

Senior Executive Officer,
Planning Department,
Wicklow County Council,
Aras an Chontae,
Wicklow.

Your Reference – N/A
Our Reference – BB/DD/141

January 14, 2009.

Re: Wicklow Water Supply Scheme Part 8 - New and expanded water treatment works including a sludge conditioning system adjacent to the existing water treatment works at Cronroe, which is 1.5km west of Ashford village. 2. Decommissioning and demolition of existing water treatment work including below and above ground tank and buildings. 3. Construction of 2,000 m3 capacity insitu potable reservoir. The reservoir at Cronroe will be partially below ground and will be screened with earth embankment slopes and grassed roof. 4. Construction of 3 no production wells (PW1, PW2 and PW3) at Nuns Cross to supply 500 m3 / day, 330 m3 / day and 180 m3 / day respectively of ground water to the new Cronroe Water Treatment Works. 5. Construction of 2 no production wells (PW4, PW5) at Ballinahinch to supply up to 770m3/day and 1400 m3/day respectively of ground water to the new Cronroe Water Treatment Works. The level of supply will be subject to findings from ongoing monitoring studies. 6. Construction of 2 no production wells (PW6 & PW7) at Milltown to supply 180 m3/day and 220 m3 /day respectively of ground water to the new Cronroe Water Treatment Works.

Dear Sir or Madam,

The ERFB has been in detailed discussions with Wicklow County Council (and the EPA) regarding the potential impact of proposed groundwater abstractions on surface waters in the River Vartry Catchment since we became aware of this proposal in late 2007. In the intervening period we have received a commitment

from Wicklow County Council that the sustainability of any such proposal would be tested and proven through an ecological impact assessment or environmental appraisal comprising ecological, hydrological and hydrogeological elements (among others) prior to initiation of any groundwater abstraction. To date, much positive work has been undertaken by all parties in pursuit of this objective. It is our hope that agreed monitoring works (including ecological monitoring and impact assessment) already complete or nearing completion on the Ballynahinch element will feed in to a final ecological impact report on the scheme in the near future. While we acknowledge that Wicklow County Council are subject to certain timing constraints, we would again (as outlined in our letter of December 12th, 2009) respectfully suggest that initiation of the Part 8 process is premature until such a time as the final expert conclusions are available regarding the nature of the scheme's impact on the surface water system.

We are extremely concerned about the limited timeframe within which meaningful input can be made once Part 8 procedures are initiated. Our concerns are compounded by the nature of early data coming from the monitoring project – our hydrogeologist informs us that early indications are that the long pump test is resulting in a significant drawdown of the aquifer adjacent to the river. We would again request that Part 8 is suspended until such a time as the final report on the impact of proposed groundwater abstractions on the River Vartry is completed and available for assessment. The sourcing of groundwater in Ashford must not result in a negative impact on the ecology (through hydrological mechanisms, absence of groundwater recharge etc.) of the River Vartry, thereby potentially contravening the range of relevant legislation (Fisheries Acts, Habitats Directive, Water Framework Directive etc.).

The River Vartry is an EU-designated salmonid system (S.I. No. 293/1988: EUROPEAN COMMUNITIES (QUALITY OF SALMONID WATERS) REGULATIONS, 1988). The Vartry and several of its tributaries are exceptional in the area in supporting Atlantic salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive) and Sea trout (*Salmo trutta*) in addition to resident Brown trout (*Salmo trutta*) populations. Recent data also indicates the presence of a spawning population of Sea lamprey (*Lampetra marinus* - ANNEX II of the EU's Habitats Directive) in the Ashford area. This highlights the sensitivity of local watercourses and the Vartry catchment in general. As the agency responsible for the conservation and protection of fish populations and their environments and having yet to receive sufficient information to allow meaningful assessment and

comment on the proposal; the ERFB must adopt a precautionary approach in this instance and therefore we must object to the development as proposed.

Yours faithfully,

Pat Doherty
Chief Executive Officer

Cc Mr. Terry Allen, Principal Officer, Dept of Environment, Heritage and Local Government, Water Services Investment Programme.

Cc Mr. Donal Daly EPA. Richview Clonskeagh Rd., D 14

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