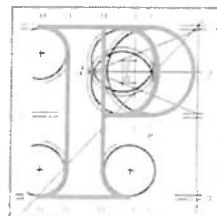


**Our Case Number:** ACP-323980-25



An  
Coimisiún  
Pleanála

Limerick City & County Council  
Planning and Pace-Making  
Dooradoyle Road  
Dooradoyle  
Limerick  
Co. Limerick  
V94 WW78

**Date:** 08 April 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 copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Coimisiún Pleanála when they have been processed by the Commission.

More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: [www.pleanala.ie](http://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,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

PA09

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a>

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

## Callum O'Reilly

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**From:** LAPS  
**Sent:** Tuesday 31 March 2026 11:26  
**To:** Eimear Reilly  
**Subject:** FW: ACP-323980-25 - Uisce Eireann Water Supply Project  
**Attachments:** ScanDocument.pdf

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**From:** SIDS <[sids@pleanala.ie](mailto:sids@pleanala.ie)>  
**Sent:** Monday, March 30, 2026 4:50 PM  
**To:** LAPS <[laps@pleanala.ie](mailto:laps@pleanala.ie)>  
**Subject:** FW: ACP-323980-25 - Uisce Eireann Water Supply Project

---

**From:** O'Brien, Majella <[Majella.OBrien@limerick.ie](mailto:Majella.OBrien@limerick.ie)>  
**Sent:** Monday 30 March 2026 16:39  
**To:** SIDS <[sids@pleanala.ie](mailto:sids@pleanala.ie)>  
**Cc:** O'Connell, Nuala <[nuala.oconnell@limerick.ie](mailto:nuala.oconnell@limerick.ie)>; Henn, Barry <[barry.henn@limerick.ie](mailto:barry.henn@limerick.ie)>; O'Keeffe, Grainne <[grainne.okeeffe@limerick.ie](mailto:grainne.okeeffe@limerick.ie)>  
**Subject:** ACP-323980-25 - Uisce Eireann Water Supply Project

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

Dear An Coimisiún Pleanála,

Please find attached the following in respect of planning reference ACP-323980-25, Water Supply Project for the Eastern and Midlands Region:

Director General Report  
Meeting Administrators Report  
Views of Elected Members

If you have any queries on the above, please do not hesitate to contact me.

Best Regards,

Majella.

**Majella O'Brien,  
Administrative Officer,  
Planning Department.**

[Limerick City & County Council Disclaimer](#)



Comhairle Cathrach  
& Contae **Luimnigh**

**Limerick City**  
& County Council

Pleanáil, agus Cruthú Áite  
Comhairle Cathrach agus Contae Luimnigh  
Bothar Thuar an Daill  
Tuar an Daill, Luimneach  
V94 WV78

Planning and Place-Making  
Limerick City and County Council  
Dooradoyle Road  
Dooradoyle, Limerick  
V94 WV78

30<sup>th</sup> March 2026

**An Coimisiún Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902**

Re: ACP-323980-25 Strategic Infrastructure Development -

Dear Sir/Madam,

I refer to the above proposed Strategic Infrastructure Development and to your correspondence sent to Limerick City and County Council dated the 7<sup>th</sup> January 2026.

In response, please find enclosed the following documentation:

1. Director General's Report
2. Meeting Administrator's Report
3. Views of the Elected Members

Please contact the undersigned if you have any queries.

Yours sincerely,

**Majella O'Brien,  
Administrative Officer,  
Planning Department.**

Phone: 061 557 539

Email: [majella.obrien@limerick.ie](mailto:majella.obrien@limerick.ie)

**DIRECTOR GENERAL'S REPORT  
SECTION 37 E (4) AND (5) OF THE PLANNING AND  
DEVELOPMENT ACT 2000 (as amended).**

**Uisce Éireann  
Strategic Infrastructure Development to An Coimisiún Pleanála**

**ACP Case Reference** – PA92.323980

**Development Address** – in the counties of Clare, Limerick, Tipperary, Offaly, Kildare, and Dublin.

**Development Description** – Proposed Water Supply Project for the Eastern and Midlands Region

**Competent Authority for Decision Making** - An Coimisiún Pleanála

---

## **1. Introduction**

This report has been prepared in accordance with the requirements of Section 37E (4) and (5) of the Planning and Development Act, 2000, as amended, following on from the submission of a Strategic Infrastructure Development (SID) to An Coimisiún Pleanála (ACP) for the proposed water supply project. The purpose of this report is to set out the views of the planning authority on the potential effects of the proposed development on the environment and the proper planning and sustainable development of the authority's area, having regard to the considerations set out under Section 34(2) of the Planning and Development Act 2000, as amended. Section 37E (5) of the Act requires that before this report is submitted to An Coimisiún Pleanála, the Director General shall submit the report to the members of the authority and seek the views of the members on the proposed development. The members may, by resolution, decide to attach recommendations to the report (Section 37E (6) of the 2000 Act refers).

## **2. Description of site and proposed development**

As set out in the application documents, the development is proposed to provide a new drinking water source for the Eastern and Midlands Region. This is proposed to be facilitated by abstracting water from the Parteen Basin in the River Shannon to the north-east of Limerick. The water would then be treated at Birdhill, Co. Tipperary and pumped in an easterly direction to a high point near Cloughjordan. Following this, the water would flow by gravity to Peamount in South Dublin County Council's administrative area via counties Offaly and Kildare. The development would have a maximum abstraction of 300 Mega litres/day and would have a lifespan of 80-100 years. Figure 1 below outlines the extent of the development in the context of Ireland.

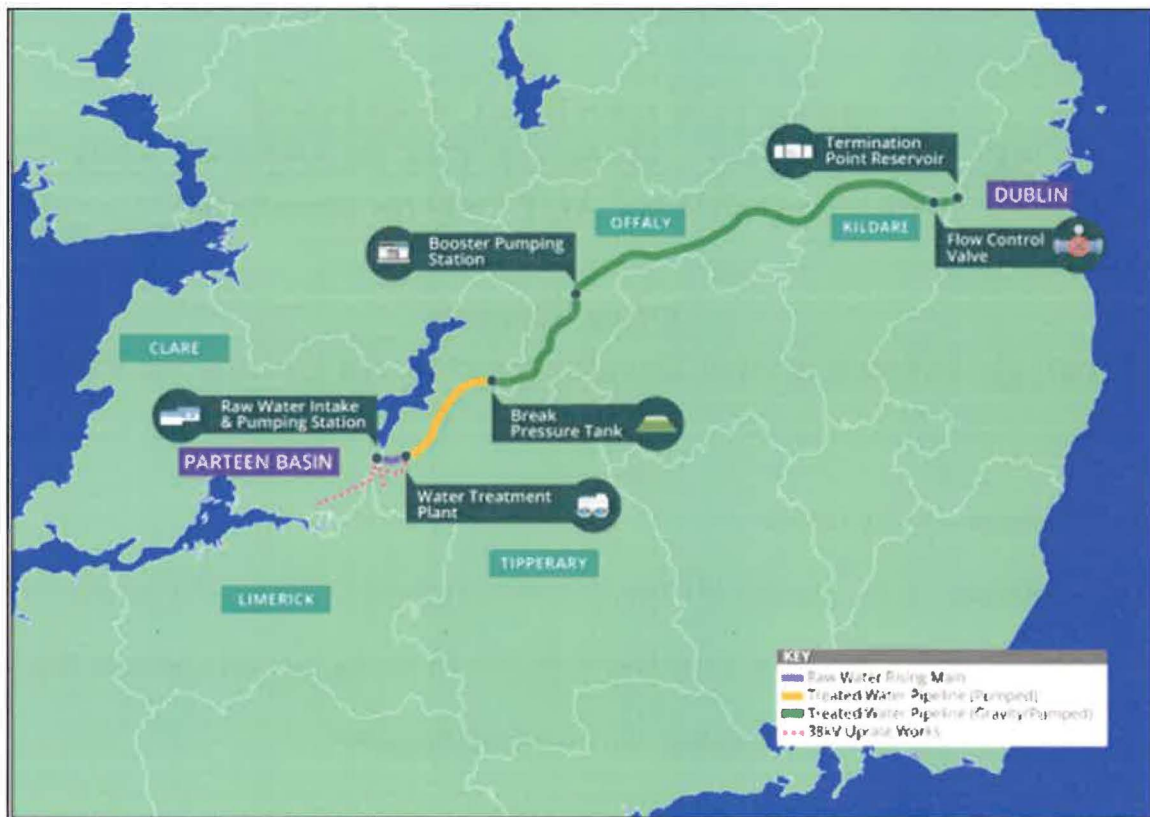


Figure 1 – Overview of the proposed project (source – Uisce Eireann)

