Our Case Number: ABP-321937-25

Your Reference: Sandyford Park Developments One Limited - SID-OBS-002808

An Bord Pleanála

Thorntons Chartered Surveyors
c/o Tony Cullen
13G Blanchardstown Corporate Park
Blanchardstown
Dublin 15

Date: 23 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

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1800 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Thorntons
CHARTERED SURVEYORS

An Bord Pleanala
64 Marlborough Street
Dublin 1
D01 V902

CHARTERED VALUATION
& BUILDING SURVEYORS
13G Blanchardstown
Corporate Park,
Blanchardstown,
Dublin 15
D15 YCX5

Tel: 01 811 5240
Email: surveyors@tcsl.ie

www.thorntonsurveyors.ie

11th April 2025

RE: Flood Relief Scheme for the Carrickmines and Shanganagh Rivers

Dear Sir/Madam

On behalf of our client, we wish to make a number of submissions/ observations in respect of the above flood relief scheme. Our submission and observations are set out below following the criteria set out in the site notice dated 19th February 2025.

Please also find attached cheque in the sum of €50 in respect of the submission observation fee.

The submission and observations listed and set out below are made by Tony Cullen, MSCSI MRICS Chartered Building Surveyor from Thorntons Chartered Surveyors, 13G Blanchardstown Corporate Park, Blanchardstown, Dublin 15.

These submissions or observations are made on behalf of our client Sandyford Park Developments One Limited CLG c/o Cuala Property Management. For clarity, Sandyford Park Developments One Limited CLG is the owners' management company of the Clon Brugh development.

The address for correspondence in respect of this matter is c/o Thorntons Chartered Surveyors, 13G Blanchardstown Corporate Park, Blanchardstown, Dublin 15.

Subject Matter of Submission/Observations.

The subject matter in relation to this submission/observations relates purely to Flood Zone One and how it affects the Clon Brugh development and in particular, the measures proposed, ie, Measures 1A and 1B.

Submission/Observations

In principle, the owners' management company of Clon Brugh welcome the proposed alteration and provision of additional flood defence walls to combat what has been a flood risk ever since the development was constructed. There have been two significant flood incidences within the development in circa 2010 and 2011 which caused large property damage within a number of apartments in The Park Block caused by over flooding of the overland flow channel or swale. Also the flooding of the basement car park in The Hill and The Wood Blocks due to flooding of the Carysfort-Maretimo Stream at its junction with the Enniskerry Road.

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The board of the Management Co welcome the proposed works which they hope will assist with the identified areas at risk of flooding on Map 1 at the southern end of Clon Brugh the proposed works. However the proposed works will not fully address the flooding risks within the development along the north, northwest and west parts of the development comprising houses 84 to 92, Clon Brugh, The Wood and The Hill apartment blocks.

The owners' management company had commissioned their own report in 2015 prepared by Roughan O'Donovan Consulting Engineers which recommended various flood alleviation works particularly along the backs of the houses 84 to 92 Clon Brugh showing issues where the riverbank of the Carysfort-Maretimo Stream was at risk of flooding. Whilst the council and indeed, An Bord Pleanala may argue that this is outside the scope of this proposed flood relief scheme, the issues regarding the Carysfort-Maretimo Stream are directly interlinked at the north and northeast side of Clon Brugh due to the presence of the overland flow channel or swale linking the Carysfort-Maretimo Stream and the Kilgobbin Stream. This was designed into the development of Clon Brugh originally at the time of planning and the matter went to An Bord Pleanala. The review of the documentation in relation to the initial scheme design here showed that the original design of the overland flow channel or swale to be much more pronounced i.e. wider and deeper then it was ever constructed, lack of attenuation tanks with hydro brake which were apparently never installed. Previous correspondence with Dún Laoghaire-Rathdown County Council on this matter by way of planning enforcement back in 2012-2014 with Ray Hickey /Paul Faughnan to have the matter addressed by the original developer, Cannon Kirk (DLRCC were holding a development bond at the time) were simply not taken any further, when it was clear that the scheme had not been constructed in substantial compliance with planning.

Now turning the work being proposed, they will assist but will not in themselves fully protect Clon Brugh against future flooding particularly the houses at 84 to 92 Clon Brugh.

