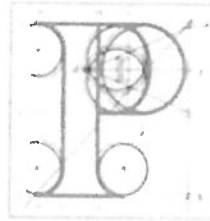


Our Case Number: ACP-323980-25



An
Coimisiún
Pleanála

Christopher Campion
Brightwater
Derrycastle
Ballina Killaloe
Co. Tipperary
V94 C6X2

Date: 04 August 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 a copy of all submissions/observations received in relation to the application will be made available for inspection on the Commission's website at the following link:

<https://www.pleanala.ie/en-ie/case/323980>.

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
Glao Áitiúil
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Ríomhphost

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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Eimear Reilly

From: Eimear Reilly
Sent: Friday 24 July 2026 12:26
To: ccmc8888@hotmail.com
Subject: RE: Case ACP-323980-25 your letter 24 June 2026 requesting submissions or observations on Proposed Water Supply Project

Good afternoon Chris

The Commission acknowledges receipt of your email and confirms receipt of your submission which was received by email and by the Commission's online portal (SID-OBS-005777).

A formal acknowledgement will issue by post in due course, and a refund will be issued to the credit or debit card used to make the online payment.

Kind regards
Eimear Reilly

From: LAPS <laps@pleanala.ie>
Sent: Tuesday 21 July 2026 09:08
To: Eimear Reilly <e.reilly@pleanala.ie>
Subject: FW: Case ACP-323980-25 your letter 24 June 2026 requesting submissions or observations on Proposed Water Supply Project

From: chris c <ccmc8888@hotmail.com>
Sent: Monday 20 July 2026 14:55
To: LAPS <laps@pleanala.ie>
Subject: Re: Case ACP-323980-25 your letter 24 June 2026 requesting submissions or observations on Proposed Water Supply Project

You don't often get email from ccmc8888@hotmail.com. [Learn why this is important](#)

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir/Madam,

PLEASE CONFIRM RECEIPT OF THE EMAIL BELOW SENT TO YOU ON FRIDAY 17TH JULY, ESPECIALLY THAT YOU HAVE RECEIVED THE ATTACHED PDF FILE.

I ATTACH THE PDF FILE ONCE AGAIN TO THIS EMAIL, NOW.

THANK YOU
KIND REGARDS
CHRISTOPHER CAMPION

From: chris c <ccmc8888@hotmail.com>

Sent: Friday, July 17, 2026 3:13 PM

To: LAPS <laps@pleanala.ie>

Subject: Re: Case ACP-323980-25 your letter 24 June 2026 requesting submissions or observations on Proposed Water Supply Project

Good afternoon,

Further to your email below suggesting I send observations on this case to you at the laps@pleanala.ie email address,

Please find my submission herewith attached as a .pdf file , dated today 17th July 2026.

Please kindly confirm receipt and that you are able to open the file in the required format.

Please also let me know if any fee is in fact payable, or there are any other issues obstructing An Coimisiun Pleanala acceptance and consideration of my submission today.

With my kindest regards
Christopher Campion

From: LAPS <laps@pleanala.ie>

Sent: Monday, July 13, 2026 11:44 AM

To: chris c <ccmc8888@hotmail.com>

Subject: RE: Case ACP-323980-25 your letter 24 June 2026 requesting submissions or observations on Proposed Water Supply Project

Good morning Christopher

As there is no fee for making a further submission in relation to this case, you may submit your observation/submission by email to laps@pleanala.ie, or by hand/post to the offices of the Commission.

Please do not use the Commission's submission portal on the website.

Kind regards

Eimear

From: chris c <ccmc8888@hotmail.com>

Sent: Friday 10 July 2026 21:28

To: LAPS <laps@pleanala.ie>

Subject: Case ACP-323980-25 your letter 24 June 2026 requesting submissions or observations on Proposed Water Supply Project

You don't often get email from ccmc8888@hotmail.com. [Learn why this is important](#)

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear M Reilly

Please advise if the requested submissions or observations may be submitted electronically, rather than by post?

If so, please advise if we should use the Third Party Appeal portal on the ACP website? If not, please advise the portal or link for transmission of these submissions.

Please also advise if a fee is payable?

