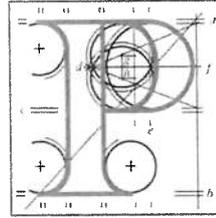


Our Case Number: ACP-323980-25



**An
Coimisiún
Pleanála**

Ballymore Eustace Trout and Salmon Anglers' Association
c/o Thomas Deegan
Broadleas
Ballymore Eustace
Co. Kildare

Date: 06 March 2026

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

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

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

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

PA04

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BALLYMORE EUSTACE TROUT AND SALMON ANGLERS' ASSOCIATION

An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1

AN COIMISIÚN PLEANÁLA	
LDG-	086 418-26
ACP-	323980-25
05 FEB 2026	
Fee: €	50
Type:	CHQ
Time:	9:00
By:	Post

Broadleas,
Ballymore Eustace,
Co. Kildare,
3rd February 2026

Re: Project name: Water Supply Project Eastern and Midlands Region
Subject: Strategic Infrastructure Development
Planning Application for the Water Supply Project Eastern and Midlands Region in the counties of Clare, Limerick, Tipperary, Offaly, Kildare and Dublin.

Dear Sir/Madam,

On behalf of Ballymore Eustace Trout and Salmon Anglers' Association I wish to make the following submission on the Uisce Éireann planning application for Water Supply Project Eastern and Midlands Region in the counties of Clare, Limerick, Tipperary, Offaly, Kildare and Dublin.

Our submission will refer mainly to that element of the planning application dealing with "3. Water Treatment Plant site (WTP) which will consist of: 2 no. Raw Water Balancing Tanks, 3 no. Water Treatment Module Buildings, 2 no. Sludge Dewatering Buildings, 2 no. Sludge Storage Buildings, Chemical Dosing Manifold Building, Chemical Dosing Building, High Lift Pumping Station, an Electricity Substation, Washwater Settlement building, Control and Visitor Building (Totalling c. 53,300m² GFA, maximum building height of 15.6m over finished ground level); associated pumping stations, lagoons, attenuation pond, above and below ground tanks, 5 no. surge vessels; 640m access road from the R445; 50 no. car and 4 no. coach parking spaces; telemetry mast (14.0m height); ground and roof mounted PV panels; landscaping, lighting, and other ancillary above and below ground structures and works; on a c.31 ha permanent site at Incha Beg, Knockadromin and Greenhills, Birdhill, Co. Tipperary."

Ballymore Eustace Trout and Salmon Anglers' Association (TSAA) has over 50 years experience dealing with problems associated with Uisce Éireann's and Ireland's largest Water Treatment Plant (WTP) at Ballymore Eustace, County Kildare. We consider a large WTP a dirty industry producing a sludge waste that must be dewatered prior to being transported to a suitable licensed landfill. Also a toxic liquid waste which at Ballymore Eustace is discharged by means of a Spillway into the sensitive designated Liffey_040 which is upstream of Uisce Éireann's and Ireland's second largest WTP also on the Liffey at Leixlip, Co. Kildare.

Because of the list of chemicals used at the proposed WTP at Birdhill, (Sulphuric Acid, Aluminium Sulphate, Polyelectrolyte, Caustic Soda, Sodium Hypochlorite, Brine,) it could also be considered a chemical process factory.

However, at the outset, I wish to state that Ballymore Eustace Trout and Salmon Anglers' Association has been advocating since 1986, going to the River Shannon to supply Dublin's insatiable demand for water in order to save the Liffey, where Uisce Éireann abstract from Poulaphouca Reservoir 318 million litres per day, or 40% of the total annual flow. This huge volume of abstraction renders the Liffey downstream incapable of assimilating the parametric Emission Limit Values set for the Spillway Discharge during the spring, summer and autumn months of the year when the ESB are only releasing the minimum flow to the Liffey from Golden Falls Dam/Hydro Station in order to conserve the water in Poulaphouca Reservoir for drinking water purposes. Ireland's second largest WTP is also located on the Liffey where a further 40% of the annual flow is abstracted at Leixlip, Co. Kildare.

We are making this submission in the hope that by highlighting the problems that were created by the Ballymore Eustace WTP the same problems will not be created by the proposed large WTP at the lovely village of Birdhill.

Our primary concern with the present Uisce Éireann planning application relates to the proposed Abstraction, Water Treatment Plant, the treatment and disposal of the aluminium hydroxide coagulated with polyelectrolyte sludge and the large volumes of toxic filter backwash water and other wastewater produced at the WTP.

On reading the following paragraphs of the Uisce Éireann's planning application we have this gut wrenching sense of Déjá Vu as I'll explain below.

5.2.8 Process Water

"253. Treated washwater, supernatants, etc., cannot be returned to Parteen Basin due to its environmental designation and would therefore be returned to the head of the treatment works following suitable treatment consisting of settlement, to limit the turbidity of the return water, and UV disinfection. This is achieved via the Backwash Water Tank and Pumping Station and Used Washwater and Settlement Tanks."

