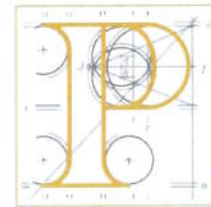


Our Case Number: ABP-321937-25



An
Bord
Pleanála

Roslyn Nicholson
12 Bayview Rise
Killiney Hill Road
A96X449

Date: 22 April 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,

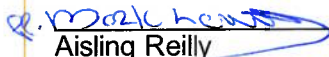
An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

If you have any queries in relation to the matter please do not hesitate to contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,


Aisling Reilly
Executive Officer
Direct Line: 01-8737131

JA02

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64 Marlborough Street
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To: An Bord Pleanála
Ref: 391937
Carrickmines-Shanganagh River Flood Relief Scheme

From
Roslyn Nicholson
12 Bayview Rise
Killiney Hill Road
County Dublin
A96X449

AN BORD PLEANÁLA	
LDG-	079298-25
ABP-	
14 APR 2025	
Fee: € 50	Type: Card
Time: 14.05	By: hand

13.4.25

This Submission relates mainly to Flood Cell 5 and the southern section of the Bayview Estate Killiney, which is bounded by the Shanganagh River.

I am not convinced that this scheme will give adequate protection to all residents close to the waterside in Bayview South: Bayview Glen and the part of Bayview Crescent that borders the river bank.

The Shanganagh River is well described in the introduction to the Non Technical Summary Document (Volume 1) where constraints included are;

“steep tributaries, urban runoff, and a narrow floodplain which forces flood flows into a channel with very limited capacity before it discharges to the sea.”

At Bayview Estate the river makes its final passage with a sharp right hand turn to filter under the narrow early twentieth-century railway bridge, before proceeding under the original Victorian railway arch about 300 metres downstream, where it meets the sea. Both of these bridges restrict the natural flow and though there is space for overtopping in the final 300 metres, factors such as high tides and potential backwash from the sea can slow the clearance of any rapid flash flood waters along the Bayview Glen banks.

The Proposed Protection Plan addresses the bottle neck point at which the channel has to turn right in “Defence 5C” where the river bank on the Bayview side and under the railway bridge will be re-enforced with flood proof walls. A flood wall will protect the rear garden boundaries of homes at Bayview Grove.

With the further heightening of flood walls upstream of Bayview at the adjoining housing estate Brookdene (which had emergency interventions followed by a flood wall around 2013, in addition to added protection at both Shanganagh Bridge and Commons Road) the column of water in any flooding situation is likely to increase further in volume, velocity and power before it hits Bayview Glen where no added protection is being provided.

While the Glen appears to be a wider open space it is still under pressure when the channel waters rise. Three underground concrete pipes (as far as we can determine) also discharge surface water into the river at this point and there are two concrete inflows of larger dimensions on the opposite bank, so in times of heavy rains the channel is already receiving run-off from the surrounding areas.

River Bank Notes Bayview

Though the section of riverbank (5.C) where a new flood wall is to be constructed has the appearance of 'settled land,' it is of composite material, which the test drill confirmed. It was once a marshy field with scrap metal and building rubble, which was leveled off to form a riverside greenway after the construction of the Bayview houses in the mid-1980s.

During river clean-ups by the community in the late 90s, it was evident the rusty car parts embedded in tangled tree roots formed part of the riverbank, so we learned not to attempt to remove those.

Disturbance of this ground and removal of trees and roots, combined with the pressure of high waters, may contribute to further erosion and undercutting of the riverbank at the wall point and cause some subsidence at a later stage, after the construction of the flood wall.

Around 2006 the river was diverted for several weeks to facilitate the insertion of a series of large concrete pipes, including in the area between Bayview Lawns and Brookdene. This may have been to provide extra surface water drainage after the construction of the motorways 2/3 km upstream at Loughlinstown.

There is little natural soakage for rain or runoff along the Bayview riverbank, and this was confirmed during the time of the engineering test drilling when the concrete-solid underlying boulder clay was quickly encountered. It was speculated that the river may require an extra culvert or outchannel, but that possibility was never raised in further plans.

In August 2008, after ceaseless torrential rains, the waters rapidly rose along the Bayview section of the riverbank. A water gauge on Commons Road was swept away, so data for water levels is not on record. The Deansgrange River at the north end of the estate simultaneously went into flash flood mode. Potential flooding issues had become critical, and the Bayview Residents Association engaged fully with Dun Laoghaire Rathdown Council and the CFRAM process through the subsequent years.

