

Report on Consultation Submissions regarding the River Bride (Blackpool) Drainage Scheme

(Scheme Reference: DPE63-18-2018)

by
CAAS Ltd
for the
**Department of Public Expenditure and
Reform**



**An Roinn Caiteachais
Phoiblí agus Athchóirithe**
Department of Public
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QA

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Introduction

CAAS Ltd have been commissioned by the Department of Public Expenditure and Reform to review and report on submissions made during the public consultation carried out in January and February 2020 in relation to the Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) of the proposed Glashaboy River (Glanmire/Sallybrook) Drainage Scheme. This consultation was carried out Pursuant to Section 7(1)(c) of the Arterial Drainage Acts 1945 and 1995 as amended, particularly by S.I. 472 of 2019, the European Union (Environmental Impact Assessment) (Arterial Drainage) Regulations 2019.

Consultation was advertised to the public and copies of the scheme documents including the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) were made available in Cork City Hall. The consultation period was from 23 January to 27 February 2020. A copy of the public consultation notice is included at the end of this report.

Summary of Submissions

A total of 103 submissions were received before the close of the publicly advertised consultation period; 6 from statutory bodies and 97 from members of the public and other bodies. 5 Further submissions were received after the close of the consultation period, all from members of the public.

All submissions contain observations which and they have been reviewed to ensure that due account has been taken of all relevant and significant issues in the EIA and Appropriate Assessment of the scheme.

The nature of the issues raised in the submissions is summarised in the table below. A more detailed review including the names of the respondents and summaries of issues raised is provided in the detailed table which follows.

	Public bodies	Members of the public and other bodies	Late submissions (all from members of the public)
Number	6	86	5
General nature of submissions			
Positive	1	24	0
Neutral	3	2	0
Negative	2	60	5
Main issues raised in submissions			
Impacts on biodiversity	2	53	4
Scheme design	3	55	5
Support for scheme	1	26	0
Adequacy of assessment	1	14	0
Adequacy of mitigation	4	2	0
Scheme programme	0	7	0
Other	0	8	0

It can be seen that of the six submissions from statutory bodies, one was positive, three were neutral and two raised negative issues. Of these two negative submissions, two expressed significant and serious reservations about the scheme and the environmental assessments. These two were from Inland Fisheries Ireland and An Taisce. Cork County Council made the positive submission in support of the scheme.

An Taisce acknowledge the need to address flooding in the area. However, they consider that the approach and the consideration of catchment level alternatives is inadequate. They submit that the assessment of impacts on biodiversity and fisheries in the EIAR is inadequate and highlight apparent contradictions between statements presented in the EIAR on this aspect. They point out the intention in the proposal to leave some mitigation measures to be decided post consent and state that doing so would be contrary to the requirements of the Aarhus Convention regarding public consultation.

Inland Fisheries Ireland acknowledge the efforts to relieve hardships caused by flooding and welcome the positive fisheries effect of some elements of the scheme, particularly the removal of a 70 m section of culvert. Overall however, they have a number of significant concerns in relation to effects on fisheries. These relate to 500 m of new culverting, design of trash screens, construction details, and details of design of a winter channel and sediment trap. They have significant concerns about mitigation of adverse impacts and sufficiency of proposed funding to IFI to offset habitat loss through improvements upstream in the catchment.

The 86 public submissions include submissions from local business interests, Blackpool Flood Group, Cork Chamber, Cork Nature Network and Save Cork City.

24 Are in favour of the scheme and the predominant issues raised by these is the hardship caused by flooding, timeline for implementation of the scheme and desire to avoid delay and reduce further flooding risk.

Of the 60 negative public submissions, the main issues raised relate to effects on biodiversity including otters and fisheries. Most of these submissions also raise concerns about the consideration of alternatives and the design of the scheme.

While gaps or inadequacies can in some cases be dealt with through conditions, the reviews of the EIAR and the NIS show why in the case of this scheme, it is recommended to seek further information in relation the EIAR and NIS for this scheme. The recommended further information request has been prepared, *inter alia*, to take account of concerns raised in the submissions and facilitate robust responses to the issues raised.

Detailed Review of Submissions

Respondent Listed in sequence of receipt of submissions.	Topic(s) See totals rows for full topic wordings	Positive / Neutral / Negative [+ / 0 / -]	Brief description	Key scheme document refs	Comments
Statutory Bodies					
<i>Department of Business, Enterprise and Innovation</i>		0	No observations made.		
			No observations were made by the Dept. of Business, Enterprise and Innovation with regard to the scheme.		Noted
<i>Inland Fisheries Ireland</i>	Biodiv, Design, Info, Mit	-	IFI acknowledge objectives of the scheme. Concerns and issues raised are outlined below.		
			<ul style="list-style-type: none"> ▶ Salmonid habitat will be lost by culverting, primarily at Orchard Court (342 m), also at Blackpool Church ▶ EIS is quoted as stating that community concerns over negative impact of high walls led to decision to culvert ▶ IFI contend that maintenance of an open channel with walls is a realistic option ▶ Potential compensatory measures are discussed in the EIAR. These include de-culverting of a significant length of culvert through Sunbeam and a commitment from OPW to fund other interventions in the catchment by IFI. IFI are concerned about amount and sufficiency of funding. ▶ Design of scheme including low-flow channel, rock armour, flow deflectors, culvert screens, culverts and bridges, winter channel and sediment trap. ▶ The submission maintains that there are deficiencies in the level of information provided on the design of the scheme, its construction and its maintenance and in the proposed mitigation measures. ▶ Require that permanent negative impacts of the scheme are appropriately mitigated. 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity ▶ EIAR s.2.6 'Consideration of Alternatives', ▶ EIAR s.3.2 'Anticipated Construction Methods' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including fisheries impacts. However, there are significant gaps in the description of the scheme, including its construction and maintenance and the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>Clarity of mitigation measures (including fisheries mitigation measures) is also considered inadequate. Furthermore, the deferral of scheme details which have significant potential to affect the level of environmental impacts caused by the scheme until after the granting of an Order would be contrary to the requirements of jurisprudence.</p> <p>These issues are addressed in the recommended request for further information.</p>

<i>Transport Infrastructure Ireland</i>	Design, Info, Mit.	0	TII do not object to the scheme subject to certain measures being implemented.		
			<p>DESIGN/ CONSTRUCTION</p> <ul style="list-style-type: none"> ▶ Assessment, alteration, modification, strengthening and repair of all road structures (national roads) shall be agreed with the Bridge Management Section of TII. ▶ Concerns regarding the potential for scour along the toe of Kilnap Bridge Embankment. ▶ Scour inspection and assessment requested for Blackpool shopping centre culvert. ▶ Hydraulic modelling requested to address concerns regarding the potential scour at the interface of the reinforced concrete culvert at the southwest end of the structure. ▶ Additional detail required in Drg. RB111 to confirm impact on existing structures. ▶ Require more detail on the impacts on the embankment and mitigation measures. 		<p>These are matters which can be generally be addressed at detailed design stage. Where compliance with any of these standards requires material changes to the scheme which would have potential to change its likely significant environmental effects, these should be addressed in the EIA process.</p> <p>The items raised in the TII submission are addressed in the recommended request for further information.</p>

An Taisce	Biodiv., Design, Info, Assess, Mit.	-	An Taisce recognise the need for the scheme. Issues noted are outlined below.		
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Traditional flood management practices should be interrogated. ▶ Scheme will likely be beneficial for residents of the area but may cause damage to residents further downstream. <p>ALTERNATIVES</p> <ul style="list-style-type: none"> ▶ Submission queries consideration of environmental effects of alternatives, particularly Option 2, the upstream flood reservoir. <p>FISHERIES</p> <ul style="list-style-type: none"> ▶ The impact on fisheries is noted as being unacceptable, noting the IFIs correspondence in EIAR Appendices of the impacts on fish. ▶ It is stated that surveys for lamprey, eel or trout were not carried out and deems this to be unacceptable. ▶ Submission points out discrepancies between different opinions provided regarding adequacy of fisheries mitigation measures. Also maintains that leaving significant mitigation matters is contrary to requirements, including requirements regarding public accessibility under the Aarhus Convention. <p>OTTERS</p> <ul style="list-style-type: none"> ▶ Impact on Otter habitats and the lack of clarification in mitigation measures given as they have not yet been devised. <p>Natura 2000</p> <ul style="list-style-type: none"> ▶ Natura 2000 sites 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity ▶ EIAR s.2.6 'Consideration of Alternatives', 	<p>The EIAR provides a review of alternatives and an assessment of environmental impacts including impacts on biodiversity however the assessment as submitted is inadequate for compliance with EIA requirements.</p> <p>There is also a lack of clarity regarding mitigation measures and residual impacts.</p> <p>The deferral of scheme details which have significant potential to affect the level of environmental impacts caused by the scheme until after the granting of an Order would be contrary to the requirements of jurisprudence.</p> <p>Clarity of mitigation measures (including ecological mitigation measures) is considered inadequate for EIA purposes.</p> <p>These issues are addressed in the recommended request for further information.</p>
Cork County Council	Support	+	Cork County Council express support for the scheme.		
			<ul style="list-style-type: none"> ▶ The Council states that it has worked closely with the OPW to develop the scheme and is in favour of it being approved as Blackpool has experienced flooding in the past. ▶ They state that they are willing to work with the OPW to implement it. 	<ul style="list-style-type: none"> ▶ EIAR s.2.2 'Need for the Proposed Development' 	Noted

<i>Dept. Culture, Heritage and Gaeltacht</i>	Mit	0	Dept. Culture, Heritage and Gaeltacht have provided advisory notes regarding archaeology.		
			<ul style="list-style-type: none"> ▶ Advise that all cultural heritage mitigation measures be undertaken as stated in the EIA with OPW Archaeologist involved from earliest stage. ▶ A suitably qualified experienced conservation architect is to be engaged, with all requirements adhered to as stated in EIA including any additional requirements issued by Local Authority. ▶ Works required in the vicinity of protected structures to be consulted with relevant bodies (OPW, MNS, LA). ▶ Measures are advised for the following areas: Blackpool Village, Sunbeam Industrial Park and Dulux Factory, Fitz's Boreen Road Bridge, Kilnap Glen House Property and Glenamought River. ▶ A strategy for archaeological monitoring of dredging is to be devised OPW Archaeologist and agreed with National Monuments Service. ▶ A finds retrieval strategy is to be devised and implemented with weekly reporting by Archaeologist. 	<ul style="list-style-type: none"> ▶ EIA s. 10 Cultural Heritage ▶ EIA s.10.5 'Mitigation and Monitoring' 	The observations of the DCHG are generally incorporated in the scheme proposals. Further details and clarity of mitigation measures are addressed in the recommended request for further information.
Number of statutory body submissions	6				
Statutory body topic totals	Biodiversity (2), Design (3), Support (1), Adequacy of assessment (1), Adequacy of mitigation measures (4), Programme (0), Other (0)				
+ / 0 / - totals	Positive (1), Neutral (3), Negative (2)				

Members of the Public					
Hurley, Liam	Design	0	Design query		
			► Asks if flows from Rathpeacon stream and other sources have been taken into account in the design of the scheme...		This is beyond the scope of this review and is a matter for the Commissioners
Kirwan, Catherine	Biodiv., Design, Assess	-	Issues and concerns raised are outlined below.		
			<p>BIODIVERSITY</p> <p>► Impact on species</p> <p>NATURA SITES</p> <p>► Concerns regarding impact on Cork Harbour SAC and SPA.</p> <p>DESIGN</p> <p>► Objection to the design of the scheme, where better river management / natural flood protection would be considered much more desirable.</p> <p>HERITAGE</p> <p>► Objection to the design of the scheme due to the impact on heritage in the area, including the removal of a historic bridge.</p>	<p>► EIA s.5 'Biodiversity'</p> <p>► EIA s.5.2.4.1 'Natura 200 Sites' (Designated Areas in the Vicinity of the Study Area), NIS</p> <p>► EIA s.2.6 'Consideration of Alternatives'</p> <p>► EIA s.10 Cultural Heritage notably s.10.4 'Predicted Impacts', tbl 10.4 'Predicted Impacts to identified Heritage assets' and tbl.10.5 'Mitigation measures and monitoring of process for Heritage Assets'.</p>	<p>The EIA as submitted contains an assessment of alternatives however this is considered as inadequate for EIA purposes.</p> <p>There are also gaps and discrepancies in the assessment of impact and there are issues concerning clarity of mitigation measures (including ecological and cultural heritage mitigation measures) and residual impacts.</p> <p>These issues are all addressed in the recommended request for further information.</p>
Dennehy, Tom	Support	+	Owner of local fish shop in Blackpool in support of the scheme proceeding as fast as possible.		
			► Local business owner in support of the scheme	► EIA s.2.2 'Need for the Proposed Development'	Noted
Hayes, Alice	Support	+	Owner of business who has had to close for considerable amount of time in the past due to flooding, and greatly welcomes this scheme, particularly the covering of the culvert.		
			<p>► Local business owner in support of the scheme being implemented and who has been impacted by flooding in the past</p> <p>► Support expressed for culverting of the river</p>	<p>► EIA s.2.2 'Need for the Proposed Development'</p> <p>► EIA s.2.6.2 'Possible Flood Risk Management Methods' para 'Flood Risk Management Option' Assessment'</p>	Noted
Daly, Orla	Biodiv., Design	-	Issues raised are outlined below.		
			► Objection to the design of the scheme, deemed as a poor solution to the issue.	► EIA s.2.6 'Consideration of Alternatives'	The assessment of alternatives as presented in the EIA is considered inadequate for EIA compliance purposes. This is addressed in the recommended request for further information.