The main components of the proposed development are as follows:

- A Raw Water Intake and Pumping Station
- Raw Water Rising Mains
- Water Treatment Plant
- Treated Water Pipeline – Water Treatment Plant to Break Pressure Tank
- Break Pressure Tank
- Treated Water Pipeline – Break Pressure Tank to the Termination Point Reservoir
- Booster Pumping Station (BPS)
- Flow Control Valve
- Termination Point Reservoir
- 38 kV Uprate Works
- Pipeline Features

Within County Limerick, the project’s footprint is confined solely to the uprating of the existing Ardnacrusha-Birdhill 38 kV line. The works occur within an established ESB utility corridor that crosses the northern part of the county, extending from poleset 6B north of Ardnacrusha in Clare and continuing northeast toward Birdhill in Tipperary. The section in Co. Limerick comprises a narrow linear route through a rural landscape of agricultural fields, mature hedgerows and dispersed housing, passing close to the settlements of Montpelier and O’Briensbridge (see Figure 2). Existing overhead transmission infrastructure already forms a defining feature of this area. As no permanent above-ground water supply infrastructure is proposed in Limerick, the works are limited to replacing or uprating existing 38 kV components to provide the necessary power for the Raw Water Intake and Water Treatment Plant in Tipperary.

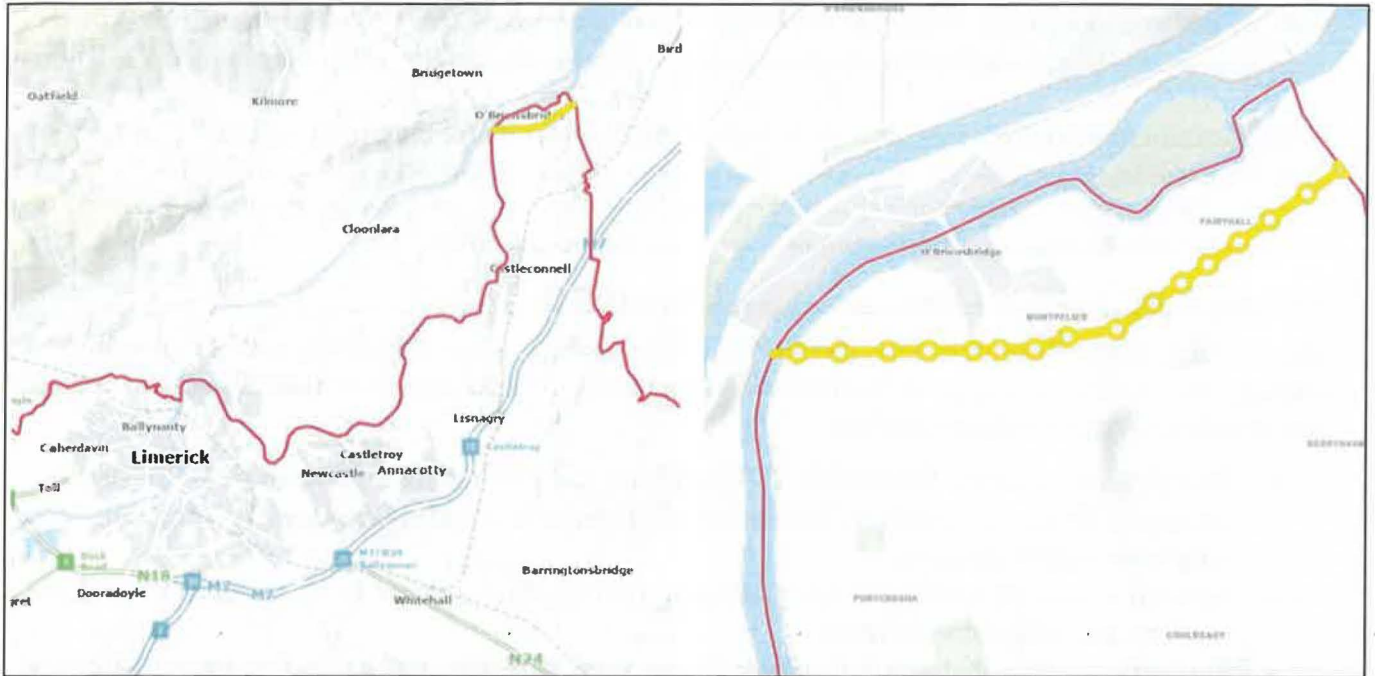


Figure 2 – Extent of works in Co. Limerick

### 3. Need for the Development

The applicants supporting documents have set out a need for the proposed development. This need is based on a projection for the future demand of water by 2050 in the Greater Dublin Area which is calculated to be 197 mega litres per day (Mld). The 35 other Water Resource Zones (WRZs) are calculated as requiring 83 Mld giving a forecast deficit of 280 Mld. Also included in the demand calculation is the provision for the risk of reductions in volumes of water available from the current levels of abstraction from a number of existing sources when they are licenced. Overall, therefore the total peak volume of water required is 300 Mld.

### 4. Policy Context

#### National Planning Framework (NPF) – (First Revision 2025)

The NPF sets out Ireland’s long-term strategy for national growth to 2040 and beyond. It highlights clean water supply as fundamental for health, economic development and environmental protection.

The NPF specifically states:

- A resilient water supply is “essential to support the additional 1 million people projected by 2040.”
- The Water Supply Project is listed as a national priority for the Greater Dublin Area.
- The project is recognised as a key future growth enabler for the metropolitan region.

#### National Policy Objective 92

Ensure planned growth aligns with the efficient and sustainable development of water resources and water services infrastructure.

#### National Strategic Outcome 9 – Sustainable Management of Water and Environmental Resources

The NPF identifies the need for a new long-term water supply source for the Eastern and Midlands Region, explicitly naming the Water Supply Project as required by the mid-2020s. National Strategic Outcome 9: Sustainable Management of Water and other Environmental Resources of the NPF is relevant to the proposal and states:

*Investment in water services infrastructure is critical to the implementation of the National Development Plan. The current Water Services Strategic Plan by Irish Water will be updated in the*

*light of the policies in the National Planning Framework addressing the requirements of future development, while also addressing environmental requirements such as obligations under EU Water Framework Directive mandated River Basin Management Plans. A new long-term water supply source for the Eastern and Midland Region, which includes the Dublin Water Supply Area (DWSA), is needed by the mid-2020s, to provide for projected growth up to 2050 and contribute to resilience and security of supply for the region. This requires infrastructure provision to be guided and prioritised in a manner that can benefit the greatest possible number of areas within the country.*

### **National Water Resources Plan – Framework Plan (2021)**

The National Water Resources Plan (NWRP) is Uisce Éireann’s first integrated national plan for the entire public water supply system. It establishes a long-term strategic approach to ensuring safe, secure, sustainable and reliable water supplies.

- Provides a transparent framework for identifying and prioritising investment in water supply.
- Integrates Government policy, legislation, climate impacts and environmental obligations into long-term supply planning.
- Aims to ensure all customers have access to reliable, high-quality drinking water over short, medium and long-term horizons.
- Supports compliance with EU Water Framework Directive and Drinking Water Directive requirements.

The Water Supply Project (Eastern and Midlands Region) is identified as the Preferred Approach for meeting long-term supply needs across 36 Water Resource Zones.

### **National Development Plan (NDP) 2021–2030**

The National Development Plan provides the Government’s capital investment framework for delivering the NPF. It identifies water services investment as critical to meeting housing, economic development, environmental and public health requirements.

