

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

24 August 2026
Ref.: ABP-321937-25

Re: Carrickmines-Shanganagh River Flood Relief Scheme
Application Notice of Request for Further Information

Dear Sir/Madam,

We refer to the request for further information in support of the above referenced planning application. We wish to respond to the queries raised as follows.

1. Information to Address Section 177AE(6)(a)

Query 1a. *Section 177AE of the Planning and Development Act 2000, as amended, requires at subsection (6) that the commission in their consideration for approval take into account:*

(ii) The likely consequences for the proper planning and sustainable development of the area.

The application documentation submitted to the Commission fails to satisfactorily address part (ii) above and you are requested to provide information to facilitate the Commission in its consideration of this requirement of the approval application.

Response:

The Document "Planning Statement, Carrickmines-Shanganagh Flood Relief Scheme", included as Appendix 2 of the EIAR Addendum Appendices, demonstrates that the proposed Flood Relief Scheme is consistent with the National Planning Framework First Revision 2025, the Regional Spatial and Economic Strategy for the Eastern and Midland Region, the Eastern CFRAM Flood Risk Management Plan, and the Dún Laoghaire-Rathdown County Development Plan 2022-2028. The assessment concludes that the scheme will provide significant long term flood protection benefits, support climate resilience objectives, reduce flood risk to residents, businesses and critical infrastructure, and is therefore consistent with the proper planning and sustainable development of the area. The Planning Statement also confirms that the conclusions of the EIAR remain unchanged and that no significant adverse environmental effects are anticipated following implementation of the proposed mitigation measures.

Query 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 to 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.*

Response:

The Planning Statement assesses the relationship between the proposed flood relief works at Priorsland and Objective PI11 of the Cherrywood SDZ Planning Scheme. It confirms that while the proposed Flood Relief Scheme does not itself deliver the flood containment zone and bypass culvert identified under Objective PI11, it does not conflict with, undermine, or prejudice their future implementation. The proposed works will reduce peak flows in the Carrickmines River and remain fully compatible with the future delivery of the flood

containment measures envisaged by the SDZ Planning Scheme. Accordingly, the proposed development is considered consistent with the objectives of the Cherrywood SDZ and the proper planning and sustainable development of the area.

2. Flood Risk Data

Query 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.

Response:

The Options Report (Ref: 20108-JBA -00-XX-RP-Z-00322_Options_Report_P04) is included as part of the documentation submitted with this response. It was previously published on the FRS website¹.

Query 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.

Response:

It should be noted that the Hydrology Report (Ref: 20108-JBA-00-XX-RP-Z-00328_Hydrology_report_C01) is a single document that addresses both hydrology and hydraulics for the flood relief scheme (rather than two separate reports). The Hydrology Report was prepared by JBA and is included as part of the documentation submitted with this response. It was previously published on the FRS website².

Query 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 defines 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.

Response:

The FRS is designed to account for fluvial flooding only, in line with the Project Objectives outlined in Section 1.2 of the Options Report.

Query 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.

Response:

As requested, all section drawings provided with the application have been updated to show the HEFS water levels.

¹ JBA Consulting (2025) Options Development Report, Carrickmines-Shanganagh River Flood Relief Scheme. Available at: https://www.csfrs.ie/media/ojvnllno/20108-jba-00-xx-rp-z-00322_options_report_p04.pdf

² JBA Consulting (2025) Hydrology Report, Carrickmines-Shanganagh River Flood Relief Scheme. Available at: https://www.csfrs.ie/media/amkm2zxp/20108-jba-00-xx-rp-z-00328_hydrology_report_c01.pdf

Query 2e. *The before and after (installation of measures) scenarios are not presented in any great detail in the application document. 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.*

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.

Response:

Additional maps per work area 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, have been produced and are included in the EIAR Addendum Appendices, Appendix 1.

3. Risks of Major Accidents and/or Disasters

Query 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.*

Response:

An assessment of the risks of major accidents and/or disasters has been included in the EIAR Addendum, Chapter 17.

4. Climate Change Risk (CCR) Assessment

Query 4a. *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.*

Response:

Detailed flood risk modelling and assessment was carried out throughout the development of the proposed FRS, as outlined in the Hydrology Report and the Options Report, both submitted as part of this RFI Response. These included an assessment of the likely effects of climate change with the Mid-Range Future Scenario (MRFS) and High-End Future Scenario (HEFS) flood probabilities also considered in addition to the Present-Day Scenario.

