



## **Uisce Éireann's Water Supply Project, Eastern and Midlands Region - Public Consultation**

The Eastern and Midland Regional Assembly notes that Uisce Éireann has launched a public consultation on the Water Supply Project, Eastern and Midlands Region. This submission has been prepared by the executive of the Regional Assembly and approved by the Cathaoirleach of the Eastern and Midland Regional Assembly.

### **1.0 Overall Context**

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on driving regional development through the formulation, adoption and implementation of the Regional, Spatial and Economic Strategy (RSES), oversight and coordination of County Development Plans and Local Economic and Community Plans, management of EU Operational Programs, EU project participation, implementation of national economic policy, and additional functions working with the National Oversight and Audit Commission. As a strategic policy body, EMRA also participates in the consultation processes of other relevant strategic plans and policies.

The role and function of the Regional Assembly, including the scope of the RSES, is currently provided for in the Planning and Development Act 2000, as amended. It should be noted that this legislation has been superseded by the Planning and Development Act 2024, which was signed into law on 17<sup>th</sup> October 2024. However, the provisions of the Planning and Development Act 2024 have not commenced to date, and they will commence on a staged basis in the coming months. Until then, the provisions of the Planning and Development Act 2000, as amended, remain in force.

It is noted that the Planning and Development Act 2024 expands on the scope of the Regional Spatial and Economic Strategy and the functions of the Regional Assembly. In this respect, Section 29 (1) (i) of the Act states that an RSES shall make provision for the provision of services, including water services. Furthermore, Section 29 (13) of the Act states that an RSES shall include objectives to secure the effective implementation and monitoring of the RSES, including an indication and order of priorities for infrastructure of scale relating to water services; potential sources of funding for infrastructure; cross-sectoral investment and actions required to deliver planned growth and development; and co-ordination between constituent local authorities and the co-operation of public bodies.

## 2.0 Regional Spatial and Economic Strategy (RSES)

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region was made by the Members of the Assembly in June 2019, and it is a strategic plan and investment framework to shape future growth throughout the Region. The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of people and places in the Region, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision of the RSES is supported by 16 Regional Strategic Outcomes (RSOs), that are aligned with National Strategic Outcomes of the National Planning Framework (NPF) and framed around the 3 key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

A primary statutory objective of the RSES is to support the implementation of the National Planning Framework (NPF), alignment with the investment priorities of the National Development Plan 2021-2030 (and thus Project Ireland 2040), by coupling new development with the requisite investment in services and infrastructure. The RSES, as the succeeding tier of policy delivery in Ireland, is of critical importance for the delivery of Project Ireland 2040.

The RSES presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; securing Athlone, Drogheda and Dundalk as Regional Growth Centres, acting as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns (which include Swords, Maynooth, Bray, Navan, Naas, Wicklow, Longford, Mullingar, Tullamore and Portlaoise) that provide employment and services to their surrounding areas. All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places.

It is essential that decisions impacting on the water infrastructure within the Region reflect this Spatial Strategy and the settlement hierarchy presented, to allow managed and sustainable growth that enables each place fulfil ambition and potential.

## 3.0 Submission

The Regional Assembly welcomes this consultation with regard to Uisce Éireann's Water Supply Project, Eastern and Midlands Region, the objective of which is to provide a new supply to address the projected need for drinking water and increase the reliability of supplies in the Eastern and Midland Region. The proposed project consists of an abstraction from Parteen Basin on the Lower River Shannon in County Tipperary, a new 172km pipeline, five associated infrastructure sites, a Flow Control Valve and other ancillary infrastructure to treat the raw water to drinking water standard and transfer it to a new reservoir at Peamount in County Dublin. The proposed project will traverse the administrative area of six local authorities including Offaly County Council, Kildare County Council and

South Dublin County Council in the Eastern and Midland Region.

Uisce Éireann has set out the need for the proposed project as follows:

1. **Population growth needs:** The population of the Eastern and Midland Region is expected to grow by 26% by 2044, increasing demand for water services. The 'Housing for All' strategy relies upon water services infrastructure and capacity being available to meet requirements.
2. **Economic growth needs:** FDI alone is expected to grow by 73% in the Greater Dublin Area between 2019 and 2050.
3. **Climate Change:** There have already been water restrictions as a result of drought conditions in recent years. The impacts of climate change are now clearly in evidence and are expected to increase in the years to come. Extreme weather including droughts and intense rainfall will affect both the availability and quality of water sources.

