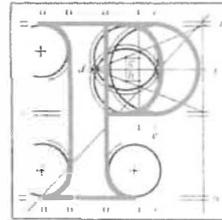


Our Case Number: ACP-323980-25

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Garrett Reil and Cliona Geary
12 Ard Coillte
Balinna
Co. Tipperary

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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SUBMISSION TO AN COIMISIÚN PLEANÁLA

Observations / Objection to the Proposed Water Supply Project

Eastern and Midlands Region – Shannon to Dublin Water Supply Project

Case Reference: PA92.323980

Applicant: Uisce Éireann

Name: Garrett Reil and Cliona Geary

Address: 12 Ard Coillte, Balinna, Co Tipperary

Date: 25 February 2026

We, the above named, formally object to the Proposed Water Supply Project for the Eastern and Midlands Region (Case Reference PA92.323980) as submitted by Uisce Éireann to An Coimisiún Pleanála on 19 December 2025.

This submission sets out specific grounds for our objections under the relevant legal and policy frameworks, including the EU Habitats Directive (92/43/EEC), the EU Environmental Impact Assessment Directive (2011/92/EU as amended), the EU Water Framework Directive (2000/60/EC), and the Planning and Development Act 2000 (as amended). The objection is grounded in planning, environmental, and public interest considerations that We believe warrant refusal of the application, or at minimum the imposition of fundamental conditions.

Contents

1. Inadequacy of the alternatives assessment
2. Departure from international best practice in water resource management
3. Habitats Directive – inadequacy of the Appropriate Assessment
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5. Construction impacts on communities and agriculture
6. Disproportionate impact and regional equity
7. Cost escalation and proportionality
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1. Inadequacy of the alternatives assessment

Article 5(3)(d) of the EIA Directive requires that an Environmental Impact Assessment Report include an outline of the main alternatives studied by the developer and an indication of the main reasons for the choice made, taking into account the environmental effects. We submit that the EIAR's consideration of alternatives is fundamentally deficient in the following respects.

1.1 Failure to model an ambitious leakage reduction programme as a primary alternative

The Greater Dublin Area water network currently loses between 38% (Uisce Éireann's mains-only figure) and 57% (when customer-side losses are included, per Kennedy Analysis) of treated drinking water through leaks. This is among the worst leakage rates in western Europe (Kennedy Analysis, 2018; Agriland, 2025). The EIAR treats leakage reduction as complementary to the pipeline rather than as a genuine standalone alternative capable of eliminating or substantially reducing the need for the project.

Independent analysis by Kennedy Analysis has identified what it describes as three significant mathematical and data errors in Uisce Éireann's demand forecasting. Once corrected, these would convert the projected 255 million litre per day deficit by 2050 into a surplus (Kennedy Analysis, 2018). This analysis has been in the public domain since 2018 and was presented to both the Oireachtas Committee on Housing, Planning and Local Government and the Commission for Regulation of Utilities. Yet the EIAR does not meaningfully engage with it.

International comparisons highlight the inadequacy of Uisce Éireann's leakage targets. Thames Water in London achieved a reduction from 946 million litres per day to 713 million litres per day in just four years. Other European cities have achieved reductions of 50% in eight years and 83% in twenty years. Kennedy Analysis characterised Uisce Éireann's earlier leakage targets as amounting to a 31% reduction over 39 years (Kennedy Analysis, 2019; Irish Times, 2019). It should be acknowledged that Uisce Éireann has since updated its stated ambition, targeting 20% leakage in the Greater Dublin Area by 2030 and 'Sustainable Economic Levels of Leakage' by 2034. However, the utility's track record of meeting its own targets gives cause for concern: by its own admission, network leakage in Dublin increased rather than decreased in the years following the setting of its earlier 2021 targets. Even accepting the updated targets at face value, the fundamental question remains – has the outcome of achieving those targets been genuinely modelled as an alternative to the Shannon abstraction in the EIAR? When Uisce Éireann told the Oireachtas committee in 2018 that no UK water utility had achieved 20% leakage, its own data showed that 13 out of 22 water suppliers in England and Wales had leakage at or below that level.

We submit that an EIAR which does not model the outcome of an internationally benchmarked leakage reduction programme – treating it as a genuine alternative to the Shannon abstraction – fails to meet the requirements of the EIA Directive. An Coimisiún Pleanála should require an independent review of the demand forecasting methodology before any determination is made.

