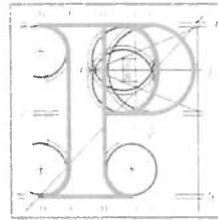


Our Case Number: ACP-323980-25

Your Reference: A.M.R Limited



An
Coimisiún
Pleanála

Crowley Millar Solicitors
2-3 Exchange Place
Georges Dock
ISFC
Dublin 1
D01 AE27

Date: 10 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.

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
Glaao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

CM

CROWLEY MILLAR

Solicitors LLP

Incorporating J R Sweeney LLP

2-3 Exchange Place
Georges Dock
IFSC
Dublin 1
D01 AE27
DX 112014 Talbot Street

Tel. No. + 353 1 676 1100
E-Mail: law@crowleymillar.com
www.crowleymillar.com

An Coimisiún Pleanála
64 Marlborough Street
Dublin D01 V902
By email: laps@pleanala.ie
& By Hand Delivery

AN COIMISIÚN PLEANÁLA	
LDG-	_____
ACP-	_____
25 FEB 2026	
Fee: €	_____ Type: _____
Time: 16:50	By: <i>Hand</i>

25 February 2026

Your Ref: 323982/323980

Our Ref: EMK/AH/AMR001/0007

Re: Notice of a Compulsory Purchase Order under The Water Services Acts, 2007 to 2022, The Planning and Developments Acts, 2000 to 2025, Section 184(2) of The Local Government Act, 2001, The Housing Act, 1966, Section 10 of The Local Government (No. 2) Act, 1960 (as substituted by Section 86 of The Housing Act, 1966 and as amended by Section 6 and The Second Schedule of The Roads Act, 1993 and by Section 222 of The Planning and Development Act, 2000) The Land Clauses Acts and The Acquisition of Land (Assessment of Compensation) Act, 1919.

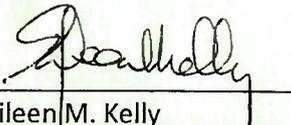
Uisce Eireann Compulsory Purchase (Water Supply Project Eastern and Midlands Region) Order, 2025

Our client: A.M.R. Limited

Dear Sirs

Please find **enclosed** Notice of Objection on behalf of our client in respect of the above mentioned application.

Yours faithfully



Eileen M. Kelly
CROWLEY MILLAR SOLICITORS LLP
eileen@crowleymillar.com



Hugh J. Millar, John W. Carroll, Catherine Keane, Brian Ó Longaigh, James Bardon, Tommy Dalton, Eileen M. Kelly, Bryan C. Sweeney (Notary Public), Bai Ping (Also qualified in China), Jonathan Whisker, Mary Flanagan, Olivia Treston, David Hickey, Noelle McDonald (Notary Public)
Associates: Miriam Doyle, Samantha Holton, Neil Millar, Anjusha Puthan Purayil, Colm Shalvey, Hannah Varley, Seán Doherty
Chairman: Joseph R. Sweeney **Consultant:** Simon Deane-Johns **Business Consultant:** Gerry O'Grady*

Also at: Suite 2 Leamy House, Hartstonge Street, Limerick, V94 859C. DX 3032 Limerick. Tel:+ 353 61 758 899 E-Mail: limerick@crowleymillar.com

An Coimisiún Pleanála

64 Marlborough Street

Dublin D01 V902

Re: Uisce Eireann (Water Supply Project Eastern/Midlands Region) Order 2025

Notice of Objection

TAKE NOTICE that on behalf of our client, A.M.R. Limited c/o Crowley Millar Solicitors LLP, 2/3 Exchange Place, George's Dock, IFSC, Dublin D01 AE27, we hereby make the following objection in respect of a proposed compulsory acquisition as set out in the Notice of Uisce Eireann dated 15th December 2025 wherein A.M.R. Limited was notified of the proposed compulsory acquisition on a permanent basis of lands set out in Part I of the schedule attaching to that Notice, the permanent acquisition of lands for the purposes of a wayleave as set out in Part II of the said Notice as well as for the purposes of providing an access road and the temporary acquisition of lands as set out in Part IV (subpart (a)) in respect of a temporary working area related to the permanent acquisition and the works to be carried out thereon, and in respect of a working area for the right of way and as more particularly described in the Schedule attached to that Notice of 15th December 2025.

The said acquisition is for the purposes of the provision of a water supply infrastructure network which would extend from the Parteen Basin in County Tipperary to Peamount in County Dublin.

Specifically in respect of our client's lands the proposal provides for the abstraction of raw water from the Parteen Basin on the Lower River Shannon downstream of Lough Derg and the Towns of Ballina and Killaloe, the provision of a raw water intake, the provision of a pumping station within the Parteen Basin and the pumping from there via 1500mm raw water rising main to a water treatment plant near Birdhill, County Tipperary and from there to its terminus at Peamount, County Dublin.

The said abstraction of raw water, the raw water intake facility and the pumping station are all to be provided in part or in whole on the lands of our client and in addition in order to facilitate that development it will be necessary to provide a wayleave to facilitate the rising main, a major access road as well as high security fencing and in addition there is a proposal to provide for a 38Kv overhead line which may or may not be located on the lands of our client.

The said raw water extracted from the River Shannon will be conveyed, via a pumping station to be located on our client's lands via 1500mm diameter raw water rising main for approximately 2km to a water treatment plant near Birdhill in County Tipperary and from there will be transferred through a piped network terminating at Peamount in the County of Dublin.