Fenlon, Myles	Biodiv. Design	-	Issues raised are outlined below.		
			<ul style="list-style-type: none"> ▶ Impact of culverting on wildlife ▶ Alternative approach encouraged which reflects and embraces the ecosystem of the river. 	<ul style="list-style-type: none"> ▶ EIAR s5 including s.5.4.2.1 'Instream Habitats' para 4, EIAR s.5.4.4.8 'Residual Impacts on Terrestrial Fauna' para 2, EIAR s.5.4.5 'Impact on Fisheries' para 4 & 8 ▶ EIAR s2.6 including s.2.6.2 'Possible Flood Risk Management Methods' 	<p>The EIAR as submitted contains an assessment of alternatives however this is considered as inadequate for EIA purposes.</p> <p>The EIAR assesses environmental impacts including impacts on biodiversity however, for EIA purposes, the assessment as submitted is inadequate and clarity of mitigation measures and residual impacts is insufficient.</p> <p>These issues are addressed in the recommended request for further information.</p>
Maguire, John & Deborah	Design	-	Issues raised are outlined below.		
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Design issues raised previously during consultation and are requested to be addressed and responded to. 		Issues regarding assessment of alternatives and description of the scheme details are addressed in the recommended request for further information.
O'Brien, Theresa	Support	+	Local long term business owner expressing support of the scheme.		
			<ul style="list-style-type: none"> ▶ Local business owner in support of the scheme. 	<ul style="list-style-type: none"> ▶ EIAR s.2.2 'Need for the Proposed Development' 	Noted
O'Brien, Robert	Support	+	Local long-time business owners who are in support of the scheme.		
			<ul style="list-style-type: none"> ▶ Local business owner in support of the scheme due to concerns of flooding in the future. 	<ul style="list-style-type: none"> ▶ EIAR s.2.2 'Need for the Proposed Development' 	Noted
Sheedy, Irene	Biodiv.	-	Issues and concerns raised are outlined below.		
			<ul style="list-style-type: none"> ▶ 'Detrimental' impact on Otters. ▶ 'Detrimental' impact on fish, including salmonid habitat. 	<ul style="list-style-type: none"> ▶ EIAR s. Biodiversity, most notably s.5.4.4.2 'Otter Mitigation', and including s.5.3.3.2 para 'Otter' (Field Survey) s.5.4.4.1 'Otter' (Impact on Fauna), s.5.4.4.8 'Residual Impacts on Terrestrial Fauna', ▶ EIAR s.5 Biodiversity including s.5.3.3.3 'Fish' (Field Survey), s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries' notably para 2 & 4, Tbl 5.6 'Potential Impact in Combination with other Plans and Projects' 	<p>The EIAR assesses environmental impacts including impacts on biodiversity however, for EIA purposes, the assessment as submitted is inadequate and clarity of mitigation measures and residual impacts is insufficient.</p> <p>These issues are addressed in the recommended request for further information.</p>

Keeley, David	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>DEBRIS GATES</p> <ul style="list-style-type: none"> ▶ Blockages due to lack of maintenance of debris gates and their impact on the river. <p>RE-ROUTING</p> <ul style="list-style-type: none"> ▶ Impacts on the river due to re-routing and its known cause of flooding. <p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ▶ Urges more sympathetic means of flood relief which works with nature and respects the many species living on the River. <p>WILDLIFE</p> <ul style="list-style-type: none"> ▶ Impacts of the scheme has on Otters. ▶ Impacts of the scheme has on Dippers. 	<ul style="list-style-type: none"> ▶ EIA s.3.1.11 'Maintenance Regime' and including s.3.1.9 'Screens' (Proposed Works), s.3.2.8 'Other Instream Works' (Anticipated Construction Methods), s.5.3.3.2 'Mammals' para 'Otter' para 1, s.5.4.4.3 'Kingfisher', s.5.4.5.1 'Fisheries Mitigation' para 12/13s. 9.5.2 'Location of Photomontages' para 'Photo Location 9 - Proposed View', s.9.6.3.6 'Trash Screen and Roughing Screens' and s.11.4.4 'Potential impact during the Operational Phase' para 1. ▶ EIA s.2.6 'Consideration of Alternatives', s.3.1.2 'Culverts' (Proposed Works), s.3.1.11 'Maintenance Regime', s.3.2.1 'New Culverts' (Anticipated Construction Methods), s.4.3.11 'Human Health and Safety' para 1, s.5.2.3 'Otter Camera Survey' para 1, s.5.3.3 'Fauna' para 'Other bird species', s.5.3.3.2 'Mammals' para 'Otter', s.5.3.3.3 'Fish', s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries', s.6.5 'Hydromorphology' notably para 'Potential Impacts on Hydromorphology', s.9.6.3.3 'Construction of new and replacement culverts and backfilling of existing watercourse' ▶ EIA s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' ▶ EIA s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna', s.5.3.31 (Field Survey), s.5.4.4.4 'Other Birds', EIA s.5.4.4.5 'Birds Mitigation', EIA s.5.4.4.8 'Residual Impacts on Terrestrial Fauna' para 1 	<p>The EIA assesses environmental impacts including impacts on biodiversity however, for EIA purposes, the assessment as submitted is inadequate and clarity of mitigation measures and residual impacts is insufficient.</p> <p>These issues are addressed in the recommended request for further information.</p>

O'Connor, Louise	Biodiv, Design, Assess	-	Issues raised are outlined below.		
			<ul style="list-style-type: none"> ▶ Impacts on biodiversity and loss of habitat ▶ Impact on Salmonid habitats ▶ Impact on Otter habitats ▶ Impact of culverting on landscape/amenity. 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity ▶ EIAR s.5.3.3.3 'Fish', s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries' notably para 2 & 4, Tbl 5.6 'Potential Impact in Combination with other Plans and Projects' ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ▶ 	<p>The EIAR assesses environmental impacts including impacts on biodiversity however, for EIA purposes, the assessment as submitted is inadequate and clarity of mitigation measures and residual impacts is insufficient.</p> <p>These issues are addressed in the recommended request for further information.</p>
Casey, James	Support	+	Local business owner in support of the scheme.		
			▶ Business owner in support of the scheme	▶ EIAR s.2.2 'Need for the Proposed Development'	Noted
Ó Buachalla, Dylan	Support	+	Local business owner in support of the scheme.		
			▶ Business owner in support of the scheme	▶ EIAR s.2.2 'Need for the Proposed Development'	Noted
O Regan, Josh	Support	+	Local business owner in support of the scheme.		
			▶ Business owner in support of the scheme	▶ EIAR s.2.2 'Need for the Proposed Development'	Noted
Manley, Olive	Support	+	Local business owner in support of the scheme.		
			▶ Business owner in support of the scheme	▶ EIAR s.2.2 'Need for the Proposed Development'	Noted
Crowley, Gerard	Biodiv.	0	Query outlined below.		
			▶ Query on the impact the scheme will have on the environment and on Natura 2000 sites.	▶ EIAR s.5.2.4.1 'Natura 200 Sites' (Designated Areas in the Vicinity of the Study Area), NIS s.4.2 'Identification of Potential Impacts'	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. The NIS assesses impacts on the Natura 2000 Network. However, the assessments as submitted are considered inadequate for compliance purposes.</p> <p>These issues are addressed in the recommended request for further information.</p>

Cashman, Kate	Support	+	Local business owner in support of the scheme.		
			► Business owner in support of the scheme	► EIAR s.2.2 'Need for the Proposed Development'	Noted
Mulcahy, Denis	Support, Prog.	+	Local business owner in support of the scheme.		
			► Business owner in support of the scheme and would appreciate the scheme to proceed as fast as possible. ► Concerned regarding progress of the scheme that it will no longer be implemented.	► EIAR s.2.2 'Need for the Proposed Development' ► EIAR s.2.8.2 'Public Consultation'	Noted
Jones, Emma	Biodiv., Design	-	Issues raised are outlined below.		
			BIODIVERSITY ► Impact on Otters ► Impact on fisheries ► Impact on birds	► EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ► EIAR s.5 Biodiversity including s.5.3.3.3 'Fish' (Field Survey), s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries' notably para 2 & 4, Tbl 5.6 'Potential Impact in Combination with other Plans and Projects' ► EIAR s.5.2.8 'Birds' (Methodology and Limitations), s.5.3.3.1 'Birds' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.4.3 'Kingfisher'/s.5.4.4.4 'Other Birds' (Impacts), s.5.4.4.5 'Birds Mitigation', s.5.4.4.8 'Residual Impacts on Terrestrial Fauna'	The EIAR assesses impacts on biodiversity however the assessment as submitted is inadequate. There is also a lack of clarity regarding mitigation measures and residual impacts, These issues are addressed in the recommended request for further information.
Twomey, Conor	Support	+	Local business owner in support of the scheme.		
			► Business owner in support of the scheme proceeding as fast as possible	► EIAR s.2.2 'Need for the Proposed Development'	Noted
Moriarty, Louise	Support, Prog.	+	Local business owner in support of the scheme.		
			► Daughter of local business owner in support of the scheme (cannot get insurance due to flooding).	► EIAR s.2.2 'Need for the Proposed Development'	Noted
Singh, Manjot	Support	+	Local business owner in support of the scheme.		
			► Local business owner in support of the scheme (cannot get insurance due to flooding).	► EIAR s.2.2 'Need for the Proposed Development'	Noted
Singh, Harmendra	Support	+	Local business owner in support of the scheme.		
			► Local business owner in support of the scheme (cannot get insurance due to flooding).	► EIAR s.2.2 'Need for the Proposed Development'	Noted

Murphy, Rosaleen	Support	+	Local business owner in support of the scheme.		
			▶ Local business owner in support of the scheme and concerned about flooding.	▶ EIAR s.2.2 'Need for the Proposed Development'	Noted
Hickey, Liam	Support, Prog.	+	Issues raised are outlined below.		
			▶ Supports the scheme but concerned regarding the lack of progress.	▶ EIAR s.2.2 'Need for the Proposed Development' ▶ EIAR s.2.8.2 'Public Consultation'	Noted
Finn, Collette (Cork Green Party)	Biodiv., Design	-	Issues raised are outlined below.		
			DESIGN ▶ Issues regarding the design choice of the scheme. Urging that a design that does not destroy the river amenity is needed. Alternative suggestions are provided. BIODIVERSITY ▶ Concern with regard to the impacts on Otters ▶ Concern with regard to the negative impact on fisheries.	▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ▶ EIAR s.5 Biodiversity including s.5.3.3.3 'Fish' (Field Survey), s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries' notably para 2 & 4, Tbl 5.6 ▶ 'Potential Impact in Combination with other Plans and Projects'	The EIAR as submitted contains an assessment of alternatives however this is considered as inadequate for EIA purposes. The EIAR also contains an assessment of environmental impacts including impacts on biodiversity however, for EIA purposes, the assessment as submitted is inadequate and clarity of mitigation measures and residual impacts is insufficient. These issues are addressed in the recommended request for further information.
O'Sullivan, Sheila	Support	+	Local business owner in support of the scheme.		
			▶ Local business owner in support of the scheme and concerned about flooding.	▶ EIAR s.2.2 'Need for the Proposed Development'	Noted
Buckley, Jer for Blackpool Flood Group	Support, Prog.	+	Local business owner in support of the scheme.		
			▶ Struggles the community have endured are outlined. ▶ Record of issues raised by local community at community meetings. ▶ Support for the scheme's implementation outlined.	▶ EIAR s.2.2 'Need for the Proposed Development'	Noted