The NDP states that:

- Irish Water will invest almost €6 billion (2021–2025), including the Water Supply Project.
- The Project is explicitly listed as a Strategic Investment Priority for water infrastructure.
- Investment is required to maintain compliance with the EU Drinking Water Directive and support major growth settlements.

The 2025 NDP Review further strengthened investment in water services by allocating:

- €2 billion equity injection in 2025, and
- €2.5 billion for 2026–2030, specifically for large-scale water infrastructure projects.

### **Regional Spatial and Economic Strategy 2020-2032 (RSES) – Southern Region**

Limerick falls within the Southern Regional Assembly (SRA) area.

The SRA RSES supports major infrastructure to enhance climate resilience, sustainable water use and regional growth. Relevant policies include:

- RPO 89 – Building Resilience to Climate Change
- RPO 111 – Water Resources

Supports efficient and sustainable development of water resources to ensure a healthy society and growing economy.

The RSES identifies the Water Supply Project as a significant water infrastructure project required to support development in the Southern Region, including communities adjacent to the pipeline route.

- RPO 208 – Irish Water and Water Supply

Requires alignment with Irish Water Investment Plans and support for climate-sensitive planning.

- RPO 209 – Strategic Water Supply Projects

Supports investment in strategic water supply projects arising from the National Water Resources Plan.

### **Limerick Development Plan 2022–2028**

The following objectives of the Development Plan are relevant for this proposal:

- Policy EH P1 Protection of Natural Heritage and Biodiversity
- Policy EH P2 Sustainable Management and Conservation
- Policy EH P3 Climate Action and the Natural Environment
- Policy EH P6 Water and Air Quality
- Objective EH O1 Designated Sites and Habitats Directive
- Objective EH O3 Ecological Impact Assessment
- Objective EH O5 New Infrastructure Projects
- Objective EH O11 Invasive Species
- Objective EH O12 Blue and Green Infrastructure
- Objective EH O17 Water Quality
- Objective ECON O45 Tourism
- Objective ECON O55 Marine Economy
- Policy IN P1 Strategic Infrastructure
- Objective IN O6 Water Services
- Objective IN O7 Drinking Water Source Protection

## **5. Planning and Environmental Issues**

### **5.1 Introduction**

As per the requirements of S37E (4) of the Act, this report deals specifically with the requirements set out in S34(2) of the Act. It is noted that the physical works within Limerick are limited to the uprating of the existing 38kV electricity line between Ardnacrusha - Birdhill via Montpelier, over a distance of 2.3km to provide the new power needed for the Raw Water Intake and Pump Station and the Water Treatment Plant, located in Co. Tipperary. However, whilst the scope of the physical works in Limerick are relatively minor in the context of the entire scheme, the potential effects from abstracting water do raise a number of issues within Limerick with respect to the environment and the proper planning and sustainable development of the area which are outlined in more detail below.

### **5.2 Future Development in Limerick**

It is noted that the proposed development would provide a water supply source that would be of significant strategic benefit to the Eastern and Midland region. The Planning Authority acknowledges the need to provide a sustainable and resilient water supply to the Eastern and Midlands Region, in particular the international Capital City of Dublin. However, such a supply cannot be at the expense of catering for existing demand, or prohibiting the envisaged future population and economic growth, including in the context of climate change, of Limerick City and County and the Limerick Shannon Metropolitan Area

It is considered that there would be no direct benefit from the proposal for Limerick. A strategic objective of the National Planning Framework (NPF) is to promote balanced regional development, supported by investment in high-quality infrastructure. The proposed development represents a substantial investment in water supply infrastructure that will predominantly benefit the eastern and midland regions, facilitating further population growth and economic activity in those areas.

Limerick is the largest urban centre in Ireland's Mid-West, which is focused on the Lower River Shannon catchment. Limerick City and Metropolitan Area includes the port and energy related

facilities of the Shannon Estuary, Shannon Airport and adjoining parts of Counties Clare and Tipperary. Along with Cork, Galway and Waterford, Limerick is one of the largest centres of population, employment and services outside of Dublin. The Department of Housing, Local Government and Heritage's 'The Updated Draft Revised National Planning Framework (NPF)' envisages that the four cities will continue to provide a regional focus for growth, creating viable alternatives to Dublin. Investment in infrastructure, housing, employment and amenities will focus on the cities to improve the collective offer.

In this context, Limerick has the potential to generate and be the focus of significant population and employment growth. The NPF envisages that Limerick City will grow by at least 50% over 2016 levels to 2040, with enhanced potential to become a city of scale. The NPF predicts that the population of Limerick City and Suburbs will grow from 102,287 in 2022 to at least 150,000 by 2040, a significant increase of 68.2% with an additional 47,713 persons.

Further to the envisaged population growth, employment growth is projected to expand by approximately 27,700 jobs from a 2022 base of 45,210, including in the manufacturing sector by 2040 in Limerick City and Suburbs, Mungret and Annacotty. As set out in the NPF, National Policy Objective 11 requires that growth at settlement level is determined at Development Plan making stage and shall have regard in particular to the receiving capacity of the environment. In this regard, Limerick City and County Council seeks to make efficient use of, and maximise the capacity of, water service infrastructure to support the delivery of envisaged population and economic growth to the benefit of the City, County and Metropolitan Area.

The future population and employment growth of Limerick City, its towns and villages is dependent on the availability of capacity in a sustainable water supply, with consideration for supply issues associated with climate change. In the event that existing manufacturing/ pharmaceutical industries expand, or new industries seek a location in Limerick, these large users of water supply need to be accommodated. Such industry is essential to enable continued expansion of the existing employment base, enhanced employment opportunities for a growing population and the achievement of a region of scale. These factors are essential in order to achieve balanced regional growth and create a real alternative to Dublin as envisaged in the NPF.

The Water Supply Project, in the absence of addressing the long-term water supply requirements to cater for Limerick's population and employment growth, including with regard to the existing manufacturing/ pharmaceutical industry base, would inhibit the Region from realising its full potential as a driver of national growth. A lack of water supply capacity in the Mid-West Region may have negative consequences that could in the long-term lead to additional growth pressure on the Dublin Region.

The proposal should also address security of supply issues as Limerick City and a large area of its rural hinterland is dependent on a single treatment plant at Clareville. If this treatment plant fails or the source of its water suffers a major pollution event, there is no back up plan to supply drinking water to Limerick City. On this basis it is recommended that the proposal provide security of supply to Limerick City for projected population growth and to support the growth of water critical industry both indigenous and foreign direct investment (FDI) and provide confidence to future investors in the Limerick region in the resilience of the water supply.

Another important factor is the ongoing issue of the presence of Trihalomethanes (THMs) that impact the current drinking water supply from the treatment plant at Clareville serving Limerick City that are proving to be a challenge to address. A secondary source of treated water would help to address this serious issue. The distance from the proposed new Treatment Plant at Birdhill to the existing Reservoir at Castletroy, Limerick is approximately 15km, less than 10% of the 175km length of the pipeline to Dublin and the significant investment required in the extraction station and new treatment plant infrastructure in Birdhill will be provided as part of the overall scheme making this a very cost effective and sensible proposal to secure water supply for Limerick City.

It is respectfully requested that the above points, particularly in the context of Limerick's envisaged population growth as per the NPF are taken into consideration in the assessment of the proposal.

### 5.3 Natura Impact Statement (NIS)

The Lower River Shannon is designated as a Special Area of Conservation (SAC) (002165) from the northern tip of the Parteen Basin, down through the City and out along the Shannon estuary to the Atlantic Ocean. The area of the river from Shannon Bridge in the city centre, down along the estuary is designated as a Special Protection Area (SPA) known as the River Shannon and River Fergus Estuaries SPA (004077). An Coimisiún Pleanála being the decision maker on this SID application is also the competent authority. It is recommended that ACP has regard to these two significant Natura 2000 sites and their qualifying interests given that water will be abstracted from a point to the north of their siting, upriver on the River Shannon.

