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

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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.

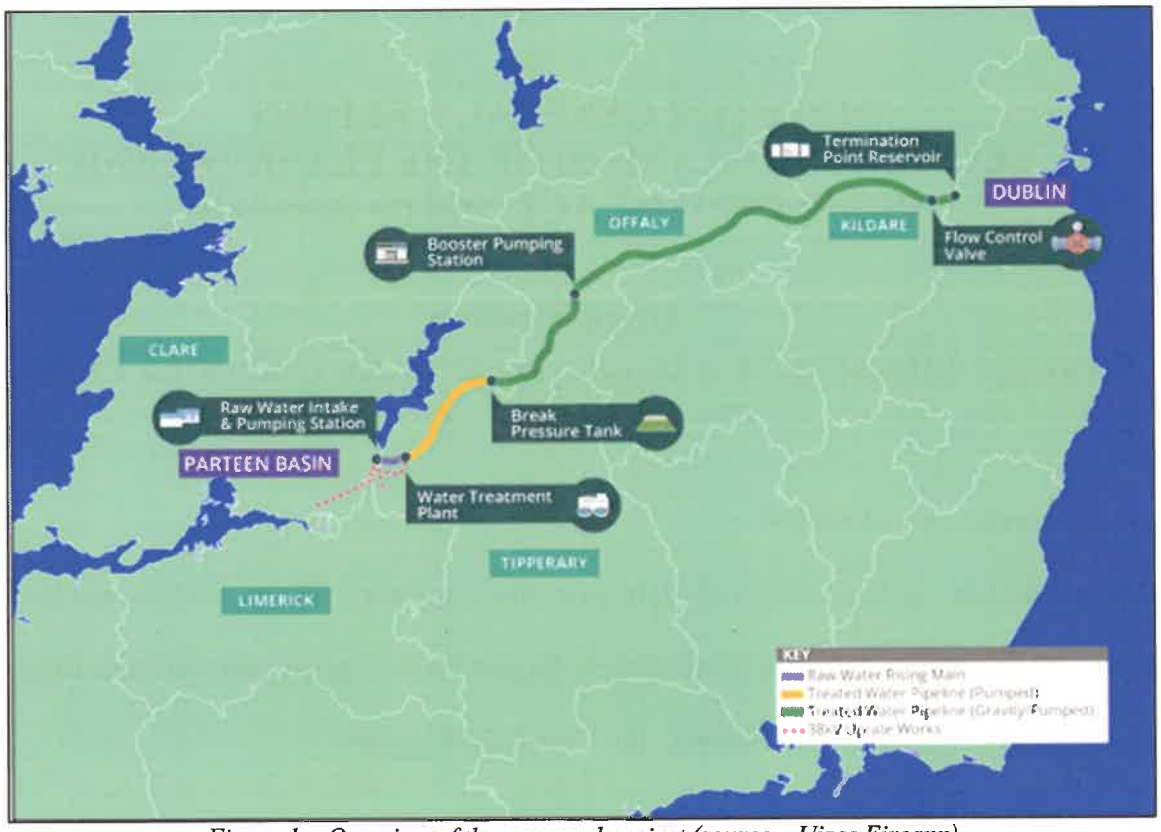

Figure 1 – Overview of the proposed project (source – Uisce Eireann)

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.

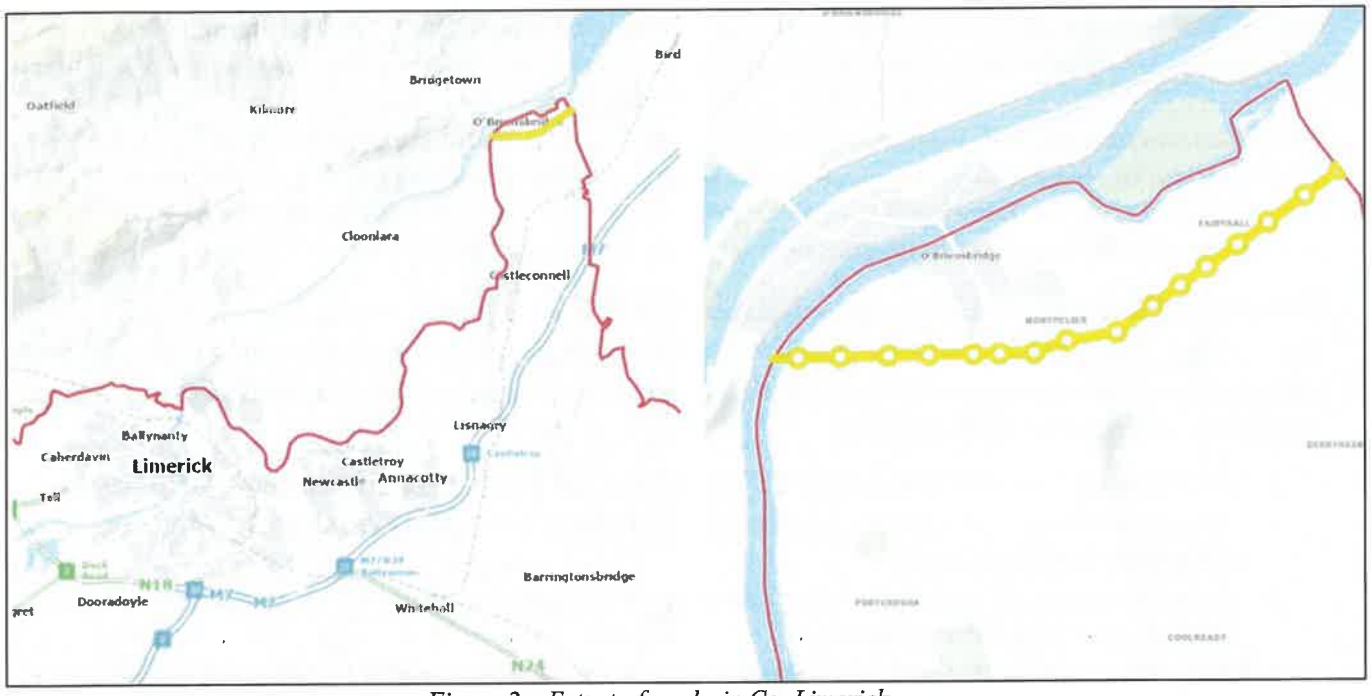

Figure 2 – Extent of works in Co. Limerick

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 05 New Infrastructure Projects
- Objective EH O11 Invasive Species
- Objective EH 012 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 Coimisiúin 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 EIAR 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 10m3/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 400m3/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 10m3/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 EIAR. 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 propsoed 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 10m3/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