Jeral Centra	Support, Prog.	+	(Same as submission no.34 above) Local business owner in support of the scheme.		
			SUPPORT OF THE SCHEME ► Struggles the community have endured are outlined. ► Record of issues raised by local community at community meetings. ► Support of the scheme's implementation.	► EIAR s.2.2 'Need for the Proposed Development'	Noted
Morrish, Rory	Biodiv., Design	-	Issues raised are outlined below.		
			OTTERS ► Concerns with regard to the impact of the scheme on Otter populations. BIRDS ► Impact of scheme on Dipper ► Impact of scheme on Kingfisher FISH ► Impacts of scheme on Brown Trout ► Impacts of scheme on River Lamprey DESIGN ► Concerns highlighted with regard to loss of the River as an amenity of nature and the benefits it provides in terms of human health. ► Design team encouraged to consider the option of decommissioning of the weirs over culverting of the river.	► EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ► EIAR 5.3.31 'Birds' para 'Other bird species', tbl5.5 'Holt Survey Records from trail camera surveillance', s.5.4.4.4 'Other Birds para 4, s.5.4.4.5 'Birds Mitigation', s.5.4.4.8 'Residual Impacts on Terrestrial Fauna' ► EIAR s.5.3.3.2 'Birds' para 'Kingfisher', s.5.3.4 'Significance of Fauna', sa.5.4.4.3 'Kingfisher' (Impacts) ► EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.2 'Brown Trout' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.2.1 'Instream Habitats' (Impact on Loss of Habitat), s.5.4.5 'Impact on Fisheries' and s.5.4.5.1 'Fisheries Mitigation'. ► EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.2. 'Lamprey' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.5 'Impact on Fisheries' notably para 9. ► EIAR s.2.6.2 'Possible Flood Risk Management Methods'	The EIAR assesses environmental impacts including impacts on biodiversity however, for EIA purposes, the assessment as submitted is inadequate and clarity of mitigation measures and residual impacts is insufficient. The EIAR as submitted contains an assessment of alternatives however this is considered as inadequate for EIA purposes. These issues are addressed in the recommended request for further information.
Sheehan, Grace	Support	+	Local business owner in support of the scheme.		
			► Local business owner in support of the scheme who has been impacted by flooding in the past.	► EIAR s.2.2 'Need for the Proposed Development'	Noted

Horgan, Geraldine	Support	+	Local business owner in support of the scheme.		
			SUPPORT OF THE SCHEME ▶ Daughter writing on behalf of elderly woman who supports the scheme.	▶ EIAR s.2.2 'Need for the Proposed Development'	Noted
MacCárthaigh, Seán	Biodiv., Assess, Other	-	Issues raised are outlined below.		
			<p>BIODIVERSITY</p> <p>▶ Quote given and concern expressed with regard to the impact of culverting, sediment traps and maintenance regimes on the habitats of: Brown Trout;</p> <p>▶ Lamprey; and</p> <p>▶ Eel.</p> <p>OTTERS</p> <p>▶ Concern regarding the impact of the scheme on otters despite the proposed mitigation measures.</p> <p>DESIGN OPTIONS</p> <p>▶ Gaps in the alternatives/scheme options analysis identified including upstream river alignment change, failure to implement planning conditions, unlicensed river structures, performance and failure of instream structures</p> <p>▶ The design cannot be justified given the environmental destruction</p> <p>▶ Scheme no longer satisfies CBA</p>	<p>▶ EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.2 'Brown Trout'. 'Lamprey' (, s.5.2.7.4 'European Eel', s.5.3.3.3 'Fish' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.5 'Impact on Fisheries' notably para 9..</p> <p>▶ s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'.</p> <p>▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'</p> <p>▶ EIAR s.4.4 'Likely and Significant Impacts and Associated Mitigation measures', s.5.4 'Impacts and Mitigation Measures', s.6.3.4 'Loss of Bedrock', s.6.3.5 'Loss of Geological Heritage', s.6.3.6 'Loss of Quaternary Geology', s.6.4.1 'Loss of Soil', s.6.4.2 'Contaminated Land', s.6.5 'Hydromorphology', s.7.2.4 'Impacts and Mitigation for Surface Water Quality', s.7.3.3 'Potential Impacts on Hydrogeology', s.7.4.3 'Potential Impacts on Flooding', s.8.4 'Likely Significant Effects and Associated Mitigation Measures', s.9.6 'Likely and Significant Impacts and Associated Mitigation Measures' s.10.5 'Mitigation and Monitoring', s.11.2.4 'Potential Impacts on Traffic and Transport Infrastructure', s.11.3 'Potential Impacts on Services and Proposed Mitigation Measures', s.11.4.3 'Potential Impact during Construction Phase', s.11.4.4 'Potential Impact during the Operational Phase'.</p>	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>

Carney, Bernie	Biodiv., Design	-	Issues raised are outlined below.		
			<p>DESIGN OPTIONS</p> <ul style="list-style-type: none"> ▶ Other drainage scheme solutions are encouraged to be explored ▶ An option which supports the protection of the habitat of the River Bride ▶ A design option which complies and supports the recent Climate and Biodiversity Emergency declared by the Dáil. 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the EIAR as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
Moody, Chris / Dr Sleeman, Paddy	Biodiv., Design	-	Submission made by Dr. Paddy Sleeman (School of Biological, Earth and Environmental Studies, UCC. Issues raised are outlined below. In addition, a map and additional information regarding Otters recorded in the Blackpool area is attached to this submission.		
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Concern with regard to the impacts on fish and mammals <p>OTTERS</p> <ul style="list-style-type: none"> ▶ Inconsistencies in the EIAR regarding Otter movements is noted <p>DESIGN</p> <ul style="list-style-type: none"> ▶ The number of proposed hard measures including culverting; trash screens; sediment traps; and defence walls, are noted. ▶ Contradiction of the Scheme to the recent Climate and Biodiversity Emergency declared by the Dáil. 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity including s.5.3.3.3 'Fish' (Field Survey), s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries' notably para 2 & 4, Tbl 5.6 'Potential Impact in Combination with other Plans and Projects' ▶ EIAR s.5.2.9 'Mammals', s.5.3.3.2 'Mammals' (Field Surveys), s.5.3.4 'Significance of Fauna', s.5.4.4 'Impact on Fauna', s.5.4.4.8 'Residual Impact on Fauna'. ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' ▶ EIAR s.3 'Description of the Propose Development' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>

Cashman, Aileen	Biodiv., Design, Other	-	Issues raised are outlined below.		
			<p>NATURA 2000 SITES</p> <ul style="list-style-type: none"> ▶ Risk to Natura 2000 sites is noted <p>KINGFISHER</p> <ul style="list-style-type: none"> ▶ Impact of the scheme on Kingfisher <p>BATS</p> <ul style="list-style-type: none"> ▶ Impact of the scheme on Bats <p>OTTERS</p> <ul style="list-style-type: none"> ▶ Impact of the scheme on Otter <p>DESIGN</p> <ul style="list-style-type: none"> ▶ Alternative option to culverting (outlined within submission) <p>EXISTING PLANS/POLICIES</p> <ul style="list-style-type: none"> ▶ Scheme fails to integrate with existing plans (Cork City Development Plan - objective 10.9 outlining the goal to protect and maintain integrity and maximise the potential of natural heritage and diversity of River Lee) ▶ Scheme does not reflect the recent Climate and Biodiversity Emergency by declared by the Dáil 	<ul style="list-style-type: none"> ▶ EIAR s.5.2.4.1 'Natura 200 Sites' (Designated Areas in the Vicinity of the Study Area), NIS s.4.2 'Identification of Potential Impacts' ▶ EIAR s.5.3.3.2 'Birds' para 'Kingfisher', s.5.3.4 'Significance of Fauna', sa.5.4.4.3 'Kingfisher' (Impacts) ▶ EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.9.2 'Bats' (Methodology and Limitations), s.5.3.2 'Significance of Fauna', s.5.4.4.6 'Bats' (Impacts), s.5.4.4.7 'Bats' (Mitigation). ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' ▶ EIAR s.2.3.2 'Regional Level' para Cork City Development Plan, s4.2.1 'Methodology' (Receiving Environment), s.5.5 'Cumulative Assessment', tbl 5.6 'Potential Impact in combination with other Plans and Projects', s.6.1 'Methodology and Limitations' para Published Material, s.6.3 'Geology' para Geological Heritage and para Economic Geology, s.6.6 'Cumulative Assessment', tbl 6.6 'Potential Impact in combination with other Plans and Projects', s.7.5 'Assessment of Cumulative Impacts', tbl 7.7 'Potential Impact in combination with other Plans and Projects', s.9.2.2 'Baseline Landscape Assessment', s.9.3.3 'Cork City Development Plan 2014-2020', s.10.2.2 'Desktop Study', s.10.3.2 'Legal and Planning Context', s.11 'Material Assets', s.11.5 'Assessment of Cumulative Impacts' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. The NIS assesses impacts on the Natura 2000 Network. However, the assessments as submitted are considered inadequate for compliance purposes.</p> <p>These issues are addressed in the recommended request for further information.</p>

Moriarty, Mick - Blackpool Flood Group	Support, Prog.	+	Lengthy submission from Blackpool Flood Group outlining the struggles the community have suffered (pictures included) and the support that they have for the scheme being implemented. Document also provides meeting minutes of each of the meetings held in 2013 by the committee showing issues raised. A range of points are given as to why this scheme is essential for the local people and why it should go ahead.		
			► Chair of Blackpool Flood Group in support of the scheme.	► EIAR s.2.2 'Need for the Proposed Development'	Noted
Grandon, Martin	Support, Prog.	+	Business owner who supports the scheme going ahead.		
			► Local business owner in support of the scheme (cannot get insurance due to flooding). ► Impact of recurring flooding on businesses and dwellings outlined.	► EIAR s.2.2 'Need for the Proposed Development'	Noted
O'Leary, Tadhg & Buckley, Jer	Support, Prog.	+	Two local business owners who have been impacted by flooding in the past, in support of the scheme going ahead. Urges that consideration to humans and the impact flooding has on their lives should be given. Submission includes photos of several flooding events over the years in the area.		
			SUPPORT OF THE SCHEME ► Community is in constant fear of flooding. ► The positive impacts the scheme will have on alleviating dumping issues in the area. ► Lack of mention in the EIAR of attendance at open days ► Lack of emphasis in EIAR of fear and stress that flooding poses on locals. ► The impact that climate change will have on flooding in the area in the future. ► Impact that flooding may have on recently granted housing developments in the event that the scheme is not implemented.	► EIAR s.2.2 'Need for the Proposed Development' ► EIAR s.3 'Description of the Proposed Development' ► EIAR s.2.8 'Scoping and Consultation' notably s.2.8.2 'Public Consultation', ► EIAR s.4.3.11 'Human Health and Safety' notably para 2 ► EIAR s.1.2 'Brief Description of the Proposed Development' para 2, s.2.2 'Need for the Proposed Development' bp.1, s.2.3.2 'Regional Level' para Cork City Development Plan. ► EIAR s.4.5 'Cumulative Assessment' bp.1, tbl 5.6 'Potential Impact in combination with other Plans and Projects'.	The EIAR provides a review of consultation and some assessment of the benefits of the scheme. However, the assessment as submitted is considered inadequate for compliance with EIA requirements. These issues are addressed in the recommended request for further information.
Barrett, Alex	Support	+	Local who has experienced hardship form previous flooding events and in support of the scheme being approved		
			SUPPORT OF THE SCHEME ► Local in support of the scheme.	► EIAR s.2.2 'Need for the Proposed Development'	Noted