The Assembly welcomes the aims and objectives of the proposed project which Uisce Éireann has set out as follows:

- Provide a sustainable water supply from a New Shannon Source.
- Address critical supply issues in the Greater Dublin Area with provision for future supplies to multiple Water Resource Zones in the Region.
- Increase resilience of supplies and levels of service.
- Deliver a flexible, future-proofed solution that is responsive to change.

This submission is structured to set out the Strategic Investment Priorities of the Eastern and Midland Region and the Dublin Metropolitan Area, as they relate to water supply and water infrastructure for the Region and focusses on the key concerns detailed in the consultation documents including population growth, economic growth, climate change and biodiversity and natural heritage.

### 3.1 Strategic Investment Priorities of the Eastern and Midland Region

The RSES identifies that the sustainable growth of the Region requires the provision of water services and infrastructure in a plan-led manner to ensure that there is adequate capacity to support future development. High-quality infrastructure is an important element of a modern society and economy, it provides essential functions and services that support societal, economic and environmental systems at local, regional and national levels.

The overarching guiding principle for water in the Region is the protection, improvement and sustainable management of the water resource, as identified in the RSES Environmental Report. The strategic environmental objectives which have informed the sixteen RSOs of the RSES and which remain priorities for the Region include:

- Ensure that the status of water bodies is protected, maintained and improved in line with the requirements of the Water Framework Directive and Marine Strategy Framework Directive.
- Ensure that economic growth of the marine resource and its ecosystems are managed sustainably.

- Ensure water resources are sustainably managed to deliver proposed regional growth targets in the context of existing and projected water supply and wastewater capacity constraints ensuring the protection of receiving environments.
- Avoid inappropriate development in areas at risk of flooding and areas that are vulnerable to current and future erosion, particularly coastal areas.
- Integrate sustainable water management solutions (such as SuDS, porous surfacing and green roofs) into development proposals.

Chapter 10 of the RSES sets out the strategic water investment priorities for the Eastern and Midland Region, noting that water supply for the wider Dublin area is at critical levels of demand, and to facilitate further growth in line with NPF population growth projections, the prioritisation of water supply investment for the Eastern and Midland Region should occur. In this respect, Regional Policy Objective (RPO) 10.2 of the RSES states that EMRA supports the delivery of the strategic water services projects which are included in Project Ireland 2040 to provide for planned development and maintain and improve existing services. In this respect, Table 10.1 of the RSES includes the Water Supply Project for the Eastern and Midlands Region to supply water to the Greater Dublin Area and other communities in the Eastern and Midlands Region as a strategic water service project.

The RSES states that the Water Supply Project for the Eastern and Midlands Region is required to ensure that sufficient treated water is available to meet the long-term water supply needs of the Region, to provide for projected growth in the medium to long term (up to 2050) and contribute to resilience and security of supply in the Region. Further to this, the RSES also states that Uisce Éireann will need to consider contingency plans to address any potential delays in the delivery of projects to ensure resilience of water supply for the Eastern and Midland Region. Furthermore, Chapter 7 of the RSES details the priorities in relation to protecting the environment and climate action. Uisce Éireann is directed to the Regional Policy Objectives (RPOs) set out in the RSES which support the sustainable management of water resources to ensure a healthy society, economic development requirements and a cleaner environment for the Eastern and Midland Region.

The Dublin Metropolitan Area Strategic Plan (MASP) which forms part of the RSES provides a strategic planning and investment framework for the Dublin metropolitan area. The MASP is an integrated land use and transportation strategy for the Dublin Metropolitan Area that sets out:

- A vision for the future growth of the metropolitan area and key growth enablers, identifying strategic corridors based on their capacity to achieve compact sustainable and sequential growth along key public transport corridors, existing and planned;
- Large scale strategic residential, employment and regeneration development opportunities and any infrastructure deficits or constraints that need to be addressed, and;
- A sequence of infrastructure priorities to promote greater co-ordination between local authorities, public transport and infrastructure providers for the phased delivery of sites.