While the physical development proposed within the administrative area of Limerick is minor in nature, there are concerns regarding the proposed abstraction of water from the Parteen Basin, and the potential impacts on the Lower River Shannon.

In assessing the ecological implications of the proposed uprate works within County Limerick, the Planning Authority has had careful regard to the Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), the ecological objectives of the Limerick Development Plan 2022–2028, and the observations of the Local Authority Heritage Officer (Appendix B). The central ecological considerations relate to:

- The functioning and conservation status of the Lower River Shannon SAC.
- Implications for the River Shannon and Fergus Estuaries SPA.
- Potential hydrological or ecological interactions with other designated sites.
- The adequacy of abstraction related assessments (as they relate to Limerick).
- Pathways for invasive species introduction or pathogen transfer.

Although the physical works within Limerick are limited to uprating an existing overhead ESB line, it remains necessary to consider the wider environmental context in which these works sit, insofar as the project as a whole may influence ecological conditions downstream or across designated sites affecting Limerick.

#### Lower River Shannon SAC

The core ecological issues for Limerick concern the possible influence of the abstraction of water from the River Shannon on the functioning of the SAC. While no abstraction points or instream works occur within Limerick, it is acknowledged that any project with potential to alter flows upstream of the county must be assessed for its capacity to indirectly influence habitat conditions, species movement, and ecological processes within the SAC. Consideration should be given to periods of drought and the potential implications of abstracting water which may have an impact downstream on the SAC and its qualifying interests.

These concerns fall within the remit of the national assessment of abstraction impacts rather than the Limerick uprate works themselves. Nonetheless, it is considered that the long-term ecological functioning of the Lower River Shannon SAC is sensitive to hydrological alteration, and that appropriate operational safeguards, adaptive abstraction triggers, and climate-responsive flow protections must be implemented at the project level. It is recommended that clarification is sought on abstraction-related issues at the overall project scale to ensure ecological integrity of the SAC is maintained.

The underlying concern is that the rate of abstraction would compromise the ecological functioning of the Lower River Shannon Catchment, particularly since abstraction rates will inevitably rise as Dublin further develops. It is mentioned in the NIS that there would be a 2% reduction in flow and that smolts for instance might benefit from this as they would avail of Parteen Weir as an alternative migration route (NIS, P.275) There has long been historical disruption for migratory fish passage in the Shannon and for this reason it is considered that the treatment of smolt and migratory fish require more attention particularly as there may be much altered flow rates as result of climate change. The flow baseline is likely to change over the coming decades, which may exacerbate the effects of the abstraction. The

base flows of the river itself are likely to change as hydrological cycles alter as a result of climate change, and this variability needs to be factored into abstraction rates during the operational phase of the development. In short, the abstraction rate cannot be a fixed factor and should vary depending on baseflows and changing ecological requirements.

The abstraction rates will also have to be considered in more detail when coupled with existing anthropogenic and natural pressures (e.g., nutrient enrichment, hydro-morphological changes, and invasive species for instance) on the river habitats and the fish and invertebrate species that use them. Rising temperatures and lesser volumes of water could be expected to exacerbate the effects of both eutrophication and raised water temperatures which itself could result from increased temperatures which are likely during the lifetime of the project. As mentioned above it is a strong likelihood that base flows in the future may decrease greatly in the coming decades. It is hugely important that this variable baseline is incorporated into any abstraction regime and careful contingency planning provided to ensure continued downstream ecological functioning, particularly at periods of greater ecological stress such as during high summer temperatures and low natural flows. It is at times like these that human demand for water could increase in addition to the natural stresses, thereby compounding their effects. It is recommended that more detail is provided in the NIS on this topic.

#### River Shannon and Fergus Estuaries SPA

The River Fergus Estuaries SPA lies within the tidal reach of the Shannon and as such could be expected to be buffered from any alterations in water volumes as a result of the pipeline. However, it is recommended that this should be clarified further.

#### Askeaton Fen Complex SAC

The absence of reference to the Askeaton Fen Complex SAC is noted. However, there is a query on whether hydrological linkages to the Shannon could create an indirect effect. While the uprate works are confined to an existing ESB corridor with no ground excavation of significance and no hydrological alterations, the NIS should explicitly confirm the absence of connectivity between the project and this site. However, for completeness it is recommended that all designated sites with potential Shannon linkages are fully documented within the final assessments.

#### Invasive Alien Species (IAS) and Pathogen Transfer Risk

One of the issues which arises is the possible transfer of invasive species and pathogens between catchments, particularly those that may have a high capacity for reproduction and have effects on ecology and infrastructure. In this regard more complete details as to the effectiveness of methods for dealing with species such as the Quagga and Zebra Mussels would be welcomed. See *3.8.1 Invasive Non-Native Species Control without Impacting the Lower River Shannon SAC at the Raw Water Intake and Pumping Station* (pp. 98-99 for instance). It is not just the Shannon that needs safeguarding here but also the receiving water bodies on the east coast. More detail needs to be provided on the measures required to prevent the pipeline from being a conduit for invasive species, particularly during the operational phase. While elements such as the use of specific screens and materials and the use of UV (p.99) light are mentioned, these are often associated with hygiene measures associated with water supply. Their utility in relation to control of the various forms of invasive species, such the larval (veliger) stage of species such as Mussels, needs to be further explained and an example of its efficiency in similar contexts demonstrated.

Limerick has suffered from outbreaks of crayfish plague in recent years the most recent being in 2017 and 2019. While generally Freshwater Crayfish might not be coated to occur in the main channel of the Shannon, the river itself could act as conduit for the disease, which in turn could be transmitted to the east coast via the pipeline. While testing for the pathogen which causes the disease is mentioned (p.91) a more complete methodology for dealing with this pathogen during the operational as well as the construction phase of the development is required.

## **5.4 Community Benefit Scheme**

The application includes for a Community Benefit Scheme which involves the establishment of a Community Gain Investment Fund by the applicant to support community-based initiatives during the construction phase of the project. Under this scheme it is proposed that Limerick would receive an allocation of 5% of the total fund. According to the applicants Community Benefit Scheme document, this figure is based on the fact that no land take is required nor is any permanent infrastructure proposed in Limerick. The document goes on to state that the investment fund amount would be benchmarked against similar largescale infrastructure projects such as EirGrid's Celtic Interconnector project.

The applicant has stated that the proposed fund would be based on the scale of impacts during construction. Whilst it is noted that the amount of physical works in Limerick would be limited to the area near Montpelier, the fund would be allocated on a 5km radius which is considered to be quite restrictive given the potential impacts downstream. There are a large number of people living within a short distance of the River Shannon in Limerick City and County, particularly through the city centre and the Castletroy area, around the north-east of the county in Castleconnell and its surrounding areas, and along the Shannon Estuary as the river flows north of West Limerick.

It is noted that the applicant has proposed that the Local Authority would act as the administrators of the fund with the primary responsibility of managing the distribution of funding to recipients in local communities in proximity to the project. It is also noted that the fund duration would be for a period of 5 years which is considered to be limited given the scale and nature of the project. ACP are respectfully asked to consider conditions that would reflect longer periods of time and also the fact that there are possible effects for people in the county that are outside of the 5km area where the construction works are proposed.

The proposal in itself is based on the demand for water in the East of the country but would not have any specific benefits for Limerick and its surrounding areas. As per the points previously raised in section 5.2 of this report, there are significant targets set for Limerick in terms of increasing population and housing within the city. Given these ambitious targets, it is considered that further investment in water infrastructure would be required. Particularly given the level of abstraction proposed which could have a significant impact on the availability of drinking water for Limerick and planned future development.

## **5.5 Surface Water**

No new hard-surfaced areas, drainage infrastructure, or ground excavation of significance are proposed within the County. Nonetheless, any construction activity has the potential to impact local surface water behaviour if not appropriately managed. The Council's Roads Department has reviewed the application and has provided a number of requirements that are recommended to be complied with to ensure that existing drainage regimes are protected.

In the first instance, all existing drainage channels, including agricultural drains, roadside ditches and minor watercourses within or adjoining the area of works, must remain undisturbed throughout the construction process. Maintaining these channels in their current condition is necessary to safeguard the existing hydrological regime and ensure that no localised flooding or blockages arise as a result of the uprate works.