Jordan, Louisa	Biodiv., Design, Assess, Other	-	Issues raised are outlined below.		
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Impacts on biodiversity ▶ River could be exploited as insect high-way, contributing to the National Pollinator Plan ▶ Lack of reference made in the EIAR to living organisms present in the till of the river bed. <p>FISHERIES</p> <ul style="list-style-type: none"> ▶ Negative impact on fisheries and aquatic life <p>DESIGN OPTIONS</p> <ul style="list-style-type: none"> ▶ Potential for alternative options of scheme design, encouraging a design which minimises concrete elements. <p>OTTERS</p> <ul style="list-style-type: none"> ▶ Impact on Otters as stated in the EIAR is noted <p>TOURISM</p> <ul style="list-style-type: none"> ▶ Damage to a natural amenity which could be exploited along with its historic value to encourage tourism in the area. 	<ul style="list-style-type: none"> ▶ EIAR s.5 notably s.5.4 'Impacts and Mitigation Measures' ▶ EIAR s.5 Biodiversity including s.5.3.3.3 'Fish' (Field Survey), s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries' notably para 2 & 4, Tbl 5.6 'Potential Impact in Combination with other Plans and Projects' ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ▶ EIAR s.2.3.2 'Regional Level' para Cork City Development Plan, tbl 2.1 'Summary of the key constraints identified for the Lower Lee Flood Relief Scheme', s.4.4.2 'Construction Phase' para Tourism (Impacts) & para Amenity, s.9 'Landscape' notably s.9.6 'Likely and Significant Impacts and Associated Mitigation Measures'. 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements. These issues are addressed in the recommended request for further information.</p>
O'Connor, Tim	Biodiv., Design	-	Issues raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Objection to culverting of the river ▶ Culverting does not allow for safety valve if anything goes wrong or flow is larger than anticipated. 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives', s.3.1.2 'Culverts' (Proposed Works), s.3.1.11 'Maintenance Regime', s.3.2.1 'New Culverts' (Anticipated Construction Methods), s.4.3.11 'Human Health and Safety' para 1, s.5.2.3 'Otter Camera Survey' para 1, s.5.3.3 'Fauna' para 'Other bird species', s.5.3.3.2 'Mammals' para 'Otter', s.5.3.3.3 'Fish', s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries', s.6.5 'Hydromorphology' notably para 'Potential Impacts on Hydromorphology', s.9.6.3.3 'Construction of new and replacement culverts and backfilling of existing watercourse' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements. These issues are addressed in the recommended request for further information.</p>

			<p>OTTERS ► Impact of the scheme on Otter populations</p>	<p>► EIA s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'.</p>	
			<p>DIPPER ► Impact of the scheme on Dipper populations</p>	<p>► EIA 5.3.31 'Birds' para 'Other bird species', tbl5.5 'Holt Survey Records from trail camera surveillance', s.5.4.4.4 'Other Birds para 4, s.5.4.4.5 'Birds Mitigation', s.5.4.4.8 'Residual Impacts on Terrestrial Fauna'</p>	
			<p>CONSTRUCTION ► Concern with regard to environmental measures and consideration given during construction is noted as being of concern, with reference made to the Bandon River scheme, where it is stated none of the promised amelioration works were taken.</p>	<p>► EIA s.3.3 'Construction Programme and Sequencing of Proposed Works', s.4.4.2 'Construction Phase' para(s) Mitigation Measures,</p>	
			<p>DESIGN ► The scheme is based on an outdated model and assessment which fails to account changes both in the Bride and of the need to move away from culverting as an option.</p>	<p>► EIA s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'</p>	
Alannah Caffrey	Biodiv., Mit., Other	-	Issues raised are outlined below. It has been noted in this submission that experts have advised of more natural approach to flood relief.		
			<p>PROTECTED SPECIES ► Impact on Annex II species</p>	<p>► EIA s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'.</p> <p>► EIA s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.2. 'Lamprey' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.5 'Impact on Fisheries' notably para 9.</p> <p>► EIA s.5 Biodiversity including s.5.3.3.3 'Fish' (Field Survey), s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries' notably para 2 & 4, Tbl 5.6 'Potential Impact in Combination with other Plans and Projects'</p>	<p>The EIA provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>

			<p>OTTERS</p> <ul style="list-style-type: none"> ▶ Impact on Otter habitat. 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. 	
			<p>NATURA 2000 SITES</p> <ul style="list-style-type: none"> ▶ Impact on Great Island SAC and Cork Harbour SPA Natura 2000 Sites. 	<ul style="list-style-type: none"> ▶ EIAR s.5.2.4.1 'Natura 200 Sites' (Designated Areas in the Vicinity of the Study Area), NIS s.4.2 'Identification of Potential Impacts' 	
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Deterioration of water quality of the river due to culverting, this does not align with WFD ▶ Reducing the ecological potential of the river. 	<ul style="list-style-type: none"> ▶ EIAR s.7.2 'Surface Water Quality' notably s.7.2.4 'Impacts and Mitigation for Surface Water Quality' 	
			<p>BIRDS</p> <ul style="list-style-type: none"> ▶ Lack of sufficient mitigation measures 	<ul style="list-style-type: none"> ▶ EIAR s.5.4.4.5 'Birds Mitigation' 	
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Potential to enhance the river ecosystem ▶ Issue raised regarding the potential for flood transfer as mentioned in the EIAR 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' 	
			<p>CUMULATIVE IMPACTS</p> <ul style="list-style-type: none"> ▶ Cumulative effect of Dulux Paint Factory is noted as having a negative impact. 	<ul style="list-style-type: none"> ▶ EIAR tbl 5.6 'Potential Impact in Combination with other Plans and Programmes' 	
			<p>OTHER PLANS AND PROGRAMMES</p> <ul style="list-style-type: none"> ▶ There are 6 noted LPZ's which fall within or partially within the study area which is noted to be a reason for not granting the proposed development. 	<ul style="list-style-type: none"> ▶ EIAR s.9.3.6 'Landscape Protection Designations' para Landscape Preservation Zones. 	
Boyden, Mark (Coomhola Salmon Trust Ltd.)	Biodiv., Design, Assess	-	Submission recognises that the scheme is needed to alleviate human suffering. Issues raised are outlined below.		
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Does not reflect international best practice ▶ Interference with attenuation capacity of river causes a reduction in response time of water level rising ▶ Opportunities ignored to consider issue on a catchment wide basis and to provide measures which will assist environmental conservation ▶ The river should be widened where possible to increase natural attenuation ▶ The scheme should take the opportunity to incorporate state of the art techniques and methodology. 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>

			<p>AMENITY</p> <p>► Lack of consideration on quality of life in EIA by eliminating riverside amenity stating that the scheme will have a negative impact on human environment by denying a visible river.</p>	<p>► EIA s.2.3.2 'Regional Level' para Cork City Development Plan, tbl 2.1 'Summary of the key constraints identified for the Lower Lee Flood Relief Scheme', s.4.4.2 'Construction Phase' para Tourism (Impacts) & para Amenity, s.9 'Landscape' notably s.9.6 'Likely and Significant Impacts and Associated Mitigation Measures'.</p>	
			<p>ENVIRONMENT</p> <p>► Stated that the scheme will have a negative and irrecoverable impact on the environment.</p>		
Blue Cabs Cork	Support	+	Local business in support of the scheme proceeding as they have been impacted on several occasions by flooding events.		
			<p>SUPPORT OF THE SCHEME</p> <p>► Local business owner in support of the scheme.</p>	► EIA s.2.2 'Need for the Proposed Development'	Noted
McCarthy, Michael	Biodiv., Design, Other	-	Issues raised are outlined below.		
			<p>BIODIVERSITY</p> <p>► Impact on otter habitat</p> <p>► Impact on Salmonid habitat</p> <p>► Impact on Irish Dipper habitat</p> <p>► Natura 2000 network</p>	<p>► EIA s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'.</p> <p>► EIA s.5.3.3.3 'Fish', s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries' notably para 2 & 4, Tbl 5.6 'Potential Impact in Combination with other Plans and Projects'</p> <p>► EIA 5.3.31 'Birds' para 'Other bird species', tbl5.5 'Holt Survey Records from trail camera surveillance', s.5.4.4.4 'Other Birds para 4, s.5.4.4.5 'Birds Mitigation', s.5.4.4.8 'Residual Impacts on Terrestrial Fauna'</p>	<p>The EIA provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. The NIS assesses impacts on the Natura 2000 Network. However, the assessments as submitted are considered inadequate for compliance purposes.</p> <p>These issues are addressed in the recommended request for further information.</p>

			<p>OTHER PLANS AND PROGRAMMES</p> <ul style="list-style-type: none"> ▶ Scheme contradicts CFRAM objectives and WFD ▶ Scheme is in direct contravention of Cork CDP. 	<ul style="list-style-type: none"> ▶ EIAR s.2.3.2 'Regional Level' para Cork City Development Plan, s4.2.1 'Methodology' (Receiving Environment), s.5.5 'Cumulative Assessment', tbl 5.6 'Potential Impact in combination with other Plans and Projects', s.6.1 'Methodology and Limitations' para Published Material, s.6.3 'Geology' para Geological Heritage and para Economic Geology, s.6.6 'Cumulative Assessment', tbl 6.6 'Potential Impact in combination with other Plans and Projects', s.7.5 'Assessment of Cumulative Impacts', tbl 7.7 'Potential Impact in combination with other Plans and Projects', s.9.2.2 'Baseline Landscape Assessment', s.9.3.3 'Cork City Development Plan 2014-2020', s.10.2.2 'Desktop Study', s.10.3.2 'Legal and Planning Context', s.11 'Material Assets', S.11.5 'Assessment of Cumulative Impacts' 	
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Trash screens will increase likelihood of flooding, ▶ Concrete walls and banks will increase flow of water creating greater risk of flood downstream ▶ Encouraging other less environmental harmful methods of flood relief. 	<ul style="list-style-type: none"> ▶ EIAR s.3.1.11 'Maintenance Regime' and including s.3.1.9 'Screens' (Proposed Works), s.3.2.8 'Other Instream Works' (Anticipated Construction Methods), s.11.4.4 'Potential impact during the Operational Phase ▶ EIAR s.2.6 'Consideration of Alternatives', s.3.1.2 'Culverts' (Proposed Works), s.3.1.11 'Maintenance Regime', s.3.2.1 'New Culverts' (Anticipated Construction Methods), s.4.3.11 'Human Health and Safety' para 1, s.5.2.3 'Otter Camera Survey' para 1, s.5.3.3 'Fauna' para 'Other bird species', s.5.3.3.2 'Mammals' para 'Otter', s.5.3.3.3 'Fish', s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries', s.6.5 'Hydromorphology' notably para 'Potential Impacts on Hydromorphology', s.9.6.3.3 'Construction of new and replacement culverts and backfilling of existing watercourse' ▶ EIAR s.2.6 'Consideration of Alternatives' 	
Moran, Cllr Oliver	Biodiv., Design	-	Issues raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Culverting will remove an urban amenity 	<ul style="list-style-type: none"> ▶ EIAR s.9.6.3.3 'Construction of new and replacement culverts and backfilling of existing watercourse' para Potential Impacts. 	The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as

			<p>OTTERS</p> <ul style="list-style-type: none"> ▶ Impact on otters and their habitat. 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. 	<p>submitted, this is considered inadequate for compliance with EIA requirements. These issues are addressed in the recommended request for further information.</p>
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ It is encouraged that the design of the scheme should provide as an attractive amenity and preserve biodiversity, reflecting positively on the Biodiversity Emergency declared by the Dáil. ▶ Objection to the removal of two pedestrian bridges at Blackpool retail park. 	<ul style="list-style-type: none"> ▶ EIAR s.10 Cultural Heritage notably s.10.4 'Predicted Impacts', tbl 10.4 'Predicted Impacts to identified Heritage assets' and tbl.10.5 'Mitigation measures and monitoring of process for Heritage Assets'. 	
O'Mahony, Declan	Biodiv., Design, Assess	-	Issues raised are outlined below.		
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Impact of siltation occurring due to culverting ▶ Negative impact of concrete being used is noted ▶ Support given to the statement by Coomhola stating that the scheme is an opportunity to incorporate state of the art techniques and methodology to achieve flood protection as well as environmental conservation. 	<ul style="list-style-type: none"> ▶ EIAR s.9.6.3.3 'Construction of new and replacement culverts and backfilling of existing watercourse' para Potential Impacts. 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. The NIS assesses impacts on the Natura 2000 Network. However, the assessments as submitted are considered inadequate for compliance purposes. These issues are addressed in the recommended request for further information.</p>
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Impact the scheme has on biodiversity and a wide range of important species ▶ Natura 2000 network 	<ul style="list-style-type: none"> ▶ EIAR s.5 'Biodiversity' notably s.5.4 'Impacts and Mitigation Measures'. 	
			<p>AMENITY</p> <ul style="list-style-type: none"> ▶ Support given to the Coomhola submission which outlines that no mention of quality of life given in the EIAR (negative impact due to nature deficit). 		

