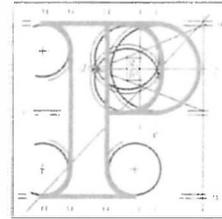


Our Case Number: ACP-323980-25
Planning Authority Reference Number:



An
Coimisiún
Pleanála

Christopher Campion
Brightwater
Derrycastle
Ballina Killaloe
Co. Tipperary
V94 C6X2

Date: 03 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

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Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Submission Objecting to the Proposed Water Supply Project for the Eastern and Midlands Region – Shannon to Dublin Water Supply Project (Ref. PA92.323980)

Applicant: Uisce Éireann

Name: Christopher Campion

Address: Brightwater, Derrycastle, Ballina Killaloe, Co. Tipperary. V94C6X2

I, the above-named, Formally Object to the Proposed Water Supply Project for the Eastern and Midlands Region. The project, as currently proposed, presents unacceptable environmental and economic impacts.

This submission outlines my objections in detail. PLEASE READ THE ENTIRE SUBMISSION, WHICH CONTAINS IMPORTANT INTERWOVEN CONSIDERATIONS

1. Environment

The proposed abstraction point at the Parteen Basin is located within the Lower River Shannon Special Area of Conservation (SAC) and is subject to regulation under EU laws for multiple protected Habitats.

These Designations and their legal protections precede the pipeline project.

These designations are in place to protect critical habitats and vulnerable species, including eels, lampreys, Atlantic salmon, trout, and protected species of water birds. Any interference with water levels and flow regimes in this sensitive ecosystem poses a serious threat to biodiversity and ecological balance.

Lough Derg and the Parteen Basin have consistently experienced low water flows during dry periods. Such reductions already trigger ecological damage.

Reduced flows increase water temperature, lower dissolved oxygen levels, and concentrate pollutants, all of which place additional stress on aquatic life.

The Parteen basin from Parteen Weir up to Killaloe Bridge has been classed as a Heavily Modified Water Body (HMWB). Modification of an HMWB environment resulting in habitat deterioration is not permitted unless there are no viable alternatives. As you will see below, there are several viable alternatives.

Lough Derg, upstream of Killaloe bridge, is an SAC and is NOT a HMWB. Interference in the waterlevel and flow conditions in the Parteen basin, directly impacts Lough Derg, which feeds Parteen.

The Old Shannon watercourse, downstream of Parteen weir, is also NOT a HMWB, and its Natura 2000 and SAC status are protected by law.

As will be evident from the flow analysis below, all these protected sites are at risk from the effects of this pipeline.

2. Climate change and drought.

Ireland—particularly the Mid-West region—is likely to experience more frequent and prolonged dry periods during summer months.

In Ireland, a hydrological drought is associated with surface and sub-surface water availability. Hydrological droughts often lag meteorological and agricultural droughts. Depending on catchment characteristics, it takes longer for precipitation deficits to emerge in streamflow, groundwater and reservoir levels. They can also last long after meteorological and agricultural droughts have ended.

See

<https://www.ria.ie/blog/drought-a-risk-being-overlooked-in-ireland/>

These periods may not involve an absolute absence of rainfall, but rather insufficient precipitation to replenish river systems adequately.

The pipeline is currently presented as a 'negligible' 2% abstraction.

This 2% is derived from annual average flow of the Shannon. To use average flow from a whole year is grossly misleading.

The proposed abstraction will in fact be the equivalent of up to 30% of available flow in drought periods, due to already lowered water levels.

This is explained in detail below.

This is a completely unacceptable environmental risk.

It is evident that over recent years, 'experts' have failed to perform a robust drought sensitivity analysis, and failed to demonstrate that the project supports a wide margin of safety in this regard.

It is unreliable as a dry-spell water source for Dublin.

3. Flow breakdown

The three outlets from Parteen Basin are

- Ardnacrusha hydro station
- Old Shannon rivercourse
- Clareville WTP.

Flow data obtained from the ESB under the Freedom of Information Act indicates that, over the past ten years, there have been, on average, 20 days per year during which the turbines at Ardnacrusha took Zero water.

Clareville WTP was supplying 0.6m³/s to Limerick all the time.

And from the same dataset, ONLY the Statutory Minimum of 10.5 m³/s was flowing down the Old Shannon.

The proposed pipeline would abstract 3.5m³/s or the equivalent of 33% of this flow of 10.5 m³/s.

So over the last 10 years, for about 20 days each year, there was No Surplus that could have been taken by a pipeline.

Limerick City is already abstracting approximately 0.6 m³/s from the Parteen Basin. This demand will increase as further housing and industry development, and associated infrastructure are constructed.

It is therefore completely misleading to suggest that there is a "surplus" available for a pipeline.

I restate:

During dry spells, when Ardnacrusha already cannot operate, it is impossible to simultaneously satisfy

- statutory flow requirements for the Old Shannon,
- supply Limerick
- maintain lake levels within ecological acceptable min/max range.
- AND supply the pipeline to Dublin.