The Options Report also considered climate change in terms of the proposed FRS by assessing the climate change adaptability of the proposed measures in Section 7. The design of the proposed measures is fundamentally part of the Climate Change Risk (CCR) Assessment Process referenced in Chapter 6 of the EIAR.

5. Ecology - Habitats

Query 5a. *Clarify if 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.*

Response:

All lands within the red-line boundary, including the proposed compound areas and any temporary access wayleaves, were surveyed for habitats and flora and fauna species.

The updated habitat mapping, encompassing the lands within the red-line boundary, compound areas and temporary access wayleaves, is provided in Chapter 8 of the EIAR Addendum.

The updated mapping in relation to Invasive Non-Native Species are included in the updated Invasive Species Management Plan submitted with this RFI response.

Query 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.

Response:

The extent of different habitats subject to permanent and temporary loss is quantified in Table 8.1 of Chapter 8 of the EIAR Addendum. The table provides, by location and habitat type, the area of loss (m²), the nature of the loss and the percentage loss.

Query 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.

Response:

Appropriate protection measures for each works area are identified in the Surface Water Management Plan (SWMP) and the Arboricultural Impact Assessment. Section 3.4.1 of the SWMP, which was submitted as part of the RFI response, identifies indicative locations of silt fencing and geotextile sandbag walls to provide protection from sediment and surface water runoff during construction. The Arboricultural Impact Assessment submitted with the original planning application identifies the tree root protection zones, which will be protected from construction activities. These measures will ensure that habitats and ecological features are protected during construction.

Query 5d. Within each works area, identify whether replanting or reseedling 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.

Response:

The proposed planting and seeding measures, including species and methods, are illustrated in the accompanying Landscape Drawings included in the EIAR Addendum Appendices, Appendix 3. The drawings identify the areas where replanting and/or reseedling is proposed to mitigate habitat loss or damage and provide the spatial extent of the proposed reinstatement measures.

Query 5e. Assess the impacts of the scheme on the shingle habitats at the mouth of Shanganagh river.

Response:

The impacts of the proposed scheme on the shingle habitats at the mouth of the Shanganagh River are assessed in Section 8.1.8 of Chapter 8 of the EIAR Addendum. These habitats lie beyond the extent of the proposed works and will not be physically altered. While there is a low risk of accidental pollutant runoff affecting these habitats during construction, particularly during storm events or in combination with high tides and flooding, this risk will be managed through the measures set out in the CEMP. No significant impact on these habitats is anticipated during the operational phase.

Query 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 work areas, and cumulative effects across the catchment.

Response:

The hydromorphological assessment presented in the original EIAR has been reviewed in response to this RFI. The review has not identified any material change to the findings or conclusions of the original EIAR assessment.

As documented in the original EIAR, the specialist electrofishing surveys undertaken by Triturus Ecology identified that good quality fisheries habitat was overall limited throughout the catchment due to hydromorphological pressures, water quality issues, and several instream barriers. In areas where local channel form supported improved habitat potential, the hydromorphological assessment concluded that no significant impacts to channel form or function were likely because of the proposed scheme.

Along the Shanganagh River, the best salmonid habitat within the assessed catchment, impacts from the proposed flood walls are not considered significant due to their setback from the channel and the locally constrained topography at Bayview. At Shanganagh Road Bridge, predicted velocity changes upstream are confined to approximately 50 m, with minor changes downstream at bankfull flows and more notable changes at higher flood flows. Monitoring of channel response has therefore been recommended to identify any unexpected changes at an early stage. The channel immediately upstream and downstream of the bridge currently offers limited habitat potential due to armoured bed conditions and a predominantly transportational dynamic. Further upstream at Loughlinstown Woods, where the best morphology and habitat potential was observed, no impact on habitats is expected.

Construction risks to habitat are not considered significant given the proposed fine sediment management measures. The CEMP Addendum also incorporates additional measures agreed with IFI, including pre-construction redd surveys, to identify and protect sensitive spawning areas prior to works.

Overall, the assessment does not identify any significant risk to physical river habitat at the catchment scale during construction or operation of the scheme.

Query 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 habits to support protected aquatic life. The applicant shall liaise with IFI on the design of such measures.

