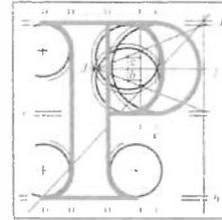


**Our Case Number:** ACP-323980-25

**Planning Authority Reference Number:**



An  
Coimisiún  
Pleanála

Diarmuid O'Crowley  
Lisballyard  
Rathcabbin  
Roscrea  
Co. Tipperary  
R42 CD62

**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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64 Sráid Maoibhríde 64 Marlborough Street  
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Re: Proposed Shannon–Dublin Water Supply Project

Case Ref: [PA92.323980](#)

To: An Bord Pleanála

Dear Sir/Madam,

I wish to formally object to the proposed Shannon–Dublin Water Supply Project on environmental grounds, specifically in relation to the ecological integrity of Lough Derg, recent water stress experienced in Nenagh, and the failure to prioritise repair of Dublin’s existing water infrastructure.

### 1. Environmental Detriment to Lough Derg

Lough Derg is a nationally significant freshwater ecosystem that supports:

- Protected habitats and bird species
- Spawning and nursery areas for coarse fish and migratory species
- Tourism, angling and recreational activity
- Local water abstraction for surrounding communities

Any sustained abstraction regime from the Shannon system has the potential to:

- Alter water levels and seasonal fluctuation patterns
- Impact shoreline habitats and spawning grounds
- Increase concentration of nutrients during low-flow periods
- Exacerbate algal bloom risk in warmer months

Even if modelling suggests minimal average impact, ecological damage typically occurs during extreme low-water events, not average conditions. Climate change projections indicate that such events will become more frequent and prolonged.

The precautionary principle should apply where the long-term ecological resilience of Lough Derg cannot be guaranteed.

### 2. Water Stress Already Evident – Nenagh Hosepipe Ban

Last summer, residents in Nenagh experienced a hosepipe ban due to water supply pressures. This occurred while proposals are being advanced to transfer water out of the Shannon catchment to Dublin.

This raises serious environmental and equity concerns:

- Local communities drawing from the Shannon basin are already experiencing supply stress.
- It is environmentally unsound to export water from a catchment where supply restrictions have recently been necessary.
- Abstraction during future dry summers could intensify pressure on Lough Derg and connected supply systems.

Approving a long-term abstraction scheme in this context appears premature and environmentally risky.

### 3. Failure to Prioritise Repair of Dublin’s Pipe Network

It is widely acknowledged that Dublin's water network suffers from substantial leakage losses.

Before pursuing a major inter-basin abstraction project, the following should be prioritised:

- Comprehensive leakage reduction
- Replacement of aging pipe infrastructure
- Network efficiency upgrades
- Demand management strategies

From an environmental perspective, extracting water from Lough Derg while significant volumes are lost through leakage in Dublin cannot be considered sustainable development.

Large-scale abstraction should be a last resort, not a substitute for infrastructure repair and conservation.

#### 4. Climate Resilience and Long-Term Environmental Risk

Climate models predict:

- More frequent drought conditions
- Increased variability in rainfall patterns
- Greater stress on freshwater ecosystems

Approving a permanent abstraction project now may reduce the ecological buffering capacity of Lough Derg precisely when resilience is most needed.

Once operational, such infrastructure creates long-term dependency and pressure to maintain abstraction levels, even during environmentally sensitive periods.

#### Conclusion

Given:

- The ecological importance of Lough Derg
- Recent water supply restrictions in Nenagh
- The unresolved issue of leakage within Dublin's water network
- Increasing climate uncertainty

I respectfully request that planning permission be refused on environmental sustainability grounds.

At a minimum, demonstrable and independently verified leakage reduction targets in Dublin should be achieved prior to any abstraction approval.

Yours faithfully,

Diarmuid O'Crowley

Lisballyard,

Rathcabbin,

Roscrea,

Co. Tipperary

R42CD62

[docrowley@yahoo.com](mailto:docrowley@yahoo.com)