

An
Coimisiún
Pleanála

Our Case Number: ACP-323980-25

Planning Authority Reference Number:

Killaloe Ballina District Angler's Association
c/o Christopher O'Meara
Ballina
Co. Tipperary
V94 T3CC

Date: 04 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.

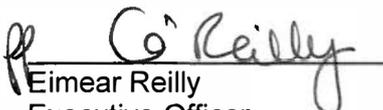
The Commission will revert to you in due course with regard to the matter.

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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Formal Objection to the Proposed Water Abstraction Project

Lough Derg Anglers Association Submission

The Lough Derg Anglers Association formally objects to the aforementioned project.

To Whom It May Concern,

This document serves as a formal objection to the proposed Water Supply Project for the Eastern and Midlands Region—SHANNON to DUBLIN WATER SUPPLY PROJECT (Ref. PA92.323980).

Applicant: Uisce Éireann

Organization: Killaloe Ballina District Angler's Association

Address: Ballina, Co. Tipperary V94 T3CC

Date 25/02/26

The Lough Derg Anglers Association presents its formal objection to the aforementioned project. The current proposal poses substantial environmental, social, and economic risks to local communities, with perceived benefits disproportionately favouring Dublin while the local area assumes an inequitable share of liabilities.

1. Environmental Impacts

- The proposed abstraction at the Parteen Basin is located within the Lower River Shannon Special Area of Conservation (SAC), representing a significant threat to critical habitats and protected species, including pollan, salmon, and trout, as well as endangered waterfowl habitats.
- Modeling indicates that, under present proposals, Lough Derg and the Parteen Basin could face critically low water levels during droughts, risking ecological collapse. Climate change analysis by the ICARUS Institute at Maynooth University suggests increased drought frequency for Ireland and the Mid-West region, potentially increasing water abstraction from 2% to 30%, due to reduced river levels.

- The potential effects on water quality and river resilience are considerable, especially during low-flow periods, which may adversely impact biodiversity and downstream communities.
- The development lacks sufficient safeguards against long-term environmental degradation, and proposed mitigation measures are inadequate and non-binding.

Heavily Modified Water Body (HMWB)

Lough Derg is classified as a Heavily Modified Water Body (HMWB). Project documentation repeatedly references this designation, implying flexibility regarding abstraction.

Under Article 4 of the Water Framework Directive (WFD):

- HMWB designation does not remove the requirement to prevent deterioration.
- HMWBs must achieve and maintain Good Ecological Potential.
- Dependent protected areas, such as Natura 2000 sites, retain full protection.

The Environmental Protection Agency's (EPA) technical review confirms that excessive abstraction from regulated systems may lead to unlawful deterioration, particularly under low-flow conditions.

The project's proposed abstraction regime would significantly affect:

- Flow magnitude and variability.
- Lake level stability in Lough Derg.
- Downstream dilution capacity.
- Floodplain and groundwater interactions.

These parameters are specifically protected under the WFD, even for HMWBs.

2. Failure to Meet Article 4(7) WFD Conditions

Any new abstraction constituting a modification of a water body must fulfill all Article 4(7) WFD conditions. The project fails to satisfy these requirements:

1. **No Lawfully Demonstrated Overriding Public Interest:** The demand case supporting the project is overstated and relies on acknowledged methodological errors in forecasting and leakage assumptions.
2. **Existence of Better Environmental Alternatives:** Groundwater resources within the supply corridor were dismissed using incorrect metrics and outdated studies, without field verification.

3. **Insufficient Practicable Mitigation Applied:** The project depends on discretionary operational management rather than binding hydrological limits, which is legally insufficient.

Failure to meet any of these criteria is critical; the project fails on all three.

6. Breach of the Habitats Directive (Article 6(3))

Consent under Article 6(3) of the Habitats Directive requires certainty that the development will not adversely affect the integrity of the Lower River Shannon SAC. The project presents a significant risk to spawning beds in the northwest lower lake, notably for bream, tench, roach, and pike, located merely 100 meters opposite the raw water intake pipes.

Spawning beds are highly sensitive to environmental changes. Water current influences habitat selection, egg survival, and substrate composition. While moderate currents sustain clean, oxygenated gravel, excessive or fluctuating flows can damage spawning sites, displace eggs, or cause premature hatching.

Low water levels negatively impact fish reproduction, often exposing spawning areas and causing direct egg mortality.

