



Dún Laoghaire-Rathdown County Council
C/o Joe Craig
County Hall
Dún Laoghaire
A96 K6C9

Date: 15 December 2025

Re: This proposed development is for flood defences at key locations along the Carrickmines and Shanganagh rivers including new walls/raised existing walls, culverts, localised screens upgrades and localised works in the river. An Environmental Impact Assessment Report (EIAR) is submitted with application

This proposed Flood Relief Scheme for the Carrickmines-Shanganagh Rivers at sites in the townlands of Woodside, Kilgobbin, Carrickmines, Brennanstown, Shankill, Loughlinstown, Shanganagh and Hackettsland

Dear Sir / Madam,

I refer to the above mentioned proposed development which is before the Commission for approval. Please be advised that the Commission, in accordance with section 175(5)(a) of the Planning and Development Act, 2000, as amended, hereby requires you to furnish the following further information in relation to the effects on the environment of the proposed development:

1.	Information to Address Section 177AE(6)(a)
1a	<p>Section 177AE of the Planning and Development Act 2000, as amended requires at subsection (6) that the Commission in their consideration of the application for approval, take the following into account:</p> <ul style="list-style-type: none">(i) The likely effects on the environment,(ii) The likely consequences for the proper planning and sustainable development of the area, and(iii) The likely significant effects of the proposed development on any European sites. <p>The application documentation submitted to the Commission fails to satisfactorily address part (ii) above and you are requested to provide</p>

	information to facilitate the Commission in its consideration of this requirement of the approval application.
1b	Works at Priorsland are located in Cherrywood SDZ. The SDZ Planning Scheme contains a specific objective, PI 11, which requires a flood containment zone shall be constructed in the Priorsland area by raising adjacent ground levels approx. 500mm and by incorporating a large diameter (1650mm) bypass culvert. Your response to 1a should address this objective.
2.	Flood Risk Data
2a	The EIAR makes several references to an Options Report also referred to as Carrickmines - Shanganagh Flood River Relief Scheme Option Development Report. JBA and EGIS, February 2024. This is briefly referenced to justify the alternatives considered but does not form part of the application documentation. It is further referenced in the Response to Submissions document. You are requested to submit a copy of the relevant Options Report.
2b	The EIAR (Chapter 2) indicates that a Hydrology Report was prepared to understand the design flood flows for the scheme, while a Hydraulics Report was prepared to understand the river system and simulate predicted flood flows for different return periods. Neither of these documents form part of the application submitted to the Commission. You are requested to submit copies of the relevant Hydrology Report and Hydraulics Report.
2c	Section 4.2.1 of the EIAR states that the proposed development is defined to "provide protection to properties in the study area from the 1 in 100-year fluvial flood event", or 1% AEP. A review of OPW's floodinfo.ie indicates that part of the Shanganagh and Carrickmines river systems are subject to coastal flooding, which the OPW define in probabilities of 0.1%, 0.5% and 10% AEP. It is not clear from reading the EIAR if the FRS is designed to account for a 0.5% flood event. While this information may be in supporting reports which were not included with the original documentation, you are invited to address this point in your response.
2d	Section drawings for each of the areas where works are proposed are submitted with the application, however only some include markers of the high-end future scenario (HEFS). All sections should include details for both the

	present-day scenario and high-end future scenario and revised sections should be submitted accordingly.
2e	<p>The before and after (installation of measures) scenarios are not presented in any great detail in the application documentation. This information is considered necessary and may be contained in the Options Report, Hydrology Report or Hydraulics Report which the EIAR references but were not included with the application. An aerial photograph of the design flood event – 1% AEP event baseline scenario is included as Figure 10.3, however it is not clear which properties would benefit from the scheme. EIAR section 7.4 describes the principal potential receptors however, in the interests of clarity, maps per works area, should be submitted showing (i) the onset of flood damages to properties, baseline current scenario and (ii) Operational Phase 1% AEP Flood Extent indicating/highlighting properties protected and outline of flood risk, with the proposed measures in place.</p> <p>This information is considered necessary to inform members of the public, the observers who have raised concerns regarding the lack of information to support the application and the Commission so that it can make an informed decision on the proposed development.</p>
3	Risks of Major Accidents and/or Disasters
3a	The EIA must include the expected effects arising from the vulnerability of the project to risks of major accidents and/or disasters that are relevant to the project, however this is not addressed in the EIAR. An addendum to the EIAR should address this issue.
4	Climate Change Risk (CCR) Assessment
	Chapter 6 of the EIAR considers the construction impacts of Air Quality and Dust, Climate, Noise and Vibration, in which it is stated that a Climate Change Risk (CCR) Assessment Process has been undertaken elsewhere in the EIAR in the form of detailed flood risk assessment. A CCR Assessment Process/detailed FRA has not been submitted with the application. You are invited to clarify or submit the referenced reports accordingly.

