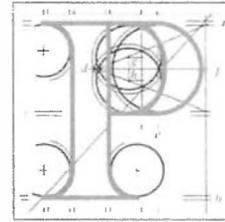


Our Case Number: ACP-323980-25

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Cllr Fiona Bonfield, Alan Kelly TD, & Cllr Louise Morgan Walsh
87 Mulkear View
Newport
Co. Tipperary

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

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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

Names : 1 Cllr Fiona Bonfield, Tipperary County Council, 2. Alan Kelly TD, 3 Cllr Louise Morgan Walsh

Address: 1. 87 Mulkear View, Newport, Tipperary, 2. No 1 Summerhill, Nenagh, Co. Tipperary, 3 No 1 Summerhill, Nenagh, Co. Tipperary.

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We, the above-named persons wish to formally make the following submission to the Proposed Water Supply Project for the Eastern and Midlands Region. The project, as currently proposed, presents unacceptable environmental, social, and economic impacts for local communities, with the perceived benefits overwhelmingly accruing to Dublin, while the local area bears disproportionate risks. We have serious concerns with this project in the context of its necessity, projected and eventual cost, issues associated with balanced regional development and a range of environmental and ecological concerns.

1. Environmental Impacts

- The proposed abstraction at the Parteen Basin lies within the Lower River Shannon Special Area of Conservation (SAC), threatening critical habitats and protected species, including pollan, salmon, and trout as well as the habitats of endangered species of water birds.
- Modeling indicates that even under current proposals, Lough Derg and the Parteen Basin could experience dangerously low water levels during drought conditions, risking ecological collapse. Climate change analysis by the ICARUS Institute at Maynooth University have shown that in a short number of years, Ireland and the Mid West could experience increased times of drought during the summer months. This would mean that the proposed 2% water abstraction would in fact become a 30% abstraction due to the lowered levels of the river.
- Potential impacts on water quality and river resilience are significant, particularly during low flows, which could affect both biodiversity and downstream communities.
- The development does not adequately safeguard against long-term environmental degradation, and mitigation measures proposed are insufficient and non-binding. In 2018 the level of water in Lough Derg was very low and harbours could not be accessed for tourism, /fishing purposes.
- Fishing industry will be negatively impacted. If there is not enough water in spawning beds for fish, the fish will not spawn in their natural habitat

- Algae Bloom is a serious issue on Lough Derg annually. This proposed significant project will only add to this concern , which will also have a detrimental effect on the Lake.

2. Construction and Traffic Impacts:

- The five-year construction period will cause severe disruption to local communities, including heavy traffic on regional and rural roads, temporary road closures, and risks to public safety.

- The scale of works, including large construction compounds and abnormal load movements, will generate significant noise, dust, and loss of agricultural access, with impacts lasting up to 24 months per land parcel.

3. Local tourism :

- A vital economic driver for the Shannon region, Foynes Port and up as far as Lough Derg, will be adversely affected, with potential damage to boating, sailing, and recreational amenities. It is my belief that there are many other options open to Uisce Eireann to increase water supply in the Dublin region without recourse to damaging the integrity of the River Shannon. There is the Poulaphouca reservoir which is currently under the control of the ESB but is hardly used to generate electricity. This massive reservoir alone would be enough to service Dublin and beyond if the electricity generating apparatus was removed. There are the Slaney, Boyne and Barrow rivers, all of which are far closer to Dublin than the Shannon and with far less disruption to agriculture and habitats.

4. Leakage :

- There is the proposal that Uisce Eireann begin a massive campaign to replace leaky, lead, Victorian pipe work which is currently allowing up to 50% of all expensively treated drinking water simply leak into the ground. The water network in Dublin needs to be replaced prior to abstraction of water from any other source.

5. Balanced Regional Development:

- Proposed development of significant infrastructure benefitting the Greater Dublin Area has the potential to affect negatively the development potential of Tipperary and the Shannon Region and counter intuitive to the NPF objective for balanced regional development. Industry should be brought to where the water is and not the other way around.

6. Cost to Taxpayers:

- There are huge concerns regarding the high cost of this project, running into billions of euros. There is no contingency in place for overruns, delays etc, which could have a severe impact on the future delivery of safe water to Tipperary and the protection of our watercourses and natural habitats.

Conclusion:

Lough Derg and the Shannon System already operate under ecological stress and reduced resilience. The proposed abstraction introduces additional low flow risk that is disproportionate during the very conditions that drive ecological failure.

The project has not demonstrated compliance with the Water Framework Directive “no deterioration” requirement, has not met the Habitats Directive Integrity test for Natura 2000 sites and relies on the headline average flow metrics that obscure the real ecological risk. There is also not enough evidence of alternatives being looked at as being more cost effective, environmentally sound and less damaging to balanced regional development. The level of leakage in the pipes in Dublin surely needs to be addressed before any project like this could be even considered.

On that basis, and in the absence of conservative, enforceable, drought-realistic operating rules this whole project carries massive risk and needs to be completely reassessed and alternative strategies looked at.