1.2 Inadequate consideration of alternative water sources

The EIAR’s assessment of alternative sources is insufficiently rigorous. Specifically:

Poulaphouca/Blessington Reservoir: This substantial reservoir, located much closer to Dublin, is currently controlled by the ESB primarily for peaking electricity generation – a function that is becoming less critical as Ireland’s renewable energy capacity grows. Its potential as a supplementary water supply source for Dublin has not been adequately explored.

Groundwater and aquifers: The investigation of groundwater sources has been limited to desk studies. Given Ireland’s substantial groundwater resources, this represents a significant gap in the alternatives analysis (Kennedy Analysis, 2018).

Closer river sources: The rivers Barrow, Boyne, and Slaney are all substantially closer to the Greater Dublin Area than the Shannon. Abstraction from these sources would involve shorter pipeline routes, lower capital costs, less construction disruption, and a smaller environmental footprint. The EIAR’s basis for dismissing these alternatives warrants close scrutiny.

Desalination: While acknowledged and dismissed in the EIAR, desalination is used in over 150 countries worldwide with 18,423 plants serving 300 million people (International Desalination Association). The dismissal on grounds of it being “Dublin-centric” is not a valid planning objection to a project whose primary purpose is to serve Dublin.

2. Departure from international best practice in water resource management

The proposed project represents a significant departure from current international best practice in urban water resource management. This is a material consideration for An Coimisiún Pleanála in assessing the adequacy of the alternatives analysis and the overall justification for the project.

2.1 The international consensus: demand management before new supply

The established international framework, as set out by the International Water Association (IWA), the American Water Works Association (AWWA), the US Environmental Protection Agency, and the World Bank, treats demand-side management – leakage reduction, pressure management, network renewal, and water conservation – as the first-order

intervention for cities facing water supply challenges. New supply infrastructure, and in particular long-distance inter-basin transfer, is recognised as a last resort to be pursued only after demand-side options have been exhausted to an appropriate standard (EPA, 2016; IWA, 2006).

The US EPA's guidance on best practice explicitly states that prior to seeking a new source of water supply, a water utility should have at least five years of water audit data and should use the results to develop and implement a water loss control plan targeting an economically feasible level of leakage (EPA, 2016). The World Bank recommends that non-revenue water should be below 25% of total water produced (Kingdom, Liemberger and Marin, 2006). In England and Wales, Ofwat reports that around a fifth of water supplied is currently lost to leakage, with the sector having achieved a 43% reduction since privatisation and a target of a further 50% reduction by 2050 (Ofwat, 2025).

The UK Environment Agency reported in 2025 that nearly 19% of water supplied in England is lost through leakage (Environment Agency, 2025).

Dublin's leakage rate of 38–57% is wildly out of step with all of these benchmarks. Under any recognised international framework, a city with these leakage levels would not be permitted to pursue a major new source before demonstrating a credible programme to reach at least the World Bank threshold of 25%. The fact that Uisce Éireann is proceeding with a €4.6–€10 billion inter-basin transfer while its network loses up to half its treated water is, by international standards, extraordinary.

2.2 The ecological risks of inter-basin water transfer: international evidence

Inter-basin water transfers (IBTs) are not a routine or low-risk solution. The peer-reviewed literature demonstrates consistent patterns of ecological damage in donor basins worldwide. A comprehensive review published in *Environmental Science and Pollution Research* found that IBTs cause negative impacts including salinisation and aridification of donor basins, damage to the ecological environment of donor basins and conveying channel systems, and increased water consumption in recipient basins (Zhuang, 2016).

A Cambridge University Press assessment of inter-basin transfers noted that globally, many such projects have been criticised for their negative environmental, social and cultural impacts, as well as their poor economic performance (Ghassemi and White, 2007). Similarly, an analysis published in *Frontiers in Environmental Science* found that inter-basin transfer projects can lead to altered river flows, changes in water quality, and loss of ecologically important habitats (Frontiers, 2024).

The most relevant European comparator is Spain's Tagus-Segura transfer. The pressure of that transfer on the Tagus River has made it difficult to achieve good ecological status as required by the EU Water Framework Directive, and the river dried up in major urban centres during the summer of 2006 while transfers continued. A citizen movement

subsequently formed demanding more sustainable management (WWF, 2009). The parallels with the Shannon – an EU-designated river and SAC, with WFD obligations and competing demands during drought – are directly applicable.

