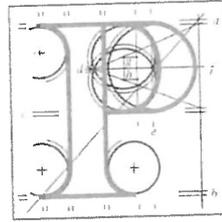


Our Case Number: ACP-323980-25

Your Reference: Michael McKeogh



An
Coimisiún
Pleanála

James O'Brien & Co
30 Castle Street
Nenagh
Co. Tipperary

Date: 20 February 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.

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

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AN COIMISIÚN PLEANÁLA	
LDG-	086715-26
ACP-	323980-25 (PA)
11 FEB 2026	
Fee: €	Type:
Time: 9:15	By: Reg post

Our Ref: MMcK.VS-MCM75/1

10th February 2026

RE: Objection to Uisce Éireann Planning Application (Proposed Water Supply Project, Eastern & Midlands Regions)
Our client: Michael McKeogh, Drombane, Ballina, Killaloe Post Office, Co. Tipperary, V94 R623

Dear Sir/Madam,

We wish to advise that we act on behalf of the above mentioned client, who is the owner of lands at Inchabeg, Ballina, Co. Tipperary, registered on Folio TY2819 and TY32282, being property over which part of this application is being proposed.

Under the proposed application our client's entire holding at Inchabeg comprising 18.245 hectares is proposed to be acquired to facilitate the proposed project. The lands form an integral and actively used component of our client's wider dairy enterprise, being utilised on an ongoing basis as an out-farm for the grazing and management of younger follow on livestock. The proposed acquisition would result in the permanent loss of this entire agricultural unit.

We formally object to the above mentioned planning application on behalf of our client on the following grounds:

1. Environmental Impact & Loss of Ecologically Valuable Land

The proposed development poses a significant risk to the surrounding natural environment, including nearby watercourses connected to the River Shannon catchment, as well as local habitats and protected species.

The subject lands are located within a sensitive catchment area and are characterised by established field boundaries, grassland habitats and semi-natural features that support a diverse range of flora and fauna, including birdlife and wildlife typical of undisturbed agricultural landscapes.

The proposed development will require extensive site clearance, excavation and land reprofiling. These construction activities will:

- a) Result in the permanent destruction of existing habitats;
- b) Disrupt established ecological networks;
- c) Eliminate land that has developed ecological value over time through careful low-intensity agricultural use.

Any malfunction, leakage or operational failure associated with the treatment plant presents a credible risk of contamination of soils and downstream watercourses, with the potential for long-term and irreversible ecological damage.

Once lost, these environmental attributes cannot be restored or adequately mitigated.

2. Inappropriate Development in a Rural Agricultural Setting

The scale, nature and industrial character of the proposed water treatment plant are entirely inappropriate in this rural location.

The development would irreversibly alter the established agricultural and rural character of the area, replacing open farmland with large-scale infrastructure that is visually intrusive and operationally incompatible with its surroundings.

The proposal represents a fundamental and permanent change in land use, inconsistent with the principles of sustainable rural development and the protection of agricultural landscapes.

3. Impact on Local Residents

Having regard to the scale of the proposed development in respect of the treatment plant, 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 not been proposed to protect residents from these effects.

4. Traffic, Access and Rural Road Safety

The construction and operation of the proposed treatment plant will generate a sustained increase in heavy goods vehicle traffic on local rural roads.

These roads are:

- a) Narrow and unsuitable for industrial traffic volumes;
- b) Used regularly by agricultural machinery, cyclists and pedestrians;
- c) Not designed to accommodate prolonged HGV usage.

The proposal raises serious concerns regarding road safety, traffic conflict, and the physical deterioration of the local road network, impacts which extend well beyond the application site.

5. Loss of Operational Agricultural Holding (Non Financial Impacts)

In order to facilitate the proposed project, 45 acres of land are proposed to be acquired from our client, which form a very significant and functional portion of our client's overall farm holding.

The proposed acquisition will:

- a) Remove an essential out-farm used for livestock management;
- b) Disrupt established grazing, animal welfare and herd management systems;
- c) Force a complete restructuring of the farming operation, with knock-on environmental impacts elsewhere on the holding.

These impacts are operational, environmental and social in nature, not purely financial. The permanent loss of this land undermines the sustainability of an existing agricultural enterprise that has been built up and managed responsibly over generations

6. Social and Generational Attachment to the Land

The subject lands have been farmed by our Client and his predecessors for generations. They form part of a lived rural environment and are central to the identity and daily working life of the landowner.

The proposed project would permanently sever this relationship and extinguish a family-farmed agricultural unit.

This social and generational impact, particularly in a rural area where land use, community and identity are intrinsically linked, cannot be underestimated.

7. Insufficient Public Consultation

There has been inadequate engagement with the local community regarding this proposed development and the effect it will have on the local community, having regard to the scale of the development.

8. Alternative Locations not adequately considered.

Our client does not believe that alternative, more suitable locations for the facility were adequately considered.

In conclusion, our client believes that the proposed development is not in the public interest, does not align with the principles of sustainable local development, and fails to respect the character and rights of the rural community. The proposed development, having regard to its scale in acquiring 45 acres from our client, has a disproportionate effect on our client as one individual farmer which cannot be compensated for in monetary value.

We would respectfully urge An Coimisiún Pleanála to refuse the planning application and for Uisce Éireann to reconsider the proposed development.

As our client is a landowner affected by the associated CPO application, the fee for objection does not apply in this case.

All correspondence in relation to this matter should be addressed to our office:

**James O'Brien & Co., LLP,
Solicitors,
30 Castle Street,
Nenagh,
Co. Tipperary E45 YW77.**

Yours faithfully,



Margaret McKeogh
JAMES O'BRIEN & CO. LLP
e-mail: mmckeogh@jamesobrien.ie