Cork Nature Network	Biodiv., Design, Assess	-	Issues raised are outlined below.		
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Concern with regard to the impact biodiversity including: otter; ▶ Brown Trout; ▶ Dipper; ▶ Stonefly; ▶ Mayfly; ▶ Midge Larvae ▶ Snails ▶ Beetle Larvae ▶ It is requested that river embankments be planted with other native species besides just grass. ▶ It is recommended that the banks opposite and above Commons Inn are left with vegetation on the northern side to enable otters to continue breeding and resting. ▶ Noted that there is no reference made to the impact of the scheme on a number of pNHA sites (Shournagh valley, Blarney lakes, Blarney Castle woods, Blarney Bog, Lee valley). ▶ Natura 2000 <p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Objection to culverting the river as it removes part of the invaluable habitat for otters; and ▶ fish species ▶ That it is creating a concrete environment that does not enhance the natural environment or our well-being, and suggest a further investigation into a wall improvement approach 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter' , s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ▶ EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.2 'Brown Trout' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.2.1 'Instream Habitats' (Impact on Loss of Habitat), s.5.4.5 'Impact on Fisheries' and s.5.4.5.1 'Fisheries Mitigation'. ▶ EIAR 5.3.31 'Birds' para 'Other bird species', tbl5.5 'Holt Survey Records from trail camera surveillance', s.5.4.4.4 'Other Birds para 4, s.5.4.4.5 'Birds Mitigation', s.5.4.4.8 'Residual Impacts on Terrestrial Fauna' ▶ EIAR s.7.2.3.2 para 'Q Rating/Biological Water Quality' ▶ EIAR s.7.2.3.2 para 'Q Rating/Biological Water Quality' ▶ EIAR s.2.1.3 para 5 (pNHA Shournagh Valley) 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. The NIS assesses impacts on the Natura 2000 Network. However, the assessments as submitted are considered inadequate for compliance purposes.</p> <p>These issues are addressed in the recommended request for further information.</p>

Steer, Roslyn	Biodiv., Design	-	Issues raised are outlined below.		
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ The removal of two pedestrian bridges ▶ The plan is short sighted and outdated, urging alternative options to be considered. ▶ Damage a local amenity which could be better served by positive urban regeneration. ▶ Removing the availability of an attractive riverside walking route which would greatly enhance the area encouraging sustainable transport, leisure and recreation. 	<ul style="list-style-type: none"> ▶ EIAR s.10 Cultural Heritage notably s.10.4 'Predicted Impacts' , tbl 10.4 'Predicted Impacts to identified Heritage assets' and tbl.10.5 'Mitigation measures and monitoring of process for Heritage Assets'. ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ The lasting damage and wildlife discussed in the EIAR is noted. 	(Impact on wildlife) EIAR s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5	
Sherry, Jude	Biodiv., Design, Other	-	Resident of Blackpool. Issues raised are outlined below.		
			<p>OTTERS</p> <ul style="list-style-type: none"> ▶ Impact of the scheme on Otters. 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter' , s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>HUMANS</p> <ul style="list-style-type: none"> ▶ It is noted that the River Bride is one of the very few and limited natural resources of Blackpool which its loss would impact negatively on mental health 		
			<p>FISHERIES</p> <ul style="list-style-type: none"> ▶ Impact of the scheme on Brown Trout and; ▶ Eel ▶ The impact on the above does not reflect on the recently declared Biodiversity and Climate Emergency 	<ul style="list-style-type: none"> ▶ EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.2 'Brown Trout' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.2.1 'Instream Habitats' (Impact on Loss of Habitat), s.5.4.5 'Impact on Fisheries' and s.5.4.5.1 'Fisheries Mitigation'. ▶ EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.4 'European Eel' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Surveys), s.5.3.4 'Significance of Fauna', s.5.4.5 'Impact on Fisheries', para 9. ▶ (Impact on biodiversity) EIAR s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5 	

			<p>NTS</p> <ul style="list-style-type: none"> ▶ Concerns raised regarding the NTS failing to state the impact on bird feeding grounds. 	<ul style="list-style-type: none"> ▶ NTS pg.10 para 2 	
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Scheme represents an outdated means of flood and water management, potentially even causing very dangerous flooding ▶ Alternative upstream flood management approaches should be assessed further, urging that OPW only use international best practice in natural flood management. 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	
			<p>CULTURAL HERITAGE</p> <ul style="list-style-type: none"> ▶ Objection to the removal of two footbridges in Blackpool Retail Park and the permanent alteration and destruction to the heritage structures pre dating 1940s 	<ul style="list-style-type: none"> ▶ EIAR s.10 Cultural Heritage notably s.10.4 'Predicted Impacts', tbl 10.4 'Predicted Impacts to identified Heritage assets' and tbl.10.5 'Mitigation measures and monitoring of process for Heritage Assets'. 	
			<p>OTHER PLANS AND PROGRAMMES</p> <ul style="list-style-type: none"> ▶ Proposed scheme contradicts Cork City Council LAP. 	<ul style="list-style-type: none"> ▶ EIAR s.2.3.2 'Regional Level' para Cork City Development Plan, s4.2.1 'Methodology' (Receiving Environment), s.5.5 'Cumulative Assessment', tbl 5.6 'Potential Impact in combination with other Plans and Projects', s.6.1 'Methodology and Limitations' para Published Material, s.6.3 'Geology' para Geological Heritage and para Economic Geology, s.6.6 'Cumulative Assessment', tbl 6.6 'Potential Impact in combination with other Plans and Projects', s.7.5 'Assessment of Cumulative Impacts', tbl 7.7 'Potential Impact in combination with other Plans and Projects', s.9.2.2 'Baseline Landscape Assessment', s.9.3.3 'Cork City Development Plan 2014-2020', s.10.2.2 'Desktop Study', s.10.3.2 'Legal and Planning Context', s.11 'Material Assets', s.11.5 'Assessment of Cumulative Impacts' 	
O'Connor, Frank	Biodiv., Design, Assess	-	(Same submission as above 57) Resident of Blackpool and qualified in the area of environmental management. Issues raised are outlined below.		
			<p>OTTERS</p> <ul style="list-style-type: none"> ▶ Impact of the scheme on otters 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p>

	<p>HUMANS</p> <ul style="list-style-type: none"> ▶ It is noted that the River Bride is one of the very few and limited natural resources of Blackpool which its loss would impact negatively on mental health 	<ul style="list-style-type: none"> ▶ EIAR s.3 Human Beings, Population and Human Health 	<p>These issues are addressed in the recommended request for further information.</p>
<p>FISHERIES</p> <ul style="list-style-type: none"> ▶ Impact of the scheme on Brown Trout and; ▶ Eel ▶ The impact on the above does not reflect on the recently declared Biodiversity and Climate Emergency 	<ul style="list-style-type: none"> ▶ EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.2 'Brown Trout' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.2.1 'Instream Habitats' (Impact on Loss of Habitat), s.5.4.5 'Impact on Fisheries' and s.5.4.5.1 'Fisheries Mitigation'. ▶ EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.4 'European Eel' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Surveys), s.5.3.4 Significance of Fauna', s.5.4.5 'Impact on Fisheries', para 9. ▶ (Impact on biodiversity) EIAR s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5 		
<p>NTS</p> <ul style="list-style-type: none"> ▶ Concerns raised regarding the NTS failing to state the impact on bird feeding grounds. 	<ul style="list-style-type: none"> ▶ (Bird feeding grounds) NTS pg.10 para 2 		
<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Scheme represents an outdated means of flood and water management, potentially even causing very dangerous flooding ▶ Alternative upstream flood management approaches should be assessed further, urging that OPW only use international best practice in natural flood management. 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods 		
<p>CULTURAL HERITAGE</p> <ul style="list-style-type: none"> ▶ Objection to the removal of two footbridges in Blackpool Retail Park and the permanent alteration and destruction to the heritage structures pre dating 1940s 	<ul style="list-style-type: none"> ▶ EIAR s.10 Cultural Heritage notably s.10.4 'Predicted Impacts', tbl 10.4 'Predicted Impacts to identified Heritage assets' and tbl.10.5 'Mitigation measures and monitoring of process for Heritage Assets'. 		

			<p>OTHER PLANS AND PROGRAMMES</p> <ul style="list-style-type: none"> ▶ Proposed scheme contradicts Cork City Council LAP. 	<ul style="list-style-type: none"> ▶ EIAR s.2.3.2 'Regional Level' para Cork City Development Plan, s4.2.1 'Methodology' (Receiving Environment), s.5.5 'Cumulative Assessment', tbl 5.6 'Potential Impact in combination with other Plans and Projects', s.6.1 'Methodology and Limitations' para Published Material, s.6.3 'Geology' para Geological Heritage and para Economic Geology, s.6.6 'Cumulative Assessment', tbl 6.6 'Potential Impact in combination with other Plans and Projects', s.7.5 'Assessment of Cumulative Impacts', tbl 7.7 'Potential Impact in combination with other Plans and Projects', s.9.2.2 'Baseline Landscape Assessment', s.9.3.3 'Cork City Development Plan 2014-2020', s.10.2.2 'Desktop Study', s.10.3.2 'Legal and Planning Context', s.11 'Material Assets', s.11.5 'Assessment of Cumulative Impacts' 	
O'Connor, Rory	Design, Assess	-	Issues raised are outlined below.		
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Scheme to be reconsidered in light of avoiding culverting ▶ Natural elements of the area should be considered 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
Devereux, Kathriona	Biodiv., Design	-	Issues raised are outlined below.		
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Alternative engineering solutions encouraged which allow room for the river ▶ Design will remove a unique urban amenity <p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Scheme will impact natural environment and remove unique natural urban amenity. 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' <p>(Impact on biodiversity) EIAR s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5</p>	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>

Kelleher, Mary	Biodiv., Assess	-	Issues and concerns raised are outlined below.		
			<p>ENVIRONMENT</p> <ul style="list-style-type: none"> ▶ Concern with regard to the overall impact of the scheme on the environment, particularly at a time when people are giving energy to improving the environment. ▶ It is noted to be a duty of the state to protect the environment which they have been contracted to through EU Directives. 	▶ EIA s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5	<p>The EIA provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
Russell, Brian	Design	-	Requirement for scheme recognised but believes all requirements of the project are not met. Issues raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Objection to culverting the river as it is no longer considered best practice in flood management ▶ A long term maintenance plan for culvert repair and trash screen clearance should be modelled to demonstrate the long term cost of such a scheme in preference to other potential options which maintain an open water course. ▶ Link given to the Bolton municipal council culvert policy which states that open culverting should be maintained as a priority for both for flood control and environmental protection 	▶ EIA s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods	<p>The EIA provides a review of alternatives. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p> <p>This issue is addressed in the recommended request for further information.</p>
Lynch, John	Biodiv., Design	-	Submission made by retired engineer. Issues and concerns raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Objection to culverting of the river due to its impact on wildlife. <p>DESIGN</p> <ul style="list-style-type: none"> ▶ Reference to the Greater Dublin Regional Code of Practice which states that rivers are not to be culverted or piped, they should remain open in their natural valley, and, all proposed structures should be set back from the edge of any watercourse to allow access for channel cleaning/maintenance, with a 15m wide riparian buffer zone. 	▶ EIA s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5	<p>The EIA provides a review of alternatives. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
Diskín, Karl Shane	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Concern with regard to the impact on biodiversity. ▶ Deemed as an incorrect approach to addressing the issue given the declared Climate and Biodiversity Emergency. 	▶ EIA s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5	<p>The EIA provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as</p>

