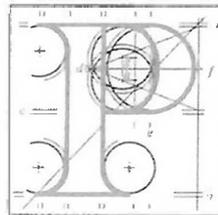


**Our Case Number:** ACP-323980-25



**An  
Coimisiún  
Pleanála**

Waterways Ireland  
Ashtowngate  
Navan Road  
Dublin 15

**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 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

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**From:** LAPS  
**Sent:** Wednesday 25 February 2026 16:46  
**To:** Eimear Reilly  
**Subject:** FW: Water Supply Project Eastern and Midlands Region - SID - 323980  
**Attachments:** WI\_WSP\_260225.pdf

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**From:** Kevin Macken <kevin.macken@waterwaysireland.org>  
**Sent:** Wednesday 25 February 2026 14:52  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** Water Supply Project Eastern and Midlands Region - SID - 323980

You don't often get email from [kevin.macken@waterwaysireland.org](mailto:kevin.macken@waterwaysireland.org). [Learn why this is important](#)

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

To whom it may concern,

Please find attached the formal submission from Waterways Ireland in its capacity as a prescribed body regarding the proposed Water Supply Project.

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

Kind regards,

Kevin

**Kevin Macken**  
**Senior Hydrologist**  
**Waterways Ireland** | Ashtown Gate, Navan Road, Dublin 15  
**Tel:** +353 (0)87 2829145

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

25<sup>th</sup> February 2026

## **Water Supply Project Eastern and Midlands Region**

Dear Sirs,

Waterways Ireland wish to make observation on the Water Supply Project Eastern and Midlands Region as follows.

### **Mullingar Water Resource Zone and the Royal Canal**

Waterways Ireland recognises the importance of the Water Supply Project as a necessary enabling step for the Mullingar Water Resource Zone. The National Water Resources Plan developed by Uisce Éireann identified a connection to the Water Supply Project as the “preferred approach” for the Mullingar Water Resource Zone. This would allow Uisce Éireann to reduce their abstraction from Lough Owel, which currently supplies the Mullingar Water Resource Zone and serves as the summit level feeder to the Royal Canal, acting as its primary source of water. There is insufficient supply or yield in Lough Owel to meet the operational needs of the Royal Canal and the Mullingar Water Resource Zone. Annually, Waterways Ireland supplements the water in the Royal Canal through pumped abstractions. Despite these interventions, prolonged periods of dry weather can lead to low water levels and difficulties navigating the canal.

While a connection to the Mullingar Water Resource Zone is outside the direct scope of this current Strategic Infrastructure Development (SID) application, the Water Supply Project (WSP) is an essential first step to ensuring a sustainable water supply for the Mullingar Water Resource Zone and the Royal Canal.

### **Grand Canal Crossings**

Waterways Ireland notes that the proposed development crosses the Grand Canal in two locations. Waterways Ireland seeks early engagement prior to detailed design and construction from Uisce Éireann on the following:

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Cuan na Scairbhe  
Bóthar an Duga  
Baile Driú  
An Scairbh  
Contae an Chláir

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Scarriff Harbour  
Dock Road  
Drewsborough  
Scarriff  
Co. Clare

Western Regional Office  
Scarriff Harbour  
Dock Road  
Drewsborough  
Scarriff  
Coonty Clare

- Appropriate Crossing Design and Methodology, which protects the structural integrity of Waterways Ireland's canal banks infrastructure.
- Incorporation of the Grand Canal Greenway into proposals.
- Location of proposed lay-by at Kilpatrick / Ticknevin

### Impacts on the Shannon Navigation

Waterways Ireland has reviewed the SID application with regards to impacts on the Shannon Navigation. Waterways Ireland accepts that, due to the nature of Meelick Weir, there can be no impact on water levels upstream by changes in the level of Lough Derg. The primary area of concern for the Shannon Navigation is the reach downstream of Meelick Weir to the Ardnacrusha Power Station.

Chapter 14 of the EIAR (Section 14.2.1.3, Paragraph 31) states that navigation would not be affected, as users would "experience the same operating water level range as normal" based on the assumption that *"these facilities can currently be used throughout the range of water levels within the Normal Operating Band"*.

Appendix A9.1, Annex A (Hydrological Modelling Report, Table C.1: Key Operating Principles) summarises the current operation of Lough Derg by the ESB (see below). Table C.1 states that the Normal Operating Band is defined as 30.4 mOD to 30.86 mOD at ESB's water level gauge at Killaloe. Table C.1 details how the lake is typically managed by the ESB.

- **Early Summer levels:** ESB aims to maintain an average lake level of 30.80mOD.
- **Autumn/ Winter Lough Derg levels:** ESB aims to maintain the level at 30.60mOD at Killaloe - equivalent to approximately 30.70mOD on the average lake level scale.
- **Black Start Reserve:** ESB actively manages levels to avoid encroaching on the Black Start reserve at 30.60mOD at Killaloe (30.70mOD average lake level).

