



Ref: River Bride Blackpool  
(Please quote in all related correspondence)

**28/02/20**

Office of Public Works  
Government Buildings  
Upper Merrion St  
Dublin 2  
Via email

**Re: River Bride (Blackpool) Certified Drainage Scheme**

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

**Archaeology**

Having considered the EIAR and its recommendation regarding the cultural heritage, the following is the response of the National Monuments Service.

The Department concurs with the recommendations made in the EIAR and. All the proposed cultural heritage mitigation should be undertaken as stated. The OPW Project Archaeologist shall be involved from the earliest stages in the process to ensure the archaeological mitigation is scheduled and carried out in a timely fashion. This is most relevant where archaeological testing is being undertaken, to enable results to be submitted to the relevant authorities for consideration and further comment in advance of the next phase of works commencing.

The services of a suitably qualified and experienced Conservation Architect shall be engaged to advise on the built heritage requirements for the entire works. All requirements regarding Built Heritage and Architectural Policy shall be adhered to, as specified in the EIAR, and any such requirements as issued by the Local Authority's Conservation officer. The Conservation specialist shall be fully aware of all relevant policy, regulations, guidelines and protections regarding built heritage within the footprint of the proposed works.

All features listed in the RPS have statutory protection and where feasible, the works should avoid these features. Should works be required in the vicinity of protected structures then the formulation of site-specific mitigation strategies in consultation with the OPW Project Archaeologist, NMS, and local authority staff shall take place.

The same strategy shall be adopted for architectural heritage features listed in the NIAH. The mitigation strategies will conform to those outlined in the various Development and Local Area Plans within the study area.

The following is noted and agreed:



### ***Blackpool Village***

Archaeological monitoring will be undertaken in all areas to be impacted by ground reduction works and in-channel works. The removal of vegetation overgrowth from both within and adjacent to the channels will also be carried out under archaeological supervision.

### ***Sunbeam Industrial Park and Dulux Factory***

Archaeological test trenching will be undertaken in all areas to be impacted by ground reduction works within the Sunbeam site during the preconstruction phase. Archaeological monitoring will also be carried out within the wider area during the construction phase.

### ***Fitz's Boreen Road Bridge***

A detailed architectural heritage survey of the unnamed masonry bridge to be removed by the proposed works at Fitz's Boreen will be undertaken to ensure its preservation by record. This record will comprise detailed written, drawn and photographic surveys of the structure and will be undertaken in consultation with the heritage staff of Cork City Council.

A detailed record of the sluice and associated industrial features in the section of the channel within the Dulux Paint Factory will also be carried out during the preconstruction phase. All ground works in this area will be archaeologically monitored during the construction phase.

### ***Kilnap Glen House Property***

Archaeological test trenching will be undertaken in all areas to be impacted by ground reduction works for the earth embankment during the preconstruction phase. Archaeological monitoring will also be carried out within this area during the construction phase.

A detailed architectural heritage survey of the late 19<sup>th</sup>-century masonry bridge will be undertaken to ensure its preservation by record. This will comprise detailed written, drawn and photographic surveys of the structures and will be undertaken in consultation with the heritage staff of Cork City Council and the OPW Project Archaeologist. Archaeological monitoring will also be carried out within this area and during the course of the bridge removal during the construction phase.

### ***Glenamought River***

A pre-construction written, drawn and photographic survey of the River Walling/Revetment, Masonry Wall (part of former mill building) and un-named Masonry Bridge is required. Currently there are a number of cultural heritage features to be removed that shall require archaeological monitoring and supervision (Masonry Road Bridge x 3; Bridge section; River walling/revetment; Masonry culvert; Large rectangular slab) and as identified in the Underwater Archaeological Impact Assessments. Archaeological monitoring and supervision is required based on the results of the Archaeological Impact Assessments,

If works extend into the River Bride, the identified masonry there shall be recovered under archaeological supervision and all works shall be subject to archaeological monitoring. All masonry from known structures or identified during the course of archaeological monitoring of the works shall be retained and stored securely for



suitable reuse. The advice of Cork County Council's Conservation Officer shall be sought in this regard.

### **River/channel Dredging Works**

It is noted that there are to be sediment removal upstream of Sunbeam Industrial Estate. A strategy for the archaeological monitoring of any such dredging of granular/sediment material in all watercourses shall be drawn up by the OPW Project Archaeologist and agreed with the National Monuments Service. In general, such a strategy would include the work being carried out by a suitably qualified archaeologist with prior experience of such monitoring of dredging work. One archaeologist shall be assigned to monitor each item of plant used for excavation, to ensure that adequate numbers of suitably qualified and experienced archaeological personnel are engaged.

A finds retrieval strategy shall be prepared and implemented whereby either all of the granular/sediment dredged material or an agreed amount of this material shall be archaeologically assessed as follows:

- It shall be removed to an agreed location.
- It shall be spread to a depth no thicker than 200mm.
- It shall be visually inspected, washed if necessary and metal detected by an appropriate number of archaeological personnel to allow for the full assessment of the volumes of material being dredged.
- The archaeological personnel shall have suitable experience of similar assessments to maximise finds retrieval, documentation and care.
- River location of dredged material shall be recorded by GPS insofar as possible

The finds retrieval strategy shall be carried out in accordance with the submitted Method Statement, as approved by the National Monuments Service and National Museum of Ireland and following consultation with the OPW Project Archaeologist.

From the outset of the project, assessment as above shall be carried out on an agreed percentage of granular/silt/mud material removed from open courses of rivers/in channel works. Where dredging works are associated with specific sites, such as bridges, fording points, recorded monuments or National Monuments or within a Zone of Archaeological Protection (ZAP) or townland, parish or barony boundaries, 100% of the dredged material shall be assessed. Based on the results of such assessment over an agreed timeframe, such archaeological assessment may be scaled up or down accordingly.

The Project Archaeologist shall put in place a weekly reporting strategy for any specialist/consultant archaeologist(s) engage to carry out the archaeological mitigation that will include informing on the level and nature of archaeological objects being recovered from the assessment of all dredged material from all areas. The weekly reports submitted to the OPW's Project Archaeologist shall include updates outlining rates, quantities, range, locations and types of archaeological objects being retrieved. The NMS and NMI shall be briefed weekly by the OPW Project Archaeologist on results



to enable decisions to be made on the level of archaeological monitoring of dredging works and related assessment of dredged spoil required.

It is a requirement that provision shall be made by the Contractor for the temporary storage of waterlogged material and metal objects from wet contexts in a suitable environment during the course of such works. In addition, any particularly vulnerable, fragile or unusual archaeological objects should be immediately brought to the attention of the Project Archaeologist to enable decisions to be made on immediate conservation needs.

Any modifications to the finds retrieval strategy and care of archaeological objects recommended by the NMS and NMI shall be implemented.

If potential archaeology is identified, either *in situ* or as a result of the assessment of the dredged material, that warrants the suspension of dredging works in a particular area, then the Contractor shall suspend the works pending the full resolution of the identified and/or potential archaeology.

Should it become necessary to have an archaeological dive survey undertaken to inspect newly discovered potential archaeology during the course of any channel/river works, the provision for such a specialist team, and all required licences, shall be in place to have such an underwater archaeological impact assessment undertaken immediately.

It is advised that a licence under Section 3 of the National Monuments (Amendment) Act 1987 be obtained from the Department of Culture, Heritage and Gaeltacht in advance of the dredging proceeding to facilitate relevant activities (if required) and to prevent potential delays to works should a wreck or archaeological objects be discovered. The Department shall not have any liability in regard to any such delays arising from failure to seek such a license in advance of operations.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at [manager.dau@chg.gov.ie](mailto:manager.dau@chg.gov.ie) (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager  
Development Applications Unit (DAU)  
Department of Culture, Heritage and the Gaeltacht  
Newtown Road  
Wexford  
Y35 AP90

Is mise, le meas

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Connor Rooney



## Development Applications Unit

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**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride (Blackpool) Drainage Scheme – Public Consultation Notice  
**Date:** Friday 28 February 2020 11:03:54

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Hello,

I would like to lodge an objection to the planned culverting of the river bride as part of the River Bride (Blackpool) Drainage Scheme. It will have a detrimental effect of the biodiversity of the surrounding river bride area which is currently under a massive strain. It is currently used as a feeding ground for birds, mammal and fish and would destroy their habitat. A more responsible solution is need to stop this disaster from happening.

- This scheme will have a detrimental effect on existing wildlife flora and fauna along with destroying the existing river ecosystem.
- Will have a un-reversible negative effect of on the integrity of the natural environment.

Regards,

Gerard Anthony McCarthy.

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Blackpool Flood Scheme  
**Date:** Friday 28 February 2020 09:54:06

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Dear Sir or Madame,

I am objecting to the proposed flooding scheme that intends to culvert a stretch from the Church towards and up to the shopping centre.

A few years ago I might have not objected as I had grown up in Blackpool when the river was dead due to pollution. It was at times an eyesore and even smelled.

Today that has dramatically changed and it is now a source of wildlife with birds of various types attracted to this stretch in the heart of Blackpool. I've no doubt that there are fish and there certainly are otters.

This has become a vital natural resource at the centre of this urban community. It's unique and should be cherished and enhanced. Not covered over. It will impact on people's mental health.

There are other ways to prevent flooding that involve natural sustainable solutions, allowing flooding plains to be used that were meant to be used and were used by nature in the past ie shopping centre car park.

This development should not go ahead in its current form and I object strongly to it.

Yours sincerely,

Mark Cronin

[REDACTED]

[REDACTED]

[REDACTED] [for Android](#)

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Public feedback  
**Date:** Friday 28 February 2020 09:30:48

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Hello,

I am writing to provide feedback on the idea of River Bride (Blackpool) Drainage Scheme (Scheme Reference: DPE63-18-2018).

It is my belief that this scheme will not provide enough benefit to the area to justify the costs. By costs, I am referring to financial and environmental.

At present, the river banks have enough capacity to handle circa double a normal flow volume of water.

Under normal circumstances, this should be sufficient for the vast majority of the year. However, given the level of disruption already in place on the river where it has been straightened, natural soakage removed, sped up through removal of natural barriers, etc. upstream from Blackpool and through other parts already covered (bridges, etc.), it is our own human involvement that has created the problem.

It is my view that correction of these problems rather than creation of additional problems would be a better approach.

In addition, the natural fauna in the area would be wiped out both by the works themselves and the aftermath should the works go ahead.

Cork city is very limited in natural habitats for our native animals, birds and fish so every step possible should be taken to protect the few remaining.

Therefore, based on the above, it is my view than an alternative solution be soug and the drainage scheme not go ahead.

Regards,  
Stuart Robb

[REDACTED]

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**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Blackpool flood scheme  
**Date:** Friday 28 February 2020 08:50:25

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Dear Sirs,

I believe the current plans for the River Bride flood scheme to be the wrong direction economically, socially and environmentally. The Bride has been included as a priority area for action for the attention of the local authorities waters programme to assess how improvements can be made to its water quality which recognises the river's environmental potential. It has been shown by UCC researchers to be important habitat for a strong otter population (a protected species under the European habitats directive). It is important habitat for multiple other species including grey heron, trout, kingfisher, dipper among others. It is important to the people of Cork socially and culturally and could (and should) be developed as an urban recreational facility which is desperately needed in the city. Culverting will effectively separate it from people while sterilising it.

Other options such as natural flood defenses have been demonstrated to be highly effective elsewhere (<https://www.gov.uk/government/publications/working-with-natural-processes-to-reduce-flood-risk>). These are more cost effective and provide multiple benefits to society while having only positive effects on the river.

Culverting is a drastic and permanent move and I believe an over simplified and outdated approach which is being taken without considering other potentially superior options

yours sincerely

Dr Paul O'Callaghan  
Catchment Scientist/Freshwater Ecologist

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River bride blackpool  
**Date:** Friday 28 February 2020 03:20:39

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I'd like to express my disagreement with planned works to cover the river at Blackpool.  
Karen Skillington  
[REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride (Blackpool) Drainage Scheme  
**Date:** Friday 28 February 2020 00:00:13

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To whom it may concern,

I am writing to you in relation to the public consultation currently being carried out as part of the confirmation process for the River Bride (Blackpool) Drainage Scheme. My submission relates to:

- 1.the likely effects on the environment of the scheme
- 2.the scheme's impact on Natura 2000 Site(s)

The suggested measures include; the construction of new flood walls and embankments, construction of new culverts on a section of previously open channel, bridge replacement, installation of sediment traps, modifications to existing foul/surface water collection networks in the area, construction of pumping stations and some other minor works.

The suggested measures would have a significant negative effect on the environment of the River Bride as they completely eradicate any environment from the river. The river would be essentially turned into a large drain incapable of supporting the wildlife currently present. This wildlife includes birds, insects, fish, and small mammals.

There is an existing otter population in areas affected by the planned measures. These measures will destroy the habitat for these animals during construction and do nothing to re-establish any wildlife afterward. On 350 meters length, the former river will be turned into a drainpipe void of any sunlight supporting vegetation or animal life. This is clearly stated in the Environmental Impact Assessment Report 2018.

The river will also be hidden from view and removed from use as a public amenity. The people living in Cork and specifically in Blackpool will be robbed of an opportunity to experience nature.

This hard engineering solution ignores the scientific experience that has lead other counties, e.g. the UK, France, Germany, Switzerland to abandon this approach and return to soft engineering and more natural approaches to flood prevention. Overflow areas to store floodwaters, ponds and ditches should be used in combination with vegetation to slow the flow of a river instead of trying to force waters into narrow channels that will concentrate its force and make failure of the defenses highly catastrophic. Most importantly there will need to be designated flood plains where construction is prohibited.

In light of the observations noted above I call on the Minister to reject the scheme.

Kind regards,  
Jennifer Denise Malone

[REDACTED]

Due to the nature of my work, I usually only check emails twice a day, at 1.30 pm and sometime after 5 pm (GMT). If you need me urgently, please text or call the number below.

[REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride (Blackpool) Flood Relief Scheme - Submission  
**Date:** Thursday 27 February 2020 23:58:53

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To whom it may concern,

I would like to make the following observations:

Noise - the loss of vegetation and trees along the course of the River Bride will increase the propagation of noise due to the lack of "soft" surfaces. This is not considered at all in the available reports.

Trees - A large number of trees will be lost as part of this scheme and I see no mention of replacement strategies in the area. The northside of Cork is already short on trees / green spaces and this will make it significantly worse.

Parklands - The park amenity in Blackpool Retail Park is heavily affected by this plan with the loss of vegetation, trees and pedestrian bridges. This makes the attractiveness of the site to workers and residents in the Retail Park extremely poor. There are no other amenities in walking distance.