			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Culverting of the river and to proposed sediment traps which have been known to be the cause of flooding. ▶ Culverting is deemed outdated <p>DESIGN</p> <ul style="list-style-type: none"> ▶ Causes of current floodings are linked to alterations made upstream, construction within the floodplain and the lack of natural and man made attenuation. 	<p>▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'</p> <p>▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'</p>	<p>submitted, this is considered inadequate for compliance with EIA requirements. These issues are addressed in the recommended request for further information.</p>
O'Sullivan, Michelle (Cork Chamber)	Support	+	Support of the Scheme being implemented as fast as possible for the benefit of the local people.		
			<p>SUPPORT OF THE SCHEME</p> <ul style="list-style-type: none"> ▶ Scheme deemed urgent in light of changing climate and increasingly disturbed weather patterns ▶ Cork has endured significant economic damages due to flooding which has also had implications on the health and well-being of the people ▶ The scheme will support the predicted growth of Cork City and the resilience building and adaptation to Climate Change, supporting the National Adaptation Framework 	<p>▶ EIAR s.2.2 'Need for the Proposed Development'</p>	Noted
Ross, Michelle	Design	-	Issues raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Culverting of the river does not follow modern best practice in flood relief. ▶ Culverting will be devastating to wildlife ▶ Culverting will destroy a vibrant natural amenity for the local people. 	<p>▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'</p>	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements. These issues are addressed in the recommended request for further information.</p>

Harrington, Brid	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Culverting of the river will remove an urban amenity which has potential for developing high quality urban environment ▶ The impact culverting the river will have on biodiversity including: <ul style="list-style-type: none"> ▶ Otters; ▶ Brown Trout; ▶ Eels. 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ▶ EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.2 'Brown Trout' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.2.1 'Instream Habitats' (Impact on Loss of Habitat), s.5.4.5 'Impact on Fisheries' and s.5.4.5.1 'Fisheries Mitigation'. ▶ EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.4 'European Eel' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Surveys), s.5.3.4 'Significance of Fauna', s.5.4.5 'Impact on Fisheries', para 9. 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ The scheme should be designed to be attractive and enhance and preserve biodiversity, which would support the recent Biodiversity and Climate Emergency declared by the Dáil. ▶ Objection to the removal of two pedestrian bridges at Blackpool Retail Park. 	<ul style="list-style-type: none"> ▶ EIAR s.10 Cultural Heritage notably s.10.4 'Predicted Impacts', tbl 10.4 'Predicted Impacts to identified Heritage assets' and tbl.10.5 'Mitigation measures and monitoring of process for Heritage Assets'. 	
Hurley, Alan	Design, Assess	-	Issues and concerns raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Will have negative impact on the area, as the river is a pleasure to the town with community groups utilising it. 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>HUMANS</p> <ul style="list-style-type: none"> ▶ Disappointed with the lack of consideration given to the scheme and the impact it will have on the local community and their local town, deeming the solution to be lazy. 		
Sheppard, Noreen	Support	+	Submission confirms support of the scheme which will have a positive impact on the local area.		
			<ul style="list-style-type: none"> ▶ Support of the scheme being implemented. 	<ul style="list-style-type: none"> ▶ EIAR s.2.2 'Need for the Proposed Development' 	Noted

Save Cork City	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Culverting is ill-advised, unsustainable and represents techniques abandoned by other countries 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' ▶ EIAR s.3.1 'Proposed Works' notably s.3.1..2 'Culverts' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. The NIS assesses impacts on the Natura 2000 Network. However, the assessments as submitted are considered inadequate for compliance purposes. These issues are addressed in the recommended request for further information.</p>
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ The scheme design is concrete heavy and is against the ambition of the local development plan ▶ The scheme avoids the route of the problem upstream ▶ It is recommended that the scheme be re-examined for more sustainable options ▶ The scheme would degrade Blackpool affecting local economy 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' ▶ EIAR s.3.1 'Proposed Works' ▶ EIAR s.4.4.2 'Construction Phase' , s.4.4.3 'Operational Phase' (Impacts and mitigation) 	
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ The scheme, by limiting visual connection with water would create an environment devoid of life ▶ Natura 2000 network 		
			<p>CULTURAL HERITAGE</p> <ul style="list-style-type: none"> ▶ The village gets its name from the water that would be almost entirely removed 		
			<p>PLANS, POICIES AND OTHER PROGRAMMES</p> <ul style="list-style-type: none"> ▶ The scheme is deemed contrary to the essence of the EU floods directive 		

Lynch, Caroline	Biodiv., Design	-	Issues and concerns raised are outlined below. It is the Governments duty to protect small areas like the River Bride which are viewed in isolation and as expendable.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Impact culverting will have on wildlife, notably: Otters ▶ Brown Trout; ▶ and Eel ▶ Will remove natural amenity 	<ul style="list-style-type: none"> ▶ (Impact on wildlife) EIAR s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5 ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ▶ EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.2 'Brown Trout' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.2.1 'Instream Habitats' (Impact on Loss of Habitat), s.5.4.5 'Impact on Fisheries' and s.5.4.5.1 'Fisheries Mitigation'. ▶ EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.4 'European Eel' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Surveys), s.5.3.4 'Significance of Fauna', s.5.4.5 'Impact on Fisheries', para 9. 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
		<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Reconsideration of the scheme is urged particularly in a time of such rapid decline of biodiversity. 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 		
O'Brien, William	Design	-	Submission highlights issues made in that past with regard to flood relief and is urging that such mistakes are not made again. Issues and concerns raised are outlined below.		
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Objection to the removal of pedestrian bridges in Blackpool Retail Park ▶ Impact the scheme would have on the park as a valuable amenity ▶ Loss of a natural amenity in such a built up area ▶ Emphasis is placed on opening up natural spaces in other countries it would be a shame to spend such a big amount of money on covering the river and natural space up to only spend more money in the future opening it up again 	<ul style="list-style-type: none"> ▶ EIAR s.10 Cultural Heritage notably s.10.4 'Predicted Impacts', tbl 10.4 'Predicted Impacts to identified Heritage assets' and tbl.10.5 'Mitigation measures and monitoring of process for Heritage Assets'. 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>

			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Impact culverting will have on wildlife ▶ Culverting of the river has in the past not given the desired effect and has simply pushed issues further back the river channel and forcing the river to flood in the only areas it can which in this case is Blackpool 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives', s.3.1.2 'Culverts' (Proposed Works), s.3.1.11 'Maintenance Regime', s.3.2.1 'New Culverts' (Anticipated Construction Methods), s.4.3.11 'Human Health and Safety' para 1, s.5.2.3 'Otter Camera Survey' para 1, s.5.3.3 'Fauna' para 'Other bird species', s.5.3.3.2 'Mammals' para 'Otter', s.5.3.3.3 'Fish', s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries', s.6.5 'Hydromorphology' notably para 'Potential Impacts on Hydromorphology', s.9.6.3.3 'Construction of new and replacement culverts and backfilling of existing watercourse' ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	
McCarthy, Orla	Biodiv., Design, Other	-	Issues and concerns raised are outlined below.		
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Concern with regard to the impact of the scheme on: Otters; and ▶ Little Dippers. ▶ Natura 2000 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ▶ EIAR 5.3.31 'Birds' para 'Other bird species', tbl5.5 'Holt Survey Records from trail camera surveillance', s.5.4.4.4 'Other Birds para 4, s.5.4.4.5 'Birds Mitigation', s.5.4.4.8 'Residual Impacts on Terrestrial Fauna' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. The NIS assesses impacts on the Natura 2000 Network. However, the assessments as submitted are considered inadequate for compliance purposes.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Objection to culverting of the stream and heavy engineering measures due to their potential in destroying salmonid habitats and fish populations 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	

			<p>OTHER PLANS AND PROGRAMMES</p> <ul style="list-style-type: none"> ▶ The proposed scheme conflicts with the Cork CDP ▶ The scheme contradicts the EU Flood Directive and National Catchment Flood Risk Assessment Management guidelines which suggest using the natural environment to reduce flood risk 	<ul style="list-style-type: none"> ▶ EIA s.2.3.2 'Regional Level' para Cork City Development Plan, s4.2.1 'Methodology' (Receiving Environment), s.5.5 'Cumulative Assessment', tbl 5.6 'Potential Impact in combination with other Plans and Projects', s.6.1 'Methodology and Limitations' para Published Material, s.6.3 'Geology' para Geological Heritage and para Economic Geology, s.6.6 'Cumulative Assessment', tbl 6.6 'Potential Impact in combination with other Plans and Projects', s.7.5 'Assessment of Cumulative Impacts', tbl 7.7 'Potential Impact in combination with other Plans and Projects', s.9.2.2 'Baseline Landscape Assessment', s.9.3.3 'Cork City Development Plan 2014-2020', s.10.2.2 'Desktop Study', s.10.3.2 'Legal and Planning Context', s.11 'Material Assets', S.11.5 'Assessment of Cumulative Impacts' 	
			<p>COST</p> <ul style="list-style-type: none"> ▶ Concerned regarding the cost of the project as there are less costly options available which would also benefit the environment and offer better flood protection 	<ul style="list-style-type: none"> ▶ EIA s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	
Ryan, Fiona	Design	-	Recognises the importance and need for flood defence in the area. Issues and concerns raised are outlined below.		
			<p>DESIGN</p> <ul style="list-style-type: none"> ▶ Scheme is outdated and does not take into account importance of environmental conservation ▶ Plan is outdated and based upon affordability rather than best interest which is considered unacceptable given the increasing awareness of climate change 	<ul style="list-style-type: none"> ▶ EIA s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	<p>The EIA provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
		<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ The river has important role in biodiversity notably otters; ▶ Nesting birds; and ▶ Rare flora ▶ Plan contravenes the National Biodiversity Action Plan 	<ul style="list-style-type: none"> ▶ EIA s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. 		
		<p>HUMANS</p> <ul style="list-style-type: none"> ▶ River Bride is currently a green sanctuary to the area, given the significant development plans for Blackpool, culverting the only direct green spaces is considered distressing ▶ It is unacceptable to force the local people to accept a plan with such catastrophic environmental impacts. 	<ul style="list-style-type: none"> ▶ EIA S3 Human Beings, Population and Human Health 		

Synnott, Declan	Design	-	Disapproval of the scheme which appears to do greater harm than good resulting in a loss of a vital resource. Issues and concerns raised are outlined above.		
			DESIGN ► Preference is expressed for greater research into a means of maintaining and improving existing infrastructure with review from experts in sustainable planning	► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'	The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements. These issues are addressed in the recommended request for further information.
O'Connor, Alan	Design	-	Submission recognises the existing threat of flooding. Issues and concerns raised with regard to the scheme are outlined below.		
			CULVERTING ► Culverting now runs contrary to international trends and is not welcomed, notably in light of climate change adaptation	► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'	The EIAR provides a review of alternatives for the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements. These issues are addressed in the recommended request for further information.
			DESIGN ► Concrete walls may diminish the aesthetic value of the river ► Submission is not suggesting no culverting or hard defences but is rather implying necessity may be more limited with a different approach ► The scheme would see the effective removal of much of the urban waterway by culverting and construction of hard defences	► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'	
Burke, Kevin	Biodiv., Design	-	Submission recognises the existing threat of flooding. Issues and concerns raised with regard to the scheme are outlined below.		
			CULVERTING ► Culverting now runs contrary to international trends and is not welcomed, notably in light of climate change adaptation	► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods, s.3.1.2 'Culverts'	The EIAR provides a review of alternatives for the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements. These issues are addressed in the recommended request for further information.
			DESIGN ► Concrete walls may diminish the aesthetic value of the river ► Submission is not suggesting no culverting or hard defences but is rather implying necessity may be more limited with a different approach ► The scheme would see the effective removal of much of the urban waterway by culverting and construction of hard defences	► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'	

Walsh, Barry	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ► It is understood that this is not best practice 	<ul style="list-style-type: none"> ► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods, s.3.1.2 'Culverts' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
		<p>OTHER PLANS AND PROGRAMMES</p> <ul style="list-style-type: none"> ► In light of Cork City's intention to apply for the European Green Capital, a more recent awarded city has reverted the same scheme (links given) which has brought many benefits to such areas 			
		<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ► The impacts of Otters and Kingfisher species are noted to be in direct contradiction with the goals of the Habitats Directive 	<ul style="list-style-type: none"> ► EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ► EIAR s.5.3.3.2 'Birds' para 'Kingfisher', s.5.3.4 'Significance of Fauna', sa.5.4.4.3 'Kingfisher' (Impacts) 		
O'Donovan, Paul	Biodiv., Design	-	A more educated and inclusive solution to the issue is requested, with the strongest objection being towards the culverting of the river. Issues and concerns raised are outlined below.		
			<p>DESIGN</p> <ul style="list-style-type: none"> ► A more concerted effort in maintaining the health of the river would help alleviate future flood risk ► It is noted that the removal of the river as a natural amenity including the various species it is habitat to would be a crime ► Advises alternative options be considered such as allowing for open spaces to provide as reservoirs in times of flooding 	<ul style="list-style-type: none"> ► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods, s.3.1.2 'Culverts' ► EIAR s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
		<p>CULVERTING</p> <ul style="list-style-type: none"> ► Strongly suggests that culverting of the river would be a regressive approach, with cities and developed areas needing to learn how to live with water by making room for the river ► The impact of structural containment of the river on biodiversity is noted 	<ul style="list-style-type: none"> ► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods, s.3.1.2 'Culverts' 		

