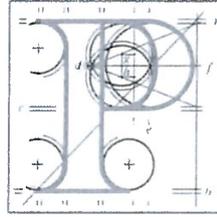


Our Case Number: ACP-323980-25



**An
Coimisiún
Pleanála**

Cllr Rita McInerney
Main Street
Doonbeg
Co. Clare
V15 K202

Date: 05 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 recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Commission will revert to you in due course with regard to the 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.

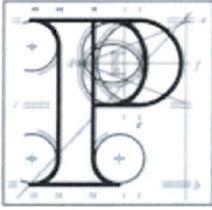
If you have any queries in the meantime please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184
PA04

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's
name

Cllr Rita Mc Inerney

(b) Observer's
postal address

Main Street, Doonbeg, County Clare. V15 K202

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal
address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

- 4 Please provide details about the **current application** you wish to make an observation.

- (a) **An Coimisiún Pleanála case number for the current application (if available)**

(for example: 300000)

32244 7

- (b) **Name or description of proposed development**

Water Supply Project

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

River Shannon to Dublin

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

Dear Sir/Madam,

I write as a public representative for County Clare to make a further submission regarding the proposed Eastern & Midlands Water Supply Project as set out by Uisce Éireann.

Water security is unquestionably a matter of national importance. However, projects of this scale must be assessed not only on engineering design but on their consistency with the strategic objectives of the National Planning Framework (NPF) and the National Development Plan (NDP), particularly in relation to balanced regional development, compact growth, climate resilience and sustainable investment prioritisation.

1. Conflict with Balanced Regional Development Objectives

The NPF explicitly seeks to rebalance growth away from over-concentration in the Greater Dublin Area, strengthening regional cities and rural communities. This project, by design, facilitates further expansion of Dublin's water supply capacity, effectively enabling continued demographic and industrial concentration in the east. Ireland already experiences one of the highest levels of economic concentration in Europe, with a disproportionate share of GDP

5. Grounds

generated in Dublin. The NPF's core aim is to counteract this imbalance. Yet a multi-billion euro pipeline transporting water over 170km reinforces precisely the growth pattern national policy is intended to correct.

Instead of directing strategic capital toward unlocking housing and enterprise capacity in the regions, including the Atlantic Economic Corridor and the Midwest, this proposal underwrites further eastern expansion.

If the State is serious about regional equity, infrastructure sequencing must reflect that priority.

2. Infrastructure Sequencing and Rural Deficits

In County Clare and across the Shannon basin, communities face acute water and wastewater constraints:

- Numerous towns and villages remain without public wastewater treatment systems.
- Development is restricted due to network capacity limits.
- Boil water notices and water quality challenges persist in rural areas.

The NDP emphasises addressing infrastructure deficits as a foundation for sustainable regional growth. However, this project allocates substantial capital toward servicing projected growth in one region while longstanding rural constraints remain unresolved.

The sequencing of investment raises fundamental policy questions: Should national capital first remove structural barriers to balanced growth, or should it expand capacity where over-concentration already exists?

3. Environmental and Climate Resilience Concerns

5. Grounds

The River Shannon is not merely a resource reservoir; it is a living ecological system central to biodiversity, tourism, fisheries, agriculture and community life throughout the Midwest.

Under the NPF and NDP climate resilience objectives, any abstraction must:

- Protect ecological flow levels under extreme drought scenarios.
- Model cumulative impacts over multi-decade climate projections.
- Demonstrate resilience under worst-case climate stress conditions.

With increasing climate variability, long-term dependence on inter-basin transfer introduces strategic vulnerability. A future prolonged drought affecting the Shannon catchment could place two regions at risk simultaneously.

Climate resilience policy should favour decentralised, diversified supply models rather than large-scale geographic dependency.

4. Failure to Fully Exhaust Local Alternatives

Before progressing an inter-basin transfer, it must be clearly demonstrated that all eastern catchment alternatives have been fully developed and independently assessed for cost-effectiveness and sustainability.

These include:

- Achieving best-in-class European leakage reduction levels in Dublin.
- Expansion of storage within existing eastern upland catchments, subject to environmental feasibility.
- Large-scale rainwater harvesting and greywater reuse mandates in urban planning.
- Consideration of coastal desalination, widely deployed in comparable maritime cities globally.

5. Grounds

The NDP requires value-for-money appraisal and sustainable alternatives assessment. Public confidence requires transparent comparative analysis of these options before committing to irreversible inter-regional transfer infrastructure.

5. Long-Term Regional Economic Impact

The Shannon basin underpins future development potential across Clare, Tipperary, Offaly, Westmeath and Limerick. Any abstraction must guarantee that:

- Future industrial or housing growth in the Midwest will not be constrained.
 - Economic potential within the Shannon Estuary and Atlantic corridor is fully safeguarded.
 - Environmental protections are legally enforceable rather than aspirational.
2. National policy cannot create a precedent whereby one region's infrastructure shortfall becomes another region's long-term constraint.

6. Strategic Alignment with Project Ireland 2040

Under Project Ireland 2040, infrastructure investment is intended to shape spatial development in line with balanced national objectives. This proposal risks doing the opposite: shaping development patterns that perpetuate centralisation.

True alignment with the NPF would require:

- Parallel investment guarantees for Shannon-region infrastructure.
- A formal regional dividend framework.
- Binding ecological protections enshrined in statute.
- Independent review of alternative supply strategies.

5. Grounds

Without these measures, the proposal sits uneasily with the State's own stated planning principles.

Conclusion

This submission is not opposition for its own sake. It is a call for policy coherence.

Water security must not be pursued in isolation from regional equity.

Capital investment must not contradict spatial strategy.

Climate resilience must not create new geographic dependencies.

The decisions taken now will shape Ireland's development trajectory for generations. They must align not only with engineering necessity, but with national planning policy, environmental stewardship and balanced economic growth.

I respectfully request that this submission be considered in full as part of the consultation process.

Yours faithfully,

Cllr Rita McInerney

County Clare

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to request the Coimisiún to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes