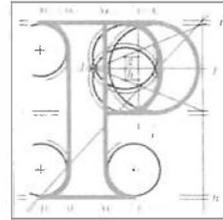


**Our Case Number:** ACP-323980-25

**Planning Authority Reference Number:**



An  
Coimisiún  
Pleanála

Environmental Trust Ireland  
c/o Michelle Hayes  
3 Glentworth Street  
Limerick

**Date:** 04 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](http://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

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D01 V902 D01 V902

# **ENVIRONMENTAL TRUST IRELAND**

**Environment | Conservation | Biodiversity |  
Ecology | Climate Change | Heritage | Advocacy**

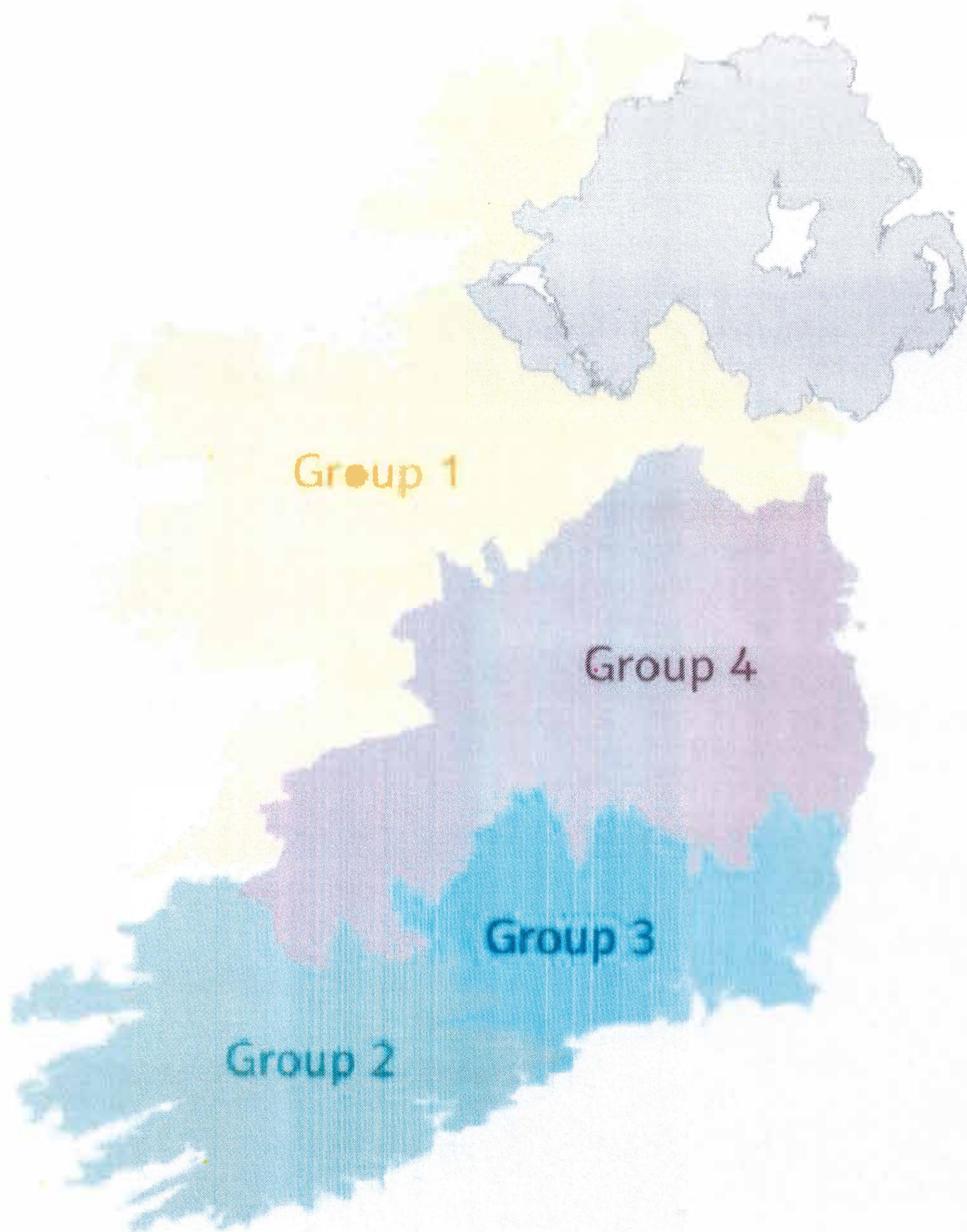


## **SUBMISSION ON NATIONAL WATER RESOURCES PLAN**

Environmental Trust Ireland makes the following observations on this initial stage of the National Water Resources Plan:

1. It is clearly apparent from the National Framework Resource Plan documentation available on the Irish Water website that the consultation process is at a very early stage as the available information is inadequate and lacks specificity thereby preventing informed decision making. Environmental Trust Ireland looks forward to receiving extensively revised and adequate documentation pertinent to the National Water Framework Plan and in particular, information relating to the environmental and ecological effects of Irish Water's proposals including cumulative and predicted in combination effects based on full assessment and a thorough analysis.
2. The SEA report provided by Irish Water and the Natura Impact Statement are completely inadequate, very generic and not in accordance with EU law in the environmental area and in particular, the Habitats Directive, the Birds Directive, the Water Framework Directive, the Groundwater Directive and the 2014 Environmental Impact Assessment Directive. Environmental Trust Ireland looks forward to receiving extensively revised documentation from Irish Water which fully assesses and considers the environmental and ecological consequences of the National Water Resources Plan upon the European Natura 2000 protected sites including the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA.

3. It would appear that there is not a separate Screening for AA Assessment. This is a stand alone document, independent of an NIS and is an essential procedural requirement which has not been complied with by Irish Water.
