



Greystones - Delgany & Kilcoole Draft LPF Amendment Stage Submission - Report

Who are you:	State Body
Name:	Inland Fisheries Ireland
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File

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**Iascach Intíre Éireann
Inland Fisheries Ireland**

Date- 18th November 2025

RE: Submission of Inland Fisheries Ireland on Proposed Material Alterations to Proposed Variation No. 4 to the WCDP 2022-2028 relating to the Draft Greystones – Delgany & Kilcoole Local Planning Framework 2025

Sir/Madam,

Thank you for the opportunity to contribute to the consultation on Proposed Material Alterations to Proposed Variation No. 4 to the WCDP 2022-2028 relating to the Draft Greystones – Delgany & Kilcoole Local Planning Framework 2025.

About Inland Fisheries Ireland's Role

Inland Fisheries Ireland (IFI) is a statutory agency responsible for inland fisheries in Ireland. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) the principal function of IFI is the protection, management, and conservation of the inland fisheries resource.

In the SEA Environmental Report for Proposed Material Alterations Appendix III – Non-Technical Summary the following is stated, which is an oversimplified review of the current capacity available within the Kilcoole WWTP.

The Kilcoole WWTP (Registration No. D0087-01) has a design capacity of 4,000 Population Equivalent (PE), with current load of 1,955 PE and, as indicated by Uisce Éireann, has spare capacity available.¹⁹ The Kilcoole WWTP is currently fully compliant with the Emission Limit Values (ELVs) set in the Wastewater Discharge Licence in the most recent available Annual Environmental Report 2022.²⁰ Notwithstanding this, the EPA has identified the plant on its Priority Area List²¹, in order to further contribute to the protection of water quality, with an upgrade to the plant proposed to be completed by 2030.

IFI would like to inform the Local Authority that although the Kilcoole WWTP is compliant with the current ELV's, prescribed in the Discharge licence, this does not protect the receiving water body, from deteriorating water quality d/s of the discharge from the plant.

This is evident when years of ambient monitoring data are examined, which shows a consistent impact downstream of the discharge from the WWTP at the current wastewater loading levels.



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If UE are considering allowing any further connections to this WWTP, a review of the discharge licence is required to allow new stricter ELVS to be set to protect the receiving water body, and the level of treatment and storm water storage would have to be improved considerably to cater for any increased loadings.

Even if improvements were made to current treatment processes which improved the discharge emission standards, it would only result in reducing the current impact that the plant is having on the receiving water body.

IFI are of the opinion that it may not be technically feasible to combine increased loadings with improved ELV's without resulting in a further deterioration in water quality d/s of the discharge from the plant.

In the interest of sustainable development and compliance with the Local Authorities legal requirements in accordance with the Water Framework Directive, The Habitats Directive to protect both surface and groundwater sources, designated sites from significant environmental impact, it is recommended that any future development is approved, only after the necessary infrastructural upgrades to the wastewater and drainage infrastructure have been completed.

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