



An  
Coimisiún  
Pleanála

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

**Planning Authority Reference Number:**

Lough Derg Mermaids  
c/o Peggy Boyle  
Cappaduff  
Mountshannon

V94 D78P

**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

**Teil** (01) 858 8100  
**Glaó Áitiúil** 1890 275 175  
**Facs** (01) 872 2684  
**Láithreán Gréasáin** [www.pleanala.ie](http://www.pleanala.ie)  
**Ríomhphost** [communications@pleanala.ie](mailto:communications@pleanala.ie)

**Tel** (01) 858 8100  
**LoCall** 1890 275 175  
**Fax** (01) 872 2684  
**Website** [www.pleanala.ie](http://www.pleanala.ie)  
**Email** [communications@pleanala.ie](mailto:communications@pleanala.ie)

64 Sráid Maoilbhríde 64 Marlborough Street  
Baile Átha Cliath 1 Dublin 1  
D01 V902 D01 V902

# FORMAL OBSERVATION

An Bord Pleanála

Re: Proposed Shannon Pipeline Project

Potential Impacts on Lough Derg and the River Shannon Ecosystem

---

**Planning Authority:** An Bord Pleanála

**Application:** Proposed Shannon Pipeline Project

**Planning Reference:** 323980

**Observer:** Lough Derg Mermaids

**Address:** Cappaduff Mountshannon, V94 D 78P

**Email:** peggyboyle22@gmail.com

**Date:** 25 February, 2026

---

## 1. Introduction

The Lough Derg Mermaids is a group of women living in Mountshannon who swim in the lake year round. We are all active in community groups which rely on the vibrant natural environs of Mountshannon and the lakeshore. We wish to lodge a formal observation in relation to the proposed Shannon Pipeline Project. This submission raises **serious and substantive concerns** regarding the potential environmental impacts of the proposed development on **Lough Derg**, the **River Shannon**, and the wider interconnected network of habitats and ecosystems within the Shannon catchment.

Lough Derg is not only a key ecological component of the River Shannon system, but also a locally, nationally and internationally significant natural resource. Any proposal involving large-scale infrastructure works in or adjacent to this environment must meet the highest legal, scientific, and environmental protection standards. At present, it is our view that the proposed project poses unacceptable risks to ecological integrity, biodiversity, and long-term environmental sustainability.

---

## 2. Environmental and Ecological Significance of Lough Derg

Lough Derg forms part of the **River Shannon Callows and associated Natura 2000 network**, supporting a complex mosaic of habitats including:

- Oligotrophic and mesotrophic freshwater habitats
- Wetlands, reed beds, and floodplain grasslands
- Spawning and nursery areas for fish species including pike, bream, and perch
- Overwintering, breeding, and migratory bird habitats

- Riparian zones critical for nutrient cycling and water filtration

These habitats function as an **interdependent ecological system**. Any alteration to hydrology, water quality, sediment dynamics, or shoreline structure has the potential to cause cascading and irreversible ecological damage.

---

### 3. Designated Sites and Legal Protections

Lough Derg and the wider Shannon system are subject to multiple layers of statutory protection, including but not limited to:

- **Special Areas of Conservation (SACs)** under the EU Habitats Directive (92/43/EEC)
- **Special Protection Areas (SPAs)** under the EU Birds Directive (2009/147/EC)
- Protection under the **Water Framework Directive (2000/60/EC)**
- Obligations arising from the **Planning and Development Acts 2000–2023**
- The **European Union (Environmental Impact Assessment) Regulations**

Under **Article 6(3) of the Habitats Directive**, any project likely to have a significant effect on a Natura 2000 site must be subject to an Appropriate Assessment, and consent may only be granted where it can be concluded **beyond reasonable scientific doubt** that site integrity will not be adversely affected.

---

## 4. Key Environmental Concerns

### 4.1 Habitat Disturbance and Biodiversity Loss

Construction-related activities such as trenching, drilling, vegetation clearance, and machinery operation present a high risk of:

- Physical destruction of sensitive habitats
- Disturbance to breeding and spawning cycles
- Displacement of protected and non-protected species
- Long-term habitat fragmentation

Given the ecological sensitivity of Lough Derg, even short-term disturbance may result in long-lasting or permanent impacts.

---

### 4.2 Water Quality Degradation

The proposal raises significant concerns regarding potential impacts on water quality, including:

- Increased turbidity and sediment resuspension
- Risk of hydrocarbon, chemical, or material spills
- Alteration of nutrient balances leading to eutrophication

Such impacts would directly conflict with the objectives of the **Water Framework Directive**, which requires the maintenance and improvement of ecological status and explicitly prohibits deterioration.

---

### 4.3 Hydrological Impacts and Flood Risk

Lough Derg plays a vital role in **natural flood regulation** within the Shannon basin. Any alteration to water flows, lakebed structure, or shoreline integrity may compromise this function, increasing flood risk both upstream and downstream – an issue of growing concern in the context of climate change. **We regularly observe the increase in algae when water levels decrease.**

---

### 4.4 Invasive Species Risk

Construction works in aquatic environments are a recognised vector for the introduction and spread of invasive species. Lough Derg is already under pressure from invasive flora and fauna, and any additional risk must be treated with extreme caution.

---

### 4.5 Cumulative and Climate-Related Impacts

This project cannot be assessed in isolation. The cumulative impacts of existing water abstractions, infrastructure projects, agricultural pressures, and climate change must be fully evaluated. Incremental degradation of the Shannon system represents a serious long-term threat to ecological resilience.

---

## 5. Application of the Precautionary Principle

Where scientific uncertainty exists regarding environmental impacts, **the precautionary principle must apply**, as required under EU environmental law. In the absence of clear, independently verified evidence demonstrating that the proposed project will not adversely affect Lough Derg or the wider Shannon ecosystem, permission should not be granted.

---

## 6. Assessment, Transparency, and Public Interest

I respectfully request that An Bord Pleanála ensure:

- A **comprehensive Environmental Impact Assessment (EIA)** is carried out
  - A **robust and legally compliant Appropriate Assessment** is undertaken
  - All ecological surveys are up-to-date, seasonally appropriate, and independently reviewed
  - Full transparency and meaningful public participation are maintained
- 

## 7. Conclusion

Lough Derg and the River Shannon are irreplaceable environmental assets of national and European importance. The potential risks posed by the proposed Shannon Pipeline Project to water quality, biodiversity, hydrology, and protected habitats are substantial and, at present, inadequately addressed.

Given these concerns, we urge An Bord Pleanála to refuse consent. The precautionary principle demands environmental protection in the face of uncertainty.

For the reasons outlined above, I strongly urge Clare County Council to **refuse permission** for this project unless it can be conclusively demonstrated that it will not result in environmental harm, either individually or cumulatively, to Lough Derg or the wider Shannon ecosystem.

Thank you for the opportunity to make this observation.

Lough Derg Mermaids

Mountshannon, County Clare

Peggy Boyle, Shulagh Colleran, Ageeth Hup, Annie Dinner, Nicki Griffin, Anna McMahon, Colette McMahon, Colette Doris, Helen Blackhurst