"255. The site layout includes eight Used Washwater Equalisation and Settlement Tanks (UWWEST) to balance the flush of backwash water from each filter. It also contains two Filter 'Run to Waste' Equalisation and Settlement Tanks, which permit the filters coming back into service to be run to waste for a period, as required until the filtration barrier has re-established itself, in order to bring the filtered water passing through up to required standards of protection against pathogenic organisms. The 'Run to Waste' would not result in a discharge as it would be re-circulated as described for the washwater.

256. The UWWEST capacity is based on providing 4.5hrs retention time for 300Mld. Flows of settled treatment process waters including settlement tank sludge bleeds, filter backwash water, filter 'run to waste' flows, and supernatants from the sludge thickening and dewatering processes are delivered forward to the Wastewater Settlement Clarifiers Building for treatment and return to the RWBTs. Underflow sludges of settled material are delivered to the Sludge Thickeners."

Comment; The following extract from Ballymore Eustace Trout and Salmon Anglers' Association History 1974 – 2007 relates to a meeting with management of the Ballymore Eustace WTP (known locally as the 'Filter Beds') explains the reason for our horrible sense of Déjá Vu.

“The meeting with Mr. O’Donnell Dublin Chief Engineer, Engineering Services, Mr. Cremmons Dublin City Engineer and Mr. Gus Murphy, Superintendent Filter Beds took place on the 26th May 1976 at the Filter Beds, Ballymore Eustace. Tommy Deegan Honorary Secretary represented the Association and Billy Valentine and Michael Pender represented Kilcullen Fishing Club.

Mr. O’Donnell enquired about the fish kills and said he was surprised that sludge from the Waterworks had killed fish in the Liffey. Mr. Gus Murphy said no settling tank were emptied on the days in question and said the Secretary could look in the log book if necessary. (Terminology was being used to confuse the issue, they were probably desludging the settling tanks but not emptying them. Both operations lead to a heavy discharge of sludge to the River but the ‘man in the street’ cannot tell which is which unless he visits the Waterworks at the time of the discharge.) The Corporation officials were told that a stinking, heavier volume of sludge than normal from the Waterworks entered the Liffey on the days in question and it was plain to see that the gills of the fish were completely blocked with this sludge. Mr. O’Donnell also asked if the Board of Conservators had been asked to investigate the fish kill and was informed that the 2nd August 1974 was the Friday of a bank holiday weekend and by the time he (the Hon. Sec.) had returned home from work after 6.00 p.m. all offices were closed for the holiday. Mr O’Donnell was informed of the report on the dead fish which the Association received from the Veterinary Research Laboratory which indicated that the fish had suffocated due to their gills being blocked with sludge.

Mr. O’Donnell informed the Association that the Corporation intended to build a new sludge treatment plant at the Filter Beds and that this plant would prevent all sludge getting to the River. Before this could be done it would be necessary to find out the amount of sludge produced in the new waterworks being completed at the Filter Beds. The Corporation would then design a treatment plant based on the amount of sludge. The plant would then be tendered for and built. Mr. O’Donnell estimated that it would take five years to complete the project. In the meantime the Corporation would reopen the sludge holding lagoons and Mr. O’Donnell promised that this would be completed by August 1976. Mr. Murphy stated that the lagoons would be effective for three years. When asked what would happen to the sludge for the remaining two years Mr. O’Donnell replied that there was room to extend the lagoons and that if necessary drag lines could be used to clean them out.

Mr. O’Donnell also told the Association at this meeting that the back wash water from the Filters was now being recirculated into the settling tanks at the plant and that the Waterworks Department would continue to recirculate the back wash despite the teething troubles being encountered. The teething problems would be solved and the backwash water would not be discharged directly to the Liffey again.”

(Note: The sludge holding lagoons were never cleaned out as the sludge in them was considered too liquid and would flow downhill into the Liffey. The discharge was allowed flow through/over the lagoons and through the wooded area into the Liffey. Following construction of the first Sludge Treatment Plant, the old sludge holding lagoons were never cleaned out and are still in situ but while non operational, discharges still flow from pipes out of them into and through the wooded area into the Liffey.)

The recirculation promised was never successfully carried out. I believe other attempts were half heartedly made at later stages during upgrading of sedimentation tanks and the construction of a

replacement new Sludge Treatment Plant (KCC Planning Ref 08520) which was necessary following an increase in the capacity of WTP, but recirculation of the process waste water never took place.

As recently as a meeting with Uisce Éireann on the 3rd December 2024 and at other times, the TSAA raised the issue of recirculation during discussions about Uisce Éireann's non compliance with Kildare Planning Permission Ref 08/520 and An Bord Pleanála Ref Pl.09. 229575 Condition 8 regarding the emission limit values for aluminium in the Spillway Discharge to the Liffey. We were informed on every occasion that recirculation of the waste water was/is not possible because of the risk of introducing *Cryptosporidium* into the drinking water. We are aware that *Cryptosporidium* could be killed by UV light treatment and even asked if the real reason was that it's easier and cheaper to discharge the backwash and waste water down the Spillway and pollute the Liffey rather than implement the recirculation system but we were informed that the risk and fear of introducing *Cryptosporidium* into the drinking water supply was the main reason recirculation was not possible.

