

Our Case Number: ACP-323980-25



An
Coimisiún
Pleanála

Stefan and Olivia Hahne
Sonas
Loughtea
Ballina
E45 K822

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
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Website
Email
(01) 858 8100
1800 275 175
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Eimear Reilly

From: LAPS
Sent: Tuesday 21 July 2026 09:06
To: Eimear Reilly
Subject: FW: ACP-323980-25
Attachments: ACP-323980-25 Stefan and Olivia Hahne.docx

From: Olivia Scully Hahne <oliviahahne@gmail.com>
Sent: Monday 20 July 2026 11:12
To: LAPS <laps@pleanala.ie>; Communications <communications@pleanala.ie>
Subject: ACP-323980-25

You don't often get email from oliviahahne@gmail.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.

To Whom it May Concern,

With reference to your mail dated June 26th, please find attached our reply in connection to our case ACP-323980-25.

Many thanks
Olivia & Stefan Hahne

20th July 2026

Case: ACP-323980-25

To whom it may concern,

We are writing as residents living beside the River Shannon at Lough Derg to strongly object to the proposed extraction of water from the Shannon system for transfer to Dublin.

We make this objection as a local residents, as taxpayers, and as someone who lives with the river as a real place - not as a theoretical water source on a planning map. For those of us who live here, the Shannon and Lough Derg are not spare capacity for failed infrastructure elsewhere. They are part of our home, our landscape, our health, our wildlife, our local economy, and our future.

Our objection is based on fairness, environmental protection, public health, climate risk, cost to the taxpayer, and the clear failure to show that better alternatives have been properly exhausted first.

The first and most obvious issue is this: why is the State proposing to remove up to **300 million litres per day**, equal to **3.47 m³/s**, from the Shannon system when Dublin's own network continues to lose an enormous share of treated water through leakage? That is not a side issue. It goes to the heart of whether this project is necessary, proportionate, or fair.

As a taxpayer, I object strongly to being asked to fund a multi-billion euro pipeline when the simpler and more responsible first step is to stop wasting the water already being treated. Repair the leaks. Upgrade the infrastructure. Reduce waste. Improve conservation. Then, and only then, should any case be made for placing new pressure on the Shannon.

The repeated claim that this abstraction is only a small percentage of Shannon flow is deeply misleading. Ecology does not depend on annual averages. The real issue is what happens in **low-flow and drought conditions**, when the same abstraction becomes a much larger share of the water actually available in the system. During such periods, the river is at its most vulnerable and the margin for error is at its smallest. That is the only time that really matters when judging whether this proposal is safe.

This concern is no longer abstract. Local information from **18 July 2026** indicates that water levels and flows are already down to what residents describe as the **bare bones**. The low water was expected around **3:30**, with reported flows of about **19 cumecs from Parteen, 1.6 from Mulcaire, and 0.5 from Kilmastulla** - in other words, a combined

level that local observers say does not amount to much and is not enough for generation at **Ardnacrusha**. In plain language, the river is already under visible stress. We are also facing the serious concern that **no rain is forecast for another month**. That makes this proposal even more alarming. If the system is already stretched to this extent before any pipeline abstraction begins, what exactly is supposed to happen when a major new transfer demand is added on top?

This goes directly to one of the most serious problems in the whole proposal: it assumes a level of resilience in the Shannon system that many of us living beside it simply do not see. During drought periods, the system is already required to meet multiple demands. There is the **statutory compensation flow of 10 m³/s** below Parteen. There is water needed for **Limerick City**, often cited at around **0.6 m³/s**. There are the operational realities of **Ardnacrusha**. There are ecological requirements for the river itself. There is evaporation from Lough Derg during hot weather. And now the proposal seeks to add another **3.47 m³/s** for export to Dublin.

That is why one question must be put very plainly: if the pipeline were to be pushed through, **who gets the water first when the flow is at a bare minimum?** If the pipeline is built and Dublin is also short of water during drought conditions, who has legal and practical priority? Does the water go first to maintain ecological flow in the Old River Shannon? Does it go first to Limerick City's public supply? Does it go to support Ardnacrusha operations? Or does it go into the pipeline to Dublin because, once built, the political pressure to keep it flowing will be overwhelming?

This is not a side question. It is one of the central questions in the entire project. It goes to the heart of risk, fairness, and environmental protection. The people living beside the Shannon are entitled to know, in advance, exactly how that conflict would be resolved. General assurances are not enough. There must be a clear, binding answer before any permission is granted.

