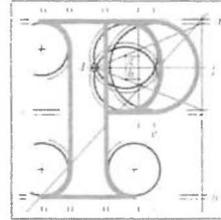


**Our Case Number:** ACP-323980-25

**Planning Authority Reference Number:**



An  
Coimisiún  
Pleanála

Derg Open Water Swim School & Lively Wimmin Swimmin  
c/o Roisin Healy & Pam Teese  
Lough Derg View Cottage  
Derrycastle  
Ballina/Killaloe  
Co. Tipperary  
V94 F6DT

**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](http://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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**Roisin Healy & Pam Teese on behalf of Derg Open Water Swim School & Lively Wimmin Swimmin**  
**Lough Derg View Cottage, Derrycastle, Ballina/ Killaloe Co Tipperary, V94F6DT**

**Formal Observation / Objection**

**Re:** Shannon to Dublin Water Supply Project

**Applicant:** Uisce Eireann

**To:** An Bord Pleanala

**Date:** 25.02.2026

**1. Introduction**

This planning objection is lodged on behalf of Derg Open Water Swim School and the swim group "Lively Wimmin Swimmin". Derg Open Water Swim School delivers open water swimming programmes in Lough Derg on behalf of Swim Ireland, operating from a base at Two Mile Gate, Killaloe. Lively Wimmin Swimmin is an informal WhatsApp social swimming group, also based at Two Mile Gate, Killaloe. The social group has been active since June 2020 and has over 150 participants, mainly local to the area, many of whom, together with their families, have been regular Lough Derg swimmers all their lives.

Lough Derg is a unique and substantial natural amenity, of national importance, which supports jobs & leisure activities. It is a key wildlife habitat & a major tourism asset for Ireland.

Faite Ireland have recently launched a website "Discover Lough Derg.ie" which aims to promote and market the area, with a particular emphasis on lake activities. As service providers and lake users we are concerned that the proposed Water Supply Project Eastern and Midlands Region will have a detrimental effect on the lake water quality which will directly impact on the open water swimming opportunities we provide and enjoy, and fly in the face of Faite Ireland objectives and policy.

Together with associated waterways Lough Derg would be ecologically compromised by the proposed project, and therefore adversely impacted.

The focus of the present objection is on the application's failure to demonstrate any meaningful risk assessment and/or mitigation against the real risk of a catastrophic escalation of toxic algae impacting Lough Derg and surrounding waterways.

**2. Existing toxic algae issues in the impacted area.**

Lough Derg is subject to long standing agricultural run-off, which contributes to lake water pollution through the flow of nitrates and phosphates into public waterways. Like other inland Irish lakes it is prone to outbreaks of cyanobacteria (toxic blue green algae), promoted by the presence of high concentrations of nutrients washed into it from surrounding fertilised farmland etc. This adversely affects amenity and safety for all lake users, and impacts pets, wildlife, rare and unique species and natural ecological balance.

As lake users, and some of us as parents and pet owners, we are acutely conscious of the fragile sensitivity of the lake water to even the slightest changes to conditions which can trigger cyanobacteria. From regular repeat first-hand experience we are equally aware of the

detrimental impacts, including human health problems, pet poisonings, and serious loss of recreational and business amenity. Over the years we have regularly found the lake out of action, for business and recreational use, as per regular formal notification by relevant authorities, specifically because of cyanobacteria promoted by excessive concentrations of pollutants.

Episodes of toxic algae and their impact on Lough Derg are a matter of public record, however they have been overlooked in the application.

**3. Proposed reduction of water levels, acknowledged as a feature of the proposed project, will increase concentration of cyanobacteria-promoting nutrients into local waterways.**

The volume of lake water in Lough Derg would reduce in the event of the proposed project going forward. This is an established & inevitable element of the proposed project.

Even temporary minimal reduction of lake-water volume risks precariously escalating the concentration of pollutants washed into it, in turn impacting the sensitive aquatic ecosystem & potentially triggering toxic cyanobacteria. The proposed water extractions of the scheme could thus have very damaging effects on the water quality of Lough Derg, with unpredictable (& potentially widespread & irreversible) repercussions.

