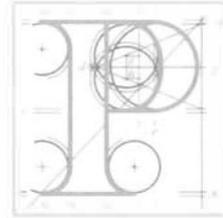


**Our Case Number:** ACP-323980-25

**Your Reference:** Melissa Anne Kenny



An  
Coimisiún  
Pleanála

Hodgins McKeever Solicitors  
11 Summerhill  
Nenagh  
Co. Tipperary  
E45 CR24

**Date:** 06 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 submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Commission will revert to you in due course in respect of this 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

PA09

Teil	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Riomhphost	Email	<a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a>

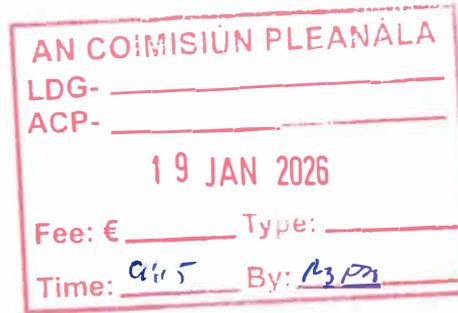
64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

# HODGINS MCKEEVER

## SOLICITORS LLP

### REGISTERED POST

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KEN003/0002/EMcK/MG

16th January 2026

YOUR REF:

OUR REF:

DATE:

**Re: Our client – Melissa Anne Kenny, Puckane, Nenagh, Co. Tipperary.  
Objection to Uisce Éireann Compulsory Purchase (Water Supply Project Eastern  
and Midlands region) Order 2025**

Dear Sir/Madam,

We confirm that we act on behalf of the abovenamed Melissa Anne Kenny. Our client is the owner of lands at Knocknacree, Cloughjordan, County Tipperary, comprised in Folios 24385 and 20048 of the register of freeholders County Tipperary. These lands are subject to the proposed Compulsory acquisition.

On behalf of our client we formally object to the proposed Compulsory Purchase Order on the following grounds:-

#### 1. **Environmental impact**

The proposed development poses a significant risk to the surrounding natural environment including water courses, habitats and protected species. The site is within a sensitive catchment and any malfunction or leakage from the facility could lead to a contamination of water sources resulting in long term ecological damage.

#### 2. **Negative impact on rural character.**

This area has been farmed by my client and her family for equine purposes for generations. Her father, Donald Swan, and her brother Charlie Swan, are well known in the equine business. Her father was a horse breeder. Her brother then took over the horse breeding business. He was a professional jockey and trainer and his son also hopes to take over the family business. Our client's land is close to her family's property at Modreeney, Cloughjordan, County Tipperary. The development will impact her access to the property and limit her access to the scenic beauty and tranquillity of her lands. The scale and nature of the proposed development are entirely inappropriate in this setting and will irreversibly alter the rural character of the area.

**3. Impact on local residents.**

Local residents will be adversely affected by noise, odour and potential health risks associated with the facility. Inadequate screening, buffer zones and mitigation measures have been proposed to protect the adjoining residents from these effects.

**4. Traffic and access issues.**

Construction operations and plant will significantly increase heavy vehicle traffic on local roads within the area around the development. These roads are not suited for such use. The property is located in a rural country area which would not be used to a huge volume of traffic or to disruption. This raises safety concerns for pedestrians, cyclists, local motorists and threatens the integrity of the road.

**5. Insufficient consultation.**

There has been inadequate engagement with the local community regarding this proposal.

**6. Alternative locations not adequately considered.**

We do not believe that an alternative more suitable location for the facility has been adequately considered.

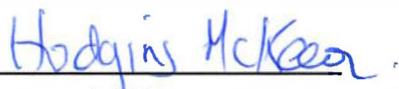
**7. Reduced land and farming complications.**

Our client's land, which are the subject of the Compulsory Purchase Order, form a very significant proportion of her and her family's overall equine enterprise and the proposed acquisition will have serious negative implications on this enterprise. These implications are not financial alone but also have significant environmental, social and personal impacts.

In conclusion we believe that the proposed development is not in the public interest, does not align with the principals of sustainable local development and fails to respect the character and rights of the local community. We respectfully urge An Coimisiún Pleanála to refuse the Compulsory Purchase Order and for Uisce Éireann to reconsider their position.

We would be grateful if you could acknowledge receipt of this letter.