All surface water arising from construction activity within the working area must be managed and disposed of appropriately. It is essential that no surface water run-off is allowed to discharge onto adjoining properties or onto the public road network. Any water generated through vehicle movement, ground disturbance or temporary works must therefore be retained and controlled within the site boundary through standard best-practice measures.

Should it be proposed to alter drainage patterns in any way, revised drainage proposals should be submitted and agreed in advance of construction.

## **5.6 Water Abstraction**

It is noted that Chapter 9 and Appendix A9.1 of the Uisce Éireann EIA submitted with the application to ACP contains an assessment regarding the abstraction of water. Appendix A9.1 (Abstraction Assessment) includes an assessment of the likely significant effects of the Operational Phase of the Proposed Project on water bodies with respect to the proposed abstraction of water from the Lower River Shannon catchment. This assessment states that the level of abstraction proposed has been assessed through the use of models of hydrology and water quality and that no significant effects are predicted and therefore no mitigation measures have been recommended.

Under the Shannon Fisheries Act, 1935, the ESB is obliged to maintain a flow of at least 10m<sup>3</sup>/s through the original Shannon channel. This level of flow is an approximate of the summertime dry weather flow. The flow through the power plant is a maximum of 400m<sup>3</sup>/s. Over the decades since the construction of the scheme, the 15km of the original channel has significantly changed with increased siltation, encroachment of vegetation and ecology alteration. To ensure that there is no further alteration of the original channel it is essential that at least the 10m<sup>3</sup>/sec is maintained in the original channel.

The UE water extraction will be from the water allocated for power generation. This will reduce the amount of power that the ESB will be able to produce. As this is Carbon neutral electricity, the impact on Ireland achieving its carbon reduction goals under the Climate Act is recommended to be assessed and taken into account by ACP in the assessment of the proposal. Compensatory Carbon neutral power generation should be identified. It is recommended that ACP take this into account when assessing the proposal.

## **5.7 Tourism**

Limerick, and its City and County, benefits from many water-based sport and leisure activities on the River Shannon, including fishing, rowing clubs and canoe clubs. Furthermore, the River Shannon is navigable through Limerick City and out to the Shannon Estuary which is a significant tourist attraction within the region. Objective ECON O45 Tourism of the Limerick Development Plan supports the growth of tourism in Limerick with particular reference to cruise ship visitors, the Shannon Estuary Way, water-based tourism activity and the development of the Shannon River Interpretive Centre.

In addition to the above, Objective SCSI O30 of the Limerick Development Plan seeks to support and encourage water-based sports and leisure activities at appropriate locations throughout Limerick. It is respectfully requested that ACP has regard to the potential for the abstraction of water on water-based activities and tourism and that any proposal would not impact negatively on any water-based amenities or tourist attractions with the River Shannon playing a key role in both.

## **5.8 Traffic, Access and Roads Safety**

The works are confined to an existing utility corridor and do not involve any new road alignments, significant ground disturbance or construction compounds within Limerick. Accordingly, the scale of interaction with the local road network is expected to be limited.

Notwithstanding this, any works requiring access from the public road network, temporary traffic management, or the movement of materials or equipment must be managed to safeguard road safety and residential amenity. The Roads Section has provided technical comments, which have been fully considered as part of this assessment.

Haul routes have been identified in the EIA. However, should access be required from any Limerick City and County Council public road to facilitate mast replacement or uprate works, the developer should be required to engage with the Roads Section in advance of commencing works. This is necessary to confirm suitability of access points, identify any constraints, and ensure that construction traffic is managed appropriately in a rural setting.

Depending on the nature and location of works, a site-specific Temporary Traffic Management Plan (TTMP) may be required. This TTMP must be agreed in advance with the Roads Section and should include:

- Detailed traffic management drawings,
- Advance warning signage,
- Protection measures for vulnerable road users, and
- Procedures to manage intermittent works along the corridor.

To protect the integrity of public roads, the wheels and undercarriage of construction vehicles must be cleaned as necessary to prevent the carryover of soil or debris. A wheel wash system or equivalent measure must be installed at any site exit. Any soiling of the public road arising from construction traffic must be cleaned immediately.

If any Limerick public roads are proposed to be used as haul routes, these must be submitted to LCCC for prior written agreement which is recommended to form the basis of a condition. This requirement ensures that only roads capable of safely accommodating construction vehicles are used and that any potential impacts (e.g. on junctions, bridges, or vulnerable road users) are fully considered.

Where the transport of abnormal loads through County Limerick is required, an Abnormal Load Permit must be obtained from Limerick City and County Council in advance. This is standard practice and ensures coordination with the Roads Section on timing, routing and escort requirements.

Given the nature of the development in Limerick no significant traffic or transportation impacts are anticipated, provided the appended requirements from the Roads Department are met. The works are temporary, localised, and constrained within an existing utility corridor, which significantly reduces the potential for adverse roads or transportation effects.

## **6. Conclusion**

This report sets out the views of the Planning Authority on the effects of the proposed development on the environment and the proper planning and sustainable development of the area. Whilst the level of physical works proposed within Limerick is limited in the overall context of the proposal, there are a number of concerns regarding the abstraction of water and the potential implications for Limerick.

The proposal has been identified as a strategically important project for the delivery of water supply to the Eastern and Midland area of Ireland. However, given the national planning policy context which identifies Limerick City as a key area of growth and area designated for significant population increase, it is noted that there are no direct water supply benefits for Limerick within the proposed development. It is considered that regard should be had to the ambitious targets set for Limerick and that adequate water supply is maintained to facilitate the existing and proposed population of the city/county and wider area in the Mid-West. It is recommended that security of water supply for projected population growth and to support the growth of water critical industry both indigenous and foreign direct investment (FDI) and provide confidence to future investors in the Limerick region in the resilience of the water supply. In addition to this regard should be had to addressing the dependence on the single treatment plant at Clareville, the presence of Trihalomethanes that impact the current drinking water supply, and the opportunity to provide a secondary source of treated water given the relatively short distance of 15km to the proposed treatment plant at Birdhill.

Given the presence of the Lower River Shannon SAC and River Shannon and Fergus Estuaries SPA in Limerick, it is considered that regard should be had to the potential implications on these two Natura 2000 sites and their qualifying interests because of water abstraction. Consideration should also be given the potential for the transfer of invasive alien species via the pipeline to the east of the country.

Further consideration should be given to the expansion of the Community Benefit Scheme given the limited geographical area of 5km and limited timeframe of 5 years within the construction phase. Consideration should be given to the maintenance of at least 10m<sup>3</sup>/sec in the original channel and the potential implications for the reduction of carbon neutral electricity.

The River Shannon plays an important role in tourism within Limerick as well as an amenity for local people. Any changes to the river should not impact negatively on this important resource for the area.

Limerick City and County Council respectfully request that the items raised above are taken into consideration by ACP in the assessment of this SID application.



Joe Delaney

Deputy Director General,

On behalf of Dr Pat Daly, Director General,

Limerick City & County Council

Date: 13/3/26



Comhairle Cathrach  
& Contae **Luimnigh**

**Limerick City**  
& County Council

Seirbhísí Corparáideacha, Rialachais & Custaiméara  
Comhairle Cathrach & Contae Luimnigh  
Ceanncheathrú Chorporáideach  
Cé na gCeannaithe  
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**TO WHOM IT MAY CONCERN**

**Re: ACP-323980-25. PA92.323980 – Water Supply Project Eastern and Midlands Region – E**

I hereby certify that the following is a true extract from the Minutes of Special Meeting of Limerick City and County Council held on 23<sup>rd</sup> March 2026.

**Signed:**

Ciara Farrell  
Meetings Administrator

**Date:** 30<sup>th</sup> March 2026

**MINUTES OF PROCEEDINGS AT SPECIAL MEETING OF LIMERICK CITY AND COUNTY COUNCIL HELD IN THE COUNCIL CHAMBER, DOORADOYLE, AND ONLINE, ON MONDAY, 23<sup>RD</sup> MARCH, 2026, AT 4.30 P.M.**

**PRESENT IN THE CHAIR:**

Príomh Chomhairleoir, Councillor C. Slattery

**MEMBERS PRESENT:**

Mayor Moran.