Research on China's South-to-North Water Diversion Project has found that water diversion during dry seasons exacerbated water scarcity in upstream regions, leading to vegetation water stress and weakened ecological functions. This seasonal contradiction – where water is diverted precisely when the donor basin can least afford to lose it – is directly relevant to the Shannon proposal, where Dublin's peak demand coincides with the Shannon's lowest flows (PLOS ONE, 2025).

We submit that the EIAR fails to engage with this body of international evidence on the ecological risks of inter-basin transfers, and that this represents a further deficiency in the alternatives assessment. An Coimisiún Pleanála should satisfy itself that the applicant has adequately demonstrated why a solution recognised internationally as high-risk and last-resort is justified in circumstances where basic demand-side management has not been pursued to an acceptable standard.

3. Habitats Directive – inadequacy of the Appropriate Assessment

The proposed abstraction point at Parteen Basin lies within the Lower River Shannon Special Area of Conservation (SAC, site code 002165). Under Article 6(3) of the Habitats Directive, any plan or project likely to have a significant effect on a Natura 2000 site must be subject to Appropriate Assessment, and consent may only be granted where it can be demonstrated beyond reasonable scientific doubt that the project will not adversely affect the integrity of the site.

We submit that the Natura Impact Statement (NIS) is deficient in the following critical respects.

3.1 Failure to assess cumulative impacts with the Shannon Fish Passage Project

This is perhaps the most significant environmental argument against the project. The ESB is currently developing the Shannon Fish Passage Project, which aims to restore salmon migration on the lower Shannon – a species whose numbers ascending the Ardnacrusha fish lift have collapsed from 12,000 in 1964 to just 123 in 2024 (Dr Anthony Leddin, Limerick Leader, 2026; Limerick Post, 2025).

Salmon restoration requires significantly increased flows down the old River Shannon channel. Expert analysis indicates that increasing the old Shannon flow from its current statutory minimum of 10 m³/s towards 50 m³/s would be necessary for the river to begin

moving towards the conservation limit for Atlantic salmon (Leddin, 2026). This flow would need to come from water currently directed to Ardnacrusha via the headrace.

The statutory requirement to maintain a minimum compensation flow of 10 m³/s down the old River Shannon is established under the Shannon Electricity Act 1925. This means that Uisce Éireann's proposed abstraction of 4 m³/s at Parteen Basin must, under normal circumstances, come from the flow directed to Ardnacrusha – not from the old river. The abstraction therefore directly competes with any future increase in flows needed for fish passage restoration.

Despite this, Uisce Éireann and the ESB are presenting the Fish Passage Project and the Water Abstraction Project as separate, unrelated initiatives (Limerick Post, 2025). The NIS must assess the cumulative impact of both projects on the qualifying interests of the Lower River Shannon SAC. A failure to do so renders the Appropriate Assessment incomplete and incapable of supporting a conclusion of no adverse effect on site integrity.

Atlantic salmon, sea lamprey, river lamprey, and European eel are all qualifying interests of the Lower River Shannon SAC. All four species depend on adequate flows for migration, spawning, and habitat maintenance. An Appropriate Assessment that does not model the combined demands on the river's flow from Ardnacrusha operations, the proposed pipeline abstraction, and the Fish Passage Project's requirements is fundamentally incomplete.

3.2 Inadequate modelling of low-flow and drought scenarios

Uisce Éireann characterises the proposed abstraction as “a maximum of 2% of the long-term annual average flow of the River Shannon at Parteen Basin”. This figure, while technically accurate as an annual average, is potentially misleading and must not be accepted at face value by An Coimisiún Pleanála.

The demand for water in Dublin peaks during summer months – precisely when Shannon flows are at their lowest. Research by the ICARUS Institute at Maynooth University has indicated that climate change will lead to increased frequency and severity of summer drought conditions in Ireland. Published EPA licensing data for the Lower Shannon reports the Q95 low-flow statistic (the flow exceeded 95% of the time) as approximately 12.53 m³/s. At Q95 conditions, a continuous abstraction of 3.82 m³/s would represent 30.5% of river flow – not 2% (Clare Champion, 2026, citing EPA data). During the 2018 drought, the EPA recorded that just 11 m³/s was being released from Lough Derg, and the Shannon could literally be waded across (EPA/Catchments.ie, 2020). EPA-funded climate research has found that higher greenhouse gas emissions are associated with large reductions in average summer and annual low flows in Irish rivers, with Ireland transitioning towards drier summers and increased evapotranspiration (EPA Research, 2024).