Yours faithfully,

  
**Hodgins McKeever Solicitors LLP**

# HODGINS MCKEEVER

## SOLICITORS LLP

**REGISTERED POST**  
**An Coimisiún Pleanála**  
**64 Marlborough Street**  
**Rotunda**  
**Dublin 1.**  
**D01 VO92**

<b>AN COIMISIÚN PLEANÁLA</b>	
LDG- _____	
ACP- _____	
<b>17 FEB 2026</b>	
Fee: € _____	Type: _____
Time: <u>9:15</u>	By: <u>Reg post</u>

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W www.hmck.ie  
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KEN003/0002/EMcK/AM

16th February 2026

YOUR REF:

OUR REF:

DATE:

**Re: Our client – Melissa Anne Kenny, Puckane, Nenagh, Co. Tipperary.**  
**Objection to Uisce Éireann Compulsory Purchase (Water Supply Project Eastern and Midlands region) Order 2025**

Dear Sir/Madam,

We refer to the above and our previous correspondence to you, in particular to our letter dated 16<sup>th</sup> ult. We confirm that following further consultation with our client's other family members associated with the Equine Enterprise we wish to make the following further objections:-

**1. Nature and sensitivity of Equine Enterprise.**

The subject holding comprises approximately 41 acres supporting a carefully managed family equine enterprise with varying horse numbers on site at any one time, depending on the time of year and sales and purchasing activity. This is a highly sensitive activity requiring quiet conditions, safe and predictable movement routes and strict control of external disturbance. The proposed acquisition will directly either remove or impact all of the lands used in the Equine Enterprise. The potential impact is fundamentally at variance with the safe and sustainable operation of the equine facility.

**2. Horse welfare and risks (construction and operational phases)**

Horses, particularly young stock, are extremely sensitive to disturbance, unfamiliar activity, noise, machinery and visual stimuli. The construction operation of the scheme will involve:-

- Large machinery and ground disturbance
- Ongoing construction activity within the farm
- Repeated vehicle movements near horses



LAW SOCIETY  
OF IRELAND  
PRACTISING  
SOLICITORS

DUNCAN HODGINS | ELIZABETH MCKEEVER  
DUBLIN OFFICE: 35 MOLESWORTH STREET, DUBLIN 2



This creates a real and conceivable risk of injury, stress induced complications and behavioural incidents. Post construction the presence of the facility and access roads introduces ongoing risk including:-

- Spooking or flight responses
- Collision risk during high energy movement
- Loss of safe grazing and exercise areas

These are horse and animal welfare impacts that legally cannot be fully mitigated through standard construction methodologies and plans.

### **3. Disruption to farm access and internal movement**

The proposed access for the facility will potentially impact :-

- Horse movements
- Veterinary farrier and other support services

Any restriction, redirection or temporary closure of this access may create unacceptable safety risks and operation disruption in a setting where calm control of movement is essential.

### **4. Potential need for temporary removal of stock**

During construction it may be necessary to remove some or all horses from the affected lands for safety reasons. Removal of horses disrupts established routines, breeding cycles and welfare management. Bio security increase significantly when animals are moved off site. Suitable livery facilities may not be available at short notice and where available would be at a considerable cost. The need to displace horses at all is evidence that the proposed works are incompatible with the existing land use.

### **5. Failure to properly access site, specific impacts.**

While some environmental and technical assessments accompanied the application there is a clear failure to meaningfully access equine matters to include:-

Equine specific welfare and safety impacts, the operational realities of Equine Enterprise Management and the cumulative effect of disturbance across multiple grazing platforms.

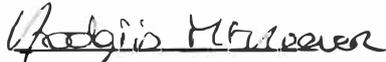
We believe this represents a material deficiency in the assessment of the proposal specific to our client's equine farm.

In conclusion it is our opinion that the proposed scheme will potentially result in serious and ongoing interference with an important equine operation, unacceptable risk to animal welfare and safety, disruption of safe access and operations.

For the above reasons the proposal as it relates to our client's land does not represent reasonable and sustainable development at this location and we would respectfully request An Coimisiún Pleanála to refuse to confirm this aspect of the scheme or alternatively require the adoption of a less intrusive site appropriate solution.

Can you please acknowledge safe receipt of the above.

Yours faithfully,



Hodgins McKeever Solicitors LLP