Traffic impact during construction - The N20 through Blackpool and the traffic in/out of Blackpool Shopping Centre / Blackpool Retail Park is already extremely poor at peak times. More detailed analysis of the impact of lane and road closures is required to ensure traffic in the city is kept moving. At Watercourse Rd, there are already significant problems with traffic backing up due to the amount of vehicles turning left / right. This work will have a significant risk factor with regard to road safety and specifically Vulnerable Road Users.

Local development - The whole area around the Sunbeam complex (essentially everything between NorthPoint and Cork Retail Park) is flagged for development and urban renewal. Demolition work is currently ongoing on a number of sites. There appears to be no joined up thinking with regard to the development of the river valley.

There is a huge opportunity to do something unique and beneficial but this proposal has zero ambition with regard to improving the urban environment and bringing more life (human, animal, vegetation) into the area.

I would be happy to elaborate on any of these points at a later date.

Kind regards

Donal Hunt  
[REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** SAVE the river  
**Date:** Thursday 27 February 2020 23:50:51

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STOP the constuction work on the river bride i want to save the future of Glanmire and its wildlife for my teenage children

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Re: Written submission with respect to River Bride (Blackpool) Drainage Scheme  
**Date:** Thursday 27 February 2020 23:50:12

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Steffen Liebig, [REDACTED]

A chara,

It is my understanding that for the River Bride (Blackpool) Drainage Scheme public consultation is now being carried out as part of the confirmation process, and members of the public are invited to make a written submission with respect to

1. the likely effects on the environment of the scheme
2. the scheme's impact on Natura 2000 Site(s)

The suggested measures include the construction of new flood walls and embankments, construction of new culverts on a section of previously open channel, bridge replacement, installation of sediment traps, modifications to existing foul/surface water collection networks in the area, construction of pumping stations and some other minor works.

The suggested measures have a significant negative effect on the environment of the River Bride as it is completely eradicating any environment from the river. The river would be essentially turned into a large drain that would not be supportive of the wildlife currently present. This wildlife includes birds, insects, fish, and small mammals.

There is an existing otter population in areas affected by the planned measures. These measures will destroy the habitat for these animals during construction and do nothing to re-establish any wildlife afterward. On 350 meters length the former river will be turned into a drainpipe void of any sunlight supporting vegetation or animal life. This is being clearly stated in the Environmental Impact Assessment Report 2018.

The river will also be hidden from view and removed from being used as a public amenity. The people living in Cork and specifically in Blackpool will be robbed of an opportunity to experience nature.

This hard engineering solution is ignoring the scientific experience that have led other countries, e.g. the UK, France, Germany, Switzerland to abandon this approach and return to soft engineering and more natural approaches to flood prevention. Overflow areas to store flood waters, ponds and ditches should be used in combination with vegetation should be used to slow the flow of a river instead of trying to force waters into narrow channels that will concentrate its force and make failure of the defences highly catastrophic. Most importantly there will need to be designated flood plains where construction is prohibited. Many mistakes have already been made with the River Bride. It's time to reverse the mistake rather than adding new mistakes to previous ones. I trust in that we can learn from past mistakes rather than repeating them over and over again.

Mise le meas,

Steffen Liebig

Am Donnerstag, 27. Februar 2020, 22:45:35 GMT hat [REDACTED]

Folgendes geschrieben:

A chara,

It is my understanding that for the River Bride (Blackpool) Drainage Scheme public consultation is now being carried out as part of the confirmation process, and members of the public are invited to make a written submission with respect to

1. the likely effects on the environment of the scheme
2. the scheme's impact on Natura 2000 Site(s)

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The river will also be hidden from view and removed from being used as a public amenity. The people living in Cork and specifically in Blackpool will be robbed of an opportunity to experience nature.

This hard engineering solution is ignoring the scientific experience that have led other countries, e.g. the UK, France, Germany, Switzerland to abandon this approach and return to soft engineering and more natural approaches to flood prevention. Overflow areas to store flood waters, ponds and ditches should be used in combination with vegetation should be used to slow the flow of a river instead of trying to force waters into narrow channels that will concentrate its force and make failure of the defences highly catastrophic. Most importantly there will need to be designated flood plains where construction is prohibited. Many mistakes have already been made with the River Bride. It's time to reverse the mistake rather than adding new mistakes to previous ones. I trust in that we can learn from past mistakes rather than repeating them over and over again.

Mise le meas,

Steffen Liebig



**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** PLEASE STOP the destruction of the river bride in Glanmire  
**Date:** Thursday 27 February 2020 23:30:18

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im a resident in Glanmire and i strongly object to the alterations planned for the river bride ..... these alterations will destroy the habitat of the otter which i have seen swimming when im walking my dogs also this will also only push the river faster downstream causing further destruction in years to come....

**Eoin Lettice, PhD MA BSc**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Daniel Lettice, BSc Hons, Analytical Chemistry**

[REDACTED]  
[REDACTED]  
[REDACTED]

27<sup>th</sup> February 2020

Dear Minister,

We refer to your notice of intention to confirm the River Bride (Blackpool) Drainage Scheme (Ref: DPE63-18-2018) and invitation for submissions as to the likely effects of the scheme on the environment.

Whilst the problem of flooding in Blackpool is a serious one and deserves timely and effective solutions, it is our view that elements of the proposed scheme will have serious negative effects on the environment and that the minister should refer the scheme back to the Commissioners of Public Works for revision.

Referring to the EIA report (May 2018) prepared for this scheme, it is clear that the measures proposed will have a significant impact on a number of species locally, most notably the otter. As the EIA notes "the permanent loss of habitat cannot be mitigated". Impact on fisheries will have a "Permanent Significant Negative Impact" as will the impact on terrestrial animals.

Additionally, there seems to have been little consideration given to taking the opportunity to plant native vegetation and trees in effected areas and instead the measures rely largely on engineering solutions to natural systems. Indeed, in a number of locations (e.g. Blackpool Retail Park, EIA Plate 9.42; Orchard Court, EIA Plate 9.48) mature trees and vegetation are proposed to be needlessly removed leaving a sterile and notably less biodiverse environment.

In terms of landscape, the proposal to culvert an extensive stretch of the River Bride from Blackpool Retail Park to Blackpool Church is a retrograde step and the loss of the river at these locations is likely to lead to the degradation of the public realm. The removal of the visible watercourse from this location will have a permanent negative effect on the landscape and visual amenity of Blackpool as well as removing a number of biodiverse ecosystems from the urban environment. Given the historical, cultural and environmental importance of the River Bride to Blackpool, its culverting at this location should be re-examined.

Culverting c. 350 metres of the River Bride at this location will result in effectively sterilising the river of much of its plant and animal life as well as removing what can be a valuable amenity from public view. The significant loss of trees and other plant life around the culverted area has, in our view, been underestimated given the notable dearth of trees and green areas in the immediate vicinity. This is a missed opportunity to provide natural recreational space in the centre of Blackpool village in what is one of the last remaining pieces of semi-natural habitat in the Blackpool village area.

We note that the previous preferred option was to provide walls at Orchard Court rather than the culvert option and that this was changed due to issues associated with illegal dumping. In essence, this amounts to removing the river, a valuable community and environmental asset due to the

appropriate authorities not being capable of controlling illegal dumping. The loss of the river seems like a high cost for the community and the environment to pay for the actions of a few.

We have previously (Letter to OPW dated 22<sup>nd</sup> January 2016) raised the issue of the railings in the curtilage of the Church of the Annunciation, Blackpool which are shown removed in the photomontages accompanying these plans (EIA Plate 9.52). These railings form part of a protected structure (PS1139, Cork City List of Protected Structures) and their removal are not permitted under the Cork City Development Plan as demonstrated by previous planning applications (09/34165). It is disheartening to continue to see these plans suggest the removal of part of the protected structure even after the issue was brought to light in 2016.

We trust that the Minister will take these issues into account before making a decision on this matter.

Yours sincerely,

Dr Eoin Lettice                      &                      Mr Daniel Lettice

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** submission with respect to River Bride (Blackpool) Drainage Scheme  
**Date:** Thursday 27 February 2020 22:50:44

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A chara,

It is my understanding that for the River Bride (Blackpool) Drainage Scheme public consultation is now being carried out as part of the confirmation process, and members of the public are invited to make a written submission with respect to

- 1.the likely effects on the environment of the scheme
- 2.the scheme's impact on Natura 2000 Site(s)

The suggested measures include the construction of new flood walls and embankments, construction of new culverts on a section of previously open channel, bridge replacement, installation of sediment traps, modifications to existing foul/surface water collection networks in the area, construction of pumping stations and some other minor works.

The suggested measures have a significant negative effect on the environment of the River Bride as it is completely eradicating any environment from the river. The river would be essentially turned into a large drain that would not be supportive of the wildlife currently present. This wildlife includes birds, insects, fish, and small mammals.

There is an existing otter population in areas affected by the planned measures. These measures will destroy the habitat for these animals during construction and do nothing to re-establish any wildlife afterward. On 350 meters length the former river will be turned into a drainpipe void of any sunlight supporting vegetation or animal life. This is being clearly stated in the Environmental Impact Assessment Report 2018.

The river will also be hidden from view and removed from being used as a public amenity. The people living in Cork and specifically in Blackpool will be robbed of an opportunity to experience nature.

This hard engineering solution is ignoring the scientific experience that have led other countries, e.g. the UK, France, Germany, Switzerland to abandon this approach and return to soft engineering and more natural approaches to flood prevention. Overflow areas to store flood waters, ponds and ditches should be used in combination with vegetation should be used to slow the flow of a river instead of trying to force waters into narrow channels that will concentrate its force and make failure of the defences highly catastrophic. Most importantly there will need to be designated flood plains where construction is prohibited. Many mistakes have already been made with the River Bride. It's time to reverse the mistake rather than adding new mistakes to previous ones. I trust in that we can learn from past mistakes rather than repeating them over and over again.

Mise le meas,  
Pat Malone

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Blackpool Flood Relief Scheme Objection  
**Date:** Thursday 27 February 2020 22:41:42

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To whom it may concern,

I am writing to request that you reconsider the plan to cover The River Bride in Cork. The presence of otters was noted in your survey and according to The Vincent Wildlife Trust "The Irish otter population remains one of the most stable in Europe. There is some evidence to suggest that since initial national surveys in the early 1980s there have been declines in the prevalence of the species. It is hoped that the reasons for these declines will be addressed by the designation of Special Areas of Conservation (SACs), ongoing national assessments and by targeted intensive surveys. The risks to the current otter population are the availability of sufficient food within their habitats and provision of resting and denning sites. This species is protected under the Wildlife Act (1976) and Wildlife (Amendment) Act 2000."

<https://www.vincentwildlife.ie/species/otter>

Your survey of wildlife in the area also noted bats and bats like the otter are also a protected species.

"Legal status and its implications for developers In view of their status across Europe, all species of bat have been listed on Annex IV of the EC 'Habitats and Species Directive' (see 2.1 Legislation) and some, such as the lesser horseshoe bat, are further listed on Annex II. The domestic legislation, which implements this directive, combined with the Wildlife Acts (1976 & 2000), ensures that individual bats and Introduction 10 Bat Mitigation Guidelines for Ireland their breeding sites and resting places are fully protected, and this has important implications for those who own or manage sites where bats occur. Guidance on the consideration that Local Planning Authorities should give to nature conservation interests is contained in Directive 2001/42/EC of 27 June 2001, commonly known as the SEA Directive. The presence of a protected species is a material consideration when the authority is considering a developmental proposal. The protected status afforded to bats means planning authorities may require extra information (in the form of surveys, impact assessments and mitigation proposals), before determining planning applications for sites used by bats. Planning authorities may refuse planning permission solely on grounds of the predicted impact on protected species like bats. Designations of various kinds, both statutory and non-statutory, may further protect individual sites. Although the presence of bats does not in most instances preclude a land parcel from development, planning and licensing controls may limit the extent of disturbance, the timing of activities, and may well stipulate compensatory measures. Planning conditions are often used to this end. However, the grant of planning permission does not authorise the disturbance of bats or interference with their breeding or resting places. A separate derogation licence is required." <https://www.npws.ie/sites/default/files/publications/pdf/IWM25.pdf>

Please accept this submission to object to the current Blackpool Flood Relief Scheme and seek an alternative that will protect The River Bride and its valuable contribution to the environment.

Yours sincerely

WT Murphy

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Don't culvert the Bride  
**Date:** Thursday 27 February 2020 22:28:33

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To whom it may concern

Submission with respect to the likely effects on the environment of the scheme

The proposed River Bride Drainage Scheme would include construction of direct flood defences comprising concrete flood walls and culverts on a section of open channel. There is a rich biodiversity in this river channel with many native and legally protected birds, otters, and other wildlife living along the river banks, as well as a wealth of natural native trees and undergrowth which have intrinsic value, both as a vital oasis of natural biodiverse habitat supporting the local ecosystem for urban wildlife, and also as sensory amenity supporting local residents' sense of connection to nature and the consequent benefits that brings to their mental and physical health. To rip out the trees and bushes and cover the river over with a culvert will completely deaden and destroy the valuable biodiverse riverine habitat, deprive the local community of their connection and access to nature, and therefore be to the detriment of the urban environment because of these factors.

I also have serious concern over the proposed installation of sediment traps. In the past these traps have actually been the cause of flooding, rather than part of the solution, because they have snagged fallen branches and objects flowing downriver and by aggregate caused dams to form in the course of the river, causing water build up. These sediment traps should be omitted from any future proposals to prevent the formation of dams in the river composed of collecting floating materials.

The proposal to culvert the river is outdated, superseded thinking and is at odds with current international trends to 'daylight' previously culverted urban rivers to restore them to their natural state (refer the Guardian article "A River Runs Through It: The Global Movement to Daylight Urban Waterways" - <https://t.co/aCoNszTzLU>).

In light of the Central Government-declared climate & biodiversity emergency, this proposal is clearly the incorrect way to address the flooding issue, it will do more harm than good, and it is counter to stated biodiversity and ecological sustainability goals.

The root cause of the flooding events in recent years can be traced back to alterations to the water course upstream, construction within the floodplain upstream, and indeed to lack of adequate natural or man-made water attenuation measures in residential and rural areas further upstream again. The township of Blackpool and its residents should not now lose out and be deprived of this valuable amenity due to the irresponsible development practices by others upstream, who have benefitted at the expense of those downstream. The root causes ought be acknowledged and rectified, rather than treating the symptoms as this proposal seeks to do. This is the only way to address the flooding issue in a fair and equitable manner.