We now feel aggrieved, betrayed and bewildered as to how it will be possible to recirculate the process wastewater in Uisce Éireann's proposed new WTP in Birdhill but not in the WTP in Ballymore Eustace. It appears that either Ballymore Eustace Trout and Salmon Anglers' Association or An Coimisiún Pleanála is not being told the truth.

We respectfully request An Coimisiún Pleanála by way of a Further Information request to seek an explanation from Uisce Éireann. We also respectfully suggest that, during the planning process and construction period of the proposed new WTP at Birdhill, Ballymore Eustace WTP, where the recirculation pipeline is already in situ, be used to demonstrate whether recirculation is feasible or not. Otherwise, we believe that the new WTP at Birdhill will end up like Ballymore Eustace and have to discharge the large volumes of toxic waste water to the River Kilmastulla or Parteen Basin despite what the planning application states.

We note with concern that there is a large pipeline (600mm) connecting the WTP site to a stream off site i.e.

“309. Stormwater from the attenuation pond would be discharged into a manhole at the head of the WTP Access Road. This manhole would contain a flow control device which would control discharge from the system, limiting it to the maximum flow that would be expected from the greenfield site calculated as 239l/s. The flow would then be conveyed by a 600mm diameter stormwater drain running along the route of the WTP access road to discharge into the stream crossed by the proposed access road approximately 220m north of its junction with the R445.”

Will this pipe also be used, after planning permission is granted, to discharge the wastewater into the stream using the risk and fear of introducing *Cryptosporidium* into the drinking water supply as an excuse?

We have concerns regarding the proposal that “311. Foul wastewater generated on the WTP site, which is estimated to be approximately 1m³/d in normal operation and 2.4m³/d with visitors to the site, would be tankered from a wastewater tank installed at the WTP to a licensed WwTP.” We believe this will lead to odour problems for the local communities and along the route to the WwTP and does not appear to be sustainable in the long term.

**“Draft Water Abstraction Document,
Final Version”**

It appears that Water Abstraction from the River Shannon Parteen Basin is basically an agreement between Uisce Éireann and the Electricity Supply Board (ESB) without any third party involvement. In our experience it will have many serious consequences for other stakeholders living along the River Shannon upstream and downstream of the WTP intake.

Does Uisce Éireann have to compensate the ESB for loss of generating capacity at Shannon Hydro Generating Station and if so by how much financially?

Can Uisce Éireann and the ESB agree between themselves without third party involvement to increase the volume of water abstraction? If the ESB is compensated by Uisce Éireann it will be no skin off their nose.

If Uisce Éireann is granted planning permission, the assimilative capacity of the Shannon downstream will decrease which will have consequences for industry, farming and pollution discharges.

Like Poulaphouca Reservoir will all WwTPs and other discharges upstream of Lough Derg be piped downstream of the abstraction point (to a neighbours back yard!) in order to protect the quality of the water supply?

As a prescribed body Uisce Éireann will receive all planning applications for housing and other developments. Like Poulaphouca Reservoir, will the obtaining of planning permission in and around Lough Derg in particular, be next to impossible in order to protect the quality of the water supply?

We respectfully request An Coimisiún Pleanála to insert a condition in the planning permission specifying the maximum volume of water that can be abstracted through all intakes into the WTP. Uisce Éireann must install metering equipment for the accurate measuring and recording of the daily abstraction volume (not estimates as at Ballymore Eustace) and the volume must be reported on a regular basis to the local authority and be made available for public inspection.

We are aware following an Access to Information on the Environment request to Uisce Éireann dated 4th August 2025 that Uisce Éireann are non compliant with Kildare County Council Planning Ref; 86/1310 which sets a maximum total daily abstraction from Poulaphouca Reservoir through all intakes into the WTP of 70mgd (318mld). Uisce Éireann are also non compliant with Kildare County Council Planning Ref 00/2270, ABP Ref. PL.09.124046 Condition 2 relating to the reporting of the quantum of water abstracted from the Liffey and the monitoring of water levels downstream of the WTP. As mentioned above Uisce Éireann are also non compliant with Kildare Planning Permission Ref 08/520 and An Bord Pleanála Ref P1.09. 229575 Condition 8 regarding the emission limit values for aluminium in the Spillway Discharge to the Liffey.

We respectfully request An Bord Pleanála and Inspectors to try and find time from their very busy workloads to visit all aspects of the Uisce Éireann Ballymore Eustace WTP from its intake from Poulaphouca Reservoir to the Spillway discharge point into the Liffey to see for themselves what is involved in a proposed large Water Treatment Plant.

In conclusion, Ballymore Eustace Trout and Salmon Anglers' Association respectfully request An Coimisiún Pleanála to take our concerns and comments into consideration when making their decision on the planning application.

Yours faithfully,

Thomas Deegan

Thomas Deegan

Honorary Secretary,

Ballymore Eustace Trout and Salmon Anglers' Association.

P.S. Please find enclosed cheque €50 to cover submission fee.