



Ref: PA92.323980

24 February 2026

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1

Dear Sir/Madam

Re: Proposed Water Supply Project for the Eastern and Midlands Region

Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management, and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

From the outset, it should be acknowledged that the Heritage Council recognise the importance of this nationally important piece of infrastructure in relation to a sustainable water supply for the Eastern and Midlands region. Therefore, our submission on this application will consider if there are any undue impacts on natural and cultural heritage.

A significant amount of assessment and surveying work has been undertaken as part of the preparation of the application with a large amount of information relating to cultural heritage, landscape and biodiversity matters provided.

We also consider it prudent to break down the application into its component parts to fully consider the proposal's impacts on heritage assets along the route. This is necessary to ensure that the assessment is not just comprehensive but accessible.

In general terms, the Heritage Council cannot describe the negative impacts as currently presented as undue, although clarification is certainly needed on some matters. However, we believe that this can be largely achieved by condition, which is necessary, to ensure there are no undue and/or significant impacts on natural and cultural heritage

Our comments are divided by:

- Cultural Heritage
- Ecology and Biodiversity

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Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

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- Landscape

Cultural Heritage

Given the spatial extent of the project which will traverse a variety of landscape types, it is the view of the Heritage Council that significant archaeological heritage will be encountered, particularly in relation to unknown/ previously unrecorded archaeology. This has been evident in previous linear schemes with comparable spatial extents i.e. gas pipelines and road infrastructure.

Within this context it is therefore necessary to ensure that comprehensive surveying work has been completed in advance of the planning application, as far as reasonably practicable. We note the key avoidance by design principles implemented; and that the assessment has reviewed the route in terms of known monuments, artefact finds and has employed the use of aerial photography, field investigations, with limited geophysical surveying and archaeological testing undertaken in specific locations.

We also note from section 17.2.4 *Data Collection Methods* what sources have been utilised; however, we query the absence of LiDAR in this section. There are now considerable holdings of LiDAR which are publicly available online and we point out that use of this is now an established practice.

The Heritage Council recognise the difficulty in utilising the full suite of archaeological surveying methods for a project of this scope. However, the geophysical surveying has been limited in extent. It's use in combination with the existing LiDAR resource could have resulted in a more informed identification of the Zones of Archaeological Potential.

Therefore, An Coimisiún Pleanála would be justified in seeking further information for this if they believe it necessary. Equally possible is that this could be conditioned in advance of construction during liaisons with the National Monuments Service.

We also highlight the following key mitigation measures, which should be conditioned:

- The employment of a project archaeologist by Uisce Éireann to manage all aspects of the archaeological project including management of any archaeological contracting companies involved in fieldwork
- Specialist wetland/peatland archaeological expertise in the areas where the corridor will traverse peatland deposits – this has been noted in section 17.5.2.7 *Bogland*, and this needs to be required by a strict condition.
- Need to prioritise a formal code of practice between Uisce Éireann and the National Monuments Service
- We recommend that a programme of advance geophysical survey and field investigation testing take place prior to the main contractor starting construction, in liaison with the National Monuments Service

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- Site Investigation and archaeological testing will be essential for key areas of interest e.g. Modreeny Church, graveyard, deserted medieval settlement. Areas such as this which have been identified as experiencing a *potential profound Moderate to Profound Negative* (in the absence of mitigation), should also be accompanied by some level of geophysical work to compliment site testing. It is important to ensure that the mitigation measures, which involve further archaeological testing to some degree, are fully robust, as in the absence of such measures, the effects would be significant in EIAR terms.

We also suggest that this project should set out to present itself as an exemplar of good practice in managing the archaeological resource (including underwater archaeology) in large infrastructure schemes, up to and including the publication of the results of this project.

Ecology

Designated Sites

Specifically in relation to designated sites, we note that there will be some habitat loss at Parteen, albeit the final site selection for the RWI&PS (Raw Water Intake and Pumping Station) has avoided the highest ecological value woodland to the north of the site. There are potential impacts on the non-habitat-based Qualifying Interest species of the Lower River Shannon SAC due to direct habitat loss, or potential degradation/disturbance of aquatic habitat. However, the NIS has concluded that with mitigation that there are no significant residual impacts on the QIs associated with the SAC.

Alongside the three crossings of the Grand Canal pNHA, outside of this designated site [Lower River Shannon SAC] the proposed development does not directly interact with any other SACs/SPAs/NHAs/pNHAs etc, however the Zone of Influence does include several other designated sites where a *source pathway receptor* impact is viable. The mitigation measures as recommended in the Biodiversity Chapter and the Natura Impact Statement should be strictly conditioned for any potential impacts on such sites.

Whilst, the main impacts will be during the construction phase, water abstraction is a unique pathway of potential impact. The detailed discussion provided in the Environmental Impact Assessment Report and other reporting indicates that this will result in no distinguishable change, and we therefore assume that there will be no negative impacts on the qualifying interests for Lower River Shannon SAC that depend on a stable hydrological regime. A condition on the monitoring of the water levels should be required, so that in times of drought the necessary action can be taken in terms of cessation of activities¹.

¹ It is assumed from the reporting (paragraph 820 in the biodiversity chapter) that power generation at Ardnacrusha would cease in times of drought.

