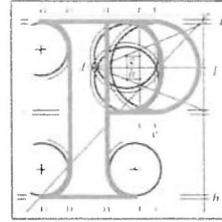


Our Case Number: ACP-323980-25

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Futureproof Clare Environmental CLG
c/o Sinéad Sheehan
12 Connaught Road
Scarriff
Co. Clare
V94 RCX7

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.

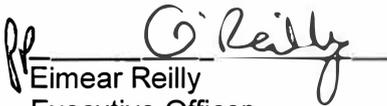
The Commission will revert to you in due course with regard to the matter.

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.

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



Futureproof Clare Environmental CLG

25th February, 2026

Strategic Infrastructure Development Section

An Coimisiún Pleanála

64 Marlborough Street

Dublin 1 D01 V902

Via Email: sids@pleanala.ie

Re: Observations on Uisce Éireann's Water Supply Project (Eastern and Midlands Region) Strategic Infrastructure Development Application

Case reference: PA92.323980

Futureproof Clare welcome the opportunity to submit an observation on Uisce Eireann's Water Supply Project proposal to pipe water from the Shannon to the eastern area of the country.

Futureproof Clare Environmental CLG (FPC) is a grassroots-led environmental justice campaign group with members in Munster and beyond. We engage in local, national and international climate justice issues, and have ongoing campaigns related to developments in Co. Clare and surrounding areas, including the River Shannon.

We wish to object in the strongest possible terms to the proposed Eastern Midlands Region Water Supply Project, herein referred to as the Shannon Water Pipeline. The Shannon Water Pipeline is intended to address water shortages in the Greater Dublin Area (GDA) by taking water from the River Shannon and piping it to the east of the country. The reasons for our objection to the application are 1) Lack of sufficient consideration of suitable alternatives to the pipeline 2) Lack of thorough assessment of cumulative impacts of other developments in the Shannon area 3) Lack of proper regard to the Water Framework Directive and Habitats Directive 4) Undue pressure on the Shannon River and inhabitants 5) Lack of consideration of cultural significance of the Shannon 6) inadequate assessment of the impacts of climate change and how climate change might interact with the impacts of the pipeline.

1. Lack of sufficient consideration of suitable alternatives.

There are more suitable alternatives to address the water supply issue in Dublin and these have not been adequately addressed in the application.

i) The leaks and water infrastructure in GDA should be repaired and upgraded. There is no point in taking millions of litres of water from the Shannon only for the water to be wasted due to poor infrastructure.

ii) The inordinate data centre development in the east of the country is using an inordinate amount of water. The water used by data centres nationally needs to be monitored and regulated by Uisce Eireann, as this would result in a better supply of water to residents. A moratorium on new data centres would prevent an even greater strain on the water supply.

iii) There is a lot of spare water falling out of the sky these days. It's called rain and it can be harvested, treated and used to supply the GDA. Rain water harvesting/rain water attenuation. Rain water harvesting and rain water attenuation in Ireland is currently at a minute scale. Large scale rain water harvesting/attenuation presents an opportunity for us to increase water supply.

Each of these three alternatives, if combined, would result in a more cost effective, just and less environmentally risky supply of water for the GDA.

2. Lack of thorough assessment of cumulative impacts of other developments in the Shannon area.

The River Shannon, particularly the lower river Shannon, is already heavily industrialised. Developments include Moneypoint, Limerick Cement Factory, Aughinish Alumina, Ardnacrusha as well as two proposed Liquefied Natural Gas terminals in the Shannon Estuary. The nature of this project is particularly alarming in respect of the conservation status of the Shannon Estuary. The Shannon Estuary and Lower River Shannon is a Special Area of Conservation (SAC) and is home to many endangered species. Pollution is at an all-time high and fish stocks are dwindling. Endangered species such as the freshwater pearl mussel are becoming even more critically endangered. The SAC is also home to a resident population of bottlenose dolphins and the unassessed cumulative impacts of this project pose adverse effects to bottlenose dolphins. The supply of drinking water in the west of the country is impacted by these industries. Together with the proposed pipeline, the river runs a risk of irreversible harm due to the cumulative impact of the current and proposed developments.