Response:

The mitigation measures identified in the original EIAR have been reviewed in response to this RFI. No material change to the proposed scheme or the assessed effects on river habitats has occurred, and the original mitigation strategy remains appropriate.

Mitigation by design has been incorporated where works have the potential to interact with the existing channel. For example, at the Shanganagh Road Bridge, the design of the concrete apron has followed relevant NRA and IFI guidance to maintain the existing channel grade line over the long term and avoid the creation of an apron perch or other alteration to fish passage and channel hydraulics. The proposed design therefore aims to retain the existing instream conditions and avoid unnecessary disturbance or modification of the river habitat. In addition, ongoing monitoring has been recommended to identify any unexpected channel response or changes to instream conditions at an early stage, allowing appropriate remedial measures to be implemented where required.

As part of this RFI response, the applicant liaised with Inland Fisheries Ireland (IFI) regarding the potential effects on aquatic habitats and the proposed mitigation measures. IFI confirmed that they were satisfied with

the conclusions of the original EIAR assessment and requested that specific additional measures be incorporated into the CEMP. These measures are detailed in the CEMP Addendum submitted as part of this application.

6. Ecology – Invasive Species

Query 6a. In light of the request for extended habitat surveys, question 5 relates, clarify that all works areas have been surveyed for invasive species.

Response:

All works areas have been surveyed for invasive species. The previously submitted Invasive Species Management Plan (Ref: 20108-JBA-00-XX-RP-Y-00342_Invasives_Report_Management_Plan_A-C01) has been reviewed and updated accordingly to reflect the survey findings and the requirements arising from the extended habitat surveys. The updated Invasive Species Management Plan has been submitted with this RFI response.

7. Ecology – Bats

Query 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.

Response:

Based on the findings of the bat activity surveys, mitigation measures are proposed to address the impacts on linear habitats at the Glenamuck Road and Bray Road works areas. These measures include replacement tree planting to reinstate the affected commuting corridors, together with retention of existing vegetation and new meadow planting to maintain foraging opportunities for local bat populations. Artificial bat roosts will also be installed to compensate for the loss of PRFs associated with tree removal.

The proposed mitigation measures, including the reinstatement and enhancement of linear habitats within each works area, are detailed in the Bat Roost & Activity Assessment submitted with this RFI.

Query 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 on tree codes.

Response:

A revised systematic survey of the trees identified for removal has been undertaken to assess their potential to support bat roost features (PRFs). The survey findings have been cross-referenced against the tree codes in the arborist report, with photographic evidence provided. The assessment identifies trees containing PRFs and trees contributing to bat commuting and foraging habitat. The full survey findings and photographic evidence are provided in the Bat Roost & Activity Assessment.

Query 7c. If these surveys identify that roosting sites have the potential to be impacted, the applicant must seek a derogation license from NPWS in advance of planning consent being granted. Detailed survey findings must be submitted with the license application.

Response:

The surveys undertaken did not identify any bat roosting sites that would be impacted by the proposed works, and a derogation license from NPWS is not required.

8. Ecology – Otter

Query 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.*

Response:

An Otter Conservation Plan (Ref: EJB-JBAI-XX-XX-BD-0001-Otter_Conservation_Plan_A-C01) has been prepared and submitted with this RFI response. New otter surveys have also been undertaken along the relevant sections of the Carrickmines and Shanganagh river systems affected by the proposed flood defence works, including the required survey extent of at least 200m upstream and downstream of the proposed works.

Query 8b. *Undertake camera-trapping surveys at the locations of any former holt sites identified.*

Response:

Camera-trapping surveys have been undertaken at the locations of former otter holt sites identified during the otter surveys. The findings of the camera-trapping surveys are incorporated into the Otter Conservation Plan.

Query 8c. *If these surveys identify that resting sites have the potential to be impacted, the applicant must seek a derogation license from NPWS in advance of planning consent being granted. Detailed survey findings must be submitted within the license application.*

Response:

The surveys undertaken did not identify any otter resting sites that would be impacted by the proposed works, and a derogation license from NPWS is not required.

Query 8d. *Include a mammal ledge within the new N11 culvert to allow for safe passage of mammals during flood conditions.*

Response:

The proposed 2.4 m diameter overflow culvert beneath the N11 at the Lower Brides Glen works area has been designed to provide suitable passage for Otter and other non-volant mammals. The culvert will provide a spacious and dry passage under low-flow conditions and will maintain ecological connectivity across the N11.