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Terrestrial Ecology

In terms of general terrestrial ecology, the temporary habitat loss for variety of habitat types is detailed in Table 8.55 of the Biodiversity Chapter. The Heritage Council observe that the geographical value ascribed to habitats (as categorised under Fossitt), applies a blanket value to each habitat type irrespective of the quality of the habitat at a specific location, or the prevalence of such habitat in a certain area².

As an example, of the 17.89 hectares of Bog woodland (WN7), all of this habitat has been ascribed *Locally Important Higher Value* irrespective of prevalence of this habitat in a particular area or the quality of the current vegetation composition. This has been done for all habitats. It is possible that in some location along the route that a certain habitat may merit a higher geographical value-based judgement (e.g. County Importance), depending on the quality and composition of the habitat, and the prevalence of the habitat in that specific area. Furthermore, we assume that should any of these habitats (in specific locations) correspond to Annex I/Priority Annex I habitats, that this would have been noted. We request that 'the Commission' clarifies this.

Irrespective of this, there will be cumulatively significant losses to semi natural habitats of various types at the *Higher Value* local scale, if not *County* scale. Some of which will be permanent habitat loss, upon which a variety species in the wider countryside relies.

Of key importance, therefore, are the mitigation measures suggested, and these should be implemented in full. We would place particular importance on the Ecological Clerk of Works and a clear monitoring regime for oversight should be established as a condition.

Bearing in mind the restrictions on certain tree species within the 20metre wayleave, like for like replacement planting to achieve similar vegetation communities is important. We would put particular emphasis on the local seed bank as a source for reinstatement and restoration works.

Equally, we note the mitigation under paragraph 941. Whilst it is expected that for projects such as this that land ownership returns retrospectively, there may be possibilities to provide fence/barrier free access along the linear corridor of the project. This would be particularly important for publicly owned areas and as suggested in this section, an ecological corridor such as this could significantly mitigate the undoubted habitat loss and fragmentation. We would recommend that a condition be provided to scope out the possibility of this within the context of any Compulsory Purchase Order/ legal land ownership agreements.

In addition, pre-construction species specific surveys would be required as sections of the route commence works. Accordingly, as part of these surveys, a more detailed view of the habitat on site in terms of quality and composition could be included. This would be particularly important for any areas that were not accessible during the initial surveys. This should also be achieved by condition.

² As an example, Petrifying Springs with Tufa Formation habitat has been identified as Local importance (lower value) in Table 8.52. Irrespective of Annex I correspondence this may be an undervaluation.

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Given the habitat losses envisaged, there is potential for negative impacts on mammal species. In this regard, we believe that pre-construction surveys will be required for the presence of trees/features suitable for bat roost potential, badger setts, otter holts etc. For other species, similar mitigation in terms of pre-construction surveys, for example larval web survey in terms of Marsh Fritillary, would be essential.

Equally the mitigation measures with specific regard to aquatic ecology will be important and should be implemented in full. The phasing of the construction works is key and although this has been noted in relation to ornithology, this should also be fundamental mitigation for all species effected. The seasonal restrictions for breeding and wintering birds are especially critical and should be adequately conditioned.

Finally, we would recommend greater effort in terms of the treatment of invasive species. This needs to go beyond removal of plants to a licensed facility. Best practice involves more actions i.e. to remove all soil within 7metres of all plants, sieve it for bits of roots and then make sure to dispose of bits of roots and soil appropriately. This can be achieved by condition.

Landscape

The Heritage Council note that the most substantial impacts are isolated to the area of work at Parteen Basin and east of the Parteen Basin and primarily relate to the Water Treatment Plant and RWI&PS. This is due to the high landscape sensitivity ascribed to this area in the Tipperary County Development Plan. However, we cannot consider that any of the above ground water infrastructure buildings would result in unacceptable and undue significant impacts.

Whilst along the route corridor, most of the impacts locally are due to temporary tree and hedgerow removal, and while this is unfortunate, we are satisfied that in the longer term, replanting, restoration, and reinstatement measures will mitigate this to a large degree along the route of the pipeline.

We would therefore request by condition that ongoing site-specific design be employed within the construction corridor which reduces the number of trees and hedgerows to be removed as far as possible. Equally a condition on screening planting for the large above ground infrastructure i.e. key buildings, should also be secured.

Conclusion

We note that avoidance by design is evident throughout this application, which we commend. Yet it would be remiss of the Heritage Council to fail to note that a project of this scale and scope will undoubtedly have impacts on habitats, species, and unrecorded/unknown archaeology. Equally we acknowledge that a comprehensive assessment has been provided for these matters, albeit some further surveying methods could have been employed, potentially resulting in a more refined identification of the zones of archaeological potential.

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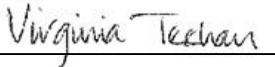
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In the absence of mitigation measures, we believe that the proposal would have significant negative impacts on many features of natural and cultural heritage, and therefore we have put strong emphasis on the conditioning of such mitigation measures. We recommend that the Commission do likewise.

I trust these views will inform the Commission's determination of the application.

Yours sincerely



Virginia Teehan

Chief Executive Officer

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Charity reg. no 20036867

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