Table 1 Key Operating Principles for Lough Derg. (Source: Uisce Éireann, Water Supply Project EIAR, Appendix A9.1, Annex A, Table C.1)

General Principle or Rule	Description	Comment
Water level to be kept within the Lough Derg Normal Operating Band (NOB)	The ESB manage the water levels (as monitored at Killaloe) to be within the Lough Derg Normal Operating Band (NOB) between 30.40m AOD and 30.86m AOD. During sufficiently big floods the level of Lough Derg cannot be prevented from exceeding the top of the NOB and the Flood Rule comes into effect.	The Lough Derg NOB is further refined by the presence of the 30.50m AOD 'Black Start' reserve level for water that is reserved by ESB in case of a supply emergency upon the electricity network necessitating power to be supplied by Ardnacrusha. Whilst it is acknowledged that ESB may manage lake water levels not to encroach upon the Black Start reserve, the WSP hydrological models do not use the Black Start as a minimum threshold level, and are only concerned with simulated levels being maintained within the NOB.
Early summer Lough Derg level	ESB seek to have Lough Derg water levels towards the upper end of the NOB in late spring/ early summer.	A guide rather than a strict rule. The ESB do not aim to be at 30.86m AOD at Pier Head however tend to the upper end around 30.80m OD average Lough Derg level, subject to operational requirements which can, when there is sufficient water available, mean that they utilise the full operating band.
Autumn and winter Lough Derg level	ESB seek to have Lough Derg water levels towards the lower end of the band in autumn and winter.	A guide rather than a strict rule. The ESB do not aim to be at the black start level (30.50m OD at Pier Head, Killaloe), however tend to the lower end of the Lough Derg NOB around 30.60m OD Pier Head, Killaloe (equivalent to approximately 30.70m OD on the average lake level scale).
Low flow regime	Lough Derg inflow of 100m <sup>3</sup> /s on a falling hydrograph is a trigger to commence retaining water towards the upper end of the band.	A guide rather than a strict rule. From the records it is evident that variation in the amounts of water going to Ardnacrusha during these times have resulted in fluctuations to the Lough Derg water level that take the level away from the upper end. Though it should be noted that the sensitivity of the level to the water balance of the system is such that these fluctuations can generally be addressed by subsequent changes to the amount going to Ardnacrusha. Set rules describing by how much the ESB curtail their abstraction during these periods are not given, though during the lowest inflow periods the ESB stop generating altogether.

Due to these principles, the effective historical operating band is approximately 200mm higher than the 30.40m OD bottom of the Normal Operating band. It would appear from Table C.1 that there is limited to no sustained period where the average lake level is below 30.60m OD during the navigation season.

Whether the navigational facilities can currently be used at the bottom of Normal Operation Band is not assessed. Because the lake does not typically reach 30.40m OD (i.e., at bottom of Normal Operation Band), the ability to sustain navigation and recreational activity at this level is unknown. Whereas, as indicated above there is an assumption "*these facilities can currently be used throughout the range of water levels within the Normal Operating Band*".

### Requests for Further Assessment

Drawing down Lough Derg to below 30.60m OD - as predicted in the simulation below - may lead to isolated highpoints with insufficient navigational draft.

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Scarriff  
County Clare

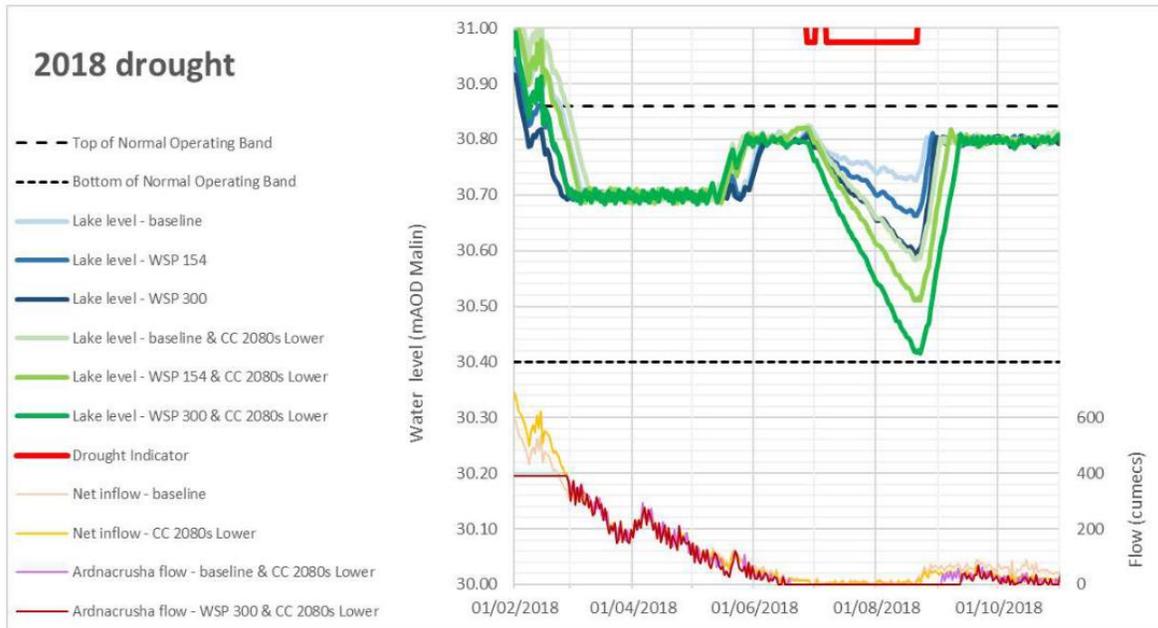


Figure 1: WSP Hydrological Model: Simulation of the 2018 Drought Including Climate Change: i) Without WSP, ii) WSP =154Mld, iii) WSP = 300Mld (Source: Uisce Éireann, Water Supply Project EIAR, Appendix A9.1, Annex A, Image 2.9)

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

Yours faithfully,



Éanna Rowe  
Operations Controller  
Waterways Ireland  
Scarriff  
Co. Clare

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W: [www.waterwaysireland.org](http://www.waterwaysireland.org)