the Oireachtas Joint Committee on Infrastructure and National Development Plan Delivery in June 2026 that it was confident of delivering within that range. The same evidence disclosed a separate, modelled "in extremis" worst-case figure of €10.3 billion, built on some €7 billion of contingency for the possibility that the project encounters conditions well beyond what is currently anticipated. Úisce Éireann has described that worst case as unlikely. I am not treating the higher figure as the true cost, but a contingency allowance of that size, on a project of this national significance, still warrants independent scrutiny of the assumptions behind both figures before this project receives the Council's support in any form. I am recommending an independently verified cost-benefit analysis, setting out clearly what would need to go wrong for the cost to move materially beyond the €4.58–5.96 billion range, be published and made available for public and elected member scrutiny before the application proceeds further.

7. Alternative Sources and Desalination

Úisce Éireann's dismissal of desalination and alternative regional sources (Sections 5.2.2 and 5.2.4) rests on cost and energy-intensity grounds that are reasonable as far as they go, but the response does not weigh those costs against the very significant capital cost of this project, nor against the environmental cost of a

172km cross-regional pipeline. A fuller, comparative assessment of alternatives — including accelerated leakage reduction, demand management, and regional sourcing — is needed rather than the Applicant's summary treatment of each option in isolation.

8. My Recommendations

On the basis of the above, I am putting forward the following recommendations for attachment to the Council's submission to An Coimisiún Pleanála:

- That my opposition to the project proceeding in its current form be recorded;
- That Úisce Éireann's dismissal of leakage reduction as "not an alternative" be rejected, noting the utility's recent CRU fine for missing its own leakage reduction target, and that a strengthened, published leakage-reduction trajectory for the Dublin network be sought;
- That binding conditions requiring independent, published monitoring of abstraction volumes and Shannon flow levels be sought;
- That Limerick's security-of-supply concerns be recorded as unresolved, with a parallel commitment required to address them;
- That a materially expanded and extended Community Benefit Scheme be sought, reflecting the permanence and regional scale of the project;
- That an independently verified cost-benefit analysis be sought, given the scale of the contingency built into the Applicant's own worst-case cost modelling; and
- That a fuller comparative assessment of alternatives be sought before any further step in the process.

I am asking that these recommendations be attached to the Council's response in accordance with Section 37E.

Is mise, le meas,

A handwritten signature in black ink, appearing to read 'Sarah Beasley', with a stylized flourish at the end.

CLlr Sarah Beasley
Limerick City North, Aontú

Introduction

I welcome the opportunity to respond to Uisce Éireann's submissions response documents for the Water Supply Project. While Uisce Éireann has sought to address a number of concerns raised during the consultation process, significant issues remain unresolved, particularly in relation to projected future water demand, cumulative impacts with the Shannon Fish Passage Project, ecological flow requirements, hydrological modelling assumptions, and compliance with obligations under the Water Framework Directive and Habitats Directive.

My observations focus on areas where the response appears to rely on outdated assumptions, incomplete modelling, or an underestimation of future environmental constraints. In particular, I am concerned that the project continues to be assessed against current operational conditions in the Lower Shannon system, despite an acknowledged need for substantial ecological restoration measures, including increased flows to facilitate fish migration and recovery of protected species. Any assessment of the proposed abstraction must fully account for these future requirements and demonstrate that the project will not compromise the achievement of environmental objectives or the restoration of favourable conservation status within the Lower River Shannon SAC.

6.2.2 Capacity of the Proposed Pipeline

There is nothing to stop UE applying to increase the abstraction licence or the capacity of the water treatment plant in the future. The full capacity of the pipe without the current limiting factors of water treatment and abstraction licencing needs to be divulged. The demand for water beyond 2050 will undoubtedly increase. An Fóram Uisce has expressed concerns in their submission that the demand for water in Dublin to 2050 is not accurately calculated as it is based on 2016 census data and the 2022 census has revealed a significantly greater increase in population. The ESRI1 also highlighted that the 2022 Census data indicated that many previous population scenarios for Ireland have underestimated population growth over the short term, largely due to net migration in recent years. The total pipe capacity and projected increases in population beyond 2050 needs to be factored into modelling/calculations and water demand for the Eastern and Midlands Region needs to be recalculated using both the 2022 Census data and the population projections from the draft National Planning Framework (2024) to properly account for growing water demand.