I would greatly appreciate your response by return,

Yours sincerely

Christopher Campion



An
Coimisiún
Pleanála

SID Online Observation

Online Reference
SID-OBS-005777

Online Observation Details

Contact Name
christopher campion

Lodgement Date
19/07/2026 18:29:57

Case Number / Description
323980

Payment Details

Payment Method
Online Payment

Cardholder Name
christopher campion

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€50.00

Lodgement No

LDG- 089439-26

Reason for Refund

No fee required

Documents Returned to Observer

☐ Yes ☒ No

Request Emailed to Senior Executive Officer for Approval

☒ Yes ☐ No

Signed

EO

Date

24/07/26

Finance Section

Payment Reference

ch_3TuyXJB1CW0EN5FC1iys9N8d

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

Case Number ACP-323980-25

Proposed Water Supply Project from the Eastern and Midlands Region in the counties of Clare, Limerick, Tipperary, Offaly, Kildare and Dublin.

This is a Submission dated 16 July 2026 by
Christopher Campion
of
Brightwater
Derrycastle
Ballina Killaloe
V94C6X2
County Tipperary

In respect of

An Coimisiún Pleanála (ACP) letter dated 24 June 2026 inviting further submissions and observations related to the above project.

The further observations and responses herebelow, refer to the Responses Report prepared by WSP on behalf of Uisce Éireann (UE) to initial submissions dated 6 May 2026, comprising some 585 pages. (The RtS report)

Following the paragraph numbering system used in the 585 page report of 06 May 2026: Throughout this submission, quotes from the RtS report are in *italics*, and the pertinent points raised are stressed in **bold**.

For the record:

I recognise and support UE's mission to provide a stable and resilient water supply.

But,

I do not accept that the process undertaken so far has produced a best-solution, or even a good solution, for the Irish State and Public, for the future. As it is currently configured, the applicant's project will also be in breach of EU Habitats directives, and hence it requires reconfiguration.

1. Pre-occupation with a single-solution project.

It is apparent there is momentum within government and UE to now pursue this single proposed pipeline solution and forbid or quash any alternative considerations, by reasoning that other alternatives have been considered and discarded already.

This is a complex topic with many aspects to be considered. The project is intended to serve the public, and will be paid for by the public. Therefore the public has to see that all aspects have been considered fairly and transparently, and the rationale behind decisions, or the selection of preferences, follows legal protocol and is properly explained.

A robust and worthy plan must also allow for inclusion of new considerations as they arise, new legislation, technology, and a changing climate and environment, and not just plough ahead with a single narrow-minded focus.

2. Data centre demand not included

The rapidly increasing demand for water from Data Centres was probably not a sufficiently major factor in the RWRP or NWRP when they were compiled. But once these centres are built, their ongoing requirements for power and water will be incontestable.

Nobody in public service has the authority to divert a significant portion of a Public Good (potable water) to commercial applications, when it is obviously going to be to the detriment of the general public.

3. UE rejection of submissions without substantial argument.

The UE responses throughout the RtS report to initial Submissions has a repeating theme of 'not agreeing with....' the assertion of a submission, on the grounds that they "...had been previously considered by UE and rejected by UE", and therefore are now past the point of reconsideration.

This does not demonstrate respect for the submissions process. Those making submissions are trying to be constructive.

Example: submissions contested there are multiple alternative water sources obtainable at lower cost, lower environmental impact, and greater resilience, therefore the current project should be reconsidered or reconfigured.

As the UE cost estimate for this project has ballooned from less than €1 billion to somewhere around €5-6 billion (and MPAG estimates over €10 billion), the appeal of previously-rejected 'expensive' options must be reconsidered through fresh eyes.

As no cost-benefit analysis of reasonable alternatives has been presented to the public domain by UE, it is hard to take the blanket rejection of alternatives seriously.

UE responded that the alternatives were "already considered and rejected by the NWRP", and that the one best solution has been selected, and therefore no re-consideration is now necessary.

This reply does not demonstrate a serious or constructive consideration of 'reasonable alternatives'.

My contention is that the reasonable alternatives were NOT fully considered, or disclosed, in that no publicly disclosed cost-benefit analysis has been published to demonstrate just how close to viable they may be, for a fraction of the projected cost of this proposed pipeline.

The claim that this pipeline will return €10 for every €1 spent is appealing marketing, but there is no supporting information on how this magnificent figure was reached.

UE is pursuing and promoting a narrow 'single-bullet solution'.