There is a fundamental paradox at the core of this project: the same climate projections used to justify the pipeline – increasing drought, reduced recharge, hydrological stress – are simultaneously evidence that the Shannon system

itself may not have surplus water available during the periods when Dublin most needs it (River Shannon Protection Alliance, 2026). The NIS must demonstrate, using robust and independently verifiable climate and hydrological modelling, that the abstraction will not compromise the conservation objectives of the SAC during critical low-flow periods. We submit that this has not been adequately demonstrated.

3.3 Impacts on water quality and river resilience

Reduced flows increase the concentration of pollutants and reduce the dilution capacity of the river system. During low-flow periods, the abstraction of 330 million litres per day will reduce the Shannon's capacity to assimilate treated wastewater discharges, agricultural run-off, and other pollution sources. This has implications for both the SAC's conservation objectives and for downstream communities in Limerick and the Shannon estuary. The EIA's treatment of water quality impacts during critical low-flow scenarios requires independent scrutiny.

4. Water Framework Directive compliance

Article 4 of the Water Framework Directive prohibits deterioration of the status of surface water bodies and requires Member States to achieve good ecological status. The proposed abstraction must be assessed against these requirements for all affected water bodies in the Shannon catchment.

We submit that the EIA does not adequately demonstrate that the abstraction – particularly during low-flow periods and in combination with existing abstractions for Ardnacrusha – will not cause deterioration of ecological status in affected water bodies. This is a legal requirement that cannot be set aside in the public interest; the Court of Justice of the European Union has confirmed that the prohibition on deterioration is binding and must be assessed at the level of individual quality elements.

The EPA's own catchment assessments accentuate this concern.

According to the EPA's Cycle 3 catchment report (May 2024), only 44% of surface water bodies in the Lower Shannon and Mulkear catchment were at Good or High Ecological Status in the 2016–2021 monitoring period. For the Lower Shannon (Lough Derg) catchment, the figure was just 38%. The receiving environment is already under significant pressure, with more than half of water bodies failing WFD objectives. Adding a major new abstraction to a system in this condition requires the most rigorous justification, and the EPA's own guidance on water resources and abstractions warns that pumping too much water can reduce levels and dry out the downstream river, with particular impact during drought conditions (EPA, Water Resources and Abstractions). The Inland Fisheries Ireland has separately warned that freshwater communities

are becoming increasingly vulnerable due to water abstractions and the impact of climate change.

5. Construction impacts on communities and agriculture

The construction phase of this project will last four to five years and will affect approximately 500 landowners across four counties, involving a 170km pipeline corridor (Agriland, 2024; Irish Times, 2025). During construction, a 50-metre wide wayleave will be required, reducing to 20–25 metres upon completion. The impacts include:

Traffic and road disruption: The scale of works, including heavy construction traffic, abnormal load movements, and temporary road closures on regional and rural roads, will cause severe disruption to local communities for an extended period. The EIAR must demonstrate that mitigation measures are enforceable and adequate.

Agricultural impact: Loss of agricultural access, noise, dust, and soil disturbance over periods of up to 24 months per land parcel will affect farm operations. Soil structure, drainage patterns, and land quality may not be fully restorable following deep excavation works for a pipeline of this scale.

Tourism and recreation: Lough Derg and the Shannon region support a significant tourism and amenity economy. Boating, sailing, angling, and recreational use of the river and lake are vital to local communities. Both the construction phase and the long-term operational impacts on water levels and flows pose a threat to this economy (Clare Champion, 2026; RTÉ, 2026).

6. Disproportionate impact and regional equity

The benefits of this project accrue overwhelmingly to the Greater Dublin Area, while the environmental risks, construction disruption, and long-term ecological consequences are borne disproportionately by communities in Clare, Limerick, Tipperary, and Offaly. This raises important questions of proportionality and public interest that An Coimisiún Pleanála must weigh carefully.

We note that Clare County Council and Tipperary County Council have lodged objections to this application, and that Limerick City and County Council is considering doing the same (RTÉ, 2026; Limerick Post, 2026). The opposition of the local authorities in whose administrative areas the abstraction and initial pipeline route fall is a material consideration.

Limerick's own water supply is already under strain. The city's wastewater treatment infrastructure requires substantial upgrading. Abstracting 330 million litres per day upstream of Limerick during drought conditions – precisely when the city itself faces water stress – raises legitimate concerns about the prioritisation of Dublin's needs over those of downstream communities.