It is my impression that since 2014, pluvial downpours in the immediate area have not been as persistent and severe, but the threat remains and could strike at any stage. Continuous heavy rains combined with high tides and east winds put us at increased risk. Tidal surges and climate change are additional factors now.

Insurance:

Homes within 200 metres of a river have been denied flood insurance for well over a decade, and any flood cover on older policies would now be deemed 'invalid' if residents need to make a claim. This is an increasingly thorny issue for new residents requiring home insurance.

As Bayview Estate is now 40 years old, inevitably there are a few residents close to the waterside with long-term illnesses. There is a duty of care that the Flood Protection Scheme will protect all residents, especially should displaced floodwaters overtop the devised channel and spread.

Intensive building programs in the Carrickmines-Shanganagh catchment area, in addition to the development of the new town upstream at Cherrywood, have reduced natural soakage, particularly where concrete now replaces green areas. Even with the implementation of SUDS measures, the waters will ultimately discharge into the single waterway, which is the boundary of Bayview South.

Cumulative Pressures:

Dublin Array Windfarm Landfall Cables: Bord Pleanála Case Reference: 321992

The Carrickmines-Shanganagh Protection Works submission period and the Dublin Array

Windfarm submission to An Bord Pleanála are overlapping now in April 2025.

Construction periods for the long-awaited flood protection works and those for the Dublin Array Landall Cable Route via Shanganagh Cliffs will probably overlap in the time frame 2026 to 2030 at Bayview Glen and the riverbank. The proposed twin cable route through Bayview Glen, Crescent, and Grove was only officially acknowledged in summer 2024, and we were originally told that the route would be most likely via River Close. This has been changed in the current plan.

Disruption to residents of Bayview South ('Hackettsland' townland) during the combined period of these works will be severe.

There will be a loss of amenity space, and a number of the mature and graceful trees will be removed in both the riverbank area and along Bayview Crescent, which will undermine one of the most appealing features of our surroundings. The temporary loss of the right of way that functions as the daily exercise route for many people will reduce options. That will result in more car movements to access other amenity spaces as preferred.

One resident noted the loss of the play space for local children.

Impacts of the flood protection construction works for Bayview South residents and other riverbank walkers.

The right of way along the riverbank northwards will be narrowed to a laneway after the works with the path enclosed by high walls at two points. The popular walkway is the customary route to the beach underpass and shore area for many people.

The main concern will be the maintenance of the space and the safety of the path for users.

In our general experience, the greenway space can become very contaminated with dog poo, and at times, as it deteriorates, it attracts dumping. Several years ago we had to request the council to remove a butchered animal carcass from the space. Antisocial behavior can bring an extra layer of debris at times. Scrambler bikes have been an issue in recent years at times.

There can also be dumping in the river channel, which may cause a flood hazard, in addition to fallen trees. With a raised wall, it will be difficult for pedestrians to identify rubbish on the riverside, which may fester and bring vermin.

This space has always brought management challenges, and the support of DLR in dealing with these over the years has been welcome. Regular monitoring will be necessary.

There are many successfully maintained and attractive laneways in DLR, I am told. A streetlight with a low beam may be an advantage and also one or two corrugated paving slabs underfoot at the narrowest points.

At the final landscaping and replanting phase, these practical issues can be taken into account.

Water Safety:

There needs to be provision of a rapid access point in the flood wall area for any sudden emergency where a person or pet slips into the waterway.

PEST Control

The CEMP report includes a reference to pest control in Section 6.9. Local residents will require a contact number in order to raise urgent issues with the team during construction works. With a railway line, a river, and the major sewage plant close to the flood wall area, there is a need for rapid action if sightings of rats increase. (There are some on the seashore already this season.)

We welcome the ecological monitoring and other management measures listed in the CEMP plans. Contact details will be essential.