Councillors Beasley, Butler, Carey, Collins (B), Collins (M), Conway, Daly, Donoghue, Doyle, Foley, Galvin, Gavan, Hartigan (S), Hartigan (T), Hickey-O'Mara, Keary, Kiely, Kilcoyne, Leddin, McSweeney, O'Donoghue, O'Donovan, O'Hanlon, O'Sullivan (O), O'Sullivan (T), Pond, Reale, Ruddle, Ryan (E), Ryan (M), Scanlan, Secas, Sheahan, Stokes, Talukder, Teefy, Teskey and Ward.

**OFFICIALS IN ATTENDANCE:**

Director General (Dr. P. Daly), Deputy Director General and Director, Corporate Services, Human Resources and Organisational Development (Mr. J. Delaney), Director, Finance, Investment and Governance (Mr. M. White), Director, Planning, Heritage and Ryder Cup (Mr. S. Duclot), Meetings Administrator (Ms. C. Farrell), Administrative Officer, Corporate and Customer Services (Ms. A. Foley), Senior Staff Officer, Corporate and Customer Services (Ms. C. Sheehy), Senior Planner (Ms. N. O'Connell), Senior Executive Planner, Development Management (Mr. B. Henn), Administrative Officer, Development Management & Place-Making (Ms. M. O'Brien).

An apology for his inability to attend was received from Mr. K. Lehane, Director of Service.

**1. Strategic Infrastructure Development for Proposed Water Supply Project for the Eastern and Midlands Region**

The Members were advised that the Council was being asked to consider the Director General's Report under Section 37E of the Planning and Development Act 2000 (as amended) in relation to the proposed Strategic Infrastructure Development for proposed Water Supply Project for the Eastern and Midlands Region.

The Elected Members expressed very serious concerns about the Strategic Infrastructure Development proposal by Uisce Éireann to extract water from the River Shannon.

The Elected Members established consensus at the meeting that Limerick City and County Council should object to this project in line with neighbouring Local Authorities in the Mid-West Region.

It was agreed that the Elected Members individual comments would be noted. (See Appendix)

**Regional Development**

Members expressed concerns that the project goes against balanced regional development including the following comments:

- Limerick receives no direct benefit from this project, despite being a designated growth centre under the National Planning Framework.

- Views expressed that there is overpopulation and overconcentration of activity in Dublin; regional imbalance needs to be looked at.
- Views expressed that it is not unusual for cities to reach their natural limits and that if Dublin has reached its natural limit, then development will have to take place elsewhere in the country.
- Water demands for Limerick and in the Shannon Estuary must be met to support economic and balanced regional development.
- Clare and Tipperary County Councils have objected raising flaws with the proposal and serious planning and environmental concerns. These issues should concern everyone and neighbouring counties should be supported in their objections.
- Members queried how the project aligns with the Limerick Development Plan?

### **Environmental Issues**

With regards to environmental issues members raised the following:

- Members raised serious concerns about the implications for the Shannon River's ecological health, for the development of the region, for compliance with European law, and for the survival of species already under severe pressure.
- Members queried whether the extraction planned aligns with the Water Framework Directive and submitted EIA; and if it should include a fully integrated catchment assessment.
- Project report does not acknowledge that Ireland is legally required under the WFD to improve, not merely maintain, ecological status.
- Concern on how the project may impact on ecological health of river.
- Risk that there will be barren ecology after the abstraction of water.
- Concerns from the fisheries community and the likely impact on existing fish stocks.
- Concerns raised on the subsequent impact on the tourism industry.
- Cumulative impact of projects on migratory fish species on the Lower River Shannon must be examined. There was a serious omission that the project does not consider the Lower Shannon Fish Passage Project; they draw from the same source and therefore must be assessed together.
- Government's own CDM Smith report states that to restore fish passage:
  - Baseflows in the old River Shannon need to rise from 10 m<sup>3</sup>/s to 17 m<sup>3</sup>/s;
  - Weekly migration-supporting spills of 21–31 m<sup>3</sup>/s are required from March to September;
  - And eel migration requires bi-weekly night-time spills of 65 m<sup>3</sup>/s in autumn.
- Concerns there is no analysis of cumulative or project-on-project impacts, including the risk that the Water Supply Project could delay or obstruct the fish passage works.
- Indicated that they are the scientifically defined conditions required if salmon, eel and lamprey—the qualifying interests of the SAC—are to survive.
- Indicated that in Uisce Éireann's application and in the Director General's analysis, there is an assumption that maintaining 10 m<sup>3</sup>/s down the Old River Shannon is sufficient which is not. Members stated that 10 m<sup>3</sup>/s figure was set almost a century ago and it is the legal minimum—not the flow required to comply with the Habitats Directive, the Water Framework Directive, the Eel Regulation, or the River Basin Management Plan.
- Indicated that Uisce Éireann presented plan as if water is just simply there for them to take, as if there is always a guaranteed 2% of annual flow.
- Concerns that cumulative or project-on-project impacts have not been properly assessed.
- Concerns about impact of potential drought and that this issue has not been examined properly. E.g. during Summer drought conditions flow in the Shannon can fall dramatically. In those conditions, the real source of water available is the stored water in Lough Derg and, at Ardnacrusa.

- No consideration of whether the abstraction licence could later be increased, whether the pipeline is being built with surplus capacity, or whether the treatment plant could be upgraded. That lack of future-proofing is a serious oversight.
- Indicated that continued abstraction during drought is not assessed; Dublin's storage capacity at the termination point is only 75 megalitres, while daily demand already exceeds 630 megalitres. This means abstraction from Parteen will be continuous (day and night) including during drought and low-flow periods, precisely when the Shannon is most ecologically vulnerable.
- Report has not addressed the potential for future expansion or increased abstraction; The project does not consider impacts/potential for future expansion or increased abstraction. The lack of future proofing is a serious oversight.
- Members queried what would happen if Limerick County is under pressure for water; Limerick demands must be addressed as part of the project.
- Members expressed concern that other villages in rural Limerick should be looked at by Uisce Éireann. There are capacity issues in across our towns and villages and this should be the priority.
- Members queried percentage of the flow during drought when demand is highest, and flow is at its lowest (as it'll be taken from old course of the river and most of the water there is at that time is diverted through Ardnacrusha and away from that old course).
- Indicted that in summer drought conditions flows in the Shannon can fall dramatically. those conditions, the real source of water available is the stored water in Lough Derg and, at Ardnacrusha.
- The 2018 drought lasted nearly two months and that gap has never been properly stress-tested in real-world conditions.
- Statement that Dublin's water difficulties are largely the result of leaks and weaknesses in the existing network. A recent report by McCarthy Hyder shows that there were 800 kilometres of 100-year-old iron pipes in Dublin that are "beyond repair to extensive corrosion", so a huge amount of treated water is lost before ever reaching homes and businesses.
- Options should be looked at rivers closer to Dublin.
- There are other options, such as the River Liffey system and the existing Poulaphuca reservoir which were originally designed to supply Dublin; the River Slaney, River Barrow and River Boyne combined carry substantial flows for most of the year.
- Queried whether desalination could be an option.
- Report of Cllr. P Bulger, Elected Representative from Tipperary County Council, should be taken into account, particularly in relation to the serious impacts on water quality in Lough Derg should be considered

### **Procedural Issues**

Members expressed concern about the planning process and raised the following:

- That the planning application is deeply flawed.
- An Oral Hearing should be requested.
- Concerns that site notices were not erected in Limerick and Clare and the application should be deemed valid as a result. It was stated that residents had contacted An Coimisiún Pleanála enquiring where the site notices were located however no response was issued to the query.
- Queried how planning permission can be sought in the absence of an abstraction licensing framework in place.
- Indicated that the Water Resource Management Plans underpinning this project has no clear statutory basis, yet Uisce Éireann is relying on them to justify this development of national scale.