The ecological function of the proposed culvert and its benefits for Otter and other fauna are described in Chapter 8 of the EIAR addendum. The proposed culvert will provide a safe and suitable passage for Otter and other fauna and represents a long-term positive ecological enhancement to the river corridor.

Query 8e. *Clarify mitigation measures that will allow for otter movements upstream and downstream during construction periods.*

Response:

The mitigation measures to maintain otter movement upstream and downstream during the construction period are detailed within the Otter Conservation Plan. The measures outlined, such pre-construction surveys and the provision of short-term artificial otter holts, will be strictly adhered to throughout the relevant construction activities and are intended to safeguard the commuting, foraging and resting activities of the local otter population within the Shanganagh River catchment.

9. Ecology – Breeding Birds

Query 9a. *Undertake breeding bird surveys in the works areas, assess the magnitude of the impacts to local breeding bird population due to the removal of/disturbance to riparian habitats, and devise appropriate mitigation measures to minimise and offset these impacts.*

Response:

Breeding bird surveys were undertaken, and the assessment of potential impacts arising from the proposed works are detailed in the Riparian Bird Conservation Plan (Ref:EJB-JBAI-XX-XX-BD-0001_Riparian_Birds_Conservation_Plan_A-C01) submitted with this RFI response.

The proposed mitigation measures include the protection and retention of suitable riparian habitat, the provision of alternative nesting sites where birds are required to be excluded from existing nest sites, removal of invasive species, and remedial tree and landscape planting following construction.

The removal of existing trees will be mitigated through remedial planting to ensure that there is no net loss of riparian canopy in the long term. This will support the retention and restoration of suitable foraging and commuting habitat for riparian bird species following completion of the works.

Query 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 use by these bird species during the operational phase of the scheme.

Response:

A Riparian Bird Conservation Plan has been prepared and submitted with this RFI response, and specifically considers kingfisher, dipper and grey wagtail and sets out measures to safeguard riparian bird populations throughout the construction and operational phases of the proposed scheme.

The Plan identifies specific locations for the provision of artificial nest boxes, based on the suitability of the habitat and the requirements of the relevant riparian bird species. These are intended to provide alternative nesting sites during and following completion of the works.

10. Water Framework Directive Assessment

Query 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 assesses 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 a 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.

Response:

A detailed WFD Assessment (Ref: 20108-JBA-00-XX-RP-Y-00431_WFD_Assessment_A-C01) has been prepared and submitted with this RFI Response. The WFD Assessment concluded that the proposed FRS will not impact on the quality elements of any WFD waterbodies.

The Screening Assessment found four WFD waterbodies with potential pathways from the proposed development. These four WFD waterbodies, the CARRICKMINES STREAM_010, SHANGANAGH_010, Wicklow groundwater body, and Southwestern Irish Sea – Killiney Bay (HA10) coastal waterbody were carried forward to the Scoping stage.

The Scoping Assessment found that the proposed development, when considering all aspects of its design including the proposed layout and design measures to be put in place during construction, is not likely to cause a deterioration in WFD status objectives for any waterbodies, nor will it compromise the ability of any waterbody to meet its WFD objectives.

11. Surface Water Management Plan

Query 11a. *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:*

- *Earthworks, to include planning, excavation and processing, transportation of materials (within and outside of the proposed Scheme);*
- *Deposition of materials and temporary stockpiling.*

Response:

A SWMP (Ref: 20108-JBB-00-XX-RP-Z-02992_Surface_Water_Management_Plan_A-C01) has been prepared and submitted with this RFI Response. The SWMP provides a framework for managing surface water during the construction stage for the development as a whole and also provides area-specific surface water management measures for each FRS works area. The SWMP will be included in the construction contract documentation and will be put in place by the Appointed Contractor for the FRS.

12. Traffic and Transport

Query 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.*

Response:

An Addendum Report has been prepared for the EIAR which includes an update for Chapter 11 [Traffic]. This Report is included as part of this submission.

Query 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.*

Response:

As requested, an additional cross section [Marked as Section 6-6] has been provided in an East to West direction, along the Carrickmines River, and traversing Glenamuck Road North (R842) on drawing 20108-JBB-00-XX-DR-Z-02945.

Query 12c(i). *Notwithstanding that a CTMP will be prepared, the response to the concerns raised by the NTA are considered inadequate.*

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.