4. Concrete example from 2018

The most recent significant dry spell (drought) was summer 2018, during which the low-flow conditions persisted for 74 consecutive days. (ESB data).

During this period, Ardnacrusha abstraction ceased. It was Zero.

The only Shannon flow arriving into the Parteen basin, was just sufficient to meet the minimum statutory requirement of 10 m³/s for the Old Shannon, and supply Clareville WTP.

Additional abstraction for a pipeline under these circumstances would have been unacceptable.

Lowering the water levels in the Old River Shannon and/ or Lough Derg above Parteen, would have been the only option, with no means to control duration. We do not control how long droughts last.

The mitigation measures proposed by Uisce Éireann are insufficient, lack enforceable guarantees, and do not adequately address these realistic already-occurring climate scenarios. Their flow modelling has not been back-tested against examples such as 2018.

The entire stretch of the River Shannon concerned, is protected under the EU Natura 2000 network, which places strict legal obligations on the State to avoid deterioration of protected habitats and species. Any development, such as lowering water levels below established minimums, risking permanent ecological harm, is illegal under these protections.

5. Economic

There are various estimations for the cost of the pipeline, ranging from €3-10 billion, it is hard to know which, if any, of these can be taken seriously. Suffice to say this is Public money, and given the recent history in the State of fiscal management scandals, the Government would be well advised to evaluate the cost-benefit of alternatives. The pipeline project is a single-solution with no resilience, at an extraordinary cost. If it fails to perform, the results would be disastrous.

Viable Alternatives

Poulaphuca reservoir:its already there!

Viable alternatives exist to increase water supply capacity for the Greater Dublin Area.

The Poulaphuca Reservoir, currently under the control of the ESB, represents a substantial existing resource. It is insignificant in terms of electricity generation.

With minor appropriate infrastructural modifications, this reservoir can connect to Dublin's water supply, and this was why it was originally intended and built.

In addition, the Slaney, Boyne, and Barrow rivers are geographically closer to Dublin and would present shorter transfer distances, potentially reducing infrastructural complexity and environmental disturbance.

Groundwater sources.

There are multiple extensive groundwater resources with abundant supply of clean to very-clean spring water, in gravel and rock aquifers within easy range of Dublin's WTP's. UE have for some reason chosen to ignore these resources on Dublin's doorstep.

Collectively these offer a diversified range of water sources providing resilience across multiple points, at what is estimated to be a fraction of the cost of the pipeline.

These options warrant comprehensive, transparent reassessment and public disclosure of the cost-benefit, before any commitment is made to abstract from the Shannon.

Repair the Leaks

A large-scale programme to replace aging, leaking, and lead-containing Victorian-era pipework would represent a more sustainable and equitable solution. Its common sense! Uisce Eirann acknowledges that up to 40% of treated drinking water is currently lost through leakage!

Modernising existing infrastructure would significantly reduce demand pressures, improve water quality, and enhance long-term resilience.

A vast investment in a pipeline, only to waste the treated water on this scale, could be called the height of stupidity.

6. Dirty Water.

The water for the pipeline is proposed to come from Parteen Basin.

Clareville WTP currently takes water from the same place, treats it, and supplies Limerick.

That treated water has levels of trihalomethane (THM) that Far exceed Irish, EU, and WHO maximum permitted levels.

(THM is a proven carcinogenic molecule that is produced when chlorine is used to treat dirty water to become potable).

So it is undeniable, that the water to be treated at Birdhill, to be then sent up the pipeline, would have the same or higher already-unlawful levels of the THM carcinogen !!!

The water arriving in Parteen basin has flowed the length of the country, draining about 20% of the nation. It has acquired agricultural and industrial pollutants, slurry, discharges from waste treatment plants, and other undesirable sources. It has had time for growth of bacteria, and algae, including, more recently, increasing blooms of toxic algae, to develop.

Low flows, described above, exacerbate and concentrate these carried-pollutant and algae problems. ...There is not enough 'flushing out'.

Its possibly the dirtiest, hardest to treat water in the State.

Conclusion

The current pipeline proposal....

- is a drought vulnerable, outrageously expensive, poorly thought-through solution to Dublin's supply problems.
- has Not enough water available from the Shannon during dry spells.
- has Not demonstrated beyond any doubt, that taking that water would not severely affect pre-existing SACs and Natura 2000 sites and the ecology of Lough Derg and Shannon watercourse.
- ignores numerous viable, existing, diverse, cost-effective alternatives nearer to Dublin. (Poulaphuca, boreholes, local rivers, fixing leaks).
- has Not been shown through cost- benefit analyses to be a superior option, or a more economic option.
- proposes to treat dirty water with inevitable carcinogenic results for Dublin consumers.

—I hereby object in the strongest possible terms to the planning application submitted by Uisce Éireann for the Shannon to Dublin Water Supply Project.

I respectfully request that the application be refused.

Signed,
Christopher Champion