All of the points I have made above including the presence of rich biodiversity, native habitat, urban wildlife, the past phenomenon of formation of dams caused by sediment traps and grilles, and the cause-and-effect of past construction in the floodplain as root cause of present-day flooding events, can be verified by reference to local campaigner Chris Moody's twitter account (refer <https://t.co/zvDunU2s8X>).

regards,

Denis O'Regan

Sent from iPhone

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Date:** Thursday 27 February 2020 22:17:59

---

Hi there,

Having visited most major European cities I've noticed they all have one thing in common - their rivers. We are the only country not celebrating and utilising our rivers and for some reason Ireland thinks we should bury them all in concrete. Flood plains built into all plans and installed on the many larger plateaux that already exist would be a far more successful plan and then future generations will be able to see the river, it's abundant wildlife and may even utilise them properly. Please reconsider this plan and invest now in ecologically responsible long term plans rather than the ill conceived short term "bury the problem" solution you have given.

Thanking you in advance,  
Talia Huffe

[REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Culvert  
**Date:** Thursday 27 February 2020 21:38:34

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Hi,

I would like for the OPW to reconsider the proposed culvert for Blackpool as I am aware there is significant other and bird activity in the Bride river which could be impacted. Also I have little to no faith that cork city council could maintain the proposed paved area near orchard court. I believe the solution lies upstream in flow restrictions and flood able green areas. Thank you for your time.

Peter Crowley



**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** submission  
**Date:** Thursday 27 February 2020 21:27:31

---

Hi

Please see submission below on the River Bride Drainage Scheme

I would be against the idea of building a culvert -

Blackpool FRS - a 350 meter long culvert at Orchard Court literally sterilises that section of river. Nothing will grow there, it will not be habitat or a source of food for wildlife. It will flow underground hidden from view.

In the overall context the proposed scheme as it exists would have a highly negative impact on fisheries on permanent basis with the proposed new culverting and sediment trap being the most injurious based on current available information.

This is a negative for the community of Blackpool and will destroy an amenity that can be so much bettered if investment from local council and from government.

This needs to be stopped.

Kind Regards

John

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Blackpool drainage scheme  
**Date:** Thursday 27 February 2020 21:08:09

---

John Morehead



27th February, 2020

Dear Sir / Madam,

I write to vehemently oppose the flood defences currently proposed on the river Bride.

The works again reflect the lack of foresight and vigourous assessment of alternative upstream catchment solutions adopted by the OPW drainage ( flooding) works.

They are deemed necessary by the authorities and are a direct result of the hard engineering interventions, impervious paving and permitted developments on the flood planes upstream, compounded by decimation of tree standings / forestry and hedgerows. One day one hopes the OPW engineers will reflect on the vandalism being executed under their watch, unchallenged by the local authority 'engineers' who have failed in their remit to interrogate the proposals and demand more inclusive solutions. If our local authority would demand higher standards rather than engage in wanton tree felling and crass interventions such as those in Skehard road and environs we would have a far better future. Anthony Beese, Geologist, in his report 2019 on the flood defence proposals and identified serious risks in relation to the groundwater regime in the Lee flood defence proposals. Of grave concern is the fact that the OPW / Arup in the LLRS supplementary Groundwater Report endeavoured to dismiss groundwater permeability concerns through the use of software ( Geoslope Seep/W). The software has been confirmed by the software developer to be not fit for this purpose.

To attempt to justify a design decision with inappropriately simplistic methodologies which are clearly not validated is quite frankly unacceptable and gives me little confidence as to the level of interrogation schemes such as these appear to receive by our city engineers and indeed the health and safety authority.

Who is the Project Supervisor Design Phase? Has a design risk assessment been prepared? The city will flood from within, buildings will fracture due to dewatering by the 40 pumps and key walls will collapse due to back pressure.

The execution of the works in Bandon is contemporary evidence of the standards being applied. I attended a briefing at the site office at which a slide was presented identifying risks to the project - one included a reference to 'Save Cork City' and external interested parties, a cynical yet unfortunate inclusion, smirked at by many in attendance . The result of this project is beautiful stretch of river decimated by the heavy engineering interventions with a carbon footprint that has yet to be published. Impervious hard landscaping has been permitted in the flood plain and maize continues to be planted under plastic in the flood plain above the town. This project remains unfinished with significant environmental damage and visual scarring - and still remains incomplete as they rebuild fundamentally flawed interventions.

Douglas and the Tramore river flooding debacle is no doubt being financed by the population - a predictable engineering fiasco with no one ever held accountable - no doubt same players building culverts again?

Skibbereen and Clonakilty need little comment save to say they are opportunities lost - and an eyesore for the long haul. Wish we had the likes of Brunel or Richard Rice who took pride in their civil engineering projects to comment!

Recent flooding in UK and indeed Shannon have proven that the hard engineering approach cannot alone deal with the weather systems expected as a result of climate change - an inclusive multidisciplinary approach is

necessary and time is running out as we decimate our environment to appear to be doing something for the population.

Build the tidal barrier, engage with other disciplines and semi state agencies to address upstream catchment management. Being last in Biodiversity, Sustainability, Carbon footprint and 2nd last in tree cover Europe-wide is a direct result of this mindset in delivery of infrastructure which is reliant on 1945 Acts to implement. It is critical that another dunkettle type legacy does not materialise by taking the wrong approach.

The decimation of habitat for significant wildlife and and biodiversity potential in what could be a wonderful linear park with open access to the River Bride should be encouraged! Blackpool is a hardened transport dominated urban fabric, deficient in parkland, woodland, and fails to exploit the fine grain of the 18/19th Century and later industrialised areas on the edge of the City Island. The river as it enters the Lee should be embraced, not trashed like the Tramore / Douglas river, and certainly not justified by the LLRS study which is so deficient in so many areas.

We could do so much better than this.

Yours,

John Morehead FRIAI

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Consultation  
**Date:** Thursday 27 February 2020 20:54:32

---

Dear Sir/Madam,

I wish to add my support to the detailed submission made to you by Mr Chris Moody, who knows this area intimately and cares for it.

The scheme as presented will do more harm than good.

Regards,

Joe Noonan  
[REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Submission against the current proposal to culvert 350m section of the river bride- Blackpool  
**Date:** Thursday 27 February 2020 20:33:40

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Minister,

I wish to state my objection to the culverting of a section of the river bride in Blackpool which is proposed in the Blackpool flood relief scheme.

I believe the culverting of a 350m section of the river will be detrimental to a significant natural local amenity which provides an attractive place for locals to walk and unwind. The river walkway and footbridges near the retail park are particularly picturesque and are a haven for bird life. I have seen dippers and grey wagtail on a regular basis there and in the summer the nettle beds and flowering plants which dot the banks are a haven for pollinators.

River wildlife will also be significantly impacted by this work, in particular the local otter population. The otter numbers in the Cork area have seen a resurgence in recent years due to the significant works to remove effluent from the river lee. Otters are a sign of a healthy and active river system...it would be a shame to lose them from the locality.

Not to mention the significant biodiversity loss which would result from these works...this would be contradictory to the recent biodiversity emergency declared by the council.

While flood relief and flood mamangement is an overdue necessity for the local community who have suffered repeatedly as a result of flooding in recent years i think the current proposed works are not the correct solution and in particular the works to culvert a section of the river. One of a river's natural defences to flooding is to meander....this work will remove that key aspect of a rivers natural design.

Sincerely

Gary O'Sullivan

[REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Objection  
**Date:** Thursday 27 February 2020 20:26:22

---

Maria Cassidy

[REDACTED]  
Phone: [REDACTED]

To whom it may concern

I strongly object to the proposed works on the grounds that they will damage the habitat of otters. While I understand that something needs to be done in this instance, I believe that the proposed plans are NOT the answer. I am not representing or part of any group.

Yours Sincerely

Maria Cassidy

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride - Blackpool Flood Works  
**Date:** Thursday 27 February 2020 20:13:39

---

Dear Sir,

The proposed works to the river Bride at Blackpool would have a detrimental impact to the existing otter families that reside in the river.

Otters are a species that are protected under Annex II and Annex IV of the EU Habitats Directive (92/43/EEC).

Therefore, the proposed works would damage their habitat and as a consequence should not proceed.

le meas,  
Seán Antóin Ó Muirí

**Name:** Seán Antóin Ó Muirí

**Phone:** [REDACTED]

**Address:** [REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Blackpool Scheme  
**Date:** Thursday 27 February 2020 20:13:23

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To whom it concerns,

This proposal seems poorly thought out without due care and consideration to impacts on diverse and thriving wildlife.

The area and it's waterway should be considered an amenity, the type which is sadly lacking on the Northside.

I urge it is reconsidered and ultimately stopped.

Kind Regards,

Ciaran



**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** THE FUTURE  
**Date:** Thursday 27 February 2020 20:04:42

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i don't believe that the river should be developed in this way because the river will break out further down stream ..... my name is Gerard O Sullivan and i spent my childhood bird watching in Vienna woods and along the glashboy river watching herons and kingfishers and eating eating galtee cheese sandwiches and now i have noticed that their are no more kingfishers ... PLEASE look after the planet...

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Objection to River Bride culvert Orchard Court  
**Date:** Thursday 27 February 2020 19:29:11  
**Importance:** High

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Dear Sir or Madam,

I wish to state my objection to culverting the section of 350 meters of the River Bride in Blackpool at the Orchard Court section as proposed under the Blackpool flood relief scheme.

The culverting of the river as proposed under the scheme will remove the possibility of wildlife ever using this section of the river again in the future. The river could be instrumental in the urban renewal potential of Blackpool which has several sites earmarked for redevelopment in close proximity to the site.

The report on the flood relief scheme acknowledges the permanent devastating effect that culverting this section of the river would have on local biodiversity. In particular the negative impact on; otters, brown trout, eel and herons. The otter in particular is a species listed in Annex IV of the EU habitats directive and benefits from the legal protection regime of that directive.

The proposed walled suggestion which was objected to on aesthetic grounds could be redesigned so as to be visually appealing, enhance the river amenity and to preserve the biodiversity without the need to concrete culvert over the river itself.

Doing so now would reflect the changed policy circumstances since 2016. Especially the declaration of a biodiversity emergency by Cork Council, Dáil Eireann and the EU Parliament.

I also object to the removal of the two pedestrian bridges at the amenity park located at Blackpool Retail Park which is just outside my business premises. These bridges form a main part of an attractive amenity park and walk around the River Bride and are the only such section left alongside the river in an urban setting.

This area of the design should also be redesigned to maintain the two bridges and the attractive park and walk amenity as they currently exist.

Kind regards,  
Teresa O'Brien

[REDACTED]



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**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride (Blackpool) Drainage Scheme - Public Consultation  
**Date:** Thursday 27 February 2020 19:17:56

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To whom it may concern

Submission Re: River Bride (Blackpool) Drainage Scheme

I wish to object to the the proposed River Bride Drainage Scheme

There is a rich biodiversity in this river channel with many native and legally protected birds, otters, and other wildlife living along the river banks, as well as a wealth of natural native trees and undergrowth which have intrinsic value, both as a vital oasis of natural bio-diverse habitat supporting the local ecosystem for urban wildlife, and also as sensory amenity supporting local residents' sense of connection to nature and the consequent benefits that brings to their mental and physical health.

To rip out the trees and bushes and cover the river over with a culvert will completely deaden and destroy the valuable biodiverse riverine habitat, deprive the local community of their connection and access to nature, and therefore be to the detriment of the urban environment because of these factors. The scheme is not mindful of the biodiversity crisis which was declared in June 2019 by Cork City Council.

I also have serious concern over the proposed installation of sediment traps. In the past these traps have actually been the cause of flooding, rather than part of the solution, because they have snagged fallen branches and objects flowing downriver and by aggregate caused dams to form in the course of the river, causing water build up. These sediment traps should be omitted from any future proposals to prevent the formation of dams in the river composed of collecting floating materials.

The proposal to culvert the river is outdated, superseded thinking and is at odds with current international trends to 'daylight' previously culverted urban rivers to restore them to their natural state.

In light of the Central Government-declared climate & biodiversity emergency, this proposal is clearly the incorrect way to address the flooding issue, it will do more harm than good, and it is counter to stated biodiversity and ecological sustainability goals.

The root cause of the flooding events in recent years can be traced back to alterations to the water course upstream, construction within the floodplain upstream, and indeed to lack of adequate natural or man-made water attenuation measures in residential and rural areas further upstream again. Blackpool is an area of social and economic disadvantage and needs a flood risk management solution that increases and improved amenity and access to green spaces and wildlife.

It is my view that the root causes ought be acknowledged and rectified, rather than treating the symptoms as this proposal seeks to do. This is the only way to address the flooding issue in a fair and equitable manner.

All of the points I have made above including the presence of rich biodiversity, native habitat, urban wildlife, the past phenomenon of formation of dams caused by sediment traps and grilles, and the cause-and-effect of past construction in the floodplain as root cause of present-day flooding events should move the project management team to

consider an alternative approach which is in line with current international best practice.

Regards

Conn Donovan BCL, MSc, PMEP



**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Cc:** [REDACTED]  
**Subject:** Comments on the proposed River Bride Drainage Scheme  
**Date:** Thursday 27 February 2020 18:29:33

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To whom it may concern

### **Submission with respect to the likely effects on the environment of the scheme**

The River Bride is a precious oasis of beauty and biodiversity in a city with otherwise exceptionally green spaces. Removing it would be to the permanent harm of those living in the area and to the existing wildlife.

The proposed River Bride Drainage Scheme would include construction of direct flood defences comprising concrete flood walls and culverts on a section of open channel. There is a rich biodiversity in this river channel with many native and legally protected birds, otters, and other wildlife living along the river banks, as well as a wealth of natural native trees and undergrowth which have intrinsic value, both as a vital oasis of natural biodiverse habitat supporting the local ecosystem for urban wildlife, and also as sensory amenity supporting local residents' sense of connection to nature and the consequent benefits that brings to their mental and physical health.

To rip out the trees and bushes and cover the river over with a culvert will completely deaden and destroy the valuable biodiverse riverine habitat, deprive the local community of their connection and access to nature, and be to the detriment of the urban environment. I also have serious concern over the proposed installation of sediment traps. In the past these traps have actually caused flooding because they have snagged fallen branches and objects flowing downriver and caused dams to form. These sediment traps should be omitted from any future proposals to prevent the formation of dams in the river composed of collecting floating materials.

The proposal to culvert the river is outdated, superseded thinking and is at odds with current international trends to 'daylight' previously culverted urban rivers to restore them to their natural state (refer the Guardian article "A River Runs Through It: The Global Movement to Daylight Urban Waterways" - <https://theguardian.com/cities/2017/aug/29/river-runs-global-movement-daylight-urban-rivers>).