Response:

At Glenamuck Road North, a 1.8m wide temporary access route will be provided as part of the traffic management to maintain pedestrian and cycle movements adjoining the works area. Separate access routes for pedestrians and cyclists are not possible due to spatial constraints, thereby requiring access route to be shared. Given the vulnerability of pedestrians' relative cyclists, it is best practice and the safest option for cyclists to dismount to utilise this shared access route. It is our view that moving cyclists onto the road network to

share access with vehicles is not an option as it alters the existing condition in the area, whereby cyclists have their own designated lane.

At Commons Road and Kilgobbin Road cyclists will be expected to adhere to the existing situation as no designated cycle lanes exist. In this case, we just continue with the normal traffic flow through the management systems. A designated pedestrian route will be provided through the works areas at these locations as part of the traffic management plan.

Query 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.*

Response:

A full complement of traffic lanes and active travel facilities will be available on the N11 dual carriageway outside the proposed working hours.

Query 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.*

Response:

Access to the Luas Park & Ride at Carrickmines will be maintained throughout the works with priority given to traffic coming from the M50 motorway.

Query 12d. *A Road Safety Audit has not been submitted with the application. Scoping correspondence from TII queried the need for an RSA. There is no reference in the EIAR to an RSA other than TII's query to same. Having regard to the works proposed, clarification on the need for an RSA is necessary, and should be submitted, if found to be required.*

Response:

The applicant has identified the need for S1/2 road safety audit (Ref: 20108-JBB-00-XX-DO-Z-02996_Road_Safety_Audit_C01) based on TII publication Road Safety Audit GE-STY-01024, May 2025. Arising from this, a road safety audit has been undertaken and prepared for the areas of the scheme which interact with the road network infrastructure. This is included as an appendix to the Addendum Report. Arising from the road safety audit, it was noted that the proposed flood defence cuts off the access between Clon Brugh and Dun Gaoithe Heights. To facilitate continuous movement between these locations a minor amendment to the general arrangement of the flood defence has been adopted and is shown on Drawing 20108-JBB-00-XX-DR-Z-02910.

13. Cultural Heritage

13a. Area 2 - Belarmine and Kilgobbin

Query 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.*

Response:

The document "Architectural Heritage Addendum to an EIAR", included as Appendix 5 of the EIAR Addendum Appendices, provides photographic and heritage record of affected boundary walls, assesses impacts on the protected structure setting and outlines mitigation and reconstruction measures using salvaged stone.

13b. Area 3 – Glenamuck Road North

Query 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 Houe to facilitate same.*

Response:

As detailed in the “Architectural Heritage Addendum to an EIAR”, access for the works can be achieved from the slip road to the south of the house’s boundary. An existing metal bridge is in place, which can serve to access the embankment within the garden. The protected setting of the gates, and entrance driveway does not need to form part of the construction area and can remain unaffected by the proposed works.

Query 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 accurate assessment of impact on Priorsland House is required to be submitted, by way of an addendum to the EIAR.*

Response:

The Report provides revised assessment of impacts on Priorsland House and its setting, with mitigation measures including wall treatment, tree reinstatement and heritage recording.

13c. Area 5 – Lower Brides Glen, N11 and Bray Road

Query 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 with Appendix B of the Architectural Heritage Protection Guidelines for Planning Authorities is necessary. This should be undertaken by a suitably qualified RIAR accredited Conservation Architect. 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 represent closer visualisations of the proposed wall on Waterfall Cottage.*

Response:

The Report provides an Architectural Heritage Impact Assessment and additional photomontages demonstrating the visual effects of the proposed flood protection measures.

Query 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.*

Response:

Appendix A3 of the “Architectural Heritage Addendum to an EIAR”, includes a drawing indicating the proposed heights and finishes of the flood defence wall at this location. Drawings 20108-JBB-00-XX-DR-Z-02930, 20108-JBB-00-XX-DR-Z-02931 and 20108-JBB-00-XX-DR-Z-02932 included as part of this submission have been updated to reflect the request from ACP and the minor changes arising from the Architectural Heritage Impact Assessment. These include minor refinements to the horizontal and vertical alignment (e.g. minimal changes to height and position) flood defence wall and clarity on some of the surrounding accommodation works.