Key Impacts on Spawning Beds:

- **Dewatering/Exposure:** Falling water levels dry out eggs laid in shallow gravel beds.
- **Reduced Habitat Availability:** Lower flow depths limit available nesting areas.
- **Increased Predation:** Low water concentrates fry, making them more vulnerable to predators.
- **Sedimentation/Suffocation:** Reduced flows increase sediment deposition, cutting off oxygen to eggs.
- **Higher Water Temperatures:** Shallow, low-water conditions induce thermal stress and reduce oxygen.
- **Impeded Migration:** Low levels hinder access to upstream spawning grounds, forcing use of suboptimal sites.

The alteration of natural flow patterns impacts retention necessary for migratory fish. The positioning of the intake is a particular concern, being at the final holding pool for migratory and juvenile fish in the Parteen basin—a critical area before migration into Lough Derg.

Modification of waters for migratory fish generally has detrimental effects, disrupting connectivity and converting fast-flowing habitats into stagnant environments.

Primary Effects of Modified Holding Water:

1. Disruption of Migration and Life Cycle

- **Physical Barriers:** Intake flow creates artificial rivers, altering migratory behaviors.
- **Delayed Migration:** Changes in water velocity delay spawning migrations.
- **Reduced Juvenile Survival:** Upstream migration impediments can result in delays and increased mortality.

For the project to proceed, several safeguards are essential:

- Install a water level gauge in the Parteen basin for public transparency.
- Publish daily flow data on the ESB website, consistent with Parteen Weir flow reporting.

10. Ring-fence community funds for reinvestment into Lough Derg and the River Shannon.

11. Uisce Éireann and ESB are commercializing public assets without reciprocal measures to protect water quality, habitat, or fish populations.

12. Long-Term Implications

The project's long-term consequences have not been adequately assessed. Existing negative effects of past mechanical interventions, such as the ESB hydroelectric scheme, have already resulted in diminished salmon populations and associated economic/social losses.

13. In the proposed restricted zone on the Shannon (100mx25m of buoys), we propose attaching a mesh from river bed to buoys as a secondary measure to prevent migration of fish toward artificially generated flows.

A 100-meter section of native woodland at the abstraction point will be directly impacted and removed, fragmenting shoreline ecology and worsening hydrological pressures within the Lower Shannon system. This woodland fulfills important ecological functions:

- Bank stabilization and erosion control
- Shading and temperature regulation of near-shore waters
- Habitat connectivity for avian, mammalian, and invertebrate species
- Preservation of aesthetic and recreational value

Its removal constitutes immediate and irreversible habitat loss, requiring comprehensive assessment under Natura 2000 protections.

Flow data from 2018 indicates Ardnacrusha abstracted zero water for 74 days, with only minimal flows through the old Shannon. This poses major concerns given projected drought frequency.

The EPA recognizes the risks of altered flows from abstraction, noting decreased flood peaks, increased low flows, rapid unnatural flow fluctuations, and potential downstream drying.

14. Scope of Statutory Authority

- **Generation and Control:** ESB is authorized to operate Ardnacrusha, including management of weirs, sluices, and diversion infrastructure.
- **Water Level Management:** ESB manages levels primarily for electricity generation in Lough Derg and the Parteen Basin.
- **Fisheries Management:** ESB's responsibilities include maintaining fish passes and counters, as mandated by the Shannon Fisheries Act 1935.

ESB's statutory role is centered on electricity generation, not water abstraction. It is recommended that ESB and Uisce Éireann submit a joint application for an abstraction license to the EPA.

Alternative Strategies

Uisce Éireann possesses multiple alternatives to enhance Dublin's water supply without compromising River Shannon integrity. The Poulaphouca reservoir, if repurposed, could meet water demands. Furthermore, rivers such as Slaney, Boyne, and Barrow offer closer, less disruptive options.

A critical recommendation involves replacing aging Victorian pipework, which currently results in substantial treated water loss due to leakage.

Conclusion

On these grounds, the Lough Derg Anglers Association formally objects to Uisce Éireann's planning application. The association contends that the River Shannon is being commercialized without adequate safeguards, and prior interventions have precipitated ongoing declines in salmon populations, water quality, and habitat, warranting caution and remediation before further action is taken.

We hereby formally and unequivocally object to this planning application.

This objection is submitted on behalf of all affiliated clubs:

Christopher O'Meara

Secretary

Killaloe Ballina District Angler's Association