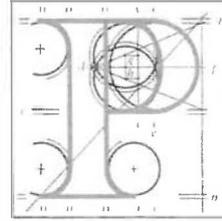


Our Case Number: ACP-323980-25

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Samuel Norris
Ballindoolin
Edenderry
Co. Kildare
R45 FC82

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

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1890 275 175
(01) 872 2684
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Submission to An Coimisiún Pleanála

Strategic Infrastructure Development Application — Case PA92

Water Supply Project Eastern & Midlands Region (Shannon Pipeline)

Name: Samuel Norris

Address: Ballindoolin, Edenderry, Kildare, R45FC82, Ireland

Email: Taupo@windowslive.com

Date: 25-02-26

1. Introduction

I wish to make a submission regarding the above Strategic Infrastructure Development application.

While recognising the importance of securing long-term water supply resilience for the Eastern and Midlands Region, I submit that significant concerns arise regarding:

- adequacy of alternatives assessment;
- proportionality of large-scale inter-basin abstraction;
- compliance with Directive 2000/60/EC (Water Framework Directive);
- Appropriate Assessment obligations under the Habitats Directive;
- cumulative hydrological modification of the Shannon system;
- climate resilience;
- and environmental and social impacts arising along the proposed pipeline corridor.

In particular, I submit that the application has not demonstrated that the proposed abstraction represents the least environmentally damaging or most proportionate solution available.

2. Failure to Adequately Assess Leakage Reduction and Network Renewal Alternatives

Projected supply deficits within the Greater Dublin Area form a central justification for the proposed development. However, significant non-revenue water losses continue to occur within the Dublin distribution network.

Accelerated investment in:

- leakage reduction;
- replacement of ageing pipe infrastructure; and
- network modernisation

represents a materially lower environmental impact alternative when compared with abstraction from another river basin.

The Environmental Impact Assessment documentation does not sufficiently demonstrate:

- the maximum achievable leakage reduction scenario;
- whether accelerated pipe replacement programmes could materially defer or eliminate the need for abstraction;
- or
- why demand reduction through infrastructure renewal cannot reasonably form the primary solution.

In circumstances where extensive environmental intervention across multiple counties is proposed, proportionality requires demonstration that lower impact alternatives have been exhausted.

3. Rainfall Availability and Local Supply Opportunities in the Dublin Region

The Greater Dublin Area receives substantial annual rainfall relative to many European cities.

The application documentation does not appear to sufficiently examine optimisation of local rainfall resources through:

- decentralised storage;
- aquifer recharge;
- reservoir expansion; or
- urban catchment retention measures.

Reliance upon abstraction from a separate river basin requires particularly strong justification where rainfall availability exists within the receiving catchment.

It remains unclear whether local water resource optimisation has been fully explored.

4. Demand Reduction Through Rainwater Harvesting and Greywater Reuse

Rainwater harvesting and greywater reuse systems for non-potable uses including:

- toilet flushing;
- garden irrigation;
- cleaning; and
- commercial processes

represent established international demand-management practices.

Such measures offer dual environmental benefits:

1. Reduction of potable water demand; and
2. Reduction of stormwater runoff entering combined sewer systems.

Reduced stormwater loading may reduce combined sewer overflow events and associated untreated wastewater discharges into Irish waterways.

The application does not adequately demonstrate why large-scale adoption of such measures could not materially offset projected demand growth.

5. Water Framework Directive — Risk of Ecological Deterioration

Directive 2000/60/EC requires Member States to prevent deterioration in the ecological status of water bodies.

The Shannon system already experiences significant hydromorphological modification.

Additional abstraction introduces risks including:

- reduced downstream ecological flows;
- altered sediment transport;
- temperature variation; and
- dissolved oxygen impacts.

Given existing pressures, even marginal reductions in flow may trigger deterioration thresholds.

Clarification is requested as to how deterioration risk has been assessed cumulatively rather than in isolation.

Where uncertainty exists, the precautionary principle should apply.

6. Appropriate Assessment — Integrity of European Sites

Downstream reaches of the River Shannon include designated Special Areas of Conservation supporting sensitive habitats and migratory species.

Article 6(3) of the Habitats Directive requires certainty beyond reasonable scientific doubt that adverse effects upon site integrity will not arise.

Baseline ecological conditions are already heavily modified.

Assessment must therefore consider impacts relative to existing ecological flow conditions rather than theoretical natural flows.

The evidential threshold should therefore be particularly high.