All the eggs in one very expensive basket.

4. Proposed project is not at all 'resilient'.

Throughout the RtS report UE repeatedly use the word 'resilience'.

e.g UE state that the current supply to Dublin *"lacks resilience by depending on a single source: the River Liffey"* (see sec. 359).

Using EU documentation as a reference, Resilience in the context of water supply means having **multiple diverse and dispersed sources, the failure of any one of which would Not be critical to the supply system.**

The proposed project **absolutely lacks resilience**, as it depends on supply from one river, the Shannon. The text below will illustrate again, that while the Shannon is a large river in the Irish context, it does have droughts, sometimes for extended periods, and these are forecasted to worsen.

A pipeline of this magnitude becomes a **critical entity in the context of the EU Water Resilience Strategy, and is as such, vulnerable, not resilient.**

The EU guidelines on Water Resilience advocate reducing dependance on critical entities, rather than building more of them. (See European Commission Com(2025) 280 dated 4.6.2025),

5. Threats and risks demonstrate vulnerability

If any one of:-

- a single major untreatable pollution event,
- a prolonged drought,
- a major power or pump failure,
- a rupture of pipework,

a failure of Ardnacrusha dam or Parteen weir requiring lowering of water levels (as has happened in the past), or malicious activity..... occurred, that would bring to a halt the so-called 'resilient' pipeline supply from the Shannon.

Any one of these scenarios are possible, within the operational lifetime of the pipeline.

History is full of examples of catastrophes that were previously thought impossible..... Covid, Bird Flu, Fukushima etc.

6. Prolonged droughts

The longer a drought persists, the longer it takes, after rain begins to fall, for water tables and catchment sources to return to normal. This cannot be measured or forecasted in neat m3/s. We are truly at the mercy of rapidly changing weather patterns.

Despite their best efforts and intentions, climate change scientists and modellers have NOT been able to accurately predict the rate of deterioration, or localised impacts for floods, droughts and other extreme weather phenomena, for the next few years, never mind the next 100. Broad projections gain some traction, but nobody can predict the future rainfall patterns over the relatively small Shannon catchment.

As an example, CapeTown in South Africa has several large storage reservoirs that ran almost dry (down to just 13% of capacity) causing critical rationing and shortages to the city, when unusual weather patterns caused a record unexpected drought which lasted 3 years, starting in 2015.

In news this week, flows in several major rivers in France have dwindled with corresponding rise in temperature, forcing the partial or complete shutdown of several nuclear power stations due to lack of cooling water.

And as Ireland is now experiencing in mid July, the beginnings of what may evolve into a serious drought, the ramifications of which will become felt through August and onwards.

7. Alternative, feasible, sources

In RtS para. 365....

"UE does not agree there are suitable alternative sources of water available".

And

".....therefore, the reasonable alternatives considered in respect of the Proposed Project did not include alternative sources".

Yet, confusingly, in para. 368 UE profess to have "assessed over 1,100 unconstrained options, narrowing them to '**594 feasible alternatives**' including groundwater, reservoirs, and transfer schemes."

The UE use of the word '**feasible**' is key: **Feasible means viable to some degree, and therefore to be considered a valid option.**

Given the lack of resilience of the proposed project, UE must now examine truly resilient solutions, such as a matrix of multiple boreholes across the aquifers of Kildare, fully reconfiguring Poulaphouca reservoir for drinking water supply and not for electricity generation, and installing multiple abstraction points on several other rivers local to Dublin (including perhaps a smaller environmentally-tolerable abstraction from Lough Ree), which can be selected from and varied according to available flow and demand.

No doubt many of the above mentioned "594 feasible options" could be brought into play. After all the narrowing down from 1,100 to 594, surely there must have been 100 or so that warrant further serious consideration?

8A. Lough Ree abstraction not resilient, (risk of ecological damage) (UE's words)

In examining other options for supply, in the UE response to alternative sources para. 372 stated as follows:

372. Abstractions from Lough Ree for the GDA were considered in the Regional Water Resources Plan -

*Eastern Midlands Plan. However as noted in the Eastern and Midlands Plan on review of the water available for abstraction it was noted that the ESB minimum normal operation levels for the Shannon at Lough Ree were not maintained during the 1995 drought without an abstraction. Any abstraction at this location would therefore **not be resilient**, as the yield is not available and would likely have a **negative environmental impact**. Therefore, this option did not meet the requirements of the Environmental Resilience or Deliverability criteria and was not progressed to the fine screening stage.*

So UE admit in para.372 that water levels for the Shannon at Lough Ree were insufficient to support proposed abstraction and would cause a negative environmental impact, and the option to abstract at Lough Ree was therefore discarded.