Our grounds of objection in respect of the proposed development are as follows:

1. The proposed development is a specified development for the purposes of the Environmental Impact Assessment Directive (EIA Directive) and the Environmental Impact Assessment Report (EIAR) submitted does not adequately or appropriately address the nature and extent in respect of the information required of all the likely significant effects both direct and indirect and in particular the impact in respect of the material assets comprised in our client's property.
2. It is impossible by way of a written submission to deal with the range of issues that are identified as arising particularly as fundamental clarifications and information is required from the developer in respect of both the manner and the considerations relating to the compulsory acquisition of our client's lands and the investigations that were carried out thereon, the information relating to the effects of the proposed development on our client's lands, interest and rights effected and the extent of such effects which are complex and require a detailed engagement with the developer in respect of the information that is contained in the Environmental Impact Assessment Report ("EIAR") and in the Natura Impact Statement (NIS) in respect of which there is fundamental disagreement in respect of a range of matters in those documents that can only be clarified by way of an Oral hearing, and in respect of the information in

the EIAR, and where it would be necessary to have explained why the lacune exists in the documentation and why significant issues have not been addressed.

3. It is only in the context and through the mechanism of an oral hearing that these range of factual disputes can be appropriately addressed.
4. As part of the development of the raw water intake, the development of a pumping station and the construction of a rising main, a very significant part of our client's lands will require to be compulsorily acquired.
5. It appears from the documentation that a number of separate but related acquisitions will be required and which are the subject matter of a compulsory purchase order. Uisce Eireann proposes to compulsorily acquire, as appears from the schedule
 - i. a permanent land acquisition which lands are described in Part I of the schedule and comprise numbers ACQ02.004 and 02.006,
 - ii. a permanent acquisition for the purposes of providing a wayleave under Plot Number W1001.011,
 - iii. a temporary acquisition where the land is described as Plot Numbers ACQ02.005 and ACQ02.007, as well as
 - iv. Under Part IV of the Schedule where a temporary acquisition is described in Plot Numbers WL001.010, 001.012,

all of which acquisitions seek to acquire compulsorily parts and/or interests and/or rights in, over and under our client's property.

6. The acquisition is described in the documentation as being a permanent acquisition for the purposes of the scheme, a permanent acquisition for the purposes of providing a right of way, a permanent acquisition for the purposes of providing a wayleave, land required as a temporary working area and land required as a temporary working area within the right of way.
7. Our client objects to the acquisition on the following grounds:

- i) The documentation accompanying the application does not describe on its face the jurisdiction of Uisce Eireann to abstract water from our client's lands and does not disclose on its face the statutory basis upon which any such acquisition can be authorised.
 - ii) There have been no adequate or appropriate investigation in respect of our client's lands, the nature of the rights and interests that our client holds in those lands, the nature of our client's occupation of the said lands and in particular the persons occupying the lands as is required to be set out in the Schedule, nor is there any consideration, assessment or engagement with the effect of the extinguishment of those rights either for the purposes of Article 40.3, Article 43 or Article 40.5 of the Constitution, or for the purposes of Council Directive 2011/92/EU or Council Directive 92/43/EEC.
8. The failure to specify those rights and interests which our client holds and all of them does not permit any or any appropriate consideration and/or assessment of the tests which are required in respect of whether it is appropriate to permit the compulsory acquisition of those lands, whether it is appropriate to extinguish or modify those rights or interests and/or to what extent such rights are to be modified within the proposed compulsory acquisition. It is not clear furthermore that the impact of these acquisitions has addressed the impact on our clients' property and/or the impact on the environment which consideration given that this compulsory purchase order requires to satisfy the requirements of Council 2011/92/EU and 92/43/EEC can be or has been addressed. There is a concern that there has been a failure to identify such rights and interests and to have those interests and rights assessed under the various requirements of Irish Domestic Law and/or European Community Law and where in addition the effect of the said scheme on those interests the issue of proportionality cannot be appropriately addressed.
9. The said acquisition will significantly and adversely affect the said lands by virtue of the nature and extent of the lands sought to be compulsorily acquired, by the interference with our client's rights both in respect of the abstraction of water and the development of the scheme, by the severing of our client's lands by the construction

of fencing across the full extent of the lands and severing without the provision of any access to two separate portions of land, and the entire scheme undermines the integrity of this important estate, undermines the privacy and security of the estate and will create by virtue of the said severance, two distinct areas of derelict land which cannot be accessed and will therefore completely undermine the integrity of this estate which is of great architectural, historical and environmental significance and will create a major disamenity, will completely undermine the privacy and integrity of the estate and will impact adversely on the high quality and sensitive environment in this area which is specifically protected in both Irish domestic law in the designations in the Tipperary and Clare County Development Plans and as a matter of European Law under Council Directive 92/32/EEC.

10. The Parteen Basin which comprises part of our client's lands is a European Site and where it is proposed to construct part of the raw water intake, a pumping station and it appears high voltage electricity conductors as part of or related to the scheme, there is no proposed consideration of or information in respect of the full effects of the impact in respect of this area which would allow for a sufficient and appropriate assessment as is required for a Stage 2 Assessment which the application documentation explicitly accepts must arise in view of the likely significant effects that the proposed development will have on this area.
11. In those circumstances we respectfully request that the Commission convene an oral hearing and where the issues in respect of our client's property, the impact thereon and the appropriate considerations relating to whether it is appropriate to confirm the compulsory purchase order and if so with what modifications that are appropriate, to engage in the substantive issues relating to the EIA that the Commission requires to carry out and in respect of the Appropriate Assessment that is required for the purposes of the Habitats Directive, and we request the Commission to confirm that it will convene such a hearing or in the event that it decides not to hold an oral hearing, that it will allow a further opportunity to make a submission in respect of any response that it made to the above grounds of objection.

We await hearing from you in respect of the progress of the inquiry.

Yours faithfully

Crowley Millar Solicitors LLP
Crowley Millar Solicitors LLP