A key aim of the MASP is to unlock the development capacity of strategic development areas within the metropolitan area by identifying the sequencing of enabling infrastructure and by directing the cross sectoral investment required to deliver development. In addition to transport investment priorities, which are set out in the MASP, it is noted that the Dublin metropolitan area is experiencing capacity issues in relation to both water and wastewater infrastructure.

Further to this, the Water Supply Project for the Eastern and Midlands Region is specifically identified as a project which is ongoing to deliver capacity at a large scale to the metropolitan area. The MASP states that it is critical that the timelines for delivery of these projects are aligned with the phased delivery of strategic development areas set out in the MASP.

### 3.2 Population growth

As outlined in Uisce Éireann's consultation documents for the Water Supply Project, Eastern and Midlands Region, the proposed project is intended to address a deficit in water supply and provide resilience in supply in the context of a growing population and the demand for housing in the Region. The proposed infrastructure project is designed to have capacity to meet water supply needs of 50% of Ireland's population into the medium to long-term and will provide a new water supply to the Greater Dublin Area while also redistributing the water supply to other communities in the east of the country.

The Assembly welcomes the objective of the proposed project to deliver safe secure water supply necessary to support the growing population and economy and also accommodating future housing demand in the Region. As outlined in the RSES, Ireland's natural and environmental resources such as water sources are critical to environmental wellbeing, and the wellbeing of the Region, into the future. Of the sixteen RSOs of the RSES, RSO 4 'Healthy Communities' is to protect and enhance the quality of our built and natural environment, to ensure clean air and water for all and quality services that support human health, which is central to the RSES key principle of Healthy Placemaking.

As identified in the RSES, the provision of a sufficient and resilient water supply is critical to accommodate future population growth. In this regard, the RSES supports the delivery of strategic water services projects to upgrade the existing water infrastructure, as outlined in RPO 10.2. Furthermore, RPO 5.1 of the Dublin MASP supports continued collaboration between infrastructure providers, state agencies and local authorities in the metropolitan area to inform cross sectoral investment plans and capital spending plans to accelerate the development of strategic development areas and secure the best use of public lands in the Dublin Metropolitan Area.

The Assembly welcomes the inclusion of proposed take off points as part of the project design within Uisce Éireann's consultation documents which allow for future connections into the Water Supply Area. Image 3.2 in the project summary report provides a clear overview of the location of the pipeline

and take off points and potential future connections that could be delivered within the Water Supply Area. The Assembly considers that the proposed project aligns with the RSES settlement hierarchy which will allow managed and sustainable growth that enables each place fulfil its ambition and potential.

## 2.2 Economic growth

The RSES presents a spatial strategy, devised and informed by a complementary economic strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. One of the key drivers of the strategy is to deliver sustainable and balanced economic growth across the Region.

The Assembly considers that the proposed project will facilitate economic development throughout the Region and will support balanced regional development within the Eastern and Midland Region through the redirection of water supply to counties Louth, Meath, Wicklow and Kildare and will have the capacity to serve communities in counties Offaly and Westmeath. Additionally, the project is designed with capacity for future connections across the Midlands and the Assembly would welcome further engagement in relation to future connections in the EMRA region.

As highlighted in Uisce Éireann's project summary report, the delivery of the proposed project will supply modern, efficient and sustainable water supply infrastructure that will encourage and enhance the needs of existing and future businesses. In turn, the proposed infrastructure project will create local employment during the construction phase and upon operation of the development and is regarded as a beneficial impact from the development.

The Assembly welcomes the incorporation of a circular economy strategy as part of the project design with the aim of 70% of waste from excavation being used in the construction and operation of the project. In this respect RSO 7 of the RSES is concerned with the conservation and enhancement of the water resources in the Region to ensure clean water supply, adequate wastewater treatment and to realise the benefits of the circular economy. Sustainable water management practices such as adopting circular economy systems can assist in meeting obligations under the Water Framework Directive and climate adaptation.

