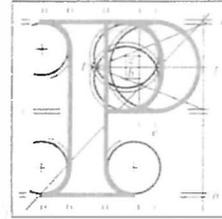


Our Case Number: ACP-323980-25

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Cllr Seán Hartigan
Drominboy House
Lisnagry
Co. Laois
V94 K38R

Date: 03 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

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Submissions on Water Supply Project Eastern and Midlands Region PA92.323980, to An Coimisiún Pleanála, 64 Marlborough Street, Dublin 1
Cllr Seán Hartigan & Limerick Greens

To: laps@pleanala.ie

From: Cllr Seán Hartigan, Drominboy House, Lisnagry, Co. Limerick. V94K38R
sean.hartigan@limerick.ie 0857218312

Introduction

Uisce Eireann have lodged a planning application to An Coimisiún Pleanála for the abstraction of water from Parteen basin, the construction of a treatment plant and infrastructure to pipe this water to Dublin. There are also plans in place for abstraction of water from Parteen basin to increase flows down the Old River Shannon course to improve the survival of critically endangered Salmon, Eels, near threatened Sea Lamprey as well as Brook Lamprey, River Lamprey and other fish species. The recommended increases in flows for fish passage are significant so the projects must be considered in combination to rule out

- i. The likely effects on the environment of the proposed development, if carried out.
- ii. The likely effects on the ability to improve environment for fish species if the proposed development is carried out without due consideration of the fish passage project.
- iii. The likely significant effect of the proposed development on the integrity of

- Lower River Shannon SAC, whose qualifying interests include *Petromyzon marinus* (Sea Lamprey), *Lampetra planeri* (Brook Lamprey), *Lampetra fluviatilis* (River Lamprey) and *Salmo salar* (Salmon),

if carried out without due consideration of the fish passage project.

Background

Up to the 1920s, salmon ran the Shannon in huge numbers; however, the implementation of the Shannon Scheme (Ardnacrusha Power Station) had an immediate effect on fish migration. The initial belief that returning adult salmon would continue to use the old river channel and access the middle and upper Shannon via Parteen Weir fish pass proved wrong. Shortly after the Shannon Scheme became operational, it became evident that the high discharge through the hydropower station attracted fish up the tailrace where there was no passage facility to the headwater at the time. This resulted salmon's failure to reach their spawning grounds. A fish lift was retrofitted in 1959 near the hydropower station, but it was not a success. Numbers of fish have progressively declined over the last century, and the Shannon salmon is now in danger of extinction.

In Europe, since 1992, three pieces of European Union (EU) legislation have forced the focus of fisheries management and fish protection to expand beyond the commercially relevant salmonids to include all fishes, namely (a) the Habitats Directive (92/43/EEC), (b) the Water Framework Directive (WFD) (2000/60/EC), and (c) the Regulation establishing measures for the recovery of the stock of European eel (EC/1100/2007). River continuity is a key environmental objective of the WFD and is used as an indicator for assessing whether water bodies are meeting Good Ecological Potential/Status (GEP/GES). To achieve good status, a

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river water body must (approximately) support the populations of all naturally occurring migratory and non-migratory fish that inhabited the waterbody before the construction of

the man-made barrier. The WFD requires Member States to apply enhancement measures to improve the ecological status/potential of all water bodies that do not meet GES/GEP. The EU Water Framework Directive requires Member States to apply enhancement measures where practicable in order to improve the ecological status and potential of all water bodies. In Section 7.6.1 of Ireland's River Basin Management Plan for Ireland 2018 – 2021, the Minister for Housing, Planning and Local Government committed to the establishment of a Steering Group which would bring together organisations with the expertise and experience to comprehensively explore the possibilities for improving fish migration at Parteen and Ardnacrusha in the lower Shannon catchment. The Final Report arising from this steering group, prepared by CDM Smith presented concept designs and conclusions for improving fish passage which included improved fish passages, barriers and increased flows of water down the old river Shannon from Parteen weir, the point where water is planned to be extracted for the pipeline to Dublin.

The improvement of fish migration on the lower River Shannon is included as an action in the water action plan 2024

Hymo 7: Implementation of the roadmap of actions, including the use of state-of-the-art technical solutions, to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate.

A commitment to improve fish is also an objective of the LIMERICK DEVELOPMENT PLAN 2022-2028

Objective EH O12

Blue and Green Infrastructure

d) Where possible remove barriers to species movement, such as the removal of in-stream barriers to fish passage for example.

The CDM Smith Report to the River Basin Management Plan Steering Group recommended that the baseline flow in the old river downstream of Parteen Weir be increased from 10 cubic meters per second to 17 cubic meters per second, when the inflow into lough Derg is high. They also recommend additional small intermittent spills of 21 to 31 cubic meters per second once a week for 24 hours between March and September to facilitate salmonoid migration and a spill of 65 cubic meters per second bi-weekly for 12 hours at night between October and December to facilitate the passage of eels downstream. These measures if implemented would result in the number of days with minimum baseflow (10 m³/s) over

Parteen weir would reduce from around 11 months under the current operating system to about two months on average if the recommendations of the CDM smith report are implemented.