The scale of the elevation provided on drawing 20108-JBB-00-XX-DR-Z-02931 has been revised to 1:100. The height of the proposed wall and railing will be a minimum of 1.1m to address safety risks where the need for a flood defence is less than this. The elevation and sections indicated on drawings 20108-JBB-00-XX-DR-Z-02931 and 20108-JBB-00-XX-DR-Z-02932 indicate the height of the proposed wall and railings.

It is accepted that the current condition where no flood defence wall with railing is provided enhances the architectural character of the cottage. However, the proposed provision of a defence is required to achieve the brief of flood protection and must be adhered to.

There will be an opportunity for post planning, at detail design stage, for the owner to review the design with the Local Authority's design team, at which time the design can be adjusted to reflect a range of guarding options.

Query 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.

Response:

It is confirmed that the arched boundary wall, bridge (RPS 654) and letter box (1:018) (both on industrial heritage list) informs the character of Rose Cottage. All will remain unaffected by the proposed works. It is confirmed that the cast iron pedestrian gate to the south of the bridge and post box is the principal entrance to Rose Cottage's eastern garden, in turn leading to a footbridge accessing the cottage. This gate arrangement will also remain unaffected by the proposed works.

Query 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.

Response:

Drawing 20108-JBB-00-XX-DR-Z-02930 has been updated to clarify the extent of the work at this location. The existing bridge (which forms the first 10m of the existing culvert) and letter box which are noted as industrial heritage references will be retained and protected throughout the works.

14. Additional Points of Detail

Query 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.

Response:

The remnants of an existing access bridge were identified during the topographical survey at the location of Section 5_5 – as indicated on drawing 20108-JBB-00-XX-DR-Z-02924. As part of the flood relief scheme, it is intended to replace this existing access bridge to restore and facilitate its intended function to landowner agreement. Drawing 20108-JBB-00-XX-DR-Z-02924 has been updated to denote the location of this access bridge once restored.

Query 14b. Brides Glen and 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.

Response:

A site-specific mitigation plan (Ref: 20108-JBB-00-XX-PN-Z-02993_SSMP_Bride's_Glen_C01) including arrangements relating to noise and traffic management, in respect of the proposed works at Waterfall Cottage has been prepared and is included with this submission.

Query 14c. Brides Glen and 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.

Response:

Drawing 20108-JBB-00-XX-DR-Z-02930 has been updated to clarify the extent of the work at this location. The existing bridge (which forms the first 10m of the existing culvert) and letter box which are noted as industrial heritage references will be retained and protected throughout the works.

Query 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 EIAR refers) and which is accessed via an existing private bridge which is proposed to close during construction works.

Response:

Prior to the commencement of works, the appointed Contractor shall liaise with the residents of Roseville Cottage, No. 60 Commons Road to agree the construction access arrangement during the construction works. Property access (no vehicular) will be maintained for the property residents as required during the works.

Query 14e. Commons Road – contradictory traffic arrangements are set out in section 11.4.1 of the EIAR. 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.

Response:

Section 11.4.1 of the EIAR clarifies that the traffic management required at Area B will require changing Commons Road from a two-way road to a one-way road for the duration of these works. As explained, this is less impactful than the other feasible traffic management arrangements which would maintain the two-way traffic flow along Commons Road.

Query 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.

Response:

Works on private land will take place only after agreement with the landowner prior to construction. Engagement with the landowner will include agreement about the access requirements for the maintenance of the proposed works.

15. EIAR Addendum

Query 15a. Having regard to the foregoing requests, update the EIAR accordingly, by way of an EIAR Addendum.

Response:

An addendum to the EIAR which addresses the foregoing requests has been prepared and submitted with this response.

Query 15b. Chapter 8 of the EIAR 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.

Response:

Chapter 8 Biodiversity of the EIAR Addendum has been updated to include an assessment of residual effects.

Query 15c. *Having regard to the likely time that will lapse between the preparation of the EIAR and submission of additional information, you are requested to review Chapter 16 Cumulative Impacts and update as may be necessary.*

Response:

Chapter 16 Cumulative Impacts has been updated having regard to the time that has passed since the preparation of the EIAR. These updates are outlined in the EIAR Addendum submitted with this response.

We trust that the above information satisfactorily answers your queries, and we await further correspondence.

Should you have any additional queries regarding the above responses, or the application itself, please do not hesitate to write to the undersigned.

Yours sincerely,



Caitrín Foley
Executive Engineer
Dun Laoghaire Rathdown County Council