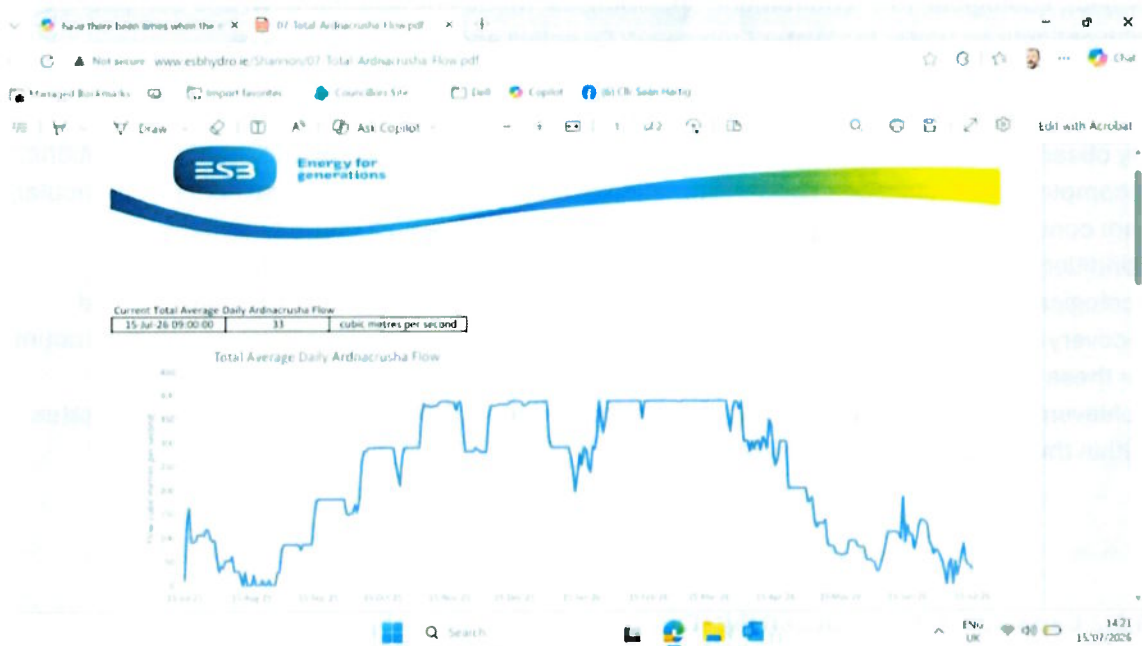
6.2.5 Adequacy of Designed Storage Capacity

It would be sensible to have increased storage capacity at the end of the pipeline to mitigate against pollution incidents, power outages and demand for water to facilitate fish passage during times of low flow/drought.

10.2.3 Potential Impact of the Proposed Abstraction on Habitats and Species

It is not possible that "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.” as water is not used for generation on a continuous year-round basis. The ESB's published "Total Average Daily Ardnacrusha Flow" data show multiple recent days with a value of 0 cubic metres per second through Ardnacrusha, including: 3 July 2026: 0 m³/s and 6 July 2026: 0 m³/s. There are many days where generation is not possible and when flows are increased for the fish passage project the number of these days will increase, See below the ESB's own published flow record on 15/07/26. <http://www.esbhydro.ie/Shannon/07-Total-Ardnacrusha-Flow.pdf>



UE admits that Lake level regimes will be affected by the proposed abstraction during extreme drought periods (1995 and 2018) and in the days immediately after the drought, the likelihood is that climate change will increase the frequency of these drought periods and with increased flows needed for fish passage will also impact lake levels. The ESB already cease power generation at Ardnacrusha to prioritise the statutory compensation flow, water will also need to be managed to increase flow to improve fish passage there will be no capacity during drought conditions (when demand is highest) to facilitate abstraction for the water supply project.