In light of the Central Government-declared climate & biodiversity emergency, this proposal is clearly the incorrect way to address the flooding issue, it will do more harm than good, and it is counter to stated biodiversity and ecological sustainability goals. The root cause of the flooding events in recent years can be traced back to alterations to the water course upstream, construction within the floodplain upstream, and indeed to lack of adequate natural or man-made water attenuation measures in residential and rural areas

further upstream again. The township of Blackpool and its residents should not now lose out and be deprived of this valuable amenity due to the irresponsible development practices by others upstream, who have benefitted at the expense of those downstream. The root causes ought be acknowledged and rectified, rather than treating the symptoms as this proposal seeks to do. This is the only way to address the flooding issue in a fair and equitable manner. All of the points I have made above including the presence of rich biodiversity, native habitat, urban wildlife, the past phenomenon of formation of dams caused by sediment traps and grilles, and the cause-and-effect of past construction in the floodplain as root cause of present-day flooding events, can be verified by reference to local campaigner Chris Moody's twitter account (refer <https://twitter.com/ChrisMoodyDraws>).

Regards,

Dr Dean Venables

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride (Blackpool) Drainage Scheme, Ref. DPE63-18-2018; Public submission  
**Date:** Thursday 27 February 2020 17:58:12

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A Chairde,

As a person born and bred in Cork City I am saddened to find myself, yet again, voicing objections to plans outlined by Cork City Council and OPW Ireland. I am fortunate enough to work in Blackpool, an area full of history and character that has unfortunately suffered from years of civic neglect.

The area's name in Irish, 'an Linn Dubh', literally translates as 'black pool' giving us a first clue as to shared history between the waterways and local industries of this part of Cork, where it is said, during times of historical flooding, water would mix with dyes from textile and weaver cabins causing the river to run black.

With three rivers flowing into Blackpool, the Kilnap, the Bride & the Glen (all the way from 'the Bog' in Lotamore via the Glen park), the area has had to adapt to the all too natural occurrence of flooding.

Unfortunately past planning decisions resulted in natural flood plains being developed on, resulting in an increased risk of localised flooding should any area of the River Bride become blocked.

Cork City Council and OPW Ireland propose to address this by culverting a 350m section of river way. I cannot stress strongly enough how I feel that this would be such a regressive approach. Cities & developed areas need to learn to live with water and not fight against it. We need to make room for our rivers.

Studies consistently show that structural containment of rivers is a brutal and ultimately failed approach with detrimental outcomes for natural bio-diversity.

Enlightened options need to be explored for Blackpool, such as the use of public open spaces as reservoirs in times of flooding. These public areas could be park land or hard landscaped amenities such as outdoor sports & play areas.

Walking through Blackpool, it is always a pleasure to both hear the river flow and to enjoy watching all aspects of nature associated with the river Bride. Nothing makes me happier than to see the various insects, otters, fish, herons, dippers and birds of all types all along the river. It would be an absolute crime to destroy this natural resource.

I am aware that past flooding is as a result of many mitigating factors, including the mismanagement of the river and it's existing culverts. A more concerted effort on maintaining the health of the river along with extensive tree planting would only serve to help alleviate any future flood risk.

In conclusion I feel that a more educated and inclusive solution needs to be found. I most strongly object to the culverting of the River Bride. This will only serve to destroy and remove forever, the only natural green belt remaining in Blackpool. Blackpool and her residents deserve better than what Cork City Council & OPW Ireland are proposing.

Blackpool and Cork City have so much potential and it is imperative that this potential is realised to the fullest.

Yours sincerely,

Paul O'Donovan,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]







**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Public Consultation Submission  
**Date:** Thursday 27 February 2020 17:24:43

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To whom it may concern,

I wish to voice my concerns regarding the proposed plans for the River Bride (Blackpool) Flood Relief Scheme.

The practice of culverting rivers is not now recognised internationally as best practice and on a basic level it is a decision I foresee being reversed in coming years for this project. Cork City has recently outlined its intention to apply for the second time to the European Green Capital Award. I wish to bring to your attention the recent reversal of the exact type of infrastructure planned in the Blackpool FRS project by the City of Oslo, European Green Capital 2019. See highlights of their efforts to re-open urban rivers and waterways [here](#) and [here](#). I have visited this project and spoken with the project team as part of work with the aforementioned European Green Capital Award on behalf of the EU Commission and aside from the biodiversity and flood attenuation benefits of these now uncovered waterways, developments adjacent to the now uncovered rivers have biodiversity and flood measures built into the planning conditions placed on them. These areas have become some of the most sought after in the city due to their location near to nature in an urban environment. There is palpable benefit beyond the immediate biodiversity and environmental benefit, that is not to deflect from that as an important aspect in any way.

Two species protected under the Habitats Directive and Birds Directive, namely the Otter and the Kingfisher, have been observed in the area where works are planned.

I would like to emphasise significance of the impact on the Otter populations of the existing river as per the text in the non technical summary authored by your consultant, Ryan Hanley:

*'Despite the proposed mitigation the impact on otters is Permanent Significant Negative Impact.'*

Also from the same report:

*'The impact of the works on habitats, flora and fauna is considered slight for most species. However, the impact on aquatic species and their habitat namely brown trout, lamprey and eel is significant due to the permanent loss of instream habitat as a result of culverting, sediment traps and maintenance regiments. Impact on otters is also considered very significant as the culverting of an extensive length of river potentially results in loss of foraging habitat and increased severance between the Bride and the River Lee. '*

The above put impacts this project in direct opposition with the goals of the Habitats Directive and indicate that it would be in breach of same if granted permission.

Regards,

Barry Walsh BScZy, MscECLM

[Redacted]

[Redacted]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride Drainage Scheme  
**Date:** Thursday 27 February 2020 17:24:07

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Dear Sir/Madam,

I am writing in relation to the above in a personal capacity.

I am supportive of measures to address the long-standing flooding issue for residents and businesses. I would urge all relevant bodies to reconsider the scheme as currently proposed on the following grounds.

- Ireland has self-declared a Climate Change and Biodiversity Emergency in May 2019. The majority of the elements of this scheme pre-date this.

- The scheme proposes to remove significant areas of vegetation and wildlife - contrary to the aims and objectives of the above declaration.

- Attempts to culvert the river is contrary to re-wilding attempts and 'day-lighting the river' efforts undertaken elsewhere (including the Dodder). There are several instances of otters and herons recorded here that need to be considered.

- Has all other options including better managing the flow of water upstream been considered? The preferred option seems pre-determined in scope.

- There is an atrocious record of maintaining culverts and keeping them clear of obstructions in Ireland. There are volunteer groups that clean the river bed but none that clear culverts. Douglas is a prime example of an insensitive, unsuccessfully integrated flood management system.

- After the Cork Docklands and Tivoli, Blackpool is the third major regeneration site in Cork City -centered around the new Rail station at Kilbarry. The area has suffered community severance through the imposition of a ill-thought, over- engineered by-pass in the 1990s. The community deserves the chance to heal and regenerate around the river from which it takes its name.

Thank you for considering my submission.

Kevin Burke

[REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Submission to the River Bride (Blackpool) Drainage Scheme  
**Date:** Thursday 27 February 2020 17:22:59  
**Attachments:** [15. River Bride \(Blackpool\) Drainage Scheme\\_aoconnor.docx](#)

---

To whom it may concern:

Please find attached (and in text below), my submission to the public consultation for the River Bride (Blackpool) Drainage Scheme.

Regards,

Alan.

\*

## Submission/observation on the proposed River Bride (Blackpool) Drainage Scheme.

By:

**Cllr Alan O'Connor**



Ph: [REDACTED]  
Ema [REDACTED]

Submission not made on behalf of any organisation or party.

February 27<sup>th</sup> 2020

A chara:

With respect to the proposed works as part of the River Bride (Blackpool) Drainage Scheme, and its likely effects on the environment, I would like to make the following comment:

- 1. Overall:** The river is a public amenity of great current and potential aesthetic and ecological value. Whilst acknowledging the threat that flooding poses, the proposed scheme would see the effective removal of much of the urban waterway by culverting, and the diminishment of some of the rest by the construction of hard defences.
- 2. Culverts:** The philosophy of 'improving' flood resilience via culverting now runs contrary to international trends, as seen in examples of urban river restoration (daylighting) such as the Porter Brook in Sheffield, the River Roch in Rochdale, the Sawmill River in Yonkton, New York, the Fairburn and Parahiku reserve streams in Auckland,

etc (<https://www.theguardian.com/cities/2017/aug/29/river-runs-global-movement-daylight-urban-rivers>). The removal of 100 metres of culvert, as part of this project, is to welcomed, but the plans to retain many existing culverts, and to build 480 metres of new culverts in other areas, represents an opportunity cost in terms of the loss of a potential public amenity. Furthermore, in a context of climate change adaptation, open rivers can provide a cooling influence against the ‘heat island’ effect of an urban landscape.

**3. Reinforced concrete flood walls:** Retained stretches of open river can be greatly diminished by the loss of ecotones, or edge habitats (which tend to be species-rich) realized by the direct emplacement of concrete defence in place of river bank. I know that new retention walls are not a major part of the scheme, but even where flood walls are regressed from the bank, their height may diminish the aesthetic value of the river by limiting its visibility.

**4. Alternatives:** I would like to thank all involved for their work on the project. I’m not saying that there should be no hard defences or culverts at all, only that perhaps their necessity may be more limited with a different approach. Such an approach would provide more space for the stream to expand into in times of flood, and different land and river management practices as part of a whole-catchment approach. The narrow scope of the project area/or the initial terms of reference for the project may have limited the potential for realizing a scheme which would protect local communities from flooding whilst minimising the scale of the proposed culverts and hard defences.

\*

On the basis of the above, I trust my submission will be taken into consideration prior to a decision being reached on this scheme.

Mise le Meas,

\*

Councillor Alan O'Connor  
Cobh Municipal District  
Cork County Council  
Green Party/Comhaontas Glas  
Designated Public Official wrt Regulation of Lobbying Act 2015  
Phone: 0871332696  
Twitter: [https://twitter.com/AlanOC\\_Green](https://twitter.com/AlanOC_Green)  
Facebook: <https://www.facebook.com/ClrAlanOConnor/>

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride (Blackpool) Drainage Scheme  
**Date:** Thursday 27 February 2020 16:35:44

---

To whom it may concern,

I wish to express my disapporval of this scheme, which would appear to be a cause of greater harm than do any good and would result in the loss of a vital resource. I would express a strong preference for greater research into a means of maintaining and improving existing strictures with a view to bolstering existing natural infrastructure, with review from experts on sustainable planning.

Yours sincerely,  
Declan Synnott



Orla McCarthy

**Re: River Bride (Blackpool) Drainage Scheme Public Consultation**

**Ref: DPE63-18-2018**

To whom it concerns,

Following your consultation notice in relation to the above scheme I would like to highlight the concerns I have regarding the proposed works. It is my belief that the carrying out of such works in their current form will not alone have a negative impact on the natural environment, Natura 2000 protected species habitats along the River Bride (Eurasian Otter) and other aquatic bird sub species that are unique to Ireland (Little Dippers) who have made the River Bride their home.

There have been many studies of the otter population along this stretch of river. The Eurasian Otter is an Annex IV protected species under Natura 2000. One particular study carried out in 2011 -2012\* detected 11 Otters in the City, 8 of them using the River Bride as their habitat. With such a small population of this species even a small disruption to their habitat could have a devastating impact on their continued presence in this area. The Eurasian Otter is the last surviving terrestrial top predator in Ireland\*\*, so its presence has a strong influence on the ecosystem of the area.

The Irish Dipper (*C. cinculus hibernicus*) is also present in this area. This aquatic bird is extra special as they are a unique subspecies that are found only in Ireland. The ecology of Dippers is intimately linked to the river ecosystem, as they rely on them for food and breeding. \*\*\*

The proposed measures such as the culverts along the section of River leading out to the River lee from Blackpool village conveying a large section of the river underground will have an obvious and immediate negative impact on the flora and Fauna that inhabit the area and the heavy engineering interference will potentially destroy the viable salmonid habitat and the resident fish population that currently exists. These proposed measures as outlined in the proposed drainage scheme also conflicts with the Cork City Development Plan of 2015 – 2021.

Apart from the environmental concerns and the impact the scheme could have on the uniquely Irish subspecies and Natura 2000 protected species along this stretch of River I am also concerned about the use of public funds as it appears there are very strong arguments available for a less costly solutions, which would have a significantly lower impact on the environment and offer better flood protection.

I would like to highlight the fact that these proposed hard measures to combat flooding in the proposed way are in contradiction to the EU Flood Directive and the National Catchment Flood Risk Assessment Management (CFRAM) guidelines which suggest where ever feasible the focus should be on preserving and using the natural environment to reduce flooding risk, for example, slow the flow of the river, rewetting farmland and natural attenuation areas upstream, planting of native tree species in the vicinity of the river. These low cost, low tech approaches are very effective in managing flood risks and at the same time are very beneficial to the natural environment.

Yours Sincerely,

Orla McCarthy.

### **References:**

\*A non-invasive genetic survey of otters (*Lutra Lutra*) in an urban environment: a pilot study with Citizen Scientists – White et al.

\*\*National Otter Survey of Ireland 2010/2012. Irish Wildlife Manuals No. 76. Department of Arts, Heritage and the Gaeltacht

\*\*\*Dipper Ecology Project, UCC. ( <https://www.ucc.ie/en/dippers/dippers/>)

Solidarity Constituency Office,  
63 Shandon Street,  
Cork City

[BlackpoolSchemeConsultation@  
per.gov.ie](mailto:BlackpoolSchemeConsultation@per.gov.ie)

Date: 27/02/2020

**Joint submission for the River Bride Blackpool Drainage Scheme**

Dear Sir/Madam,

We are writing to object to the

The plan put forward by the OPW is at this point outdated, does not take into account the greater view and importance around environmental conservation and generally represents a crude approach to address the very serious question of flooding in Blackpool.

The plan contravenes guidance around protection of biodiversity in the National Biodiversity Action Plan 2017-2021, a document which itself at this point is also outdated in terms of tackling the urgent need to fight against Climate Change. The River Bride is a green sanctuary within an area that is highly developed and the closest Green space of any significance is the Glen River Park, about a 20 minute walk from Blackpool village significantly uphill and not really feasible for young children to get to easily.

Additionally, there are significant developments planned for the local area, with planning permission having been given for hundreds of dwellings within a ten-minute walking distance of the River Bride. Blackpool already suffers from an absence rather than a lack of Green spaces and with an increasingly youthful population, the idea of culverting over the only direct green space in the area is particularly distressing.