Was the Cost benefit of reducing the pipeline length by 50 km considered?

What about a smaller abstraction from Lough Ree, combined with other available sources mentioned above?

UE are pursuing an overly simplistic, single-solution to the supply challenge. Circumstances demand that UE construct a robust and truly resilient solution from multiple sources, (one component of which could be a small abstraction from Lough Ree that does not affect the aquatic ecology).

Lough Ree is only 55km upstream of Lough Derg. Only two streams of significant flow (Rivers Inny and Suck) join and add to the flow of the Shannon. There are several other minor streams that contribute to the total flow through Lough Derg.

Therefore there is only a minor increase in available flow (especially in the summer) by the time the Shannon from Lough Ree reaches Parteen.

This additional flow is mostly negated by evaporation and transpiration from the 100km² or more of Lough Derg.

And

8B. Lough Derg abstraction not resilient, (risk of ecological damage) (UE's words)

UE response in sec 401 states

*401. An abstraction from Lough Derg was considered in the Regional Water Resources Plan - Eastern Midlands Plan. However, it was discounted as the option was determined to have a **high likelihood of significant impact on the aquatic ecology of the Lough**. The Regional Water Resources Plan also considered abstraction from Lough Ree, but as set out in Section 5.2.2 of this report, that option was also discounted.*

So abstracting from the studied locations in Lough Derg were rejected due to impacting the 'aquatic ecology of Lough Derg'.

If Lough Ree and Lough Derg abstractions were rejected for lack of resilience due to low flow, by logical extension there is not enough additional flow available to reliably disregard the same environmental concerns for lower Lough Derg, and the Parteen Basin.

8.C. Parteen Basin (named Lough Derg HMWB) is directly connected to Lough Derg proper (named Lough Derg TN).

UE describes the Parteen basin as a separate entity from Lough Derg, but in fact a glance at a map shows **they are one and the same**, connected by a short neck of narrower water at Ballina / Killaloe.

There is no weir or obstruction between Lough Derg (where abstraction would cause ecological damage) and Parteen Basin (where the proposed abstraction will take place), If there WAS a weir, it might enable UE to assess and manage levels and flows separately, but this is NOT the case.

These two waters are connected by a wide and deep neck. To describe them as 'separate' is done for administrative convenience and is not a reflection of the physical situation.

(There is no significant contribution from tributaries entering the Shannon along that narrow neck where it ceases to be 'Lough Derg' and starts to be 'Parteen basin').

8D. Level changes at Parteen, = level changes in Lough Derg

Any reduction in the level at Parteen Basin (Ardnacrusha/Parteen dams) (by drawdown for hydro generation, or opening of sluices in Parteen) is directly witnessed on any and all the shorelines of Lough Derg.

When the ESB currently draw water from Parteen for Ardnacrusha hydro-generation, the level of Lough Derg drops, no matter which part of Lough Derg you are in.....

It's a lake!

The level drops almost uniformly.

Levels in one directly impact levels in the other, on a continuous basis.

The ESB knows this which is why it has established and operates within a Normal Operating Band of levels, which simultaneously apply to Parteen Basin and Lough Derg. UE are fully cognisant of this system.

So the "abstraction-causing-an-impact" consideration, applied by UE to the 'rejected' locations on Lough Derg, apply equally to everywhere else on Lough Derg, and equally to the Parteen basin:- in UE's own words "*there is a high likelihood of significant impact on the aquatic ecology*".

9. Abstraction at Parteen WILL cause ecological damage in Lough Derg.

Extending UE's own findings and applying them to the whole water that is Parteen-and-Lough-Derg, we see that their own findings on abstraction will by their own conclusion, cause ecological damage.

Abstraction does not have a detrimental effect in flood conditions or times of abundant water flow. The sensitivity arises during low levels caused by hydrological droughts, as I stressed in my first submissions. UE have rejected other abstraction sites in Lough Derg because the proposed

abstraction risks lowering the level of the Lough below traditional ESB minimum levels, for prolonged periods, especially in droughts.