5	Ecology - Habitats
5a	Clarify all compound areas and any temporary access wayleaves were surveyed for flora and fauna, including invasive species. Provide updated habitat and IAS maps where necessary, encompassing all lands within the red-line boundary, compound areas and any temporary wayleaves.
5b	Quantify the extent (m or m2) of the different habitats that will be subject to permanent habitat loss/change, and the extent of habitats that will be subject to temporary habitat disturbance.
5c	Within each works area identify appropriate protection measures and where these must be located to guarantee habitat protection e.g. define an exclusion zone around the pond in Belarmine Park, specify locations for silt fencing.
5d	Within each works area, identify whether replanting or reseeding is proposed to mitigate or compensate for habitat loss and damage, and prescribe species and planting methods appropriate to the local soil/drainage conditions and habitats.
5e	Assess the impacts of the scheme on the shingle habitats at the mouth of Shanganagh river.
5f	Clarification is needed with regard to the hydromorphological impacts of the scheme and the consequent effects on river habitats, such as loss of spawning gravels, nursery habitat and holding pools for fish. Describe the effects on river habitats from changes in river hydromorphology during the construction and operational phases of the scheme, considering both the effects to instream habitats in specific works areas, and cumulative effects across the catchment.
5g	The Carrickmines_010 and Shanganagh_010 waterbodies are the only waterbodies attaining Good WFD status within the M50/M11 zone, and two of the few waterbodies attaining Good status in the greater Dublin area. Following the mitigation hierarchy, where impacts to river habitats cannot be avoided, describe how they will be minimised and compensated-for. This shall include proposals for reinstatement of appropriate instream habitats to support protected aquatic life. The applicant shall liaise with IFI on the design of such measures.

6	Ecology – Invasive Species
6a	In light of the request for extended habitat surveys, question 5 relates, clarify that all works areas have been surveyed for invasive species.
7	Ecology - Bats
7a	Undertake bat activity surveys for works at the Glenamuck Road and Bray Road sites. On the basis of the findings, provide mitigation or compensation measures for the reinstatement of the linear habitats impacted in each works areas.
7b	On the basis of the arborist report, a number of mature trees and trees with dense ivy cover are to be removed. Furthermore, the arborist report identifies 56 trees for removal, while the EIAR states there are 45. The applicant is requested to undertake a revised survey of trees for potential bat roost features. This shall be carried out in a systematic manner, with photographic evidence provided, and cross-referencing the arborist report tree codes.
7c	If these surveys identify that roosting sites have the potential to be impacted, the applicant must seek a derogation licence from NPWS in advance of planning consent being granted. Detailed survey findings must be submitted with the licence application.
8	Ecology - Otter
8a	Submit an Otter Conservation Plan for the proposed flood relief scheme incorporating provision for undertaking new otter surveys of the sections of the Carrickmines and Shanganagh river system to be affected by the planned flood defence works and at least 200m upstream and downstream of these works.
8b	Undertake camera-trapping surveys at the locations of any former holt sites identified.
8c	If these surveys identify that resting sites have the potential to be impacted, the applicant must seek a derogation licence from NPWS in advance of planning consent being granted. Detailed survey findings must be submitted with the licence application.
8d	Include a mammal ledge within the new N11 culvert to allow for safe passage of mammals during flood conditions.