Observations in Respect of Proposed Intervention Works Measures 1A And 1B

This relates to the upgrading and extension of existing flood walls and the closing of existing openings in existing walls. With reference to the Carrickmines Shanganagh Flood Relief Scheme Preliminary CEMP Report Section 3.2.1 on Clon Brugh, ' this will only work if the two measures work together'. In our opinion, the works as set out on the Drawing No. 20108-JBB-00-XX-DR-Z-02910 in its current proposal will not fully deal within this objective:

1. The proposed construction of Flood Defence Wall 1 is acknowledged. There is, however, no design or proposal to include a pedestrian bridge over this new Flood Defence Wall 1 between Clon Brugh and the new development to the east, Dun Gaoithe Heights. As part of the planning permission granted for this adjacent development (following submissions by OMC at Clon Brugh) a pedestrian link or 'right of way' was agreed through the Dun Gaoithe Heights development to link into the Aikens Village Road. Despite the development being largely finished, this pedestrian link or 'right of way' has still not fully re-opened. Therefore, some form of pedestrian bridge is required to extend over the new Flood Defence Wall 1.

2. The gap and staggered configuration at the north end of the new Flood Barrier Wall 1 and the altered Flood Barrier Wall 2 will, in our opinion, cause a flood flow to escape through the gap between the walls. New Flood Wall 1 and Existing Wall 2 should be linked with no gap or opening for flood flow waters to escape. The demolition of 16m of existing walls, to then build a new Wall 2 immediately adjacent just to allow for the realignment of a footpath in our view makes little sense, especially as there will still be is a staggered gap in the flood

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Represented at. Limerick, Unit 3, Castletroy Park Commercial, Castletroy, Limerick.

defence wall. In our opinion, the new Flood Barrier Wall 1 should be constructed and link up to the end of the Existing Wall No.2 with no gap. The footpath could be then realigned outside of the flood barrier wall and extended up behind the existing bin store with an opening created in the existing wall at the 'dog leg section' to connect and continue the pedestrian footpath. It is our opinion that this could be achieved at less expenditure than needed to demolish and rebuild 16 linear meters of flood barrier wall. Retaining a staggered gap between Flood Barrier Wall 1 and Existing Wall 2 even realigned leaves a gap for flood flow to occur, defeating the purpose of constructing it.

3. The other 'gaps' or openings in the Existing Wall No.2 and Section North of this (2No. gaps/openings) also require permanent infilling as the two Proposed Measures 1A and 1B need to work together in tandem. The flood flow will otherwise run out of these two existing gaps/openings in the existing walls which are higher up the overland flow channel or swale. This would make the construction of the new flood defence walls further down the overland flow channel or swale ineffective. Effectively, flood waters will escape from the overland flow channel or swale at these gaps in the existing walls well before the water reaches the proposed new circa 113 linear meters of flood defence walls. All existing openings in the walls need to be closed up, no new openings created for the proposed new flood walls to be effective as part of the relief scheme.

   We have reviewed Table 2.1 measures of the EIAR Volume 2 Flood Cell 1 as it relates to Clon Brugh. Measures 1A and 1B dealt with above as measures taken forward, and we have made our observations and comments to those.

4. Measure 1F

   Whilst we can understand why Measure 1F as set out in the document was not taken forward, it is unclear why an amendment or part of this measure i.e. the addition of a wall or raised embankment to protect the houses at 84-92 Clon Brugh was not considered alongside the measures taken forward (ie, Measures 1A and 1B). This is without the flow control outlet pipe into the swale at the spill point. There is very little, if any effective flood barrier wall at the back of these houses even with the recent small intervention by Dún Laoghaire-Rathdown County Council. There are flood barrier walls on the other side of the Carysfort-Maretimo Stream forming the boundary with Hillview and as a result, any flood waters will come the direction of Clon Brugh. A barrier or wall could easily be constructed well away from the existing stream edge along the backs of these houses to then fully protect Clon Brugh. This has not been considered as the two matters are directly interlinked as stated above.