Para. 2626 UE agrees that lake level models demonstrated that there would be measurable effects during extreme drought periods such as those in 1995 and 2018.

It is exactly these sensitivity scenarios that should determine the environmental feasibility of the project, and not the other 99% of the time.

Environmental ecological impact is frequently irreversible, and usually has long lasting consequences.

10. EU and Irish Habitats Directives are Legally Binding

Sustaining habitats and protected SAC's is not something that tolerates a 1% failure rate. Even though the occurrences may be rare and brief, like a forest fire, they cannot be factored in to any modelling as 'acceptable'.

This is why Ireland has adopted the legally binding EU Habitats directive, and must uphold the Protected status assigned to these waterbodies, to speak for the billions of dependant creatures that do not have a voice, and to intelligently assure the security of these environments for the future.

There are rules and procedures to follow, and they are there for a good reason. These cannot just be discarded whenever it suits. Failure to follow and respect the Directives specifically as applied to Lough Derg and the associated waterbodies will entrain serious legal and financial consequences for the Irish state, and the infringing parties (ACP, UE, ESB etc.).

They are NOT available for distortion or devaluation in order to quick-fix problems.

11. Lough Derg is not a demand-reservoir.

Para.2643 UE states that in extreme droughts, ESB would cease generation at Ardnacrusha. (as they do on average 20 days per year already)

The pipeline project intends to fall-back on Lough Derg as a reservoir.

In a drought crisis, 'emergency/exceptional permissions' will likely be granted to maintain supply to homes and data centres and UE will continue to draw water down below the current ESB Lower Operating Band while the drought persists.

But Lough Derg is a protected waterbody. It is not a reservoir. The interference with habitats especially along the shorelines, is forbidden.

Unless UE can demonstrate how this scenario can be otherwise managed, the pipeline project cannot be permitted to proceed.

12. Deceptive presentation of the project's impact, by UE to the general public.

The Proposed Project was initially widely promoted as a solution enabling Housing Development to continue and enable the State to manage to catch up with extreme shortages of accommodation.

It would do this by "only abstracting 2% of the flow of the Shannon".

This UE statement is still being perpetuated and deliberately misleads readers into believing the abstraction is a negligible percentage, by using a percentage of average annual flow. This claim is emphasised by UE in order to distract attention from the true damage, and lack of resilience, abstraction will demonstrate in times of drought.

As our earlier submissions and indeed UE's and ESB's own figures show that at the times of greatest demand (hot summer hydrological drought periods) the abstraction would be up to 50% of the residual flow of the Shannon.

13. Revisiting the 2018 Drought:

In 2018, there was NO available flow for the proposed pipeline, for 74 days.

If the pipeline had at that point been present and operating.....

Either the statutory 10m³/s down the old Shannon would have had to have been reduced,

or

the level of Lough Derg would have been drawn down and lowered below environmentally acceptable minimums, triggering UE's own concern of 'significant impact on aquatic ecology' along all of the 179km of shorelines of Lough Derg (including islands).

If the starting level of water in Parteen and Lough Derg was already at the lower end of the operating band, and 10m³/s compensation flow was maintained down the Old Shannon, then the pipeline would be drawing causing Lough Derg to fall below the Lower Operating Band.

How long and to what lowest level would this continue?

Who can say how long a drought will continue?

Who can say how rapidly recovery of levels will occur?

UE models look back at the last 50-70 years and assign low probabilities to such events.

We know that the future has nothing to do with recent climate patterns. We also know that UE are not able to assign a ZERO probability. Therefore they are applying for permission to breach EU directives on protected habitats, when EU and Irish guidelines dictate that we should be working to IMPROVE habitat resilience and extent, and not reduce it.

Suffice to say: the damage will have been done, Protected habitats devastated.

14. Data Centres: privileged access to water, prioritised over citizens.

More recently the 'enabling housing development' message has had 'economic development' added.

In a broad review of all documentation to date, the above mentioned DATA CENTRE can not be found.

It is no secret that the 80 or so currently operating Data Centres consume a vast amount of treated potable water, used for evaporative cooling or direct cooling with a negligible amount of recycling, before disposal. Again UE and others attempt to dispel claims about Data Centres, saying they only consume "0.15% of Ireland's water consumption."

