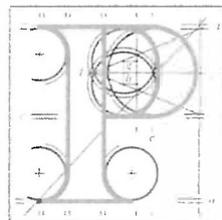


**Our Case Number:** ACP-323980-25

**Planning Authority Reference Number:**



An  
Coimisiún  
Pleanála

Joanne Skehan  
Ballynevin  
Bridgetown  
Killaloe  
Co. Clare

**Date:** 03 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

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## **Submission to An Coimisiún Pleanála**

**Case Reference:** PA92.323980

**Project:** Proposed Water Supply Project for the Eastern and Midlands Region

**Submitted by:** Joanne Skehan

**Address:** Ballynevin, Bridgetown, Killaloe, Co. Clare

**Date:** 24 February 2026

I wish to formally object to the Proposed Water Supply Project for the Eastern and Midlands Region under Case Reference PA92.323980.

While I acknowledge the importance of ensuring a secure and resilient water supply for households, public services, and industry, I believe that the current proposal is fundamentally flawed in its scale, justification, environmental assessment, climate alignment, financial prudence, and adherence to sustainable development principles.

This submission sets out detailed concerns regarding:

- The lack of demonstrated and proportionate need
- Inadequate assessment of reasonable alternatives
- Significant environmental and ecological risks
- Climate inconsistency and carbon implications
- Financial and economic risk exposure
- Impacts on rural communities and landowners
- Governance and infrastructure centralisation concerns
- Compliance with national and EU environmental law

For the reasons outlined below, I respectfully request that permission be refused in its current form.

### **Insufficient Demonstration of Need**

The central justification for this project rests on projected long term water demand growth in the Eastern and Midlands Region, particularly in the Greater Dublin Area. However, the demand forecasts appear to be heavily dependent on high growth population and industrial scenarios extending several decades into the future.

There are serious concerns regarding:

- The reliance on upper range population growth forecasts
- The incorporation of large-scale industrial water demand assumptions
- The absence of robust sensitivity modelling under moderate or low growth scenarios
- Limited transparency regarding the methodology underpinning projections

Public infrastructure of this magnitude must be justified on the basis of demonstrated, evidence-based necessity rather than speculative long term expansion models.

Moreover, Ireland continues to experience high levels of non-revenue water due to leakage within the public supply network. While efforts have been made to reduce leakage, substantial losses remain. It is neither proportionate nor economically prudent to advance a multibillion-euro abstraction and transfer scheme before leakage is reduced to best practice European benchmarks.

Demand management, conservation, and efficiency improvements should precede supply expansion. The documentation does not convincingly demonstrate that all feasible demand side measures have been maximised before resorting to major new abstraction infrastructure.

### **Failure to Adequately Assess Alternatives**

Planning and environmental law require that all reasonable alternatives be fully and transparently assessed. In this case, the alternatives analysis appears constrained and does not convincingly demonstrate that the proposed scheme is the least environmentally damaging or most sustainable option.

Alternatives that require more rigorous evaluation include:

- Regionalised water supply systems
- Enhanced interconnection of existing sources
- Phased capacity expansion
- Advanced treated wastewater reuse for industrial applications
- Aggressive leakage reduction targets prior to new abstraction
- Demand management through pricing and conservation incentives
- Upgrading and optimising existing treatment facilities

The principle of proportionality demands that infrastructure scale be matched to necessity. Instead, the current proposal represents a large scale, centralised intervention that may exceed realistic medium-term needs.

The documentation does not sufficiently demonstrate why smaller, modular, or phased solutions could not meet projected demand while significantly reducing environmental risk.

## **Environmental and Ecological Risks**

The project involves substantial abstraction from a major river system and extensive associated infrastructure. This raises serious concerns regarding:

- Alteration of natural flow regimes
- Impacts on fish populations and aquatic biodiversity
- Effects on protected habitats and species
- Cumulative impacts alongside other abstractions
- Reduced resilience during drought conditions

Ireland is already experiencing increased climate variability, including more frequent and prolonged dry periods. Climate change projections suggest increasing rainfall unpredictability and heightened risk of seasonal water stress.

Even where environmental flow thresholds are proposed, uncertainty remains regarding:

- The adequacy of modelling during extreme drought events
- The interaction of abstraction with climate induced flow reductions
- The long-term ecological resilience of the affected river system

Where scientific uncertainty exists in relation to potential ecological harm, the precautionary principle must apply. If reasonable scientific doubt remains as to whether adverse effects may occur, permission should not be granted.

The ecological consequences of over abstraction may not be immediately visible but could become irreversible over time.

## **Water Framework Directive Compliance**

Ireland has binding obligations under the Water Framework Directive to prevent deterioration of water bodies and to achieve or maintain good ecological status.

It is unclear whether:

- The abstraction risks deterioration of ecological status
- River basin management objectives are fully safeguarded
- Cumulative impacts with other licensed users have been adequately assessed
- Long-term abstraction under low flow scenarios has been stress-tested

Compliance with the Directive requires more than mitigation proposals; it requires demonstrable certainty that ecological objectives will not be compromised.

The burden of proof lies with the applicant to demonstrate no deterioration. That burden has not been conclusively discharged.

## **Climate Change and Carbon Considerations**

The project entails extensive civil engineering works, tunnelling, pipeline installation, treatment facilities, and long-distance pumping. These activities carry substantial embedded carbon costs.

Furthermore, operational energy demand over decades is likely to be significant due to:

- Pumping requirements
- Treatment processes
- Ongoing maintenance and system management

Ireland has legally binding climate targets under national and EU legislation. All major infrastructure must be consistent with the trajectory toward net zero emissions.

