

Our Case Number: ACP-323980-25



**An
Coimisiún
Pleanála**

Waterways Ireland
Ashtowngate
Navan Road
Dublin 15

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: Tuesday 21 July 2026 09:07
To: Eimear Reilly
Subject: FW: Water Supply Project Eastern and Midlands Region - SID - 323980
Attachments: WI_WSP_260721.pdf

-----Original Message-----

From: Kevin Macken <kevin.macken@waterwaysireland.org>
Sent: Monday 20 July 2026 11:24
To: LAPS <laps@pleanala.ie>
Subject: Water Supply Project Eastern and Midlands Region - SID - 323980

[You don't often get email from kevin.macken@waterwaysireland.org. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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 a further submission from Waterways Ireland in its capacity as a prescribed body, in relation to Uisce Eireann's response to submissions report.

We trust this submission will be taken into account. Should you require any further clarification, please do not hesitate to contact us.

Kind regards,

Kevin

Kevin Macken

Senior Hydrologist

Waterways Ireland | Ashtown Gate, Navan Road, Dublin 15

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1, D01 V902

21st July 2026

Case Reference 323980 - Water Supply Project Eastern and Midlands Region

Dear Sirs,

In response to your letter dated 24th June 2026 and having reviewed Uisce Éireann's responses to submissions (dated 6th May 2026 and 2nd June 2026), Waterways Ireland wishes to make the following observations.

Normal Operation band

In Uisce Éireann's Response to Submissions Report, Section 17.4.1 refers to our previous request for a navigation assessment of the proposed project. In paragraph 2209, Uisce Éireann notes that in all scenarios with the proposed project the levels in Lough Derg "*would remain within the normal upper and lower levels within which ESB currently manage water level*". For clarity, the normal operation band is defined as 30.40 mOD to 30.80 mOD. The 30.40 mOD level is required to sustain levels in Parteen Basin for embankment safety reasons.

Waterways Ireland has undertaken a review of water levels from 2000 to 2025 to ascertain the typical water level variation. For consistency with Uisce Éireann's analysis, a 3-day moving average lake level has been used. As shown in Figure 1, the full operation band is rarely used in practice; a lake level value of 30.60 mOD is exceeded 98% of the time. Further analysis of the level records indicates:

- Only 2 days were recorded below 30.52 m OD in the 25-year period during the navigation season (April to October).
- The lowest water level experienced in the last full ten years (2016-2025) during the navigation season (April to October) was 30.60 mOD.

This confirms the requirement for a navigation assessment as requested in our previous submission "as there is limited to no sustained period where the average lake level is below 30.60mOD during the navigation season."