7. Existing Flow Modification and Interaction With Ardnacrusha Hydroelectric Operations

The Shannon flow regime at Parteen Basin is substantially regulated through diversion associated with hydroelectric generation infrastructure at Ardnacrusha.

This diversion significantly alters downstream hydrology.

The SAC downstream already experiences reduced natural flow conditions.

Additional abstraction risks compounding cumulative impacts upon:

- migratory fish species;
- wetland connectivity;
- sediment transport; and
- habitat resilience.

I respectfully request that the Commission examine:

- whether cumulative assessment reflects actual operational ecological flows; and
- whether existing diversion arrangements have been considered within baseline environmental assumptions in light of evolving European environmental regulatory standards.

8. Hydrological Modelling and Climate Variability

The proposed abstraction relies upon hydrological modelling assumptions relating to available flows within the Shannon system.

Increasing climate variability raises concerns regarding:

- extended drought scenarios;
- compound low-flow events; and
- altered seasonal rainfall distribution.

Clarification is requested regarding:

- whether multi-year drought conditions have been modelled; and
- whether abstraction remains sustainable under projected climate scenarios.

9. Migratory Fish and Estuarine Impacts

Hydrological alteration may affect:

- migration cues;
- spawning habitat accessibility; and
- juvenile survival conditions.

Reduced freshwater discharge may also alter downstream estuarine salinity balance and sediment transport.

Clarification is requested regarding assessment of low-flow abstraction impacts upon migratory species and estuarine ecology.

10. Emergency Drought Operation Risk

Large national infrastructure projects frequently operate beyond initial assumptions during emergency supply conditions.

Clarification is requested regarding:

- safeguards preventing increased abstraction during national drought emergencies; and
- environmental protections applicable during emergency operation.

11. Climate Adaptation and Strategic Infrastructure Risk

Reliance upon a single long-distance inter-basin transfer introduces systemic vulnerability.

Distributed resilience measures including:

- leakage reduction;
- rainfall utilisation;
- decentralised reuse systems; and
- demand management

provide adaptive flexibility.

Failure to adequately prioritise such measures risks long-term maladaptation.

12. Environmental and Social Impacts Along the Pipeline Corridor

The proposed pipeline traverses approximately 500 individual landholdings and properties.

While temporary construction impacts are acknowledged, concerns remain regarding cumulative human and environmental effects.

Landowner Impacts

Construction activities may result in:

- disruption to agricultural operations;
- temporary or permanent loss of productive land;
- drainage interference;
- soil compaction;
- and biosecurity risks associated with soil transfer.

The cumulative burden across hundreds of landowners should be proportionate and demonstrably necessary.

Environmental Disruption

Construction may involve:

- hedgerow removal;
- habitat fragmentation;
- disturbance of protected species; and
- alteration of local drainage patterns.

Temporary disturbance may result in permanent ecological change where reinstatement fails to replicate existing habitat quality.

Clarification is requested regarding long-term ecological monitoring commitments.

Community and Amenity Impacts

Affected lands may support:

- recreational walking routes;
- angling;

- equestrian use; and
- local amenity activities.

Extended construction periods risk disruption to established community use.

The Environmental Impact Assessment should demonstrate that cumulative impacts across the entire route have been assessed collectively rather than parcel by parcel.

Property Rights and Proportionality

Where compulsory acquisition or permanent easements are anticipated, proportionality must be carefully assessed. Clarification is requested regarding how extensive private land intervention has been evaluated in light of potentially lower impact alternatives such as demand reduction and leakage elimination.

13. Matters Requested for Determination by the Commission

I respectfully request that the Commission address:

1. Whether accelerated leakage reduction could materially defer or eliminate abstraction need.
2. Whether rainfall utilisation and decentralised reuse systems have been adequately assessed.
3. Whether compliance with Water Framework Directive no-deterioration obligations has been demonstrated cumulatively.
4. Whether Appropriate Assessment fully reflects existing modified ecological flows.
5. Whether climate-adjusted hydrological modelling reflects future drought scenarios.
6. Whether downstream estuarine impacts have been fully assessed.
7. Whether cumulative environmental and social impacts across approximately 500 affected properties have been adequately evaluated.

14. Conclusion

Significant concerns remain regarding:

- adequacy of alternatives assessment;
- proportionality of inter-basin abstraction;
- ecological impacts within an already modified river system;
- cumulative hydrological alteration;
- impacts upon landowners and communities; and
- long-term sustainability compared with decentralised demand management solutions.

I respectfully request that these matters receive detailed consideration prior to any determination.

Thank You

Samuel Norris