We understand that farmers are not generally required to hold a specific EPA in place solely because they have land near waterways and there is agricultural seepage. General duties on farmers apparently involve “good practice” and are thus less onerous and less legally enforceable than EPAs. There is therefore at present no robust satisfactory means of reducing or policing the present amount of agriculture related phosphates or nitrates entering the lake. This would lead to inevitable increases in concentrations of undesirable nutrients and commensurate risk of cyanobacteria escalation, in the event of ANY reduction in water volume in Lough Derg.

This appears to have been entirely overlooked as a consideration in the planning of the proposed Water Supply Project Eastern and Midlands Region, with neither relevant risk assessments nor appropriate mitigation measures having seemingly been factored into the planning or management stage of the proposed project.

**4. Lough Neagh as a comparator**

Lough Neagh is a comparable large lake, subject to similar topographical, climatic and ecological conditions to Lough Derg.

Since 2023 Lough Neagh has been spontaneously and catastrophically affected by unprecedented blue green algae outbreaks. It is now notoriously subject to recurrent episodes of cyanobacteria, not confined to summer, with scientists warning that they are likely to continue for many years to come, without any clear solution in sight. The sight and impact of Lough Neagh and its associated waterways being covered in slimy toxic blue green algae is now a regularly reported occurrence.

It is not unreasonable to deduce that a similarly uncontrollable escalation of damaging cyanobacteria would likely happen locally, & potentially for the long term, in the event of any reduction, on-going or otherwise, in water volume in Lough Derg. There is no provision

within the present application to preclude the Lough Neagh scenario being replicated in Lough Derg.

In the event of ANY reduction in water volume in Lough Derg we believe this to be an accident waiting to happen.

5. **None-compliance with Waterwork Framework Directive, Habitats Directive, Failte Ireland objectives and Precautionary Principle.**

Article 4 of the Water Framework Directive (2000/60/EC) imposes a binding obligation to prevent deterioration of the status of any water body and protect and enhance aquatic ecosystems. It has been established by legal precedent (Bund Fur Umwelt and Naturschutz Deutschland v Germany (Weser case) that authorisation of a development must be refused where a project may cause deterioration, and that deterioration of a single quality element is sufficient to breach the directive. In the case of the present proposed development the reduction in water volume in Lough Derg represents the deterioration of an element of the existing conditions impacting risk of cyanobacteria. This would be in breach of the Water Framework Directive (2000/60/EC).

Under Article 6(3) of the Habitats Directive (92/43/EEC), consent may only be granted where there is **no reasonable scientific doubt** as to the absence of adverse effects on site integrity. Given the scale of abstraction proposed and resulting cumulative nutrient pressures reasonable scientific doubt remains. Climate change is an additional potential pressure.

As indicated in the introduction to this objection the risk of lake water degradation additionally conflicts with Failte Ireland policy and objectives.

The Precautionary Principle is a binding principle of EU environmental law. Where credible scientific uncertainty exists regarding serious environmental harm, decision-makers are legally required to err on the side of environmental protection. The ecological uncertainties surrounding the proposed development clearly engage that principle.

6. **Conclusion**

Derg Open Water Swim School & Swimmin Wimmin respectfully submits that:  
The risk of escalation of toxic blue green algae in Lough Derg and associated waterways (potentially catastrophic in scale and longevity) has been entirely overlooked as a consideration in the planning of the proposed Water Supply Project Eastern and Midlands Region.

Neither robust relevant risk assessments nor appropriate mitigation measures have seemingly been factored in to the application, and the potential environmental impact of the proposed development directly conflicts with relevant policy.

We therefore strongly object to the present application .

**Signed:**

Roisin Healy & Pam Teese on behalf of Derg Open Water Swim School & Lively Wimmin Swimmin

paanteese@gmail.com / roisinmchealy@gmail.com