The River Bride has a particularly important role in maintaining biodiversity, being home to the Eurasian Otter as well as nesting birds and rare flora.

Extensive work has been done by local community activists in cataloguing the variety of flora and fauna that relies on access to the River Bride and its locality. The Cork Nature Network has undertaken extensive work relating to the River Bride and a huge amount of information, particularly around the cataloguing of Otter populations, has been undertaken in the past few years.

Flood Defences are extremely important but the plan as it currently stands is an outdated one based more upon affordability rather than the best interests of the local population and the environment. In an era of increasing climate awareness, this plan as it currently stands would be a step backwards, using the local communities genuine fears of flooding and forcing them to accept a plan that would be catastrophic environmentally to one of the only green spaces remaining in the Blackpool vicinity and at the expense of important biodiversity.

Kind Regards

Cllr. Fiona Ryan - Solidarity

Mick Barry TD - Solidarity

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Blackpool FRS Submission  
**Date:** Thursday 27 February 2020 16:21:32

---

William O'Brien

[REDACTED]

[REDACTED]

RE: Blackpool FRS

Dear Sir/Madam,

I would like to make a submission on the Blackpool FRS.

As a family with two young children living in the Blackpool area, the Amenity Park at Blackpool Retail Park is important to us. It is the only green space within walking distance of our home, and we enjoy taking our dog for walks there when we get the opportunity (weather permitting).

Among other things the plan for this park involves removing one of the pedestrian bridges which is part of what would call "the loop walk". It's a pathway which loops around the park and crosses the river over the bridge which is to be removed.

Closing this path would make a huge difference to the amenity of the park, so I would ask that plans to not remove this bridge be considered.

To reach the other parks near to our house would involve driving, which would have a negative effect on the environment; and as it would be more inconvenient to make these trips we would visit parks less often, and not getting the health benefits of regular walks.

The plan to culvert the river closer to Blackpool Village, near Orchard Court is a mistake. It will effect the wildlife in the area. In a very built-up area close to the City - it is a part of nature that would be sad to lose.

Other cities in Europe are embracing the sharing of urban life and nature, and re-opening previously closed off areas. It would be a shame to spend a lot of public money now on covering the river up, only to spend even more money uncovering it again in the future.

Years of diversion to facilitate industry in Blackpool has effected the river's natural course, and as a consequence its ability to flood naturally. This has compounded over decades as the course of the river became more industrialised and private dwellings were built on the river bank.

Further mistakes regarding the River Bride were made nearly 20 years ago by allowing a Shopping Centre, and an office complex to be built on what had for hundreds of years been a marshy field - part of a flood plain which previously allowed the river to overflow without consequence.

Building a housing estate like Orchard Court on another flood plain further downstream has also exacerbated the problem by eliminating another large area the river would have flooded into.

As the boundary of Cork City has expanded further out to the North along the river, and we can therefore expect more residential and industrial development in the hinterland, the destruction of more of the river's flood plain will occur, the problems with the river will only increase.

Culverting to fix these problems in the past hasn't had the desired effect, and has only served to push the problem further back up the river channel; and at the same time force the river to flood in the only place it now can - the weak spot of Blackpool Village.

If we are to now trying to fix these mistakes by repeating them, then we could expect (at great public expense) to be culverting the river almost back to its source in the future.

Thank you for the opportunity to make a submission, and I hope it will be considered as part of the plan for the Blackpool FRS.

Regards,  
William O'Brien

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride - culvert  
**Date:** Thursday 27 February 2020 16:08:12

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Minister

I wish to object to the culverting of the River Bride as part of the Blackpool Flood Relief Scheme. This will take away, permanently, a valuable natural amenity. It will harm the wildlife on the river – otters, brown trout and eel for example. There are other options that could and must be utilised. We are in a period of rapid decline of biodiversity, in part because areas like the River Bride are viewed in isolation and as expendable. It is our government's duty to protect them, both as resources for the public and for their own sake.

Regards

Caroline Lynch

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride (Blackpool) Drainage Scheme (Scheme Reference: DPE63-18-2018)  
**Date:** Thursday 27 February 2020 15:12:10

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**Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) - Public Consultation Notice under the Arterial Drainage Acts, 1945 and 1995, and Statutory Instrument No. 472 of 2019 European Union (Environmental Impact Assessment) (Arterial Drainage) Regulations 2019 and (Birds and Natural Habitats Regulations 2011 (S.I. No.477 of 2011)).**

To Whom it Concerns:

We believe that the proposed flood works to the Bride River at Blackpool in Cork would have a significant and detrimental effect on the environment locally. The river supports much wildlife including protected species and the otter population is notable and of significant importance.

Flooding in Blackpool is undoubtedly affected by new culverting of the river carried out relating to development of the new local shopping centre and sediment left/gathering in the river also contributed to flooding. Lack of sustainable catchment management relating to slowing the flow of rivers and supporting flooding on open land also contributes to an unsustainable amount of water entering the river. The drainage led approach to further culverting the river and allowing more fast flowing water through the village is unsustainable and ill advised. It represents techniques abandoned in other countries. Particularly in the slowing of the flow of the Rhine River. The Bride River proposals are contrary to the essence of the EU Floods directive which promotes a balanced and safe approach to flood protection.

The scheme to reduce access and visual connection to the water would create an environment devoid of life and inspirational to people in the area who should have their lives enriched by connection to the water.

People want flood protection but not with concrete drainage culverts and covered rivers. The Village of Blackpool gets it's name from the water that would be almost removed completely under the proposals which are concrete heavy and don't solve the fundamental issue of finding space for the river while protecting nature and creating a better environment for people.

The scheme would degrade Blackpool and badly effect the local economy which should benefit from good connection to wildlife and the water. While many countries are opening up their rivers OPW are covering them over. Images of concrete landscapes are without any conservation approach to the character and authenticity of the village. They seem concrete heavy and of ham-fisted design approach which is alien to the continued wellbeing of the towns inhabitants and acts against the ambition of the local development plan.

The approach makes no sense and avoids the route of the problem upstream. We recommend the scheme be reexamined in light of the damage to nature proposed especially to protected species including otters. We recommend the effect on Cork

city and the Natura 2000 Site in Lough Mahon be reexamined. While the Cork City scheme (Formerly Cork City Drainage Scheme), is in contention the approach to Blackpool cannot be fully considerate as it must be.

The costs at Blackpool are rising and will do so and we recommend the Controller and Auditor General reexamine the benefit of the scheme and that OPW put forward more sustainable methods to improve the catchment in cooperation with landowners that may benefit all.

The great cost to the environment and nature of the River Bride (Blackpool) Drainage Scheme is not worth it for society and the reduction of possible flood waters, as well as the opening of the river in the village and creation of safe passage for water can be done in a more cost effective way that would benefit peoples lives, protect nature and support a sustainable local economy. Please refer to the minister and reconsider the scheme independently and openly in a spirit of good public service for all.

We support sustainable and beneficial, safe flood defence and we do not support the approach here at Blackpool where much independent reconsideration is required.

John Hegarty for Save Cork City



**Save Cork City are protecting the built heritage of Cork City, to sustain a viable social and economic balance that drives creativity, supports innovation, creates sensitive regeneration and attracts long term investment to the City of Cork for a better future for everyone.**

**Please support our cause.**

Save Cork City Community Association Limited T/A Save Cork City.  
Registered in Ireland No: 642820, Registered Office: Parliament Buildings, 1 Sullivans Quay, Cork T12 HN8E.  
Directors: M Pierce, J Hegarty, S A Ó'Muirí,



**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride (Blackpool) Drainage Scheme  
**Date:** Thursday 27 February 2020 15:08:33

---

Dear Sirs,

I wish to confirm that I am in favour of these works going ahead as I feel that they would have a positive impact on the local area.

Yours sincerely

Noreen Sheppard

[REDACTED]

(Sent by Angela Sheppard on behalf of Noreen Sheppard. I am Noreen's daughter)

\*\*\*\*\*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Blackpool Scheme Consultation  
**Date:** Thursday 27 February 2020 14:21:28

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To Whom It May Concern,

I'm writing to you regarding the proposed flood works in Blackpool.

I have major issues with it. I don't think the people who've come up with this plan have any idea the negative impact this culvert will have on the area. We need more green and blue in our Cities and Towns. Blackpool is already struggling, one little pleasure in the village is hearing and seeing the water and the wildlife in the river. It's a refreshing contrast to the traffic alongside it.

Community groups make use of it like how the Cork Community Art Link made a moving river sculpture last summer (powered by the current.

Not many towns have rivers running through it, and those that are lucky to have one often make it an attraction. This is possible in Blackpool and you don't know how depressing and maddening it is to see engineers with no association to the area come up with the easiest and laziest "solution" and covering the habitat in concrete. In 2020 when we should be working with nature and not against it, this is the best you can come up with? There will be massive pushback if you decide to go ahead with this plan.

You're in anger,  
Alan Hurley  
Chairman  
Mad About Cork community group

[REDACTED]

[REDACTED]

--

[REDACTED]

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride (Blackpool) Drainage Scheme  
**Date:** Thursday 27 February 2020 14:00:24

---

Dear Sir/Madam,

I wish to register, in the strongest terms, my opposition to this scheme.

As currently constituted, it is based on an outdated assessment and an outdated model, which fails to take account of changes both in the Bride (such as the culvert having been cleaned out) and of the need to move away from culverting and concrete as the first option.

It fails to take account of the permanent and extreme damage to the environment of the Bride and Blackpool, and the manner in which it would destroy the Irish Dipper population and the important otter population.

There are better, less invasive options available than culverting the river for 350m - an option which, in and of itself, allows for no safety valve if it goes wrong or flow is larger than expected in a regime of rapid and accelerating climate change.

Further, the record of the OPW in similar works of brutish indifference to the built and natural environment, as in the rivers of West Cork, its shocking record of non-oversight of contractors, such as the ongoing trial of a fish-kill on the Bandon and the manner in which the Bandon river was treated as a road-bed without any of the promised amelioration measures being taken, and the failure of OPW schemes in places such as Coonagh, should give pause to any fair-minded observer.

The scheme as constituted should be abandoned, a proper EEA carried out on the current situation of the Bride and a new, and better, scheme designed on the basis of that updated EEA.

Yours sincerely,

Tim O'Connor

A large black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** River Bride (Blackpool) Drainage Scheme (Scheme Reference: DPE63-18-2018)  
**Date:** Thursday 27 February 2020 13:47:04

---

Dear Sir/Madam,

I wish to state my objection to the culverting of 350m of the River Bride in Blackpool as proposed under the Blackpool Flood Relief Scheme.

The culverting of the river in this way will remove an urban amenity that is better utilised towards developing a high-quality urban environment in Blackpool. This is an area of Cork city with enormous potential for regeneration and for which the river has great local significance.

Furthermore, the report on the scheme acknowledges the permanent detrimental effect culverting this section of the river will have on biodiversity in particular, the permanent negative impact on otters, brown trout, and eels is acknowledged.

The otter is a species listed in Annex IV of the EU habitats directive and as such benefits from the legal protection regime of that directive.

Other options that were examined proposed walls along this section of the river. While noting that this was objected to for aesthetic reasons as then designed, the chosen approach is objectionable for culverting the river with consequential serious amenity and biodiversity loss.

The proposed works should be redesigned in this area so as to be attractive, enhance the river amenity and preserve biodiversity, without resorting to culverting, removing the river amenity, or damaging biodiversity. That is achievable with more effort and greater thought.

Doing so now would reflect the changed policy circumstances since 2016. Especially the declaration of a biodiversity emergency by Cork City Council, Dáil Éireann and the European Parliament.

I also object to the removal of the two attractive pedestrian bridges at Blackpool Retail Park. These form an attractive amenity walk around the waterway and small park. This area of the design should be reworked also so as to maintain an attractive looping river walk with associated attractive pedestrian bridges.

Sincerely,

Bríd Harrington  
[REDACTED]



Residents Flooded on Gt Willaim O Brien St , 2002

**Submission to the Minister of Public Expenditure and  
Reform concerning the Proposed River Bride (Blackpool)  
Drainage Scheme**

Tadhg O'Leary & Jer Buckley

26 February 2020

## Contents:

1. Introduction
2. Overview of Blackpool Bridge & Surrounding Flood Area
3. History of Flooding in Blackpool
  - 3.1 Flooding in 2002 to date
4. Dumping
  - 4.1 Review of Dumping since 2012
  - 4.2 Pollution caused by Dumping
  - 4.3 Blockages in the Underground Culvert caused by Dumping
5. Local Awareness Campaigns & OPW Public Exhibition Days
  - 5.1 Objections
6. Comments on the EIAR
  - 6.1 Stress
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  - 6.7 Scheme Design Process Section & OPW Consultation Process
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9. Other Considerations
  - 9.1 Planning & Construction of new Housing
  - 9.2 Insurance & Property Values
10. Conclusion

## **1. Introduction**

This submission is written by Tadhg O’Leary of O’Shea’s Pharmacy, Blackpool Bridge, Blackpool, Cork and Jer Buckley, of Daybreak Convenience Store & Subway Blackpool, in support of the proposed River Bride (Blackpool) Scheme as exhibited by the OPW. Jer and Tadhg’s businesses are adjacent to each other at 39 and 40 Thomas Davis Street, Blackpool. The local Eircode is T23PV29.

We will argue in support of the scheme. In this submission we will make the case that the scheme is sorely needed and will be a turning point for a storied and historic area of the city that has declined badly in recent years. It is an area of Cork City with a famous past, but which has had a dire time of it in recent years. Over the subsequent pages, we will make the case that local flooding and the constant fear of flooding hangs like a cloud over many people’s lives in recent years, both residents and small businesses alike.

In the submission, we will first highlight what the area has suffered in recent years. Included are many photos and videos from the period 2002 to present day. These demonstrate how flooding is blighting the area. We will discuss the Environmental Impact Assessment Report (EIAR) on the scheme. We believe that the Human Health section of the (EIAR) can be a sterile and understated document when tackling what people in Blackpool has been through.

The Minister of Public Expenditure and Reform (‘the Minister’) will assess this proposed scheme in terms of both the environment and in terms of the Natura 2000 sites. The environment as a whole should also include people, and their livelihoods and business and homes and ways of life. The impact of the recent flooding on people’s lives in the area must be also considered *alongside* the Natura 2000 sites and the flora and fauna. We want to stress that the cost to human beings at the centre of this community, and the continuing impact of being faced with the threat of flooding, is the most important element by far of this whole EIAR.