Biodiversity at Risk

For the most part, the EIAR for this scheme is reassuring, as it has identified a number of the mosaic of microhabitats and wildlife corridors between Bayview and the seashore. This April provides a good baseline for the typical biodiversity of the area. Almost deafening birdsong from the riparian canopy of trees, foxes, ducks in the stream, and swans in the estuary. Already five species of butterfly have made an appearance along the riverbank, which is part of Butterfly Transect D19 (National Wildlife Data Centre). Dolphins were observed to be heading north across Killiney Bay this week, quite close inshore. We are aware that both the river channel and receiving waters will be under added pressure from increased siltation during the construction period and trust that there will be continued monitoring of the water quality, especially if the construction of the Dublin Array cable route overlaps with the Flood Protection Scheme works. The combined onslaught of two projects in a confined area increases the pressures on Biodiversity. Disturbance of the riparian zone will increase the spread of Giant Hogweed. This is regularly treated on an annual basis by DLR

The surveys of bats, otters, and fish are appreciated.

Phase 2 of the Flood Protection Scheme? Defence 5.B?

Some residents have suggested that a Phase 2 to the Protection Works will be necessary. No doubt this would be postponed until 2030, in order to facilitate the construction of incoming cable links for Dublin Array Windfarm through the same confined spaces.

A wall along the road kerb at Bayview Crescent/Glen in order to help define the river bank boundary and protect the nearest homes from rising waters in a crisis could be considered. Practical measures to close any access gaps in the wall during an emergency could be planned in.

Alternatively, a wall lower down along the river bank in Bayview Glen, equal in height and strength to the flood walls proposed for Brookdene (5.A) upstream and Bayview (5.C Defence) further to the north, would be the solution.

Or a raised berm bank of some type, perhaps.

I appreciate the many years of surveys and assessments that have gone into the Carrickmine-Shanganagh River Flood Protection Scheme.

With integrated planning, we look forward to every success with the plans.

Roslyn Nicholson Roslyn Nicholson

(former Chairperson Bayview Residents Association 2006 to 2014 and continued as a committee member)

(Also: Bayview rep on the WWTP Liaison Committee from 2007 to 2013 which spanned the pre-planning construction and commissioning period of the sewage treatment plant project)

Shangawagh River and proposed Flood Defences N
(Sector 5)



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(391937)

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WTP
Director

DART
LINE



Fallen Tree across river channel after Storm Eoghan 2025 (at Bayview Defence 5C Proposed flood wall site) April 2025: tree still lying across the channel.
Between Bayview Glen and Bayview Lawns



Dolphin (one of four) heading from Killiney Bay South towards Dalkey Sound 11.4.25 (close to Rockabill to Dalkey Island SAC) The Shanganagh River flows into Killiney Bay northwards.

(391937)