A second question follows directly from that: **what legally binding mechanism will stop abstraction to Dublin during a prolonged drought if the river and lake are already under severe stress?** Once the infrastructure is built, once money has been spent, and once Dublin becomes dependent on the supply, what will actually prevent emergency pressure from overriding environmental limits? It is very easy to speak of safeguards during the planning stage. It is much harder to believe that those safeguards will hold when a national water crisis arrives and demand from the capital becomes politically urgent.

That is why local people are right to be worried. Once a project of this scale is in place, the pressure to keep it operating will be enormous. We need to know not just what the normal operating rules would be, but what would happen when the normal rules break down. We need to know what happens when drought lasts longer than expected, when

inflows are weaker than expected, when lake levels drop further than expected, and when both Dublin and the Shannon region need protection at the same time.

A third question also needs to be answered honestly and publicly: **how much of this water will actually be going to industry and data centres?** The public is constantly told that Dublin has urgent water needs, but there has to be full transparency about who the beneficiaries of this pipeline will be. How much is for homes and ordinary domestic supply? How much is to facilitate industrial growth? How much is for major commercial users and data centres, which are known to consume significant resources directly or indirectly? If Shannon communities are being asked to accept environmental risk and taxpayers are being asked to fund a massive pipeline, then the full end use of the water must be disclosed clearly.

Another major problem is that the current statutory compensation flow of **10 m³/s** is often treated as if it were a guaranteed ecological safeguard. But that figure dates from a very different era and from a very different set of priorities. It was not designed as a modern climate-resilient, ecology-led standard for a river system facing present-day pressures. There is strong reason to question whether it reflects what the river actually needs today, especially in drought conditions, and especially if additional abstraction is to be piled on top of it. If the baseline itself is outdated, then the whole assessment built around it is weakened from the start.

There is also the issue of **Ardnacrusha**. Local observation already suggests that with current low waters there will be **no generation at Ardnacrusha**. That is an important real-world warning sign. It shows how tight conditions already are. This is not a story of generous surplus. It is a story of a river system already close to its limits in dry weather. It is difficult to understand how anyone can look at those realities and still argue that this is the right moment to approve a major long-distance abstraction project.

The climate dimension cannot be ignored. We are being asked to believe in the safety of this proposal at a time when drought risk is increasing, weather patterns are becoming less predictable, and long dry spells are becoming a much more serious concern. If there is no meaningful rain forecast for another month and the river is already down to what local people describe as the bare bones, then that should be setting off alarm bells at every level of decision-making. Climate resilience should mean reducing pressure on vulnerable river systems, not increasing it.

There is also the simple matter of fairness. Why should people living beside the Shannon carry this risk because other infrastructure has not been properly repaired? Why should taxpayers fund a vast new pipeline before the water already being treated is properly protected from leakage? Why should one of Ireland's greatest natural systems be put under added stress while the obvious alternative - fixing waste at source -

remains incomplete? Using other viable alternatives such as Poulaphuca, groundwater, reservoirs, desalination?

This feels like the wrong project in the wrong place at the wrong time. It asks too much of the Shannon, too much of local communities, and too much of the taxpayer, while asking too little of those responsible for reducing leakage and waste where the demand is greatest.

I also object because the Shannon is not just an engineering input. It is a living river system with ecological, social, cultural, and economic value. People live beside it, work beside it, fish in it, boat on it, swim in it, depend on it, and treasure it. It supports wildlife and tourism and gives identity to the communities around it. Decisions affecting it should be made with humility, caution, and respect - not on the assumption that because it looks large on paper, it can absorb whatever burden is placed upon it.

The more plainly this is looked at, the more troubling it becomes. Current local reports point to extremely low water. Ardnacrusha may not be generating. No rain is expected for another month. Existing legal and ecological flow needs already place heavy demands on the system. Limerick has its own present and future needs. And still this proposal seeks to add a major export pipeline to Dublin.

I do not accept that this is responsible planning.

The Shannon is not a backup reservoir for bad infrastructure management. Lough Derg is not expendable. If the State is serious about sustainable water policy, it should first stop wasting the water it already has, fully disclose who will benefit from any transferred supply, explain in binding terms who gets priority in drought, and prove beyond doubt that this project will not push an already stressed river system beyond what it can safely bear.

Until those questions are answered fully and honestly, this project should not proceed.

For all of these reasons, we strongly object to the proposed extraction and transfer of water from the River Shannon / Lough Derg to Dublin.

Yours sincerely

Olivia & Stefan Hahne