The disparity in service levels is starkly illustrated by the experience of communities along the pipeline route itself. The Newport Public Water Supply, which serves approximately 8,000 customers in Newport, Birdhill, Ballina, Killoscully and surrounding areas of County Tipperary, has been subject to repeated boil water notices – in June 2022, November 2024, and most recently in January 2026. The January 2026 notice was issued because heavy rainfall caused a deterioration in raw water quality that overwhelmed the treatment plant (Tipp Mid West Radio, 2026).

In November 2025, some 38,500 homes and businesses across County Tipperary were simultaneously unable to drink their tap water, across multiple supply schemes (Tipp FM, 2025). These are the communities being asked to host the construction of, and bear the long-term environmental risk from, a €5–10 billion water transfer to Dublin. The contrast between a megaproject to secure Dublin's supply and the chronic inability to provide safe drinking water to the donor region's own residents accentuates the regional inequity at the heart of this proposal.

7. Cost escalation and proportionality

While cost alone is not a planning ground, the escalating cost of this project is relevant to the assessment of proportionality and the adequacy of the alternatives analysis. The project was originally estimated at €800 million to €1.4 billion. The current estimate range is €4.58–€5.96 billion, with the Department of Housing, Local Government and Heritage

acknowledging to the Public Accounts Committee that it could exceed €10 billion in a worst-case scenario (Irish Times, 2025).

This cost escalation – a factor of seven or more from the original estimates – reinforces the argument that less costly, less environmentally damaging, and more proportionate alternatives should have been more rigorously assessed. A fraction of the projected expenditure invested in leakage reduction, pipe replacement, and demand management could deliver substantial improvements to Dublin’s water security without the environmental and social costs associated with this project.

8. Non-binding nature of mitigation measures

We are concerned that key mitigation measures proposed in the EIAR and NIS are insufficiently specific and lack enforceable commitments. In particular:

The proposed abstraction is described as a “maximum of 2% of the long-term annual average flow”, but there is no statutory mechanism proposed to cap or reduce abstraction during critical low-flow periods. Without a legally binding and independently monitored abstraction regime that adjusts in real time to hydrological conditions, the “2%” figure provides no meaningful protection during drought.

Similarly, commitments to “neutral effect” on water quality and water levels require independent verification. If An Coimisiún Pleanála is minded to grant permission, enforceable and independently monitored conditions – including mandatory cessation of abstraction below defined flow thresholds – should be a prerequisite.

9. Conclusion and request

For the reasons set out above, We submit that this application should be refused. The grounds for refusal include:

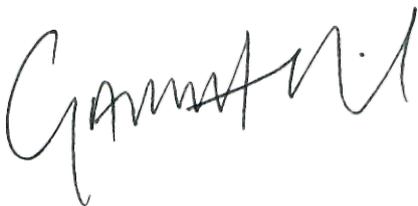
1. The EIAR’s alternatives assessment is inadequate under the EIA Directive, particularly in its failure to genuinely model an ambitious leakage reduction programme as a primary alternative to the Shannon abstraction.
2. The project represents a significant departure from international best practice in water resource management, which treats inter-basin transfer as a last resort and requires demand-side management to be exhausted before new supply infrastructure is pursued.
3. The Natura Impact Statement fails to assess cumulative impacts with the Shannon Fish Passage Project, rendering the Appropriate Assessment incomplete and incapable of supporting a finding of no adverse effect on the integrity of the Lower River Shannon SAC.

4. The hydrological modelling of low-flow and drought scenarios does not adequately demonstrate that the abstraction will not cause deterioration of water body status contrary to the Water Framework Directive.
5. The project's benefits accrue disproportionately to Dublin while its environmental, construction, and long-term risks are borne by Shannon communities, and less costly and less damaging alternatives have not been adequately explored.
6. The demand forecasting methodology on which the project's justification rests has been credibly challenged and requires independent verification before any permission is granted.

If An Coimisiún Pleanála is minded to grant permission notwithstanding these observations and objections, We request that it impose enforceable conditions including: mandatory independent review of the demand forecasting; a legally binding abstraction regime with real-time flow-dependent limits; mandatory cessation of abstraction below defined low-flow thresholds; and a requirement for cumulative assessment with the Shannon Fish Passage Project.

Yours faithfully,

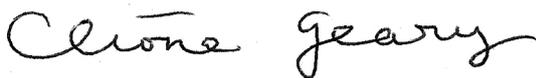
Signed:



Name: Garrett Reil

Date: 25 February 2026

Signed:



Name: Cliona Geary

Date: 25 February 2026

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