   More recently and despite this option being ruled out, a wall structure/culvert and garden has been constructed over and on the bank of the Carysfort-Maretimo Stream at the north point of the Clon Brugh development where it flows onto Hillcrest Downs. This was carried out around the same time we understand that DLRCC/their contractor also removed part of the existing wall in 2022. This has, in effect, partly created the works that the EIAR Vol 2 Table 2.1 rejected. This structure will for the reasons a wall or embankment, (Measure 1F) was rejected in the EIAR lead to additional flow levels within the Carysfort-Maretimo Stream before it can spill over into the overland flow channel or swale. This very option which is ruled out has, in fact, been partly carried out by an adjoining owner in Hillcrest Downs. This needs to be further reassessed by Dún Laoghaire-Rathdown County Council and their consultants immediately, as this places these houses 84-92 Clon Brugh at greater flooding risk. We enclose a number of photographs for your information. Water is currently breaching out of

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the base of this stream wall and diverting water from the Carysfort-Maretimo Stream down the swale or overland flow channel in a non flood scenario. Prior to this intervention by the adjoining owner, the swale or overland flow channel had remained largely dry with the exception of short periods of prolonged heavy rain or storms. We would request that this Measure 1F or part of it is re-assessed in light of these changes to the stream.

5. It is accepted that a site compound will be necessary within the grounds of Clon Brugh for these intervention works. We would, however request that a condition is inserted requiring DLRCC, their consultants or contractor to liaise with the Management Co to reach agreement here. The extent and positioning of the site compound as proposed the would appear to result in the loss of at least eight car parking spaces opposite The Park blocks which will be an issue for the owners' management company at Clon Brugh and the residents directly impacted. The direct loss of at least eight spaces for a prolonged period will need to be discussed and agreed closer to the time these works proceed.

In conclusion,
We would agree broadly with the proposals and Measures 1A and 1B but with some modification to the design, to allow the linking of Flood Barrier Walls 1 and 2, (avoiding a staggered gap where flood water can secape) not demolishing 16m section of wall already in existence for the realignment of the footpath. Footpath can be realigned outside of the flood barrier.

There is a requirement to infill the existing openings 2nr in the existing walls further north to prevent flood water escaping.

Some form of steps and pedestrian bridge to access the link footpath across the adjacent Dun Gaoithe Heights Development needs to be shown on the proposal and subsequent tender documentation.

The intervention works carried out to the bank of the Carysfort-Maretimo Stream at Hillcrest Downs estate creating a raised embankment/wall, with culvert and deck/garden above has in itself created a greater flood risk to Clonbrugh. Reasons for discounting Measure 1F state this. This alteration was carried out after certain measures were adopted over others. Flood defence walls will, need to be provided at the back of 84-92 Clon Brugh as part of this scheme or the removal of this wall and culvert structure with action from Dún Laoghaire-Rathdown County Council.

We enclose a supplementary plan document with marked up amendments proposed to drawing 20108-JBB-00-XX-DR-Z-02910 to clearly illustrate the points we are making regards measuring 1A and 1B. In additional photographs showing the intervention work at the north end of the overland flow channel or swale at the junction with the Carysfort-Maretimo Stream.

We are happy to provide any further clarification or information that may be requested.

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Yours sincerely

Tony Cullen.

Tony Cullen, MSCSI MRICS

For and on behalf of
THORNTONS
CHARTERED BUILDING & VALUATION SURVEYORS

Encl.
Clonbrugh Site layout with annotated observations

Photographs – Point 3 – 1nr gap to existing wall.
Point 3 – 1nr gap to existing wall.
Point 4 – Carysfort- Maretimo Stream at the junction with overland flow channel/Swale – wall/embankment/culvert – Clon Brugh/Hillview estate.

Payment of €50.00

Cc: Board of Directors, Clon Brugh Owners' Management Company.