## 2.3 Climate Change

Climate Action is one of the three key principles of the RSES, and the Climate Strategy of the RSES aims to ensure that the RSES drives climate resilience throughout the Region and accelerates climate action. RSO 8, 'Build Climate Resilience', of the RSES seeks to ensure the long-term management of flood risk and building resilience to increased risks of extreme weather events, changes in sea level and patterns of coastal erosion to protect property, critical infrastructure and food security in the Region.

Furthermore, RSO 9 of the RSES, to 'Support the Transition to Low Carbon and Clean Energy', is concerned with pursuing climate mitigation in line with global and national targets and harnessing the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050. Climate focused RPOs are also integrated throughout the RSES and include priorities related to the built environment, sustainable transport, energy and waste, flood resilience and water, and green infrastructure and ecosystem services.

Chapter 7 of the RSES sets out the importance of the environment and climate, and RPOs in the chapter focus on climate resilience, which overlap with improving water quality and conserving water supply. Water supply is regarded as critical infrastructure and one that should be resilient to future hazards and threats, both man-made and natural and to the impacts of climate change.

As set out in Uisce Éireann's project summary report, one of the objectives of the proposed project is to adapt to the effects of climate change by diversifying the water supply sources in the Eastern and Midlands Region. Currently the region is heavily dependent on a single water source which results in limited resilience. The Assembly welcomes the strategic nature of the proposed project which has been designed to adapt to climate change and provide water infrastructure ensuring that the population will have access to safe, secure, and resilient water supply.

RPO 7.43 of the RSES states that Climate Action Regional Offices (CAROs) and local authorities should identify critical infrastructure within their functional areas, particularly the interdependencies between different types of sectoral infrastructure, as a first step in 'future proofing' services and to help to inform longer-term adaptation planning and investment priorities. The Assembly recommends that Uisce Éireann should ensure engagement with the CAROs and local authorities to support this objective.

The RSES promotes best practice in resilience in critical infrastructure, including implementation of emerging European best practice and the identification of risks and vulnerabilities to key infrastructure to build organisational capacity and structures that can respond and adapt to external shocks. The Assembly recommends that Uisce Éireann follows best practice in this regard.

The Assembly welcomes a whole-life carbon management approach in the design and operation of the project as outlined in Uisce Éireann's project summary report. The Assembly further notes the inclusion of a lifecycle assessment and a commitment to the procurement of low carbon/sustainable materials as part of the detailed design. Notwithstanding, the Assembly notes that the project will result in a significant amount of embodied carbon being emitted during construction and operation by treating and pumping water. The Assembly considers that, in line with international best practice, viable alternative options to inform the most sustainable approach to the Water Supply Project in the Eastern and Midlands Region are identified, including assessments of the climate impacts from the

construction and operational phases of the project. Furthermore, the need for appropriate adaptation or climate proofing measures is considered necessary and should be comprehensive.

## **2.4 Biodiversity and Natural Heritage**

RSO 11 of the RSES, 'Biodiversity and Natural Heritage', aims to promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species, including landscape and heritage protection. RSO 10 of the RSES 'Enhanced Green Infrastructure' aims to identify, protect and enhance Green Infrastructure and ecosystem services in the Region and promote the sustainable management of strategic natural assets such as coastlines, farmlands, peatlands, uplands, woodlands and wetlands.

The Assembly notes that the proposed location for the Raw Water Intake and Pumping Station is located in a Special Area of Conservation (SAC) within the catchment of the River Shannon. As noted in the RSES, the River Shannon Corridor is a key resources and tourism asset. Additionally, any development within the Shannon River catchment, or which impacts any SAC, should ensure biodiversity protection is a core objective. Any impact on the habitats could result in biodiversity and environmental impacts along with impacts on the quality of life of residents and visitors to the Region.

As set out in the RSES, the Regional Assembly recognises the impact of water quality on the environment and human health. In this regard the Water Framework Directive Assessment for the project should detail any changes to the waterbodies impacted by the proposed development. Furthermore, the Assembly recognises the proposed development will impact human environments; biodiversity and landscape; surface water, groundwater, geology and soils, and; cultural heritage and supports the engagement by Uisce Éireann with relevant stakeholders in this regard.