Venables, Dean	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>OVERALL DESIGN</p> <p>► As alterations to the river course and construction in the floodplain have been the root cause of flooding in the area, its advised that a different approach be taken to rectify such previous decisions in a manner that addresses the flooding issue in a fair and equitable way on all (including biodiversity)</p> <p>► Objection to the scheme due to the removal of a valuable riverine habitat to the local community and their access to nature</p>	► (Impact on biodiversity) EIAR s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>SEDIMENT TRAPS</p> <p>► Concern regarding sediment trap is discussed as the last three traps have been the cause of flooding and is advised that they be omitted from any future proposals</p>	► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' ► EIAR s.3.1.7 'Sedimentation Management'	
			<p>CULVERTING</p> <p>► The proposal to culvert the river is considered outdated and at odds with current international trends to 'daylight' previously culverted rivers to restore them to their natural state</p>	► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods, s.3.1.2 'Culverts'	
			<p>OTHER PLANS AND PROGRAMMES</p> <p>► The scheme is regarded as the incorrect way to address the flooding issue in light of the recent Climate and Biodiversity Emergency, ultimately causing more damage than good</p>	► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'	
Donovan, Conn	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>CULVERTING</p> <p>► The river and its biodiversity is recognised as being rich and diverse and having many benefits to the local residents, which will ultimately be destroyed by culverting</p> <p>► The proposal to culvert the river is considered outdated and at odds with current trends to 'daylight' urban rivers</p>	► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>SEDIMENT TRAPS</p> <p>► Concerns over sedimentation traps are raised where in the past such traps have been the cause to much flooding</p>	► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' ► EIAR s.3.1.7 'Sedimentation Management'	

			<p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ▶ As alterations to the river course and construction in the floodplain have been the root cause of flooding in the area, its advised that a different approach be taken to rectify such previous decisions in a manner that addresses the flooding issue in a fair and equitable way on all (including biodiversity) ▶ It is requested that the design team consider an alternative approach which is in line with current international practice. 	<ul style="list-style-type: none"> ▶ (Impact on biodiversity) EIAI s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5 	
			<p>OTHER PLANS AND PROGRAMMES</p> <ul style="list-style-type: none"> ▶ The proposal is considered as an incorrect approach given the recent declaration of a Climate and Biodiversity Emergency, ultimately causing more damage than good 	<ul style="list-style-type: none"> ▶ EIAI s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods 	
O'Brien, Teresa	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Concern with regard to the impact of the scheme on the river's biodiversity ▶ Concern with regard to the specific impact on: Otters; ▶ Brown Trout; ▶ Heron; and ▶ Eels, is noted 	<ul style="list-style-type: none"> ▶ EIAI s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5 ▶ EIAI s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter' , s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ▶ EIAI s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.2 'Brown Trout' (Methodology and Limitations), s.5.2.7.4 'European Eel' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.2.1 'Instream Habitats' (Impact on Loss of Habitat), s.5.4.5 'Impact on Fisheries' and s.5.4.5.1 'Fisheries Mitigation'. 	<p>The EIAI provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements. These issues are addressed in the recommended request for further information.</p>
			<p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ▶ It is suggested that the wall structure which was objected on aesthetic ground could be reconsidered and redesigned to be more visually appealing and enhance the river amenity, preserving biodiversity without the need to culvert the river which would reflect the declaration of a biodiversity emergency. ▶ Objection to the removal of two footbridges at Blackpool Retail Park which are a main part of the attractive amenity ▶ Concern regarding the impact of the scheme on the local area which if managed properly could be instrumental in the urban renewal potential of the area 	<ul style="list-style-type: none"> ▶ EIAI s.10 Cultural Heritage notably s.10.4 'Predicted Impacts', tbl 10.4 'Predicted Impacts to identified Heritage assets' and tbl.10.5 'Mitigation measures and monitoring of process for Heritage Assets'. 	

O'Sullivan, Gerard	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>OVERALL DESIGN</p> <p>► Objection to the design of the scheme as it will only provide for the river breaking out further down stream</p> <p>BIODIVERSITY</p> <p>► Local who grew up enjoying the river as an amenity and biodiversity rich area, already noticing certain declines in Kingfishers</p> <p>OTTERS</p> <p>► Objecting to the scheme due to proposed design which will destroy otter habitat</p>	<p>► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods</p> <p>► EIAR s.5.3.3.2 'Birds' para 'Kingfisher', s.5.3.4 'Significance of Fauna', sa.5.4.4.3 'Kingfisher' (Impacts)</p> <p>► EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'.</p>	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
Allen, Ciaran	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>BIODIVERSITY</p> <p>► Concerned with regard to the lack of consideration given to the impacts the scheme will have on the diverse and thriving wildlife.</p> <p>OVERALL DESIGN</p> <p>► The area and waterway should be considered as an amenity.</p>		<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
Ó Muirí, Sen Antóin	Biodiv.	-	Issues raised are outlined below.		
			<p>OTTERS</p> <p>► Concern with regard to the impact on otter families and their habitats.</p>	<p>► EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'.</p>	<p>The EIAR provides an assessment of the biodiversity impacts of the scheme. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>This issue is addressed in the recommended request for further information.</p>
Cassidy, Maria	Biodiv.	-	Although the need for a scheme is recognised, issues and concerns raised are outlined below.		

			<p>OTTERS</p> <p>► Concern with regard to the impact on Otters, stating that it will be damaging.</p>	<p>► EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'.</p>	<p>The EIAR provides an assessment of the biodiversity impacts of the scheme. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>This issue is addressed in the recommended request for further information.</p>
O'Sullivan, Gary	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>CULVERTING</p> <p>► Concern with regard to the impact culverting will have on the river as a natural local amenity</p> <p>► The current proposed works are not believed to be the correct solution, particularly the decision to culvert the river, removing a key aspect of the rivers natural design</p> <p>BIODIVERSITY</p> <p>► The bridges and walkway and footbridges near the retail park are noted in particular as being picturesque and a haven for bird life and pollinators during the summer months, an amenity which appears to be valued</p> <p>► The impact on Otter populations is noted</p> <p>► The loss of biodiversity from the proposed works is noted as being contradictory to recent biodiversity emergency declared by the council</p>	<p>► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods</p> <p>► EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'.</p>	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
Noonan, Joe	Biodiv, Design	-	Submission supports the submission made by Chris Moody, The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. The NIS assesses impacts on the Natura 2000 Network. However, the assessments as submitted are considered inadequate for compliance purposes.		

			<ul style="list-style-type: none"> ► Support expressed for submission by Chris Moody stating that the scheme will only do more harm than good. 	<ul style="list-style-type: none"> ► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
Morehead, John	Design, Assess	-	Issues and concerns raised are outlined below.		
			<p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ► The scheme reflects a lack of foresight and vigorous assessment of alternative upstream catchment solutions ► Disgust expressed regarding the continuous hard engineering solutions by the OPW and decimation of tree standings/forestry and hedgerows ► Methods to attempt justifying design decision with methodologies considered inappropriate and simplistic is deemed unacceptable ► Recent flooding in UK and Shannon illustrate that the hard engineering approach does not deal with the weather systems expected of climate change, urging that an inclusive multidisciplinary approach is needed ► A poor record for environmental standards in Europe is deemed to be as a result of such schemes, actions and mindsets as seen in this proposed scheme ► It is encouraged that the river be embraced as a natural amenity and to encourage wildlife. 	<ul style="list-style-type: none"> ► EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>GROUND WATER</p> <ul style="list-style-type: none"> ► Frustration and great concern in the fact that OPW/Arup dismissed ground water permeability concerns in the LLRS supplementary Groundwater Report. 		

Maher, John	Biodiv., Design Assess	-	Issues and concerns raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Impacts of culverting the river on habitats is noted ▶ Impacts of culverting the river on fisheries is noted 	<ul style="list-style-type: none"> ▶ EIAR (habitats) EIAR s.5.4.2 ▶ EIAR s.5.3.3.3 'Fish' (Field Survey), s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries' notably para 2 & 4, Tbl 5.6 'Potential Impact in Combination with other Plans and Projects' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>HUMANS</p> <ul style="list-style-type: none"> ▶ It is noted that the design will have a negative impact on the community 		
Crowley, Peter	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ▶ It is not believed that Cork County Council will maintain paved areas ▶ It is believed the solution lies upstream in flow restrictions and flood able green areas 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. ▶ EIAR s.5.2.8 'Birds' (Methodology and Limitations), s.5.3.3.1 'Birds' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.4.3 'Kingfisher'/s.5.4.4.4 'Other Birds' (Impacts), s.5.4.4.5 'Birds Mitigation', s.5.4.4.8 'Residual Impacts on Terrestrial Fauna' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Objection to the scheme due to its impact on: Otter; and ▶ Bird, activity 		

Huffe, Talia	Design	-	Issues and concerns raised are outlined below.		
			<p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ▶ Objection to the design of the scheme as it does not compare with how rivers in other European countries are treated where they are celebrated and utilised positively as apposed to burying them in concrete ▶ Encourages that flood plains are built into all plans both in terms of being succesful for flood relief but also for the community in terms of being able to see the river and its abundant wildlife ▶ Urging for ecological responsibility to be considered 	<p>▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'</p>	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
O'Regan, Denis	Biodiv., Design, Assess	-	Issues and concerns raised are outlined below.		
			<p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ▶ Concerns regarding sediment traps are raised, stating that they have often been known to cause flooding, advising that they be omitted from future plans ▶ Proposal to culvert the river is considered outdated with current international trends showing efforts to 'daylight' the river, restoring the river to its natural state. ▶ It is noted that in light of the proposed measures in this scheme, the cause of flooding in recent years can be linked to alterations made upstream, construction within the floodplain upstream, and lack of adequte natural or man-made water attenuation <p>OTHER PLANS AND PROGRAMMES</p> <ul style="list-style-type: none"> ▶ The proposal does not reflect the recent Climate and Biodiversity Emergency declared by the Dáil <p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Concern with regard to the impact of the design of the scheme on biodiversity and nature in the area. 	<p>▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods</p>	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>

			<p>HUMANS</p> <p>► Concern with regard to the impact that has on the community also in terms of their mental and physical health. Removing their connection to nature</p>	<p>► EIAR S3 Human Beings, Population and Human Health</p>	
Murphy, WT	Biodiv.	-	<p>Objection to the scheme and urging that it be reconsidered due to the concerns noted below.</p>		
			<p>OTTERS</p> <p>► Objection to the scheme due to the impact the scheme will have on Otters</p>	<p>► EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'.</p>	<p>The EIAR provides an assessment of the biodiversity impacts of the scheme. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>BATS</p> <p>► Objection to the scheme due to the scheme will have on bats</p>	<p>► (Bats) EIAR s. 5.2.5.1 para9, s. 5.2.9.2, s.5.3.3.2 para 11, s.5.4.4.6, s.5.4.4.7, s.5.4.4.8 para 1, NIS s.3.1 para 13</p>	
Liebig, Steffen	Biodiv., Design, Assess	-	<p>Issues and concerns raised are noted below.</p>		
			<p>BIODIVERSITY</p> <p>► Objection to the design of the scheme due to its impact on the environment of the River Bride which would not support the current wildlife present</p> <p>► The impact the design of the scheme will have on Otters and their habitat, with the scheme ultimately providing as a drainpipe devoid of any sunlight supporting vegetation or animal life</p> <p>► Natura 2000</p>	<p>► (Impact on biodiversity) EIAR s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5</p> <p>► EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'.</p>	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. The NIS assesses impacts on the Natura 2000 Network. However, the assessments as submitted are considered inadequate for compliance purposes.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>HUMANS</p> <p>► The scheme will hide the river from the community, removing a public amenity</p>	<p>► EIAR S3 Human Beings, Population and Human Health</p>	