Uisce Eireann has not factored in the recommendations of the CDM Smity report into its modelling for planning. In its planning application Uisce Eireann has not taken the recommended new flow regime into consideration.

Throughout their planning application they say that no change to the Old River Shannon compensation and fish pass flows will result from inclusion of the Proposed Project abstraction.

In the NIS alone it states

5.2.1.1.2 Climate Change

792 the Old River Shannon compensation and fish pass flows always being met from the inclusion of the Proposed Project abstraction

802. 'The hydrological model also demonstrated that with the abstraction in place the statutory 10m³/s compensation flow over Parteen Weir could have been provided over the entire 52-year period (1972 to 2023) without interruption while maintaining the Normal Operating Band.'

803. Throughout the 52 years analysed (1972 to 2023), the impacts to the Lough Derg and Parteen Basin Lake levels and forward flows to the Old River Shannon due to the modelled inclusion of the Proposed Project abstraction (as a constant flow of either 154Mld or 300Mld) are barely distinguishable from the baseline case when viewed on level/flow duration curves

804 for the Proposed Project, alongside other relevant considerations such as, maintaining statutory compensation flow of 10m³/s down the old Shannon channel,

806 In drought conditions..... the minimum statutory compensation and fish pass flows are prioritised over the use of water by Ardnacrusha.

807. The simulated forward flows to the Old River Shannon remain unchanged by the inclusion of the Proposed Project abstraction. The proportion of days (to the nearest whole percent) when the Old River Shannon is receiving the minimum required compensation and fish pass flows is simulated to be unchanged by the inclusion of the Proposed Project abstraction

809. Climate change simulations..... mean no change to the Old River Shannon compensation and fish pass flows always being met from the inclusion of the Proposed Project abstraction

903. When the Ardnacrusha Generating Station ceases generation for long periods during low flow conditions..... Throughout the period analysed, the Lake remained within the

Normal Operating Band and the statutory compensatory flow over Parteen Weir would have been provided.

906. The results from the hydrological and hydrodynamic models demonstrate there would be no significant effects on water levels and the flow regime either upstream or downstream of the Proposed Project

Conclusion

The demand for water improved fish passage will be significant. This has not been considered by Úisce Éireann in its application when it continually refers to maintaining the statutory compensation flow of 10m³/base flow down the old water course. It may be

feasible to do both the pipeline and fish passage project, but Uisce Eireann are not taking the fish passage project into consideration in their impact assessments. The projects must be considered together, if the water pipeline to Dublin progresses without due consideration of the fish passage project it may stop the fish passage project from progressing or may impede the ability to improve fish passage in the Lower Shannon catchment.

Other considerations

1. The storage capacity at the Dublin end of the pipe will be 75 megalitres, the daily requirement for Dublin has reached 630 megalitres a day. This means there is practically no storage capacity, so water will be extracted at the same rate every day of the year even when the reserves in the Parteen basin are at its lowest in the height of drought. As the storage capacity of water at the termination point is limited there will likely be continuous pumping of water from the Parteen basin, even on days when the water levels are at their lowest, there is the greatest demand for water for all supplies abstracting from the Shannon, and there is the greatest need for water for fish migration in the old river Shannon.

From NIS “Termination Point Reservoir which will consist of: a c. 8.4 ha permanent extension of the existing Uisce Éireann site; a covered reservoir (capacity 75,000m³, maximum height 11.2m) “

With Daily demand for treated drinking water in the Greater Dublin Area has reached over 630 million litres per day. This reservoir would supply water to Dublin for between 3 hours

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2. We have not been informed of the maximum capacity of the pipe. It seems this will be limited by the abstraction licence & the capacity of the water treatment plant. These both could change in the future.

References:

Natura Impact Statement (NIS)

<https://water.widen.net/content/ekuvmw0q4p/pdf/Natura%20Impact%20Statement>

All figures for the flows of water associated with the Water Supply Project come from the Uisce Éireann document "Water Supply Project Eastern & Midlands Region: Project Summary Report 2024.

The figure of 630 megalitres a day for the current usage in the Greater Dublin Area comes from the News Section of Uisce Éireann's website,

<https://www.ringsendwwtpupgrade.ie/news/demand-for-treated-drinki>

[Lower Shannon Roadmap Report 2021.pdf](#)

https://assets.gov.ie/static/documents/Lower_Shannon_Roadmap_Report_2021.pdf

CDM Smith (2021). Roadmap for the Lower River Shannon Report 2021. Provision of Expert Advisory

Services Regarding Fish Migration in the Lower River Shannon Catchment. Prepared by CDM Smith for the

Department of Housing, Local Government and Heritage (CDM Smith (2021). Fish Pass Feasibility Study)