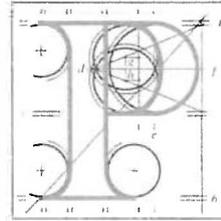


Our Case Number: ACP-323980-25

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Cllr. Dr. Phyll Bugler
Inchadrinagh
Ballina/ Killaloe
Co. Tipperary
V94 CXN2

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

PA04

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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)

Cllr. Dr. Phyll Bugler

Inchadrinagh

Ballina/ Killaloe

Co. Tipperary

V94CXN2

0872807655

I, Cllr. Dr. Phyll Bugler formally object to the proposed Water Supply Project for the Eastern and Midlands Region. I am the local councillor based in Ballina/Tipperary beside our beautiful Lough Derg and River Shannon. This proposed project is fraught with ecological and environmental risks for Lough Derg and the lower Shannon. It would have devastating effects on the ecology/environment/fish survival rates-salmon in particular/wildlife- not to mention Tourism/Economy and social fabric of the mid west region. The mistakes of the past might be justified due lack of scientific knowledge. No such excuses in the year 2026 could be used. The scientific and research data is beyond dispute.

I list the following points to substantiate my objection to the above proposed project:

- 1) I refer you the 8 EU directives that would be breached if this proposal were granted- Water Framework Directive(2000/60/EC)-Habitats Directive 92/43/EEC-Birds Directive 2009/147/EC-Environmental Impact Assessment Directive1011/92/EU-amended by Directive 2014/52/EU-Strategic Environmental Directive 2001/42/EC-Drinking Water Directive EU/2020/2184- Climate Law & Environmental Principles regulation(EU) 2021/1119-Aarhus Convention(as implemented in /EU Law). The Parteen basin lies within the lower River Shannon Special Area of Conservation (SAC)-site code 002165. This proposal would threaten critical habitats and protected species, including pollen, salmon, eels, lamprey, trout as well as the habitats of endangered species of water birds such as the curlew-only 120 breeding pairs of curlew left in Ireland and their habitat is Lough Derg.
- 2) Modelling indicates that even under current proposals, Lough Derg and the lower 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 means that the proposed 2% water abstraction would in fact become 30% abstraction due to the lowered levels of water. Drought periods and higher temperatures would result in less oxygen being absorbed by the water resulting in fish death and increased algae bloom. The absorption of oxygen by water decreases exponentially as temperature increases. Potential impacts on water quality and river resilience are significant during low flows which will affect both biodiversity and downstream communities. This

proposal does not adequately safeguard against long term environmental degradation and mitigation measures proposed are insufficient and non-binding.

- 3) Increased water pollutant concentrations resulting from any future reductions of water volume in lough Derg has been overlooked in the planning application for this proposal. Nitrates and Phosphates entering Lough Derg from WWTP 's (newly upgraded WWTP in Ballina does not have tertiary treatment which removes nitrates and phosphates (this upgrade cost 12 million euro)and agricultural run off leads to toxic blue green algae bloom (cyanobacteria). BOD levels need to be ascertained during high temperatures/summer months. This toxic blue green algae adversely affects safety of all lake users and impacts pets, wild life and rare and endangered species (eg Curlews). It is unbelievable to think that the water being abstracted is polluted with cyanobacteria -a blue green algae which produces toxins that can cause liver, kidney and brain disease. Lough Derg – the source of water in the Parteen basin is deteriorating in a similar fashion to lough Neagh.
- 4) The rationale for putting forward the most expensive, most destructive and most difficult option has not been made clear. A 50 metre wide corridor being bulldozed through Tipperary, Offaly, Kildare and Dublin county will cause unimaginable damage to wild life habitats as well as being devastating to the Mycellium Web.
- 5) The shambolic public information session in a small room at Ballina- Killaloe Family Resource Centre on 12th February 2026 served little or no purpose. The UE representatives should a poor understanding of the issues involved and were unable to answer many of the questions posed.
- 6) As a public representative it is disturbing for me to read of the many ecological breaches and legal cases being brought against UE by the EPA and EU. It is also very disappointing to read of the slow progress being made by UE on the leakage in Dublin -38% leakage still happening in Dublin after 12 years under their stewardship.
- 7) Hoping you will give these points serious consideration when adjudicating on this application.

Signed Dr. Phyll Bugler