This smoke screening is to distract from the fact that a much higher percentage of GDA potable water, is currently taken by Data Centres.

There appear to be at least 40 more data centres in construction or planning.

The total amount of water used by these, collectively, is a significant, recent, and increasing demand on the supply network.

Therefore it becomes apparent that the true destination for a large portion of (expensively treated and pumped) water of the Shannon pipeline project is to cool Data Centres, who's needs would also be at their highest in hot weather spells, just like everyone else.

Given that Data Centres, collectively, are an important customer for Uisce Eireann, what restriction is being applied (cost, limit of supply, etc) to incentivise Data Centres to find and invest in other cooling solutions?

Businesses like Data Centres will choose the cheapest cost option. If the water is free, or the cheapest way to achieve their needs, they will take it and use it, in this case to the detriment of the Irish Public. Once they have this method locked in, who will be able to turn the Data Center tap off?The homeowners of Dublin that will have rationing and standpipes, while the all-important Data Centres will draw the water they need as usual.

Some may suggest this is beyond the scope of this stage of the ACP scrutiny, but water is a Common Good and it is important ACP take a holistic view of how this Project impacts the availability of this essential Public Resource, and how ACP's decisions will affect how it will be managed by a Public Service Body such as UE.

(If the intended use of water from the Shannon was to solely supply the needs of homes of the people of Ireland, there might be a more sympathetic case).

15. Clareville WTP supplies Limerick: water is from the Shannon too!

Under the section 18.3.5 on Human Health/potential for THM in drinking water

My original submission stated "Clareville WTP currently takes water from the same place (Parteen Basin), treats it, and supplies Limerick, and that this treated water has levels of THM that far exceed maximum permitted levels".

UE response para 2272 :

"The Proposed Project abstraction is from Parteen Basin, which is upstream of the Clareville WTP that abstracts from the Ardnacrusha Headrace and Old River Shannon".

This misleadingly implies that somehow Ardnacrusha Headrace and the Old River Shannon are somehow a different and separate body of water supplying Clareville.

Parteen Basin IS the beginning of the canal that is Ardnacrusha headrace.
The old river Shannon is also fed by Parteen basin, from the sluices at Parteen weir.

Suffice to say that it is the **same water, from the same Shannon, at Parteen**, that is used by Clareville WTP.

It is apparent from para.2272 that a superior level of water treatment is proposed for the pipeline project claiming lower or no THM's in the treated water.
Elsewhere UE propose to use chlorine to prevent biofilm buildup in the 172km pipeline.

Will the Clareville plant be upgraded to bring an equivalent standard of water to Limerick consumers?

No provision is made in the flow analysis for growth in demand from Limerick and the surrounding areas supplied from the Shannon, for the next 50 or 100 years. Will Limerick need a pipeline from the Corrib?.

16. Look to other countries for leading information on solving this problem

Copenhagen is a similar sized city to Dublin in population, surface area, climate/rainfall. It has no major river or reservoirs used in direct supply of potable water. The main water authority there (HOFOR) supplies over a million consumers exclusively from groundwater pumped from a matrix of boreholes. They do not treat with chlorine, and the land where the wells are located is protected from farmers or owners using herbicides or pesticides. Their network leakage loss is currently 6%.
UE must take steps to learn from leading examples like this and try to bring the lessons that have been learned elsewhere to Ireland.

I respectfully request that my above submissions are taken in a positive context, to encourage UE to accept that circumstances require they design a multi-stage solution to water supply, incorporating true resilience, less vulnerability, and at a lower cost.

The complexity of a reliable and resilient water supply dictates a multi-point modular system with inbuilt flexibility to adapt to changes, and allowing for evolution as demand shifts in unexpected directions.

Above all I request that ACP ensure **full compliance with EU protected habitats and waterbodies directives, without exception.**

This is the heritage of the land and the future people who live here, and it is time to stop eroding natural capital.

I formally request that ACP deny planning permission for the above mentioned pipeline project on the grounds that it does not offer a resilient solution to long term water supply. Better, more resilient configurations at lower cost are available, which do not transgress the environmental protections currently in place for the river Shannon and the Lough Derg water body.

Yours sincerely,
Christopher Campion