The application does not convincingly demonstrate

- A full lifecycle carbon assessment
- Alignment with carbon budgets
- Guaranteed integration of renewable energy at sufficient scale
- Comparison with lower energy decentralised alternatives

Centralised transfer schemes typically involve higher long-term energy consumption than distributed systems. In an era of decarbonisation and energy price volatility, long-term operational energy dependency presents strategic risk.

Climate adaptation must also be considered. Building a system reliant on consistent river flows may prove vulnerable under intensified drought patterns.

## **Financial Exposure and Economic Risk**

The proposed project represents a multibillion-euro investment with a long construction timeline and substantial risk of cost escalation.

Large infrastructure projects internationally frequently experience:

- Budget overruns
- Delays
- Contractual disputes
- Inflationary impacts
- Scope expansion

The documentation does not provide sufficient clarity regarding:

- Contingency provisions
- Risk sharing mechanisms
- Independent cost verification
- Long-term operational expenditure projections
- Sensitivity to energy price increases

Public funds are finite. The opportunity cost of allocating significant resources to a single centralised project must be considered in light of competing infrastructure priorities including housing, healthcare, transport, and climate adaptation.

Before committing to such expenditure, the Board must be satisfied that this is the most efficient and necessary use of public funds. That threshold has not been convincingly met.

## **Rural and Landowner Impacts**

The infrastructure footprint will directly affect rural communities across multiple counties.

Impacts include:

- Compulsory acquisition of land
- Disruption to agricultural operations
- Soil compaction and reduced productivity
- Construction noise and traffic
- Visual and landscape alteration
- Long-term sterilisation of land use

While mitigation and compensation mechanisms are proposed, they cannot fully offset the disruption to livelihoods and community character.

It is inequitable to impose substantial and long-term burdens on specific rural regions primarily to serve distant urban growth without clear evidence of necessity and proportionality.

Infrastructure planning must respect rural sustainability and avoid transferring urban growth pressures onto agricultural communities.

## **Infrastructure Centralisation and Systemic Risk**

The proposal reflects a highly centralised supply model, concentrating abstraction and distribution into a major inter regional scheme.

While regional interconnection can improve resilience, over centralisation creates systemic vulnerability. Risks include:

- Single point failure exposure
- Major outage consequences
- Increased security risks
- Reduced flexibility compared to modular systems

Modern infrastructure resilience strategies often favour distributed networks, redundancy through diversification, and modular capacity expansion.

This proposal moves in the opposite direction, increasing reliance on a single large-scale source and transfer system.

### **Procedural and Legal Concerns**

The Board must ensure full compliance with:

- The Planning and Development Acts
- Environmental Impact Assessment requirements
- Appropriate Assessment obligations
- Water Framework Directive standards
- Climate legislation

Particular concerns arise regarding:

- Whether all reasonable alternatives were genuinely examined
- Whether cumulative impacts have been fully assessed
- Whether climate compliance is sufficiently integrated
- Whether the Appropriate Assessment removes all reasonable scientific doubt

The precautionary principle is central to EU environmental law. Where doubt remains, consent must not be granted.

### **Strategic Timing and Lock in Risk**

Approving this project would commit the State to a centralised water model for generations.

However, the context in which this proposal was conceived is evolving:

- Leakage reduction programmes continue to progress
- Water reuse technologies are advancing rapidly
- Climate modelling is becoming more precise
- Urban planning models are shifting toward regional balance

Approving irreversible abstraction infrastructure now risks technological and strategic lock in.

A phased, adaptive approach, allowing measurable milestones in leakage reduction and demand management before major expansion, would be more consistent with sustainable development principles.

## **Precedent and Long-Term Environmental Stewardship**

Decisions of this scale set precedents for future infrastructure planning.

If large scale abstraction schemes are approved without exhaustive alternatives analysis and climate alignment, it risks normalising environmentally intensive solutions as default responses to growth projections.

Ireland's natural river systems are national assets. Their protection must not be subordinated to speculative long term demand forecasts.

Intergenerational equity requires that we preserve ecological integrity for future generations rather than prioritising short term expansion assumptions.

## **Summary of Key Objections**

In summary, permission should be refused for the following reasons:

1. Failure to demonstrate proportionate and evidence-based need.
2. Inadequate and constrained assessment of reasonable alternatives.
3. Significant unresolved ecological risk and uncertainty.
4. Insufficient assurance of compliance with Water Framework Directive obligations.
5. Substantial embedded and operational carbon implications inconsistent with climate targets.
6. Exposure to financial and cost escalation risk.
7. Disproportionate impacts on rural communities and landowners.
8. Over centralisation increasing systemic vulnerability.
9. Risk of irreversible strategic lock in.

## Conclusion

The security of Ireland's water supply is an important national objective. However, security must not come at the expense of environmental protection, fiscal prudence, climate responsibility, and sustainable planning principles.

The Proposed Water Supply Project for the Eastern and Midlands Region represent an infrastructure intervention of exceptional scale and consequence. Such a project demands the highest evidential standard and the clearest demonstration of necessity.

That standard has not been met.

For the reasons outlined in this submission, I respectfully request that An Coimisiún Pleanála refuse permission for Case Reference PA92.323980.

If the Board is not minded refusing permission outright, I submit that, at minimum, it must require:

- Independent review of demand projections
- Demonstrable leakage reduction benchmarks achieved prior to construction
- Strengthened ecological safeguards and environmental flow guarantees
- Comprehensive lifecycle carbon assessment and mitigation commitments
- Transparent and independently verified financial risk analysis
- Reassessment of decentralised and phased alternatives

The precautionary principle, sustainable development objectives, and Ireland's environmental obligations require no less.

Yours faithfully,

Joanne Skehan