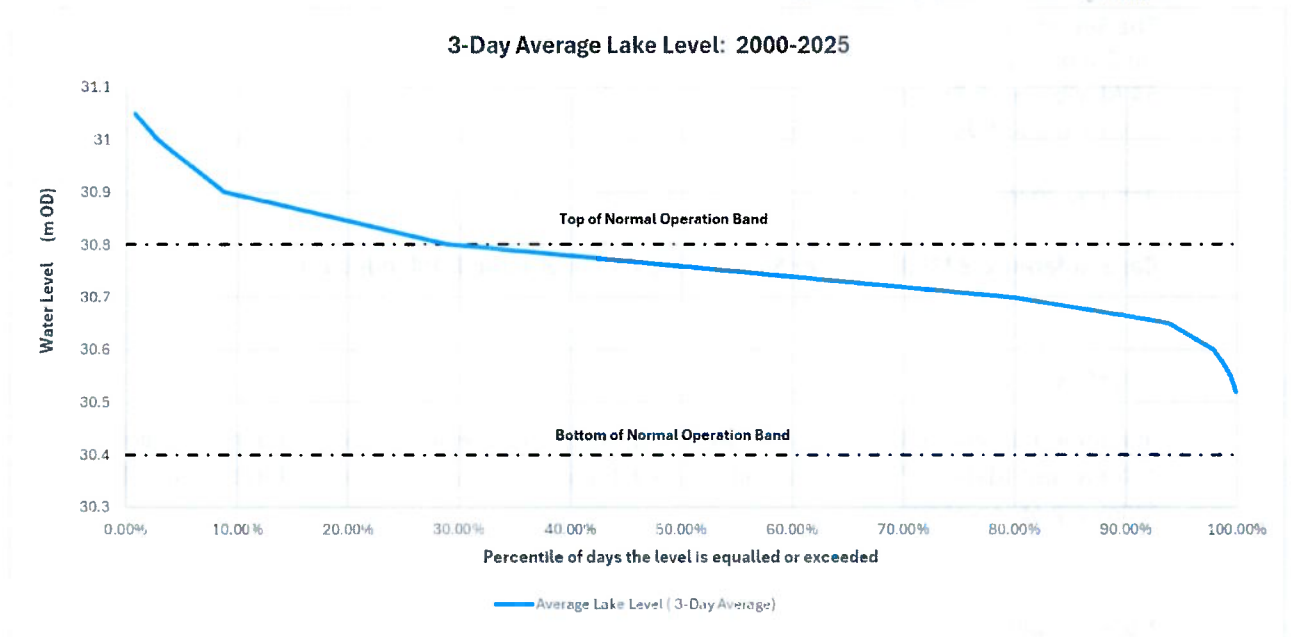


Figure 1; 3-Day Average Lake Level: 2000-2025

Climate Change

Paragraph 2211 also states Uisce Éireann concern that the proposed project is being conflated with existing issues and climate change which are independent of the project. Waterways Ireland wishes to clarify that our primary concern is the cumulative effect of the full implementation of the WSP alongside climate change.

We note that the projected change in water levels “allowing for worst-case climate change” appears to equate to the impact of the full implementation of the WSP on its own (see Figure 2):

- The reduction from the baseline due to “worst-case climate change” is approximately 140mm (see legend for *Lake Level – Baseline & CC 2080s Lower*)
- The reduction from the baseline due to full implementation of project is also approximately 140mm (see legend for *Lake Level – WSP 300*)

Therefore, rather than conflating the two issues, Waterways Ireland maintains that the combined, compounded effect of both the WSP's full implementation and climate change requires a navigation assessment.

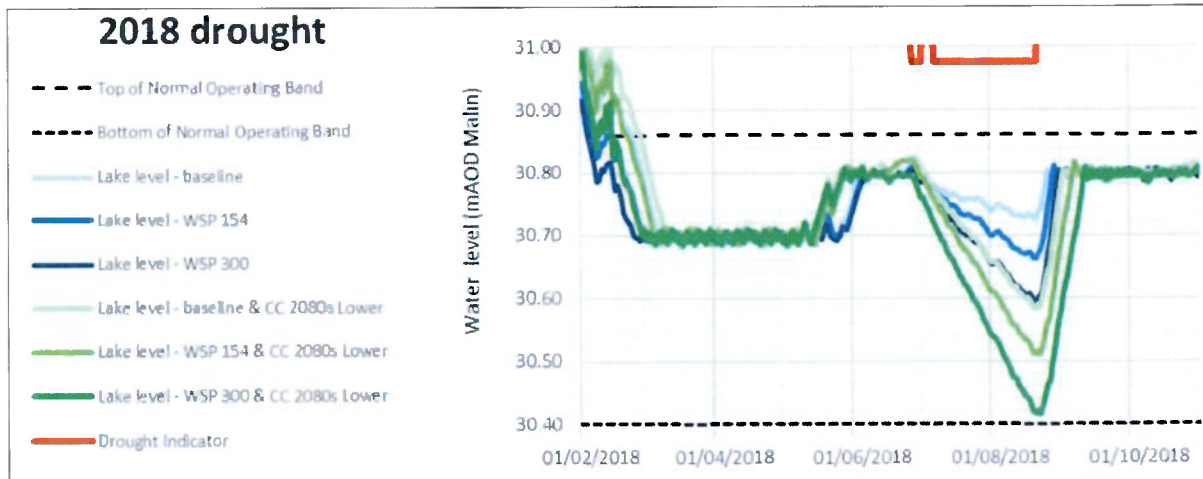


Figure 2: WSP Hydrological Model: Simulation of the 2018 Drought Including Climate Change: i) Without WSP, ii) WSP = 154Mld, iii) WSP = 300Mld (Adapted from Uisce Éireann, Water Supply Project EIAR, Appendix A9.1, Annex A, Image 2.9)

Navigation Assessment

Paragraph 2210 states that the effect of drought “would be during rare events” and would be temporary and short term. Waterways Ireland would expect an assessment on the navigation to quantify the probability and duration of these events. The assessment should also detail how the frequency and magnitude of these events may change with the effects of climate change.

Given that the required minimum draft on the Shannon Navigation is 1.8m, Waterways Ireland is again requesting an assessment of the impacts on navigation in Lough Derg, specifically evaluating the physical viability of accessing the lake via all existing jetties, marinas, and other fixed recreational facilities during scenarios that fall below a level of 30.60 m OD.

Yours faithfully,

Garret McGrath

Garret McGrath
 Technical Services Controller
 Waterways Ireland
 Carrick-on-Shannon
 Co. Leitrim