UE cannot base their calculations on the current inadequate, ecological damaging flows down the Old River Shannon which are contributing to the extinction of critically endangered species and qualifying interest species of the Lower Shannon SAC. Increased flows down the Old River Shannon need to be factored into modelling and planning applications.

If the water supply project is granted planning either before the implementation of the fish passage project or without considering the eflows needed to facilitate improved fish passage it will present a mortality risk and barrier to some of the qualifying interests of the Lower River Shannon SAC, namely Sea Lamprey (*Petromyzon marinus*), Brook Lamprey (*Lampetra planeri*), River Lamprey (*Lampetra fluviatilis*) and Atlantic Salmon (*Salmo salar*)

11.2.6 Whether Environmental Recovery may be Constrained

The Fish passage project & water supply project Uisce Eireann will impact each other, UE cannot disregard its obligations under the Water Framework Directive, habitats directive, European Communities (Birds and Natural Habitats) Regulations and Conservation Objectives for the Lower River Shannon. it is legally required to demonstrate that water abstraction, altered flow regimes, drought-related effects, cumulative impacts and associated works will not adversely affect the conservation objectives and integrity of the Lower River Shannon SAC. To say that the fish passage project “is not for the Proposed Project to resolve” does not devolve them of their obligations.

If the WSP proceeds without consideration of the FPP it may make it impossible to advance the FPP and make recovery of the Shannon to a good ecological status impossible and lead to further declines/local extinction of critically endangered salmon & eels.

The assessment needs to accept current scientific knowledge that the historic origin of the 10 m³/s flow is determinative for WFD/Habitats Directive compliance. See CDM SMITH pg 128 “The minimum flow provision at Parteen Weir represents European and international best practice for hydropower schemes, in general. However, the comparatively low and uniform compensation flow practice does not present current best practice.”

UE accepts that “The historic pressures salmon and eel populations at Ardnacrusha are long standing and arise from the operation of the hydropower scheme” and that mitigation measures including ecological flow regimes are necessary. UE also accept that the Conservation Objectives for the Lower River Shannon SAC set out a number of measures required to restore favourable condition of the qualifying interests of the SAC, including removal of barriers to fish movement. The current greatest barrier to fish movement is the 10 cumec flow for 11 months of the year on the Old River Shannon. If the WSP is granted permission before these increased flows are in place or factored into modelling/calculations it may rule out the possibility of ever implementing these increased flows.

Regarding UE’s statement that “The single largest pressure acting on adult sea lamprey is that of artificial physical barriers to passage for upstream migrating adult fish..... Barrier removal or modification to permit upstream migration would permit a greater penetration of river channels by adult fish” Increasing flows are modification/mitigation measures to address the impact of barriers. Reduced flows are physical barriers (to fish migration), increasing flows to facilitate flow is removal of a barrier.

I cannot see reference to no freshets during droughts in CDM Smith, UE make the mistake here of assuming that the statutory compensation flow is the natural drought flow, the ‘natural drought flow’ prior to the Shannon scheme would historically have been considerably higher than the current 10m³/s. CDM smith recommend freshets are released during periods when droughts are possible.

See page 119 CDM smith

“ c) Freshet

March - September:

- once per week, 24 hrs duration, max. 21-31 m³/s (M2 scenario for 0.3 m/s, 45 m³/s at confluence)
- 30x 343,000 m³ (March - May) and 1,045,000 m³/s (June - September) per freshet”

In its Hydrological Modelling Report UE has not considered the requirements for freshets during periods of drought, the need for freshets is strongest during low flow conditions. There is international precedent for the release of managed freshets or pulse flows during drought conditions to support salmon migration and survival. During California's 2014–2015 drought emergency, flow augmentation and pulse-flow releases were specifically implemented to aid coho salmon migration and maintain stream connectivity despite severe water scarcity https://www.waterboards.ca.gov/water_issues/programs/swamp/docs/cabw2015/36_collab_flow_flow_salmonids.pdf

UE's Hydrological Modelling Report needs to be redone taking into account the recommendation from CDM smith for March to September

11.2.7 Downstream Effects on the River Shannon

I believe that the reference to “0.5m³/s passing through the Ardnacrusha fish pass” (3 times in this report) displays a lack of knowledge from UE on fish passage on the Shannon scheme, are they confusing Ardnacrusha power station and the Borland fish lock with Parteen weir and its fish pass?