8e	Clarify mitigation measures that will allow for otter movements upstream and downstream during construction periods.
9	Ecology – Breeding Birds
9a	Undertake breeding bird surveys in the works areas, assess the magnitude of the impacts to local breeding bird populations due to the removal of/disturbance to riparian habitats, and devise appropriate mitigation measures to minimise and offset these impacts.
9b	Submit a Riparian Bird Conservation Plan which has regard to the surveys undertaken, in particular which has regard to kingfisher, dipper and grey wagtail, the avoidance of the destruction of the nests of such bird species in the course of these works, and alternate temporary nest sites for any birds which have to be excluded from nest sites during the works and the installation of nest boxes or ledges suitable for to be used by these bird species during the operational phase of the scheme.
10	Water Framework Directive Assessment
10a	The proposed FRS measures will take place within and along the following WFD designated river water bodies: Carrickmines Stream_010 and Shanganagh_010 which flows into the coastal water body Southwestern Irish Sea - Killiney Bay (HA10). In order to be compliant with the requirements of the WFD, any activity which has the potential to have an impact on WFD water bodies, directly or indirectly, must be assessed against the objectives of the WFD. You are therefore requested to submit a detailed WFD Assessment which assess the impact of both construction and operational phases on WFD water bodies and examines if the proposed works will cause deterioration in the status of a water body or compromise the ability of the water body to achieve its environmental objectives. Notwithstanding the hydromorphological impact assessment in Table 10.6 of the EIAR, the WFD Assessment should include an hydromorphological impact on WFD water bodies which assess it against the WFD criteria. The WFD Assessment should consider those findings arising from question no. 5 above and related to hydromorphology.

11	Surface Water Management Plan (SWMP)
11a	<p>Submit a comprehensive Surface Water Management Plan (SWMP) that addresses both the development as a whole and specific work areas which consider the complexity and individual response to each works area. At a minimum, the plan should consider the main activities, and areas where sediment, surface water runoff and pollution generation have the potential to arise including the following:</p> <ul style="list-style-type: none"> • Earthworks, to include planning, excavation and processing, transportation of materials (within and outside of the proposed Scheme); and, • deposition of materials and temporary stockpiling.
12	Traffic and Transport
12a	It is considered necessary that the EIAR is updated by way of Addendum to account for the additional information including the traffic assessment submitted in the Response to Submissions documentation.
12b	For the purposes of clarity submit an additional cross section east to west, along Carrickmines River, traversing Glenamuck Road North (R842) and capturing the proposed works either side of Glenamuck Road North.
12c(i)	<p>Notwithstanding, that a CTMP will be prepared, the response to the concerns raised by the NTA are considered inadequate.</p> <p>The NTA raise concerns regarding pedestrian and cyclists' movements during construction and state that it is not clear how these movements will be facilitated at Kilgobbin Road, Glenamuck Road North and Commons Road stating that requiring cyclists to demount is a last option. Specify how pedestrian and cyclists' movements will be facilitated at Kilgobbin Road, Glenamuck Road North and Commons Road during construction.</p>
12c(ii)	Clarify, at the N11, whether the full complement of traffic lanes and active travel facilities would be available outside the proposed working hours.
12c(iii)	Clarify that access to the Carrickmines Park and Ride will be maintained throughout the works period, with priority given to traffic coming from the M50.

12d	A Road Safety Audit has not been submitted with the application. Scoping correspondence from TII queried the need for a RSA. This is no reference in the EIAR to RSA other than TII's query to same. Having regard to the works proposed, clarification on the need for a RSA is necessary, and should be submitted, if found to be required.
13	Cultural Heritage
13a	Area 2 – Belarmine & Kilgobbin
13a(i)	It is proposed to replace boundary walls associated with Kilgobbin House, protected structure ref. no. 1684. The proposed flood wall will be constructed with a reinforced concrete core and faced with stone from the original stone wall, where possible. It is considered that a record of the wall/curtilage of the protected structure should be on file in the form of an elevational drawing and a photographic record. In addition, the EIAR, by way of an Addendum, should consider the impact of the proposed works on the setting of the protected structure.
13b	Area 3 - Glenamuck Road North
13b(i)	It is proposed to carry out works at Glenamuck Road North, within the curtilage or attendant grounds of Priorsland House, a protected structure (Ref. 1746), together with out-office and gates. Clarify how access to carry out the works at Priorsland House will be facilitated and if it is proposed to widen the access (which is narrow) to Priorsland House to facilitate same.
13b(ii)	The flood defence wall at Priorsland will be, it is stated at section 13.4.4 of the EIAR, a noticeable modern visual intrusion on Priorsland House on its parkland setting, although the length of the proposed wall is mistakenly referenced as "c.13m in length and up to 1.5m in height within Priorsland House" when the drawings indicate that the proposed wall at Priorsland House will be c.35m in length. Elsewhere, section 14.3.5 of the EIAR, Visual Receptors, states that "existing trees will be retained which will reduce the potential visual impact", where the effect is assessed as 'slight'. According to the Arborist's Report, 3 no. mature trees will be removed at Priorsland House to facilitate works. The impact assessment on Priorsland House is lacking; the EIAR does not engage to any