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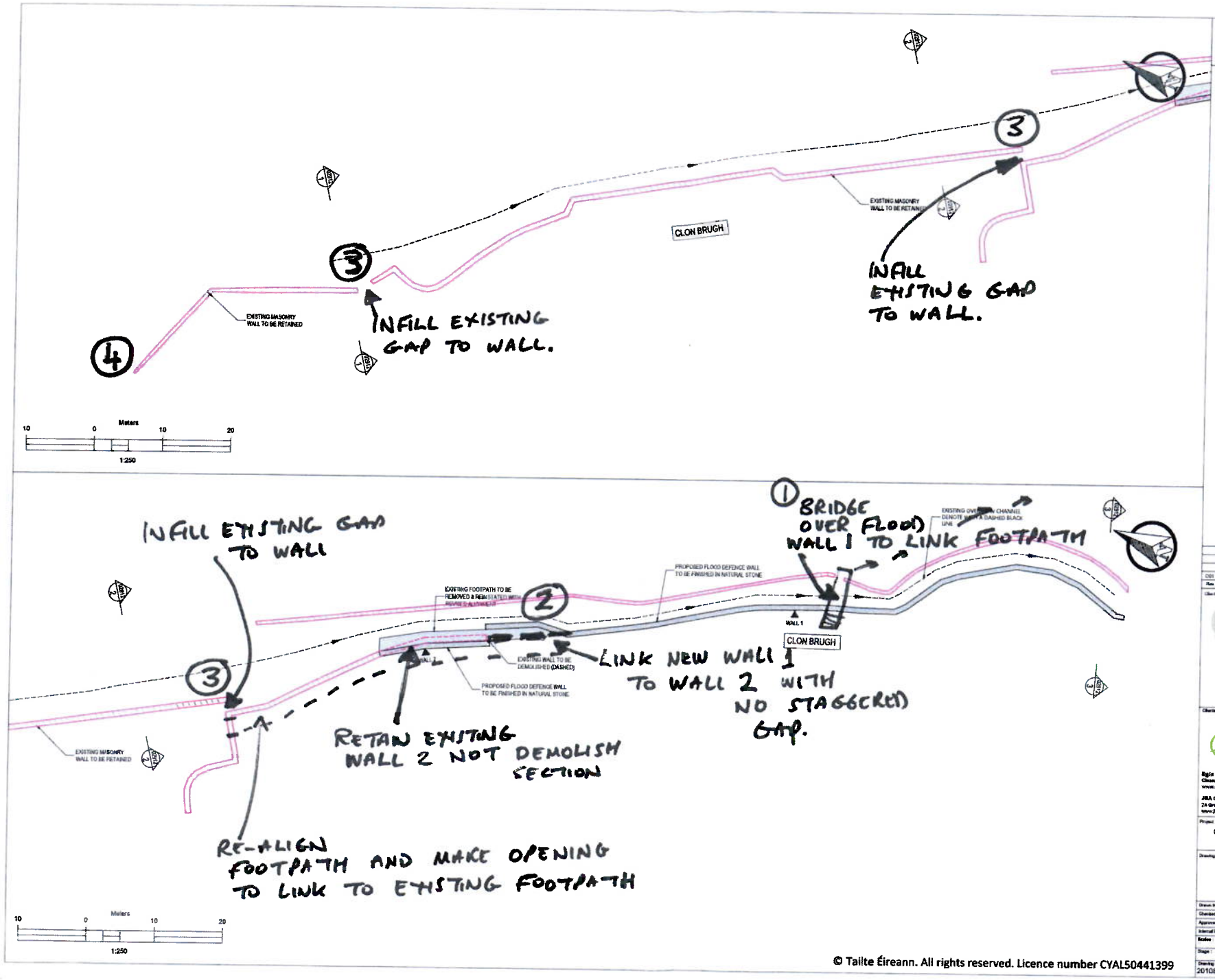

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NOTES

1. ALL LEVELS IN METERS TO MALIN HEAD DATUM
2. ALL COORDINATES ARE TO IRISH TRANSVERSE MERCATOR

LEGEND:

- PROPOSED NEW FLOOD DEFENCE WALL TO BE FINISHED IN STONE
- EXISTING WALL TO BE RETAINED
- EXISTING WALL TO BE REMOVED

Rev	Sub	Description	Drawn	Ch'ckd	Date
C01	A1	ISSUE FOR PLANNING	MH	ED	20.02.25

Client

OPW Oifig na nOibreacha Poiblí Office of Public Works

dlr Comhairle Contae County Council

Clients Representative

egis JBA consulting

Egis Engineering Ireland Ltd.
Clinton House, Dundrum Business Park, Dundrum Road, Dublin 14
www.egis-group.com

JBA Consulting Engineers and Scientists Limited
24 Grove Island, Corbally, Limerick
www.jbaconsulting.ie

Project

CARRICKMINES SHANGANAGH RIVER FLOOD RELIEF SCHEME

Drawing Title

CLON BRUGH
PROPOSED SITE LAYOUT

Drawn by :	MH	Date :	03.10.2024
Checked by :	ED	Date :	20.02.2025
Approved by :	RK	Date :	20.02.2025
Internal Project REF :	Egis: 20108	JBA: 2020e0088	
Scales :	AS SHOWN		
Stage :	PLANNING		
Drawing No. : 20108-JBB-00-XX-DR-Z-02910	Revision C01	Suitability Code A1	

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