			<p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ▶ The design of the scheme (hard engineering) is ignoring the scientific experience by other countries where the approach has returned to soft engineering and more natural approaches ▶ It is advised that overflow areas should be used in combination with vegetation with vegetation to slow the flow of the river instead of concentrating the force of the river, with designated areas on floodplains where construction is prohibited 	<ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	
Malone, Pat	Biodiv., Design	-	Issues and concerns are noted below.		
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Objection to the design of the scheme due to its impact on the environment of the River Bride which would not support the current wildlife present ▶ The impact the design of the scheme will have on Otters and their habitat, with the scheme ultimately providing as a drainpipe devoid of any sunlight supporting vegetation or animal life ▶ Natura 2000 network <p>HUMANS</p> <ul style="list-style-type: none"> ▶ The scheme will hide the river from the community, removing a public amenity <p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ▶ The design of the scheme (hard engineering) is ignoring the scientific experience by other countries where the approach has returned to soft engineering and more natural approaches ▶ It is advised that overflow areas should be used in combination with vegetation with vegetation to slow the flow of the river instead of concentrating the force of the river, with designated areas on floodplains where construction is prohibited 	<ul style="list-style-type: none"> ▶ (Impact on biodiversity) EIAR s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5 ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. <p>▶ EIAR S3 Human Beings, Population and Human Health</p> <ul style="list-style-type: none"> ▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. The NIS assesses impacts on the Natura 2000 Network. However, the assessments as submitted are considered inadequate for compliance purposes.</p> <p>These issues are addressed in the recommended request for further information.</p>
Lettice, Eoin	Biodiv., Design, Assess	-	Urging that the scheme be revised due to the negative environmental impacts, stating the scheme is a missed opportunity to provide natural recreational space to the community.		
			<p>OTTERS</p> <ul style="list-style-type: none"> ▶ Concerns raised over the impact on Otter habitat, quoting the impact stated in the EIAR 	<ul style="list-style-type: none"> ▶ EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity and cultural heritage impacts. However, the assessment as submitted is considered</p>

			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ The lack of consideration given to the opportunity to plant native vegetation and trees in effected areas with solutions instead being of engineering natural systems ▶ It is noted that mature trees and vegetation in areas are proposed to be removed 	▶ EIA s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5	<p>inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>CULTURAL HERITAGE</p> <ul style="list-style-type: none"> ▶ Railings in the curtilage of the Church are noted to be part of a protected structure, are proposed to be removed, which is not permitted in the Cork City Development Plans 		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Objection to culverting of the river as it will sterilise the river of much of its plant and animal life and will remove a valuable amenity 	▶ EIA s.2.6 'Consideration of Alternatives', s.3.1.2 'Culverts' (Proposed Works), s.3.1.11 'Maintenance Regime', s.3.2.1 'New Culverts' (Anticipated Construction Methods), s.4.3.11 'Human Health and Safety' para 1, s.5.2.3 'Otter Camera Survey' para 1, s.5.3.3 'Fauna' para 'Other bird species', s.5.3.3.2 'Mammals' para 'Otter', s.5.3.3.3 'Fish', s.5.4.2 'Impact on Loss of Habitat', s.5.4.5 'Impact on Fisheries', s.6.5 'Hydromorphology' notably para 'Potential Impacts on Hydromorphology', s.9.6.3.3 'Construction of new and replacement culverts and backfilling of existing watercourse'	
Hunt, Donal	Biodiv., Design.	-	Issues and concerns raised are outlined below.		
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Removal of vegetation along the river will increase the propagation of noise ▶ The removal of trees is not noted to be replaced ▶ Blackpool Retail Park amenity is significantly affected by the proposed scheme with the loss of vegetation 	(Vegetation) EIA s.5.4.2, s.5.4.3 (Replacement of trees) EIA s.9.6.3.7 para 7 'mitigation' (very brief and vague)	<p>The EIA provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ▶ The removal of pedestrian bridges will reduce the attractiveness to the area of Blackpool Retail Park 	▶ EIA s.10 Cultural Heritage notably s.10.4 'Predicted Impacts', tbl 10.4 'Predicted Impacts to identified Heritage assets' and tbl.10.5 'Mitigation measures and monitoring of process for Heritage Assets'.	
			<p>CUMULATIVE IMPACTS</p> <ul style="list-style-type: none"> ▶ Lack of consideration given to development in surrounding area notably sunbeam complex 	(Development in surrounding area) EIA s.5.5 tbl 5.6	
			<p>CONSTRUCTION</p> <ul style="list-style-type: none"> ▶ Traffic impact during construction with more detailed analysis of the impact of lane and road closures needed in light of road safety and vulnerable road users 	▶ EIA s.11.2.4 'Potential Impacts on Traffic and Transport Infrastructure'	

Malone, Jennifer Denise	Biodiv., Design, Other	-	Issues and concerns raised are outlined below.			
			<p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ▶ Objection to the design of the scheme due to its impact on the environment of the River Bride which would not support the current wildlife present ▶ The scheme will hide the river from the community, removing a public amenity ▶ The design of the scheme (hard engineering) is ignoring the scientific experience by other countries where the approach has returned to soft engineering and more natural approaches ▶ It is advised that overflow areas should be used in combination with vegetation to slow the flow of the river instead of concentrating the force of the river, with designated areas on floodplains where construction is prohibited. 	<ul style="list-style-type: none"> ▶ (Impact on wildlife) EIA s.5.4.2, s.5.4.3, s.5.4.4 and s.5.4.5 & s.5.5 ▶ EIA s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	<p>The EIA provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. The NIS assesses impacts on the Natura 2000 Network. However, the assessments as submitted are considered inadequate for compliance purposes.</p> <p>These issues are addressed in the recommended request for further information.</p>	
			<p>OTTERS</p> <ul style="list-style-type: none"> ▶ The impact the design of the scheme will have on Otters and their habitat, with the scheme ultimately providing as a drainpipe devoid of any sunlight supporting vegetation or animal life 			<ul style="list-style-type: none"> ▶ EIA s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'.
			Natura 2000 sites			NIS
Number of public submissions	86					
Public topic totals	Biodiversity (53), Design (55), Support (26), Adequacy of assessment (14), Mitigation measures (2), Programme (7), Other (8)					
+ / 0 / - totals	Positive (24), Neutral (2), Negative (560)					

Submissions received after deadline					
Skillington, Karen	Design	-	Issues and concerns expressed are outlined below.		
			<p>OVERALL DESIGN</p> <ul style="list-style-type: none"> Submission expressing disagreement with the scheme works to cover over the River Bride. 	<ul style="list-style-type: none"> EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 	<p>The EIAR provides a review of alternatives. However, as submitted, this is considered inadequate for compliance with EIA requirements.</p> <p>This is addressed in the recommended request for further information.</p>
O'Callaghan, Paul	Biodiv., Design, Other	-	Issues and concerns raised are outlined below.		
			<p>OTTERS</p> <ul style="list-style-type: none"> Notable status of otters within the River. 	<ul style="list-style-type: none"> EIAR s.5 Biodiversity including s.5.2.3 'Otter Camera Survey', s.5.2.9.1 'Otter' (Methodology and Limitations), s.5.3.3.2 'Mammals' para 'Otter', s.5.3.4 'Significance of Fauna' para 4, s.5.4.4.1 'Otter' (Impacts) and s.5.4.4.2 'Otter Mitigation', and s.5.4.4.8 'Residual Impact on Terrestrial Fauna'. 	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
		<p>BIODIVERSITY</p> <ul style="list-style-type: none"> The River is noted as being a habitat for the following species: <ul style="list-style-type: none"> Grey Heron; Trout Kingfisher Dipper 	<ul style="list-style-type: none"> (Heron) EIAR s.2.8.5 tbl 2.3, EIAR s.5.2.5.1 'River Lee and Tributaries', s.5.2.7.2 'Brown Trout' (Methodology and Limitations), s.5.3.3.3 'Fish' (Field Survey), s.5.3.4 'Significance of Fauna', s.5.4.2.1 'Instream Habitats' (Impact on Loss of Habitat), s.5.4.5 'Impact on Fisheries' and s.5.4.5.1 'Fisheries Mitigation'. EIAR s.5.3.3.2 'Birds' para 'Kingfisher', s.5.3.4 'Significance of Fauna', sa.5.4.4.3 'Kingfisher' (Impacts) 		
		<p>CULVERTING</p> <ul style="list-style-type: none"> Design should support the development of an urban recreational facility, which culverting would not achieve, and would in fact sterilise the the river instead. Culverting is stated as being outdated A link to alternative options is given which are more cost effective and provide many benefits to society and the river. 	<ul style="list-style-type: none"> EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods' 		

Robb, Stuart	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>OVERALL DESIGN</p> <ul style="list-style-type: none"> ▶ The river currently has enough capacity to hold approx. double the amount of water, it is human interference which has caused the issues in hand by removal of natural barriers and soakage and straightening of the river. It is believed that correction of such actions is the right approach to addressing flooding in the area. ▶ Scheme is not believed to provide enough benefit to the area to justify the cost, both financially and environmentally 	▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>FAUNA</p> <ul style="list-style-type: none"> ▶ The impact on fauna in the area from the scheme is noted, advising that any measure to protect the limited natural habitats in the city should be taken 	▶ (Impact on wildlife) EIAR s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5	
Cronin, Mark	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Objection to culverting of the river ▶ The river has become a natural resource and amenity, which if it is covered over will have an impact on people's mental health ▶ Other more sustainable solutions are requested, where the flood plains are used as meant to 	▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ The past few years there has been a significant change in the quality of the river and the river is now a source of wildlife with birds, fish and otters 	▶ EIAR s5 Biodiversity	

McCarthy, Anto	Biodiv., Design	-	Issues and concerns raised are outlined below.		
			<p>CULVERTING</p> <ul style="list-style-type: none"> ▶ Objection to culverting of the river due to its impact on biodiversity in the area and their habitat ▶ It is urged that a more responsible solution is devised 	<p>▶ EIAR s.2.6 'Consideration of Alternatives' including s.2.6.2 'Possible Flood Risk Management Methods'</p>	<p>The EIAR provides a review of alternatives and an assessment of the environmental impacts of the scheme including biodiversity impacts. However, the assessment as submitted is considered inadequate for compliance with EIA requirements.</p> <p>These issues are addressed in the recommended request for further information.</p>
			<p>BIODIVERSITY</p> <ul style="list-style-type: none"> ▶ Submission outlines that the scheme will have detrimental effect on wildlife and flora, with irreversible negative effect on the integrity of the natural environment in the area 	<p>▶ (Impact on biodiversity) EIAR s.5.4.2 & s.5.4.3 & s.5.4.4 & s.5.4.5 & s.5.5</p>	
Number of late submissions	5				
Late topic totals	Biodiversity (4), Design (5), Support (0), Adequacy of assessment (0), Mitigation measures (0), Programme (0), Other (0)				
+ / 0 / - totals	Positive (0), Neutral (0), Negative (5)				

Public Consultation Notice

The public consultation notice is available at:

<https://www.gov.ie/en/consultation/e777b7-river-bride-blackpool-drainage-scheme-public-consultation-notice/>

Report Authors

Paul Fingleton, lead author, has an MSc in Rural and Regional Resources Planning (with specialization in EIA), University of Aberdeen, 1990. Paul is a member of the International Association for Impact Assessment as well as the Institute of Environmental Management and Assessment. Paul has over twenty years' experience working in the area of Environmental Assessment. Paul has been involved in a diverse range of projects including contributions to, and co-ordination of, a number of complex EIARs, NISs and / or IPPCL Applications for projects.

Paul is the lead author of the current EPA Guidelines and accompanying Advice Notes on EIARs. He has been involved in all previous editions of these statutory guidelines. He also provides various EIA related consultancy services to the EPA. Paul has engaged by numerous consent authorities to assist at various stages of EIA, Appropriate Assessment (AA) and consultation processes, particularly in reviewing EIARs and AAs. This review work has included reviews of a number of flood relief schemes on behalf of the Department of Public Enterprise and Reform.

Clare O'Doherty, review assistant, has a BSc in Environmental Management, Dublin Institute of Technology, 2019. Clare has experience working as part of team projects and in the preparation of EIA documents on behalf of multi-nationals and infrastructural providers. She also liaises with various government agencies and local authorities in order to assimilate the environmental baseline information that is used in SEAs, EIAs and AAs and assists in the preparation of the various SEA, EIA and AA related documentation.