	extent on the impact on Priorsland House. A revised an accurate assessment of impact on Priorsland House is required to be submitted, by way of an addendum to the EIAR.
13c	Area 5 – Lower Brides Glen, N11 & Bray Road
13c(i)	The assessment of impact on the character and setting of Waterfall Cottage, a protected structure, is lacking in the EIAR. An architectural heritage impact assessment, in accordance Appendix B of the Architectural Heritage Protection Guidelines for Planning Authorities is necessary. This should be undertaken by a suitably qualified RIAR accredited <u>Conservation Architect</u> . Furthermore, it is considered that the prepared photomontage depicting the proposed wall to the east of Waterfall Cottage is at too great a distance to portray the impact on Waterfall Cottage. Additional photomontages are necessary which clearly represents closer visualisations of the proposed wall on Waterfall Cottage.
13c(ii)	Clarify the height of the proposed flood wall and railing, by way of additional sections through Waterfall Cottage and Rose Cottage and the adjoining river channel indicating the existing ground level and stone wall at scale of 1:100. Indicate the height of the proposed wall and railing. Details of proposed railings/glass panelling options are desirable.
13c(iii)	At Bray Road, an arched boundary wall, cultural heritage (CH) reference 10, also indicated to be reference 'ADCO Ref 6' in the EIAR Heritage Chapter, crosses the Shanganagh_010. The arched boundary wall includes a gateway at the northern end. Clarify if any works are proposed to the gateway.
13c(iv)	At Brides Glen, clarify extent of wall to be removed on the Bray Road, which is stated to be outlined in cyan, although not detailed in legend, it appears that the bridge which includes a post box is to be removed and reinstated. Both the bridge and letter box are detailed as industrial heritage references (ref. 1018 and 654 respectively in the DLR County Development Plan). Clarify the extent of works to the bridge structure and the post box.
14	Additional Points of Detail
14a	Cherrywood Road – clarify if there are one or two replacement footbridges proposed. Sections 5_5 and 9_9 do not correspond to the Cherrywood Road site layout plan.

14b	Bride's Glen N11 – It is considered that the proposed construction may have a temporary but significant effect on the residents of Waterfall Cottage having regard to the nature and proximity of works proposed. Submit a site-specific mitigation plan in respect of the proposed works in particular in relation to noise, and traffic management, and which also provides for their continued safe access to their property, including to Cherrywood Cottage, which shares an access with Waterfall Cottage.
14c	Bride's Glen & N11 – Clarify if the existing boundary wall to the west of Cherrywood Cottage is to be removed and reinstated to facilitate the works (highlighted in cyan on the site layout plan) but not annotated.
14d	Commons Road – clarify if (non-vehicular) access will be maintained during construction works for the residents of the single house immediately north of Noise Monitoring Location 6 (Figure 6.4 of the EIR refers) and which is accessed via an existing private bridge which is it proposed to close during construction works.
14e	Commons Road – contradictory traffic arrangements are set out in section 11.4.1 of the EIR. Clarify if two-way traffic will be maintained or whether it is proposed to change Commons Road from a two-way road to a one-way road for the duration of the works.
14f	Several flood gates and debris screens comprise part of the proposed scheme, mostly located on private property. Clarify how these elements will be maintained on private property.
15	EIR Addendum
15a	Having regard to the foregoing requests, update the EIR accordingly, by way of an EIR Addendum.
15b	Chapter 8 of the EIR considers biodiversity, the residual effects of impacts are not considered. Having regard to the additional information request, you are requested to address this oversight accordingly.
15c	Having regard to the likely time that will lapse between the preparation of the EIR and submission of additional information, you are requested to review Chapter 16 Cumulative Impacts and update as may be necessary.

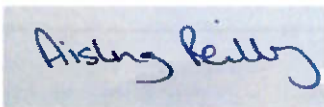
Please also note that following its examination of any information lodged in response to this request for further information, the Commission will then decide whether to invoke its powers under section 175(5)(b)(i) of the Planning and Development Act, 2000, as amended, to require you to publish newspaper notice of the furnishing of any further information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Commission.

Your response to this letter should be received on or before the **27th July, 2026**.

In this regard, please submit 3 hard copies and one electronic copy of the above information.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission at laps@pleanala.ie Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,



Aisling Reilly
Executive Officer
Direct Line: 01-8737131

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