

Architects Department
An Rannóg Ailtireachta

Mr Matthew McLoughlin
Foreshore Unit
Department of the Environment, Community
and Local Government
Newtown Rd
Wexford

Bob Hannan Snr Architect
County Hall Marine Road Dun Laoghaire
Direct Tel: 01 2054710
Fax: 01 2300391
bhannan@dlrcoco.ie

20140203

RE: The Dun Laoghaire Baths. Your Reference Ms51/4/549

Dear Mr McLoughlin,

We have reviewed the 4 submissions received during the public consultation phase and comment as follows:

Submission Number 1

No comment

Submission Number 2

Bird Watch Ireland in their submission suggests that a limited assessment has been conducted on the potential impacts on bird interests and that a full assessment is required.

In this regard Dún Laoghaire-Rathdown County Council, in accordance with the Planning and Development Act 2010 and the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No.477/2011), employed RPS consultants to carry out an appropriate assessment screening of the proposed interim works at Dún Laoghaire Baths. The consultants report was issued in March 2012 and it concluded that,

"The likely impacts that will arise from the proposed interim works at Dún Laoghaire Baths have been examined in the context of a number of factors that could potentially affect the integrity of the Natura 2000 network. None of the sites within 15km of the development area will be adversely affected. A finding of No Significant Effects Matrix has been completed and is presented in Section 4 of this Screening Statement.

On the basis of the findings of this Screening for Appropriate Assessment of Natura 2000 Sites, it is concluded that the interim works at Dún Laoghaire Baths will not have a significant effect on the Natura 2000 network and a Stage 2 Appropriate Assessment is not required.'

The recommendation of this report is very clear and states that a Stage 2 Appropriate Assessment is not required. This is contrary to the submission from Bird Watch Ireland that a full appropriate assessment is required. The submission from Bird Watch Ireland indicates that there are a number of designated sites within close proximity of the proposed scheme and lists these as Dalkey Island SPA and surrounding SPA's. In this regard seven SPA's within fifteen kms of the



proposed scheme were assessed for potential impacts as part of the screening report, including Dalkey Island SPA, and no significant effects or impacts were found.

For final certainty prior to the initiation of the Part VIII process, the County Council decided in November 2013 to seek a determination from An Bord Pleanála as to whether or not an appropriate assessment is required to be carried out,. This determination is expected to be available mid to late March 2014 and its is anticipated that they will concur with the conclusion of the appropriate assessment screening carried out in March 2012 by RPS consultants, which indicates that a Stage 2 Appropriate Assessment is not required.'

Submission Number 3

This submission has been reviewed with the Councils Consulting Engineers LMC Civil and Structural Consultant Engineers. It is not proposed to alter the existing concrete walls or to place rock armour in the vicinity of the outfall pipe as these walls have performed satisfactorily in rough conditions. It is however proposed to round off the tight internal angle at the south-western side of the smallest pool which will help reduce the heavy wave splashing up in the narrow corner.

It is proposed to lower the wall above the existing walkway level and introduce more railings to permit a greater visual connection between the walkway and the Baths -it is likely that the height of this wall had its origins in controlling general entrance into the Baths. It is accepted however that a greater proportion of solid wall to railing along this edge would provide greater shelter and this will be considered at detailed planning stage.

The level of the new walkway to the rear of the Baths Pavilion is higher than that of the walkway generally along Newtown smith. This will provide safe access to the rear of the Pavilion obviating any requirement to use the lower levels.

The interactive fountain idea is an attractive one and the feasibility of this together with ideas of graphic representations of archaeological remains will be considered at detailed planning stage. A pilot project to provide WIFI in the Town Centre area has recently been completed and this may be extended to the Baths in due course. In association with the County Councils Arts Department it is proposed to create working space for artists and this new activity in this location will assist in reducing anti social behaviour. The area is already covered by a CCTV scheme operated by An Garda Síochána.

Submission Number 4

All structures on this project will be engineer designed to withstand wave action and the design will not preclude other longer term initiatives. In relation to points 3 and 4 we note that the outfall has been in operation at this location since August 2011. The purpose of this element of the Baths Project is to move the outfall location away from the environs of the proposed Baths and to significantly accord with the Department of the Environment's guidance document on Storm Water Overflows. This requires outfalls to be located below the low water level.

The outfall operates only after severe rain events and has been installed to protect the nearby Glathule village from flooding. During 2013 the outfall operated on four occasions and the spill material was primarily rainwater entering the system via gullies and underground streams. There is no evidence that the spill material has an adverse affect on fish stocks in the area.

Yours sincerely,



Bob Hannan
Senior Architect