3. Lack of proper regard to the Water Framework Directive (WFD) and Habitats Directive (HD)

The WFD and HD set out legal obligations to minimise harm to water and to biodiversity. Unfortunately the current application does not take sufficient consideration of the impact of the Shannon Water Pipeline on protected habitats and areas.

4. Undue pressure on the Shannon River and inhabitants

This project is likely to cause a reduction in fish stock in the area. As mentioned, fish stocks are already dwindling in the Shannon river catchment area and this project will likely exacerbate this - directly affecting the recreational and touristic experience and rights of people to enjoy and interact with nature as part of quality of life.

Recently, and for a number of years, Lough Derg was impacted by blue green algae due to a lowering of the water level, most likely as a result of Ardnacrusha combined with a lack of summer rainfall and increased water temperature. The combination of climate change in conjunction with the proposed development could exceed a tipping point for pollution of Lough Derg and other parts of the Shannon causing irreversible damage and this has not been adequately considered in the application.

5. Lack of consideration of cultural significance of the Shannon and Rights of Nature

The River Shannon in Irish mythology and for the Irish people is an entity that is to be respected and cared for. The Shannon has been written into songs, poetry and lore since before people could write and told stories to one another instead. It is morally wrong to continue to prioritise extraction, abstraction on exploitation of this important resource and the Rights of Nature of the Shannon, as recognised by the United Nations, should be considered and legally applied to protect the River, the inhabitants of the River and the surrounding area from this unsustainable pipeline development, especially because there are far better alternatives to supplying drinking water to the GDA, as iterated in point 1. above.

6. Inadequate assessment of the impacts of climate change

Increased rainfall, droughts and storms are expected in Ireland due to climate change. The application does not take sufficient account of the latest climate projections in this regard. The interaction between the effects of climate change on water temperature, the fluctuation of the level of the river, and the proposed development have not been sufficiently accounted for in the Shannon Water Pipeline application.

7. Data Centres and the Greater Dublin Area

The justification supplied by Uisce Eireann for the Shannon Water Pipeline is to supply water to the residents of GDA. However, the water could also be used to provide water supply to cool data centres. Data centres require a significant amount of water per day to cool the servers. For example, a 200MW data centre requires approximately 500,000 litres of water a day. Over the last few years, data centre development has been stagnant due to both energy and water capacity constraints. However, this project in conjunction with the Private Wires Bill will facilitate Large-Energy Users (I.e. Data Centres) to operate in the Greater Dublin Area. For instance, the recent decision by An Coimisiún to grant planning permission to a data centre campus in North County Dublin is congruent to the recent advancements of the private wires bill and this project. Furthermore, the terminus of the pipeline at Peamount is significant. Grangecastle data centre is located adjacent to the Peamount reservoir and the zoning of the surrounding catchment area of Grange Castle is '*industrial, enterprise, employment*' and as a result the zoning supports the use of the reservoir to provide water capacity to feed the existing Grangegorman data centre campus and be a direct source of supply for any data centres that are developed on the campus. It seems very coincidental that the proposed reservoir is located next to one of the largest Data centre campuses in Ireland. Additionally, there

are reservoirs in the surrounding area, such as in Leixlip. Saggart and Poulaphouca that would be supplied by this project, but instead could be enlarged or improved to harvest rainwater rather than damage the Shannon.

Conclusion

Please accept this observation in relation to the Shannon Water Pipeline application which outlines strong reasons for An Comisiún Pleanála to reject the development on the grounds of inadequate assessment and adverse environmental and human impacts.

Yours sincerely

Sinéad Sheehan
12 Connaught Road
Scarriff
Co. Clare
V94 RCX7

Telephone: 085 8267751

On behalf of Futureproof Clare Environmental CLG