See below pg. 18 CDM Smith

“The fish lock was retrofitted at Ardnacrusha Station and is located about 50 m away from the main (hydropower) flow. This location is not best practice and may result in either delay or failure of the fish to detect the fish lock. The attraction flow is provided by a separate bypass pipe system into the base of the lock shaft and at the lock entrance. However, currently there is no attraction flow during the filling and exit phases at Ardnacrusha because the lower bypass pipe branch valves have been manipulated and permanently closed. During the fishing phase we observed minimal attraction flow (Figure 5) and it is unclear if the upper bypass pipe branch is working correctly. The lack of attraction flow most certainly adversely affects the effectiveness of the fish lock.

Even if the attraction flow system was working properly, the flow volume would be too low relative to best practice. Also, the attraction flow velocity would vary depending on the tailwater level at the entrance and could drop to low velocities. The pattern of the attraction flow changes, and the plume distance reduces with rising tailwater levels, which reduces fish pass attraction. “

24.3.1 Potential Cumulative Impact with the Shannon Fish Passage Study

Considering the critically endangered status of Salmon and eels and the risk they will become locally extinct in the Shannon, as well as obligations to protect other fish species, it is necessary that the FPP be designed, accepted, and constructed before the Proposed Project may apply for planning.

25.3.2 In-Combination Assessment with the Fish Passage Project

Hymo 7: Water Action Plan 2024 states Implementation of the roadmap of actions, including the use of state-of-the-art technical solutions, to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate. Granting of pp for the WSP may make this impossible.

According to CDM Smith Table 15: Generation model results for EFlow scenario the annual generation loss to the ESB under an eflow scenario is 9,164 MWh. Assuming 15,000 m³ ($E = \rho g H V \eta$) of water is required to produce one MWh, annual diversion of water down the old River Shannon to facilitate fish passage requires 9,164 X 15,000 m³ i.e. 137,460,000 m³. This represents an average cumec flow of 4.36 cumecs. This is more than the 3.47 cumecs required for the water supply project. For June, a month when we have historically had droughts the generation loss is 1,151 MWh, equating to 6.66 cumecs. Uisce Éireann cannot continue to ignore this fact and must incorporate the water requirement for fish passage into its modelling.

Conclusion

In conclusion, Uisce Éireann has not adequately demonstrated that the proposed Water Supply Project can operate in combination with the ecological restoration measures that are required for the Lower River Shannon. The responses provided continue to treat future fish passage and environmental flow requirements as separate matters, despite clear legal, hydrological and ecological links between the two projects.

The evidence available, including findings from the Shannon Fish Passage investigations and CDM Smith reports, indicates that significantly greater volumes of water may be required to restore effective fish passage, support qualifying interest species, and meet Water Framework Directive objectives. These requirements have not been properly incorporated into demand forecasts, drought assessments or hydrological modelling. Furthermore, future population growth beyond 2050, potential increases in abstraction demand, and the project's interaction with climate-driven drought conditions remain insufficiently addressed.

Given the scale of the uncertainties identified, it would be premature to grant consent for the Water Supply Project before the design, water requirements and operational implications of the Shannon Fish Passage Project are fully established and incorporated into all relevant assessments. The precautionary principle, together with Ireland's obligations under European environmental law, requires that these matters be resolved before any decision is made. Failure to do so risks constraining future ecological restoration of the Shannon system, undermining conservation objectives for the Lower River Shannon SAC, and compromising the recovery of already vulnerable and critically important migratory fish populations.

Councillor Sean Hartigan.