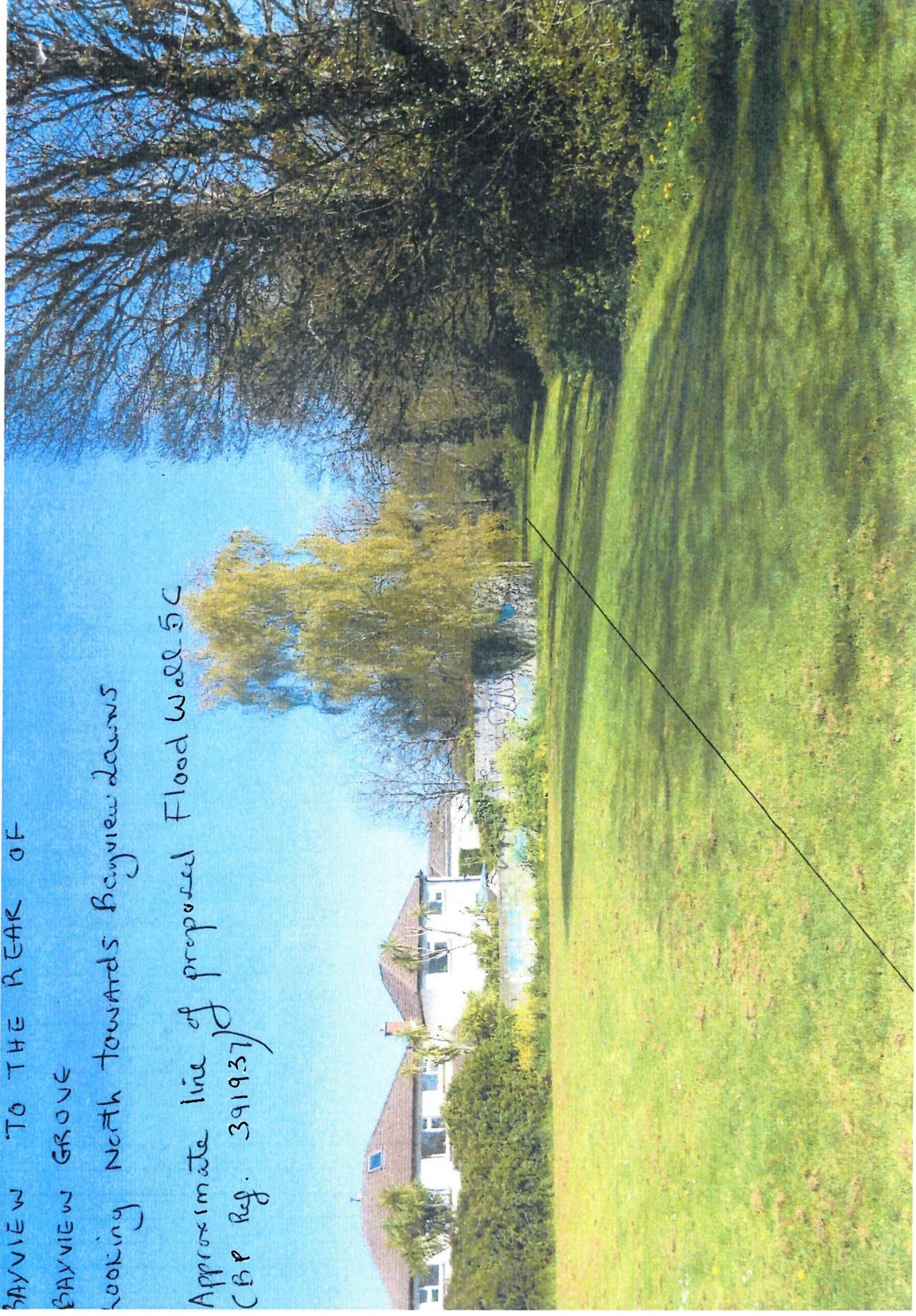
BAYVIEW TO THE REAR OF

BAYVIEW GROVE

Looking North towards Bayview Downs

Approximate line of proposed Flood Wall 5C

(BBP Reg. 391937)







BAYVIEW GLEN APRIL 2025
Looking Southwards (towards Brookdene Estate
Dog. 5A)
River on the left

Ref: BP 391937



Looking Northwards.
Approximate line of
Flood Wall (BP 391397)
← Defence 5C

near of Bayview
Grave

Cumulative Pressures (Page 2)

Dublin Array Windfarm proposed Cable Route and the proposed Flood Walls.

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DUBLIN ARRAY WINDFARM APPLICATION.

B.P. [REDACTED] 321992

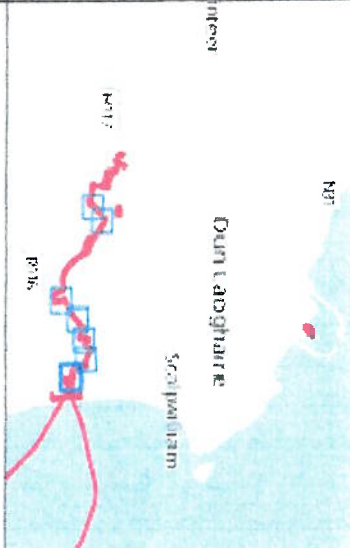
---: Approximate Route of Dublin Array windfarm double cable.

Lernekmires - Shanganwayh
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Appendix Site Boundary

Onshore Electrical System (VES) 50 m Study Area

Onshore Electrical System (VES) Design

- Terrestrial Trenchless Crossing Corridor
- Onshore Export Cable Route (Trenchless)
- Onshore Export Cable Route (Trenchless)
- Terrestrial Construction Corridor (TCC)

Export Cable Route (ECR) Sector

Sector 1

Tree Survey Results

Tree Protection Zones (TPZ) are 1 m from the trunk (as per NUIG Volume 4, 2007)

Red Protection Area (RPA) as per BS5837:2012

Exclusionary Zone (as per NUIG Volume 4, 2007)

Impact of ECR on Trees (label colour denotes impact level)

- 0001 Trees Not Affected by ECR
- 0001 Trees Severely Affected by ECR
- 0001 Trees To Be Removed To Facilitate The ECR

---: Approximate line of incoming windfarm cables (shaded in cliffs)

PUBLIC

Dublin Array

Arboriculture:

Trees Survey Results Mapping

Figure: 1

YEAR	DATE	REMARKS	STATUS	CHG	APPROV
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