Our interest in the River Bride (Blackpool) Scheme is borne of bitter experience, having been flooded several times in recent years. We are happy to host a visit, should it be useful, showing those responsible for completing the assessment around the affected area. For further clarification of anything raised here, Tadhg may be contacted at [REDACTED] and Jer at [REDACTED]

In the interests of completeness, we give anyone involved in reviewing the River Bride (Blackpool) Scheme permission to view the photos and videos. These are images we have taken and collated ourselves over the years. A few images are from footage from TG4.

Most of the photos focus on Orchard Court, just north of Blackpool Bridge where the River Bride is used a dump for all sorts of rubbish. The common themes of flooding in 2002, 2012 and 2013 were rain and rubbish trapped in the culverts and on screens, and under Blackpool bridge. We requested CCTV following the 2012 and 2013 flooding events to deter dumping, and in its continued absence we began to take photos ourselves to highlight this problem. We include them in this submission as an informal longitudinal study.

This submission will be laid out as follows

- Overview of Blackpool Bridge & Surrounding Flood Area
- History of Flooding in Blackpool
- Dumping
- Local Awareness Campaigns & OPW Public Exhibition Days
- Comments on the EIAR
- Comments on the EIAR Non-Technical Report
- Comments on the Natura Report
- Other Considerations: Planning & Construction of new Housing and Insurance & Property Values

A full written copy of this submission will also be submitted by post along with supporting photos and supporting video on a USB key. The videos are of flood events in 2012 and 2013.



In addition, we will include a CD rom of TG4 Nuacht coverage of the 2002 Flooding's, November 2002 by kind permission of TG4.

## 2. Overview of Blackpool Bridge & Surrounding Flood Area

The affected area is well detailed in the EAIR. For this submission, we are focusing on Blackpool Village and the surrounding streets, Great William O'Brien Street and Thomas Davis Street. This area is known locally as Blackpool Bridge. Orchard Court, just north of Blackpool Bridge, is of particular interest for us as it is the area from which the River Bride floods Blackpool Village. The proposed solution to the continued flooding at Orchard Court is a culvert section at approx. 340m in length.

The current flood affected zone, looking at the 2012 event, extends from Trident Cleaners at 32 Thomas Davis Street to T&A Home Improvement Centre down by Maddens Buildings. The 2012 Flood affected an estimated 90 buildings around Blackpool Bridge (OPW 2012 Flood Report).

Where we are:

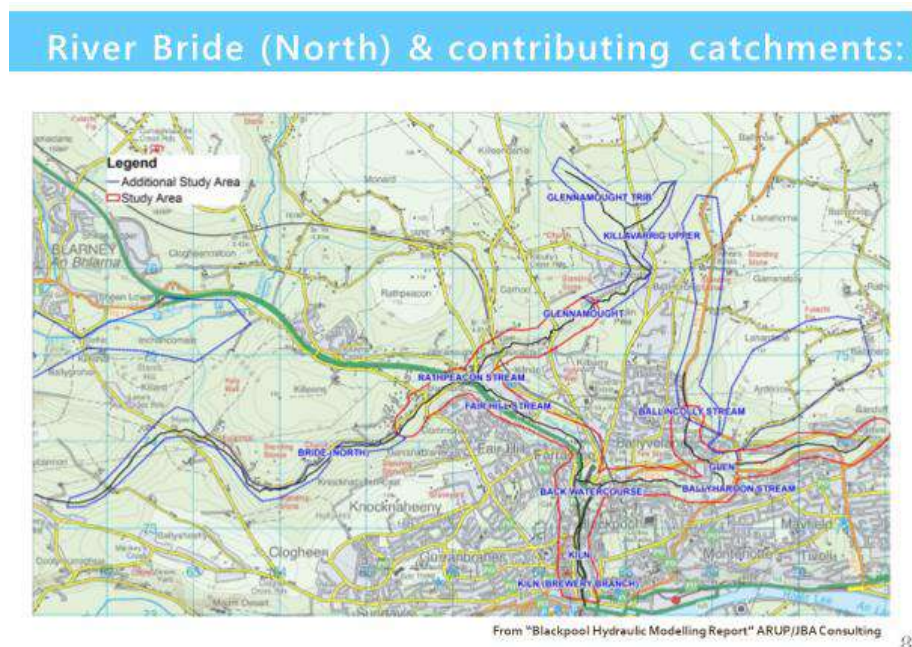


Figure 2.1: River Bride & Catchment Area



*Figure 2.2: Overview of Blackpool Area*

Two factors combine to make flooding in Blackpool risky for residents, the topography of the village, its shaped like a bowl, so when the River Bride overtops its banks at Orchard Court the village fills up in approx. 20 minutes. This is because it's at a lower level than that bank. See still from video of 2013 flooding below. This supporting video can be viewed on the USB stick and the attached PowerPoint slides.



*Photo 2.1: Flood water from Orchard Court flowing onto Thomas Davis Street and down into the Village. March 2013*

The second factor is that Blackpool does not need a freak amount of rain, as rubbish can and has, in the past, compromised the River Bride culverts. In Section 6, we have set out historic rainfall just prior to flood events to illustrate this point.

The area has the oldest population of any electoral ward in Cork City. Residents feel particularly at risk since the 2013 flooding which occurred at night.

### 3. History of flooding in Blackpool

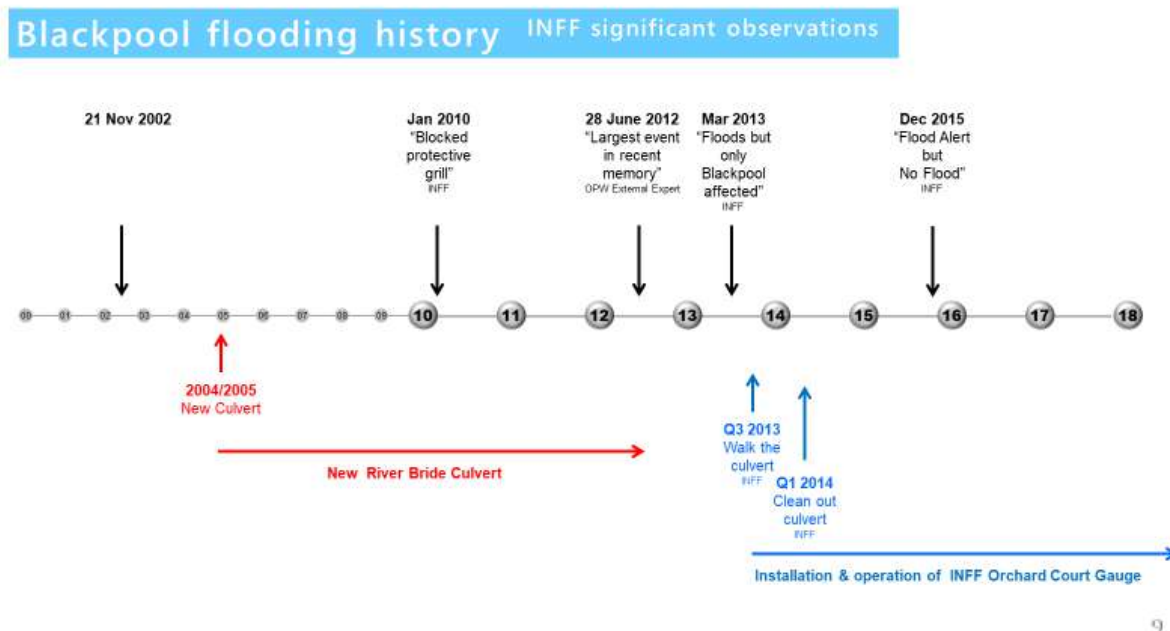


Figure 3.1: Blackpool Flooding History

#### 3.1 Flooding History from 2002 to date

Blackpool Bridge was flooded twice over one week in November 2002. A TG4 Nuacht video (see attached file on the USB stick with the hardcopy) is useful in that helps give perspective on the many small businesses and residents affected when the area floods. One can see the damage done to some of the affected resident's homes on Great William O'Brien Street and some of the small businesses such as O'Shea's Pharmacy, [REDACTED] GP Surgery, Blackpool Credit Union, Blackpool Community Centre, Blackpool Church, on Gt William O'Brien Street and Thomas Davis Street, all close-by Blackpool Bridge. Note TG4 returns a few days later as the village gets flooded again and the affected businesses and residents are hit again, much to the dismay of everyone.

- *Flooding in 2002*



*Photos 3.1 (above): Still from video of Barry Mescaill, TG4 reporting from Blackpool Bridge 2002 & Still from the video of a Telecom Eireann reel trapped under culvert entrance in 2002.*

*Photos 3.2 (below) Flooding of residents on Gt William O'Brien St, Nov 2002*





- *November 2002*



*Residents on Gt William O'Brien St, November 2002*

- *Flooding in January 2010*



*Photo 3.3: Images of flood from O'Shea's Pharmacy, Jan 2010*



- *Flooding in June 2012*



*Photo 3.4: Car submerged on Blackpool Bridge in June 2012*



*Photo Collage 3.5: Includes photos from O'Shea's Pharmacy perspective; River Bride overtopping the bank on the right-hand side and flooding Blackpool Village 2012; Looking downstream from orchard court pedestrian bridge, flow constrained by underground*

*rubbish, services in the culvert, and just sheer volume in 2012; A view inside the pharmacy with various equipment and medicines on the floor as the water receded; A view from up on a wall looking across at O'Shea's Pharmacy and Centra 2012; and The force the flood water, upended pharmacy counter looking back into the Pharmacy 2012.*

**See additional Flood videos on included USB stick.**

- **March 2013 Nighttime Flood**



*Photos 3.6: View from Blackpool Bridge in March 2013*

*Photos 3.7: View of properties on Thomas Davis Street in March 2013*



Above. Thomas Davis St Blackpool, March 2013

See below: A large tractor tyre came down the river one night during March 2013, trapping other debris in the river to create a matting effect and blinding the screen in the river, leading to the river overtopping the bank on the left hand side at Orchard Court.



Above: Contractor removing rubbish to unblock screen in river, March 2013

March 21 2013youtube.mp4



*Water flooding out of Orchard Court onto Thomas Davis Street and flooding Blackpool Village*





*Photo Collage from 2013*

*See above Trash screen which was prone to blockage with rubbish*

*ESB Services Compromising flow in underground culvert.*

*Blockages and debris compromising capacity in underground culvert downstream of the village*

This section of photos is included to give a brief visual overview of the floods over the years. We refer you to the USB stick accompanying our hard-copy submission which has further photos and videos from the 2013 event.

## **4. Dumping**

We cannot present a submission on the River Bride (Blackpool) Scheme without a discussion of dumping. Ongoing dumping in Orchard Court has been a contributory factor in local flooding. Stopping the dumping alone will not be enough as the culvert cannot take the levels of water during excessive rainfall, e.g. 2012 flooding. I will discuss this point further in Section 6.2.

Some of the items that have been found dumped include food waste, nappies, electrical waste, mattresses, shopping trollies, washing machines, gas cylinders, construction waste and tractor tyres. The proposed scheme would not only solve the flooding problem but would also help prevent the ongoing dumping into the River Bride.

After the flooding of 2012, and following the night-time flooding of 2013, due to the impact on our businesses, we took it upon ourselves to inspect this section of river regularly. Our aim was to try to get debris choking the channel removed. Sometimes Cork City Council removed debris for us, sometimes we removed it ourselves, in advance of signalled storms, heavy rainfall warning and where it was at immediate risk of entering the narrow underground culverts.

City Council workers have told me that they will not enter the river to remove debris but will remove it if we drag it out and place it on the bank. Sometimes in advance of heavy storms we put items in our own bins. When rubbish is dumped into the river it is largely irretrievable. If this short section was culverted at least the City Council could deal with the waste appropriately.

#### ***4.1 Review of Dumping since 2012***

We have monitored the section of the River Bride in Orchard Court since 2012 to present day and have amassed a few hundred photos of this section. We have created as such an informal longitudinal study of this section of river. We have included some photos in this submission to illustrate the problem. There are further photos available to view on an attached USB stick and an attached PowerPoint. I would encourage you to review these as they highlight the ongoing dumping in this area.

The solution proposed by the scheme would not only protect Blackpool but would have an important side effect: it would prevent the water being continually polluted by the contents of black plastic bags, food waste, nappies, waste electrical, mattresses, shopping trollies, washing machines, gas cylinders, construction waste, and tractor tyres which have been found in the river.

Below on pages 17 to 21 we have included photos to illustrate the types of rubbish dumped in Orchard Court.













#### ***4.2 Pollution cause by Dumping***

We argue that the OPW scheme as proposed will help prevent pollution of the River Bride and improve the water quality by keeping dumped material out of the river. As previously mentioned, the Cork City Council cannot remove dumped material easily once it is already in the river. We argue that the current open section of river near Blackpool Bridge is not a good habitat for wildlife due to persistent dumping/fly tipping.



*Photos 4.1 & 4.2:*



*Paint disposed of by being dumped into the River Bride*

### ***4.3 Blockages in the Underground Culvert***

We were concerned that the underground sections of the culvert could also be compromised by debris so in November 2013, frustrated by apparent lack of progress locally since 2012, we decided to investigate ourselves. We walked the underground section from Blackpool Church to the Heineken Brewery downstream. We then hosted a meeting for local residents, business owners where we presented photos of the underground culvert system to highlight how compromised the culvert was with rubbish. Capacity was severely compromised in places with items of large debris. Below see some photos taken during this visit to the underground culvert.

*Photo 4.3: Below photo shows Dunnes Stores trolleys and an entangled mattress here coalesce at a concrete lip in the underground culvert, choking the capacity of the “new culvert” from 2004, this is downstream of the village.*





*Photo 4.4: Above photo washing machines, radiators and wooden pallets trapped in the underground culvert.*

## **5. Local Awareness Campaigns & OPW Public Exhibition Days**

While EIAR does make a reference to public exhibition days for the proposed scheme in Cork City Hall, we feel it understates the events held in Blackpool Community Centre and the engagement with the public at the local exhibition event.

There was an open day in Blackpool Community Centre hosted by the OPW, exhibiting the detail of the proposed scheme. This was attended by circa three hundred people in Blackpool. The OPW had a large amount of staff there as well as employees from ARUP, as well as the environmental consultants, who were working with the OPW on the scheme. About 300 people signed in.

This open day was highlighted in the local and regional press by the OPW. Jer and myself had large posters in our respective shop windows in the centre of the village. Jer conducted interviews on various local radio stations highlighting the exhibition day and I put up posters in all the local GP surgeries around the village. In addition, we had the open day announced at all the masses in the parish on the weekend prior to the public exhibition of the scheme.

We were not aware locally of any objections at exhibition stage. We became aware of objections to the scheme when the OPW wrote to property owners locally. Some objectors said they hadn't been made aware of the scheme or the exhibition day.