The legal authority, oversight and accountability for allocating and managing this abstraction are not clearly set out in legislation, so there are serious governance flaws with this proposal.

### **Community Fund**

- Members expressed concerns that the Community Fund as described is not fit for purpose - it is only proposed for 5 years and the catchment area of 5km is not sufficient.
- The community impacts are much broader, for example, there no consideration to impact of tourism industries further down the river.
- A proposal for Community Fund should not be at the expense of environmental issues.

### **Cost**

- Cost is excessive and final costs are unknown.
- Costs of national projects have been demonstrated to escalate as per other Government projects.
- Project does not make common or financial sense.

### **General Director General Report**

- Indicated that the Director General report could have been more forceful in expressing concerns with the project.
- Indicated that there are additional issues to be resolved in addition to analysis provided in the Director General's report;
  - The fish passage project
  - The outdated 10 m<sup>3</sup>/s baseline
  - Continuous abstraction

It was proposed by Councillor O'Hanlon that a roll call vote would be taken requesting Members to vote in favour or against the proposed Water Supply Project for the Eastern and Midlands Region Project, this was seconded by Councillor Donoghue.

The Príomh Chomhairleoir instructed that a roll call vote would now be taken.

### **For**

No Member voted in favour of the proposed project.

(0)

**Against**

Councillors Beasley, \*Butler, Carey, Collins (B), Collins (M), Daly, Donoghue, Doyle, Foley, Galvin, Gavan, Hartigan (S), Hartigan (T), Hickey-O'Mara, Keary, Kiely, Kilcoyne, Leddin, McSweeney, Mayor Moran, O'Donoghue, O'Donovan, O'Hanlon, O'Sullivan (O), O'Sullivan (T), Pond, Reale, Ruddle, Ryan (E), Ryan (M), Scanlan, Secas, Slattery, Stokes, Talukder, Teefy, Ward.

(37)

\*Due to technical difficulties, Councillor Butler contacted the Meetings Administrator by phone to indicate his vote.

This concluded the Meeting.

**Signed:**

\_\_\_\_\_

**Príomh Chomhairleoir**

**Date:**

\_\_\_\_\_

<b>Re:</b>	Special Meeting of Limerick City and County Council, Monday, 23 <sup>rd</sup> March, 2026.
<b>Agenda Item:</b>	To consider the Director General's report on the Strategic Infrastructure Development for Proposed Water Supply Project for the Eastern and Midlands Region.
<b>Meeting Notes only</b>	Elected Member's contributions

**Cllr. Secas**

Written account of verbal observations provided as follows;

This proposal by Uisce Éireann to take three hundred thousand cubic metres of water every day from the River Shannon, and pipe it to Dublin is simply wrong.

There has been huge opposition to it from day one, with evidence-based arguments and facts being presented by various professional individuals and groups. Both Clare County Council and Tipperary County Council have expressed their formal objections. When you see two local authorities in the region which will be most directly affected, raising serious flaws with the proposal, serious planning and environmental concerns, that should raise flags for everyone, especially Uisce Eireann and the Government.

Does Dublin need a secure water supply - it certainly does, but not at this cost. Dublin's water difficulties are largely the result of leaks and weaknesses in the existing network. A recent report by McCarthy Hyder shows that there were 800 kilometres of 100-year-old iron pipes in Dublin that are "beyond repair to extensive corrosion", so a huge amount of treated water is lost before ever reaching homes and businesses. Building a massive new pipeline at an astronomic cost to the taxpayer when those leaks aren't fixed and the existing infrastructure isn't properly upgraded, is not sustainable or cost-effective, and lacks any bit of common sense.

Uisce Eireann present this plan as if the water is just simply there for them to take, as if there is always a guaranteed 2% of annual flow. But one needs to look at what actually happens during dry periods. We have seen in the past few years, in summer drought conditions, that flows in the Shannon can fall dramatically. And in those conditions, the real source of water available is the stored water in Lough Derg and, at Ardnacrusha.

I was advised.... that storage operates within tight limits. If levels drop by as little as 15 centimetres, abstraction can be stopped to protect embankments. So, at the proposed rate - that stored water could last less than a week in dry conditions.

Now, the 2018 drought lasted nearly two months and that gap has never been properly stress-tested in real-world conditions. Yet we are talking about a project costing billions without any clear proof that the water will actually be there when it's most needed.

Uisce Eireann, to my knowledge, have been presented with alternative proposals very close to Dublin. Have they genuinely considered and exhausted those alternatives?

You have the River Liffey system and the existing Poulaphuca reservoir which were originally designed to supply Dublin. You have the River Slaney, River Barrow and River Boyne together carrying substantial flows for most of the year. All is needed to strengthen resilience in the East is proper summer storage and better interconnection between treated supplies, without exporting environmental risk to the Mid-West area.

And the environmental cost cannot be ignored. You have a huge resource in

Lough Derg in that it supports fisheries, tourism, wildlife and whole communities. Increasing abstraction during low flows risks 1) prolonging artificial low water levels downstream, and 2) undermining ecological restoration efforts.

There are also fundamental governance issues with this proposal. How can planning permission be sought in the absence of an abstraction licensing framework in place?

The Water Resource Management Plans underpinning this project have no clear statutory basis, yet Uisce Éireann is relying on them to justify this development of national scale. The legal authority, oversight and accountability for allocating and managing this abstraction are not clearly set out in legislation, so there are serious governance flaws with this proposal.

Back in July 2024, I saw a motion passed in this chamber asking for an independent evaluation of this project, and asking that no planning application was submitted until such an evaluation had been completed. It seems those calls fell on deaf ears, so I am asking now that LCCC follows the example of Clare County Council and Tipperary County Council in lodging a formal objection recommendation to this proposal.

### **Cllr. Doyle**

A report has been prepared by Cllr. P Bulger, and submitted by Elected representative from Tipperary County Council, particularly in relation to the serious impacts on water quality in Lough Derg.

Queried the statistic on the 2% extraction rate.

There are options should be looked at – rivers closer to Dublin.

We should oppose the project.

### **Cllr. O'Donovan**

The planning application is deeply flawed and concerns raised that it appeared that site notices were not erected in Limerick and Clare. Cllr. Donovan questioned if the application was deemed valid as a result.

Reference made to residents that had contacted An Coimisiún Pleanála enquiring where the site notices were located however no response was issued to the query.

Queried whether the extraction planned aligns with the Water Framework Directive. The EIA should include a fully integrated catchment assessment.

Queried the cumulative impacts of the development and impact on migratory fish.

Queried how the project aligned with the Development Plan.

The cumulative ecological effect on migratory fish species on the Lower River Shannon must be examined.

The Community Fund as described is not fit for purpose. It is only proposed for 5 years and the catchment area of 5km is not sufficient. Should not set aside environmental concerns.

Limerick should oppose the project.

### **Cllr. Slattery**

Stated opposition to the project and agrees with previous speakers that Limerick should object to the project.

Raised concerns about potential droughts and requested that issue be examined as part of the project.

Concerns of how the project may impact on ecological health of river.

Impact on reduction in waterflow will have an impact on tourism and fishing industry.

### **Cllr. S. Hartigan**

Written submission of verbal contribution provided by Cllr. Sean Haritagan as follows;

I want to begin by thanking our staff and the Director General for the time and consideration given to the issues I raised—both at the workshop and in my submission to the ACP, which I shared with staff. It's clear from the report that a number of the concerns I highlighted, particularly around ecological vulnerability, hydrological sensitivity, and the future water needs of Limerick, were taken into account. That is welcome, and it's important to acknowledge that clearly.

It's also positive to see the Director General's report recognise several key points:

That the Lower River Shannon SAC is exceptionally sensitive to hydrological change.

That our migratory fish species are already under severe pressure.

That climate change will increase the frequency of drought, reduce base flows, and further stress the system.

That abstraction regimes may need adaptive management, not fixed rates.

And crucially, that Limerick receives no direct benefit from this project, despite being a designated growth centre under the National Planning Framework.