4. In respect of the Regional Water Resource Plans, Environmental Trust Ireland submits that the four groups are extremely artificial, have no regard to geographical, spatial, economic or environmental and ecological effects and should be abandoned.



Regional Water Resources Plan: North West (Group Area 1)  
Regional Water Resources Plan: South West (Group Area 2)

Regional Water Resources Plan: South East (Group Area 3)  
Regional Water Resources Plan: Eastern and Midlands (Group Area 4)

The designation of parts of Limerick, Tipperary, Clare and other counties along the River Shannon into a Group with Dublin is completely arbitrary and has significant potential adverse consequences for European Natura protected sites and in particular, the Lower River Shannon SAC, the River Shannon and River Fergus Estuaries SPA, Askeaton Fen Complex and so forth. Irish Water is urged to immediately remove Limerick, Clare and Tipperary and other counties on the River Shannon from this artificial, geographically unnaturally and potentially environmentally destructive designation group.

5. Environmental Trust Ireland seeks a commitment from Irish Water that it will not seek to extract water from the River Shannon to supply Dublin by way of pipeline or otherwise, having regard to the protected status at European level of the Lower River Shannon SAC.
6. It is noted that the national Water Resources Plan refers to replacement of lead and asbestos pipes. It is silent however on the experimental pilot programme in Limerick whereby orthophosphate was added to the water supply instead of replacing lead pipes. Irish Water is requested to provide full information on the addition of orthophosphate to pipes in Limerick and elsewhere and to specify whether or not this practice has been discontinued. Irish Water is also requested to provide a full assessment of Orthophosphate addition to the water supply including a health impact assessment and an environmental assessment, including ecological assessment conducted by appropriate experts.

Environmental Trust Ireland reserves the right to make further submissions on the National Water Resources Plan.

Dated this 1st day of March 2021.

For and on behalf of Environmental Trust Ireland:

Michelle Hayes, Solicitor,  
President, Environmental Trust Ireland,  
3 Glentworth Street,  
Limerick.