### ***5.1 Objections***

One of the objections cited was a decrease in security of the residential properties on Commons Road should the scheme proceed. Some residents felt that the River Bride provided additional security to the rear of their properties, acting, in effect, like a moat.



Currently some residents have no protection from the rear of their properties, some have fences, some have walls. Under the OPW proposal a proper wall would be constructed the whole way along the rear of these properties, see exhibited plans at [www.blackpoolfrs.ie](http://www.blackpoolfrs.ie). We believe that the plans would substantially improve the properties' security.

A further objection is the potential loss of visual amenity which objectors believe adds to the village and forms a habitat for some wildlife. We would argue that the amount of dumping in the river in Orchard Court significantly damages the quality of the river environment. The dumping has left the area a visual eye sore. This section has such persistent dumping, over such a long period, as evidenced by photos attached, that in addition to protecting the people of Blackpool, the culvert would as a side benefit to protect the water quality for the wildlife downstream.

If you walk the river in Orchard Court on warm day there is a strong smell of sewage, so we feel that there is at least some raw sewage being discharged into the river here. If you examine the photos of the close to the culvert, you will notice in Photo 5.1 below a large amount of toilet paper trapped on plant vegetation. This was taken down beside the Heineken Brewery.



*Photo 5.1: Photo showing toilet roll on the vegetation to the left*

This could be dealt with during the proposed scheme and conversely not proceeding with the scheme means the status quo of water quality on the River Bride and the lost opportunity to possibly improve it.

## **6. Comments on the EIAR**

### ***6.1 Stress***

Stress is one of the biggest issues for the residents and this topic is not covered in Section 4.4.3 Human Health in the EIAR so I will attempt to address it here.

Consider the photos and videos of the 2002, 2012 flooding event, look at the photos and video of the 2013 flooding even in Section 3.

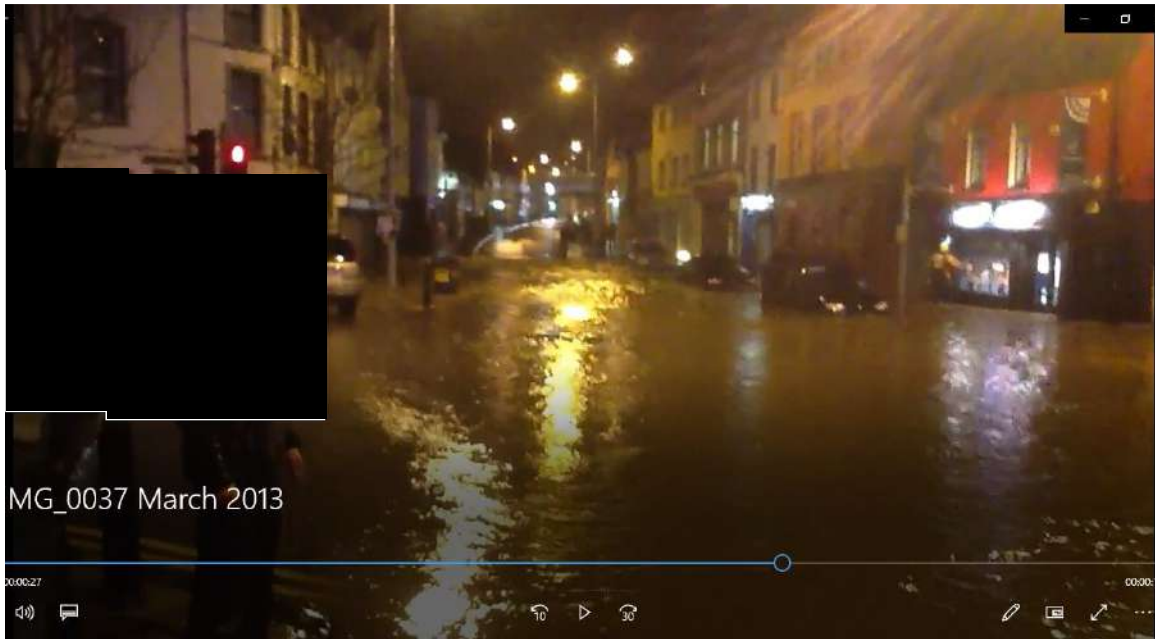
The March 2013 floods had only 40mm accumulated rainfall, and the highest hourly total was only 6mm, but a tractor tyre came down the river at night and blocked the trash screen, flooding the village in about 20 minutes. This created a kind of matting effect for other debris, blinding the screen and the river overtopped the banks, flooding the village.

The contractor hired by Cork City Council to remove debris if the screen in Blackpool was located on the other side of the city. This became a problem when the screen was blocked with rubbish as the contractor had to first cross the city. As discussed in Section 3, the village floods quickly.



*Photo 6.1: JCB removing a large tractor tyre trapped at the pedestrian bridge in Orchard Court in March 2013.*

We had a flood alarm after the 2012 event connected into the shop alarm. The night in March 2013, the alarm company rang me that night to say my shop alarm was going off. I got there in less than 15 minutes, but the shop was already under a few feet of water. The speed of the flooding gave the residents and business owners locally very little time to react. Below Photo 6.2, shows me on the left arriving in Blackpool, but it's too late to do anything. This is a still from a video which can be viewed on the Powerpoint accompanying the electronic submission and on the USB stick accompanying the hard copy submission.



*Photo 6.2: Arriving to Blackpool but the property is already under water*

The area has the oldest population of any electoral ward in Cork City. They feel particularity at risk since the 2013 flooding which occurred at night. I work in the local pharmacy since 1998 and many of the residents have been coming into the shop for years. There is a culture of talking about things both medical and personal at the counter in the shop. I was amused initially by the culture of just announcing your woes at the counter in Blackpool, until I became accustomed to it, and if other patrons had advice to share, you'd hear of it. The locals who had their homes flooded in 2002 and 2012 wouldn't go on any committees. It was like reliving it all for them. They wanted to forget it.

I was on a local flood committee after the 2012 event and when residents knew we were having meetings with the City Council so they would tell you all about their difficulties in the hope you'd be able to relay them to the council. The 2013 event was a night flooding, so residents worried about being flooded in their homes late at night. Everyone knew the trash screen at Orchard Court was easily compromised, and the River Bride was full of dumped trash.

Residents were very nervous after the 2002 flooding, especially after the second event in a week. They were very fearful of it happening again. There was relief locally after the culvert improvements of 2003/2004, but the new culvert failed to take the water in 2012 leading to a further flood. The relief felt by the residents floated away after 2012 when they realised their homes were **not** protected.

The concern felt by the residents and business owners is not so much the clean up after a flood or clearing out of personal items and stock. It is not the sterilising of their homes and businesses as the water is polluted with Gods knows what. It is fear that it could all happen again tomorrow, and the next week. The fear when they hear a weather alert. As explained in previous pages, it is a combination of rain and dumping that causes the flooding so even a relatively low level of rain can cause concern. It is fear that residents are not safe in their homes.



*Photo 6.3: Residents of Great William O'Brien Street after the first flooding in November 2002.*

For some of us, we had to do something, agency help was promised but it was a long time coming, so we did bits and pieces locally to help ourselves. If the water was low enough, we'd pull the big dumped stuff out of the river to stop into the underground culverts. Sometimes the flow in the river would be too heavy and you'd have to leave things off and hope for the best.

Someone gave me a video of myself arriving on the scene at the 2013 event, and looking at the whole place ruined again, so if you watch that, that's possibly the best way I can share my experience. A still of that video is Photo 6.2. The video is on the attached USB stick.

I think the alleviation of the stress factor is the most important benefit of the scheme for both the residents and the small businesses around Blackpool Bridge. It will deliver a significant long-term positive impact on the residents and for the small businesses. Some benefits will be easier to measure, and put in a report, but this is the most important benefit for the people of Blackpool and won't lend itself easily to being measured.

It is described in section 2.2 of the EAIR that the risk of flooding may increase in the future. If the project as proposed is not implemented, then life in Blackpool will be adversely affected. If we don't do anything then things will get worse for people in Blackpool. This would be a very substantial deterioration of the situation.

## ***6.2 Climate Change***

In terms of climate change we will consider rainfall data from previous flooding's. Section 2.2 of the EAIR discusses the need for the scheme. It is important that we also mention Climate Change as it also has the potential to have a large impact of the amount of rainfall and weather warnings.

This ties into the need for the proposed development, Section 2.2, as Climate change will result in more rainfall and more intense rainfall in future. JBA consulting visited the local flood committee in Blackpool and explained some of the developing options to us. In the current scenario Blackpool Village can facilitate about 24m<sup>3</sup> (24,000 litres) of water per second in the river around Blackpool Bridge.

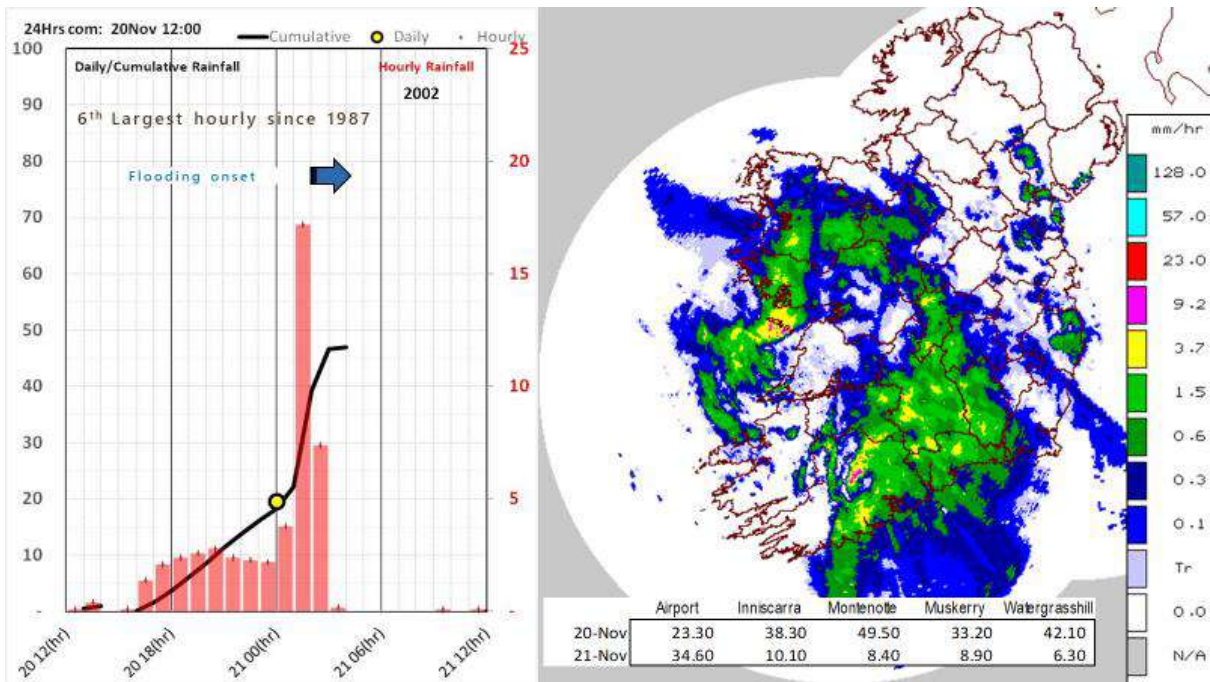


Figure 6.1 Cork Airport Data Nov 2002 Event & Met Eireann data by kind permission of Gerard Fleming

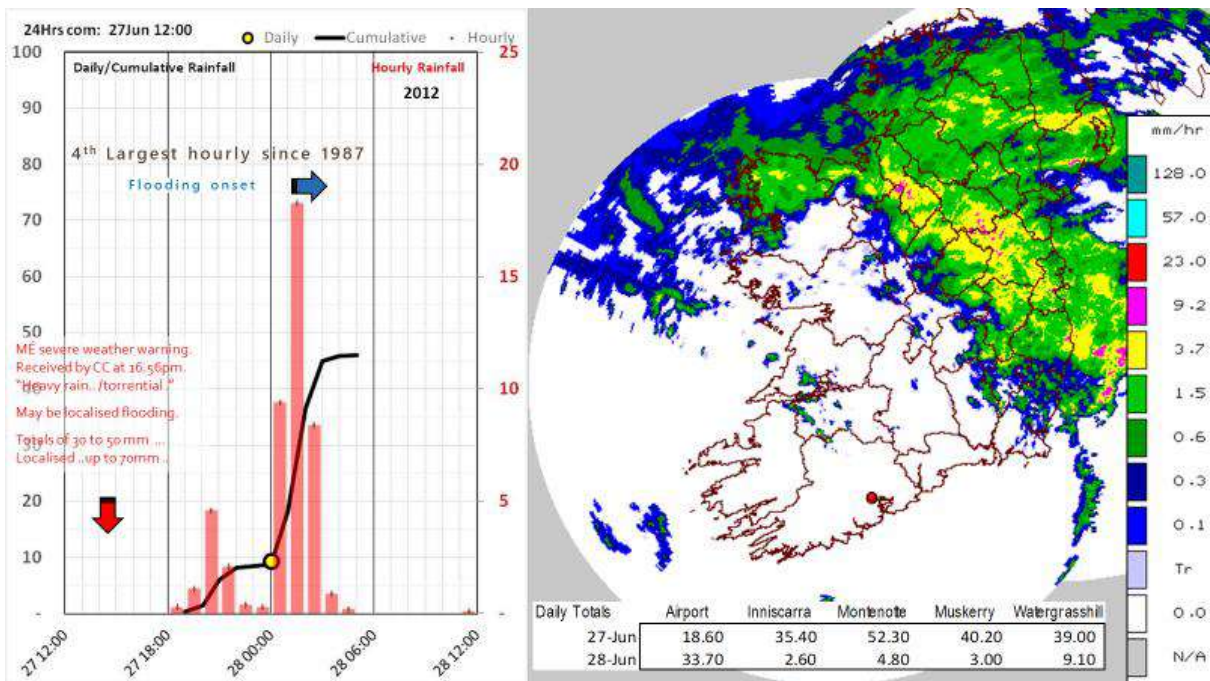


Figure 6.2: Cork Airport Data 2012 event.