I appreciate that the submission I made contributed, in some small way, to the analysis that informed the report.

However, there are also some shortcomings—areas where concerns I raised were not addressed, or not addressed sufficiently. And given the scale of this project, and its potential long-term implications for Limerick and for the Shannon catchment, it's essential that these gaps are put clearly on the record.

First, the most serious omission is the complete absence of any consideration of the Lower Shannon Fish Passage Project.

The central point of my submission was straightforward:

The Water Supply Project and the Fish Passage Project draw from the same source, and therefore must be assessed together.

Government's own CDM Smith report tells us that to restore fish passage:

Baseflows in the old River Shannon need to rise from 10 m<sup>3</sup>/s to 17 m<sup>3</sup>/s;

Weekly migration-supporting spills of 21–31 m<sup>3</sup>/s are required from March to September;

And eel migration requires bi-weekly night-time spills of 65 m<sup>3</sup>/s in autumn.

These are not optional extras. These are the scientifically defined conditions required if salmon, eel and lamprey—the qualifying interests of the SAC—are to survive.

The Director General's report never references the CDM Smith roadmap, never mentions the new flow regime that will be required, and does not assess whether the proposed continuous abstraction regime could block or undermine that fish passage project. This is a critical gap.

Second, there is an overreliance on the outdated 10 m<sup>3</sup>/s compensation flow.

Throughout Uisce Éireann's application—and implicitly in the Director General's analysis—there is an assumption that maintaining 10 m<sup>3</sup>/s down the Old River Shannon is sufficient.

But we know it is not.

That 10 m<sup>3</sup>/s figure was set almost a century ago. It is simply the legal minimum—not the flow required to comply with the Habitats Directive, the Water Framework Directive, the Eel Regulation, or the River Basin Management Plan. The report recognises ecological sensitivity, but uses the wrong baseline—the outdated 10 m<sup>3</sup>/s benchmark—instead of the scientifically updated flow regime.

Third, there is no analysis of cumulative or project-on-project impacts.

The report does not address the risk that the Water Supply Project could delay or obstruct the fish passage works. It does not acknowledge that Ireland is legally required under the WFD to improve, not merely maintain, ecological status. And it does not assess how both projects together could exceed available water volumes during drought.

This is not a minor omission; it goes to the heart of whether Ireland can meet its environmental obligations.

Fourth, the issue of continuous abstraction during drought is not assessed.

I raised the concern that Dublin's storage capacity at the termination point is only 75 megalitres, while daily demand already exceeds 630 megalitres. This means abstraction from Parteen will be continuous—day and night—including during drought and low-flow periods, precisely when the Shannon is most ecologically vulnerable.

The report acknowledges the dangers of drought but does not link that to the operational reality of a constantly pumping system. That analysis is missing.

Fifth, the report does not address the potential for future expansion or increased abstraction.

There is no consideration of whether the abstraction licence could later be increased, whether the pipeline is being built with surplus capacity, or whether the treatment plant could be updated. That lack of future-proofing is a serious oversight.

This is a nationally significant project. But it has profound implications for the Shannon's ecological health, for the development of our region, for compliance with European law, and for the survival of species already under severe pressure.

I again want to thank the Director General and staff for the engagement to date. But we must be honest: several key issues remain unresolved. Most importantly:

The fish passage project was not considered.

The outdated 10 m<sup>3</sup>/s baseline was accepted.

Continuous abstraction during drought was not assessed.

For these reasons, I believe the Council must insist on a full, combined assessment of all water-related commitments in the Lower Shannon catchment before any decision is made on this Strategic Infrastructure Development

#### **Cllr. O'Hanlon**

Serious concerns raised about fish stocks in Limerick as a result of this project.

Consulted with a lot of fishermen and they are very concerned about the impacts.

Low flow is a huge concern, if this project goes ahead, we could end up with beach in Limerick.

Stated that this project goes against balanced regional development

Would like to formally object to the project.

#### **Cllr. J. O'Donoghue**

Stated that the impact will be major in Limerick, but the physical development is not.

We need to protect water sources; it is very important for people in Limerick

Cost is unknown – it does not make common or financial sense.

Over population in Dublin is not Limerick's issue and we need to look at regional imbalance.

We have to object to this proposal.

#### **Cllr. M. Donoghue**

Queries the upper and lower limit of water abstraction. In times of drought what will happen – will it be 2%?

Salmon is already on the brink of extinction – our environmental heritage at risk.

Community fund is identified as within 5km of Parteen weir. The impacts are much broader. There is nothing for tourism industries further down the river.

The water will continue to be lost in leaky pipes.

**Cllr. Gavan**

The Chief Executive in Clare has called for an oral hearing. Limerick needs to support this.

if pipes were fixed (leaking), there would be no need for the extraction of water.

Questioned if all the water planned for extraction would be used for homes and businesses. If this goes ahead, with the increase of data centres and the leaks that are not being fixed, it will result in only 50% going to the needs of need for housing and business.

Costs will be excessive and as quoted the cost are not be trusted. Government has overspent on multiple projects including Children's Hospital.

The project does not promote regional development, it is the opposite.

Need to formally object to application.

**Mayor Moran**

There is already an overconcentration of activity on the east coast, where the least amount of water, renewable energy is located.

More businesses and people locate in Dublin – this is not balanced regional development.

**Cllr. B Collins**

There are other options available to Dublin in their own region.

Project goes against balanced regional development.

Impact on the Shannon Estuary and Port area need to be robustly environmentally analysed.

**Cllr. E. Ryan**

Queried the percentage of the flow during drought when demand is highest and flow is at its lowest (as it'll be taken from old course of the river and most of the water there is at that time is diverted through Ardnacrusha and away from that old course).

It's not unusual for cities to reach their natural limits. If Dublin has reached its natural limits, and it not clear that is has as there's plenty of rain there, just inadequate reservoirs, then development will just have to take place in other parts of the country.

Must all development in Ireland be located in, or to serve, Dublin?

There should be benefit to Midwest to compensate.

**Cllr. Teefy**

Fully agrees with previous speakers and supports opposing the project.

**Cllr. Scanlan**

Stated that the 3es need to be considered – 1. Ecology, 2. Economic and 3. Environment

There will be barren ecology after the abstraction of water

There is already an economic imbalance between the east vs west.

The cost will be extreme

Potential significant impact on the environment and potential for stagnation further up the Shannon.

Queried 2% extraction and concern of its aggregate.

**Cllr. Pond**

Fully agrees with previous speakers and recommends objecting to the project.

**Cllr. Keary**

Fully supports other members in objecting to the project

Stated that the DG report needs to be to be more forceful in discontent.

Investment in rural Limerick should be looked at by Uisce Eireann. There are capacity issues in across our towns and villages and this should be the priority.

**Cllr. Conway**

Supports colleagues in objecting to the project.

**Cllr. Sheehan**

Queried what would happen if Limerick County becomes under pressure for water.

Demands in the Shannon Estuary must be met in order to meet achieve regulation development.

Queries whether de-salination could be an option.

Advised there is no support for this project with neighbouring local authorities.

Agrees Limerick should not support the project.

**Cllr M. Ryan**

Queried how much is already being taken out for Limerick use? Demand to provide power and water for residents.

Limerick use is going to grow in meet development objectives, and the meet and infrastructure objectives. This demand must be made.

Local issues also exist in Oola and Pallasgreen.

Agrees Limerick should object to the project

**Cllr. Stokes**

Concurs with colleagues' opinions and supports Limerick objecting.

Concerns with water already an ongoing issue.

Need to retain resource for our own use

**Cllr. M. Collins**

Fully agrees with previous speakers and recommends objecting to the project.

**Cllr. Kilcoyne**

Fully agrees with previous speakers and recommends objecting to the project.

**Cllr. Beasley**

Fully agrees with previous speakers and recommends objecting to the project.

**Cllr. Hartigan**

Fully agrees with previous speakers and recommends objecting to the project.

**Cllr. Ruddle**

Fully agrees with previous speakers and recommends objecting to the project.

**Cllr. Galvin**

Fully agrees with previous speakers and recommends objecting to the project.

**END**