## **3.0 EIAR Scoping Methodology Report**

An Environmental Impact Assessment Report (EIAR) scoping methodology report is included in Uisce Éireann's project summary report. The Assembly notes the Scoping Methodology Report was issued to stakeholders in November 2023 for consultation and to seek agreement on the proposed scope and methodology in advance of the EIAR being produced. An EIAR should be prepared in accordance with the Environmental Protection Agency Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (2022), as well as applicable European, national, and topic specific legislation, guidance and policy.

Further to this, the project summary report notes that environmental reports, including an EIAR, and Natura Impact Statement (NIS) and a Water Framework Directive Compliance assessment report will be submitted with the planning application for the proposed project, which is welcomed by the Assembly.



#### 4.0 Recommendations and Observations

The Regional Assembly advises Uisce Éireann to pay particular attention to the following issues in the finalisation of the Water Supply Project, Eastern and Midlands Region, in order to ensure consistency with the RSES and makes the following recommendations:

1. The timeline for delivery of the Water Supply Project for the Eastern and Midlands Region should align with the phased delivery of strategic development areas set out in the Dublin Metropolitan Strategic Plan (MASP).  
Reason: To ensure consistency with the policies and objectives of the Dublin MASP and the RSES.
2. Ongoing collaboration should continue between infrastructure providers, state agencies and local authorities in the Dublin Metropolitan Area to inform cross sectoral investment plans and capital spending plans relevant to the Water Supply Project for the Eastern and Midlands Region.  
Reason: To accelerate the development of strategic development areas and secure the best use of public lands in the Dublin Metropolitan Area in line with the Dublin MASP, and in line with RPO 5.1 of the RSES.
3. Uisce Éireann should ensure engagement with the CAROs and local authorities to identify critical infrastructure within their functional areas, particularly the interdependencies between different types of sectoral infrastructure of which the Water Supply Project for the Eastern and Midlands Region is a key element.  
Reason: To ensure consistency with RPO 7.43 of the RSES and as a first step in 'future proofing' services and to help to inform longer-term adaptation planning and investment priorities.

The following are observations by the Regional Assembly that should be taken into consideration in the finalisation of the Water Supply Project, Eastern and Midlands Region in the interest of best practice:

1. Uisce Éireann should endeavour to follow best practice in resilience in critical infrastructure, including implementation of emerging European best practice, and the identification of risks and vulnerabilities to key infrastructure to build organisational capacity and structures that can respond and adapt to external shocks.  
Reason: In the interest of best practice.
2. In line with international best practice, Uisce Éireann should identify viable alternative options to inform the most sustainable approach to the Water Supply Project in the Eastern and

Midlands Region, including assessments of the climate impacts from the construction and operational phases of the project.

Reason: In the interest of best practice.

3. Appropriate and comprehensive climate adaptation or climate proofing measures should be applied to the Water Supply Project in the Eastern and Midlands Region.

Reason: In the interest of best practice.

4. Any development within the River Shannon Corridor and catchment, or impacting any Special Area of Conservation (SAC), should ensure biodiversity protection is a core objective.

Reason: In the interest of best practice.

5. The Water Framework Directive Assessment for the project should detail any changes to the waterbodies impacted by the proposed development.

Reason: In the interest of best practice.

6. Uisce Éireann should continue to engage with relevant stakeholders regarding the impact the proposed project will have on human environments; biodiversity and landscape; surface water, groundwater, geology and soils, and; cultural heritage.

Reason: In the interest of best practice.

7. The EIAR should be prepared in accordance with the Environmental Protection Agency Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (2022), as well as applicable European, national, and topic specific legislation, guidance and policy.

Reason: In the interest of best practice.

## 5.0 Conclusion

The Eastern and Midland Regional Assembly would like to acknowledge the extensive work that Uisce Éireann has carried out in relation to the proposed Water Supply Project Eastern and Midlands Region to date and welcomes the opportunity to participate in the public consultation. The Assembly considers the aims and objectives of the Eastern and Midlands Water Supply Project to be consistent with the policies and objectives of the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031.

The Assembly looks forward to continued engagement with Uisce Éireann in the development and delivery of this strategic water service project.

Regards,



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Clare Bannon  
A/Director  
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4<sup>th</sup> March 2025