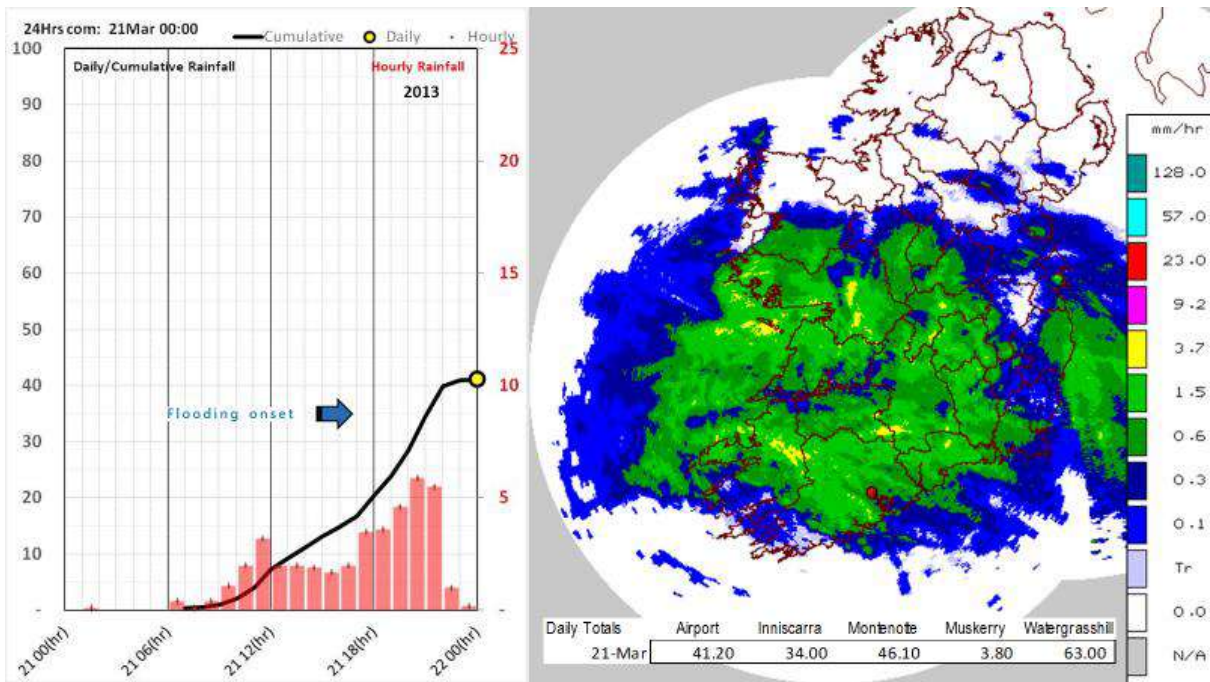


Figure 6.3: Cork Airport Data 2013 Event.

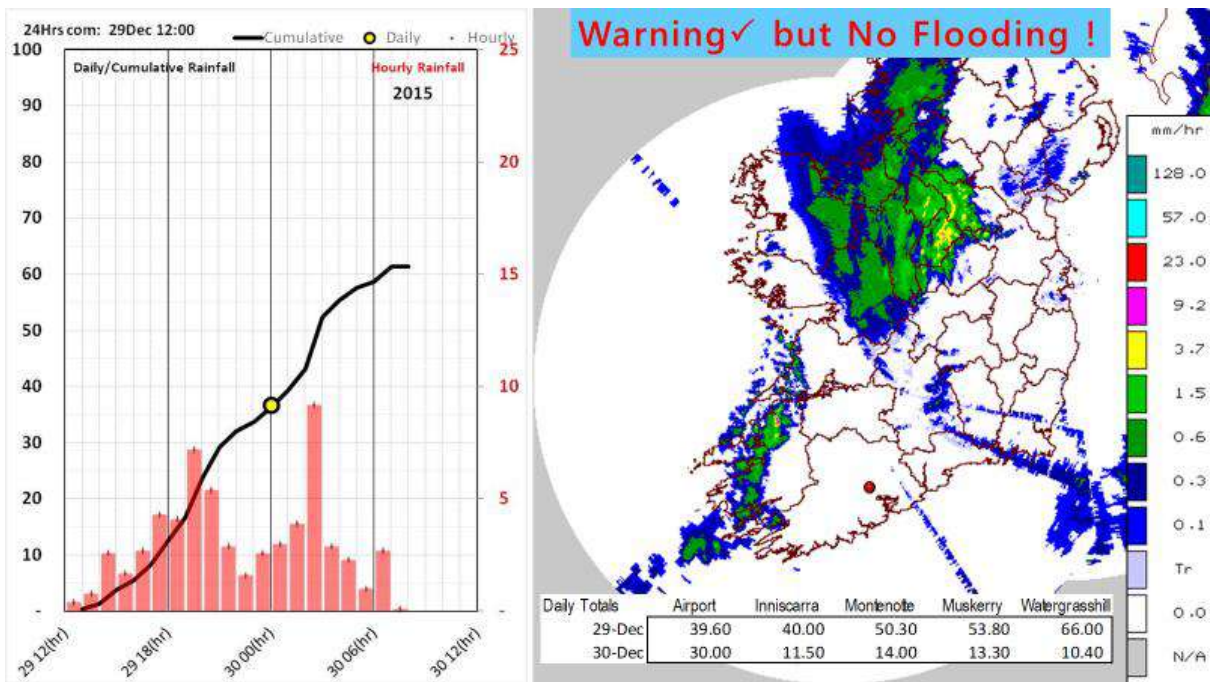


Figure 6.4: Data from Cork Airport 2015 event.

## Conclusions (if any) to-date:

	2002	2012	2013	2015
Cumulative Rain	45	45	40	62
Max Hourly Rain	17	18	6	9
Extreme/Heavy Flow		Yes	Doubtful	Yes but no flood
Blockages	Yes	Possibly	Yes	No

NB Rainfall rates for Cork Airport

36

*Table 6.1: Summary of four flood events since 2002*

We should be cautious using historic terms like a 1 in 50-year event, 1 in 30-year event, as these are historic and don't reflect climate change. These terms lend themselves to complacency. These rainfall events might have been rare in the past, but we can't assume that future flood frequency and intensity will be the same as the past. We've just had a 1 in 100-year event in Inishowen, Donegal in 2017, according to Met Eireann.

To summarise I think the EIAR understates the need for the scheme under the heading Climate Change

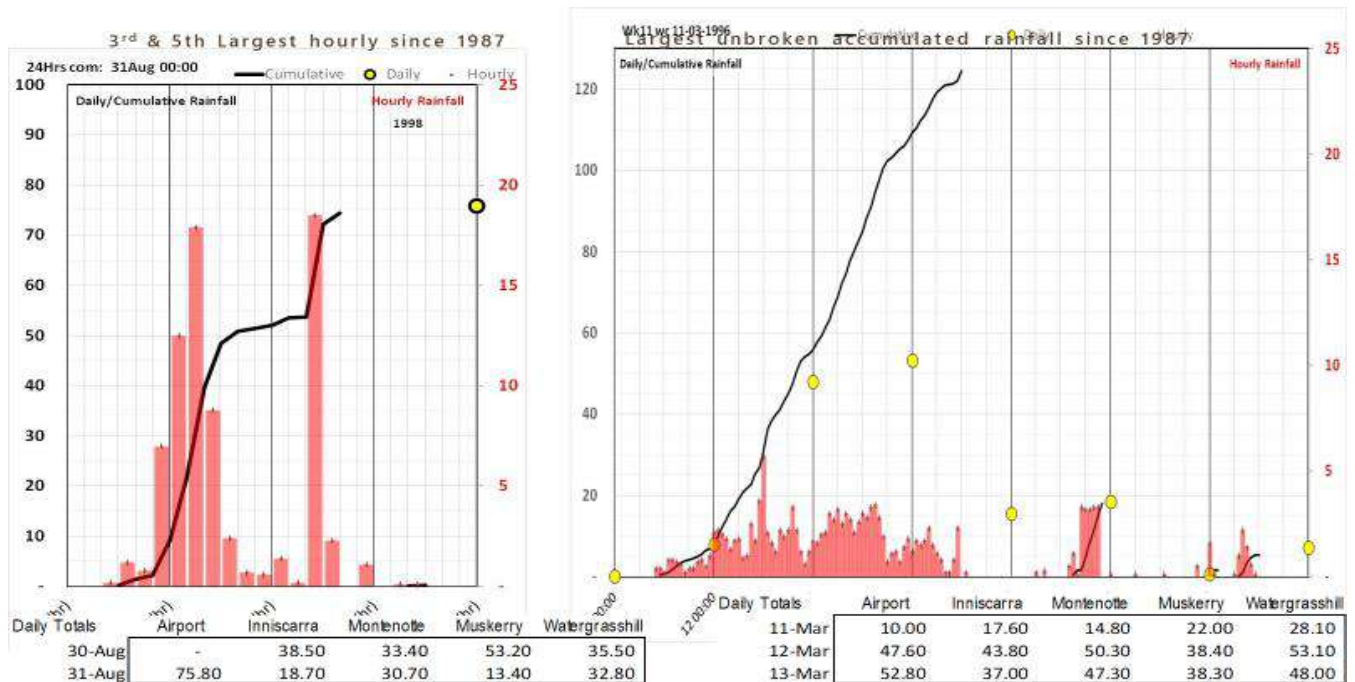


Chart 6.1: The above chart is a comparison of largest cumulative 24 hr rainfall (where break in rainfall is not more than 1hr) and largest hourly rainfall totals for Cork Airport 1987 to 2017.

Cork Airport which is approx. 8 km from Blackpool, as the crow flies. Above shows data from recent floods. When the data from 2012 and 2013 is considered, you will notice that flooding occurred in 2013 from modest rainfall. Considering climate change, higher levels of, and more intense, rainfall can be expected. Changes in the climate and the increased risk of extreme rainfall again underlines the need for the scheme to proceed without any further delay.

### 6.3 Flood is a Nuisance!

Section 4 EIAR also has a section that describes flooding as a nuisance.

The flooding in recent years represents far more than a nuisance and has been the focus of people's lives Blackpool village. Just to highlight one aspect, I think in the future EIAR reports of this nature will give much more consideration to the stress and mental health side-effects suffered by people affected by flooding. For now, it's hard to quantify, so therefore hard to include in a report.

In future I think this will change, maybe at the behest of a European directive or as result of research into this area, and once it does I think future reports will include this as a major long term benefit of proceeding with this scheme and a strong reason against not proceeding with it.

#### ***6.4 The 'Do Nothing' scenario***

The “do nothing” scenario is considered in the EIAR as a comparison with all the other scenarios. Section 4.4.1 discusses the ‘do nothing’ scenario. It highlights how the existing river channel would remain as it is, resulting in many of the potential impacts on human beings which occurred previously continuing to occur.

The flooding in 2002 marked the beginning of a long period of decline in a once thriving village. Bank of Ireland, AIB, the Post Office and the GP surgery have left the village since 2002. Small businesses, for example Monica’s Costume Hire, also shut down. While we cannot say that the flooding was the only reason they left, but it was a contributory factor.

What would be thought of as the best retail premises in the village, 37/38 Thomas Davis Street, lay vacant and unused after the 2002 flooding until circa 2014, seen on left of Pharmacy below. The business that operated a video and spray tanning businesses, and never reopened after 2002.

In O’Shea’s Pharmacy, where I work, we have endured repeated destruction of medical records, key equipment, medicines, front of shop stock and fixtures and fittings. This has led to increased costs and the constant worry of running a business. Similarly, in Centra next door, to give one example, the fridges and food stock, fixtures and fittings have been repeatedly ruined.

Some businesses don't have insurance for these losses anymore as flood insurance no longer in the risk area. One cannot improve a premise in the current scenario. The lack of insurance leads to unexpected problems with banks, mortgages and investing in premises and obviously you have the worry of it happening again.

The following photos (page 38 to 47) illustrate the impact of flooding on two local businesses, the pharmacy and the Centra store and on the residents and their homes.







Centra , Thomas Davis St, 2002



Centra , Thomas Davis St, 2002



Thomas Davis St, this building was changed to apartments, Winter 2019



Residents on Gt William O'Brien St dump flood damaged furniture, 2002





Gt William O Brien St, 2002





This pic below is from the second flooding in a week in November 2002, you can see the scale of the damage to residents' homes from these shots taken on Gt William O Brien St, again a few days only after the shots above were taken.





Gt William O Brien St



Thomas Davis St



*Residents cleaning out their homes for the second time in a week. The second flooding a week later exacerbated the financial hardship felt all around the village*

The photo below shows a protective flood barrier, distributed to residents after another flood in 2012. Note these cast-iron flood barriers are heavy and some residents must call on family and neighbours for help. They are then effectively trapped inside if they can't lift these barriers themselves, which causes stress if there was a fire or a need to evacuate the house quickly.



View from the Church on Gt William O Brien St, 2002



Gardai checking on residents after the second flooding in 2002

### ***6.5 Potential for Injury***

Gardai checking on residents after the second flooding in 2002. We've had no casualties so far in Blackpool due to flooding, but myself and Jer believe we've been lucky at times during the night floods.

One family were rescued by the Fire Brigade during the 2013 flooding and taken out through a roof when water at the entrance was too deep. If we do nothing here, the flooding and related destruction to the community will continue to occur.

The 'Do Nothing' scenario outlined in the EIAR doesn't really highlight the impact of continuing flooding to these businesses and residential homes

## ***6.6 Biodiversity, flora and fauna.***

In Section 5 of the EIAR it mentioned biodiversity, flora and fauna. An otter camera survey was carried out on the River Bride. Cameras were installed at strategic locations along with watercourse. Of particular interest to us is Camera location C5 close to Blackpool Church.

Interestingly the report states Camera C5 in the culvert system downstream of Orchard Court did not detect any otter activity despite being situated in the culvert for 12 weeks. Occasional triggers were detected but these were from otters on the move. It did not appear to show stationary otters living in this area.

The survey shows little evidence of otter activity around Blackpool Bridge, downstream from the longest proposed culvert upgrade section at 342 metres. We are pleased to note this in the report as we would like the disturbance to any otters to be kept to a minimum. We are pleased to note also that the OPW will be providing a wildlife walkway in the culvert section to make it easy to travel through for wildlife and also providing two Otter holts as part of the scheme.

Section 5.23 describes the fish diversity at Orchard Court. Unsurprisingly, given the volume of dumping into the River at this location, there is very little evidence of fish in the stretch of river. Section 5.4.1 mentions the 'Do nothing' scenario, the current regime would continue with the river being maintained as is. Section 5.4.5 mentions that there are currently significant impediments to the movement of migratory fish due to the culverted sections of river downstream of Blackpool Church.

Section 5 does not mention the positive impact on water quality of the prevention of dumping of solvents, paint and domestic rubbish etc. This will hopefully have a positive impact on water quality for any potential flora and fauna in the river.

We were pleased to note that no protected plant species were recorded at any locations along the River Bride during the field survey.

### ***6.7 Scheme Design Process Section ( 2.4 EIAR) And OPW consultation with local flood committee.***

There was an active local flood committee formed following the flood events in the village. It was made up of a mix of residents and people from the small businesses around the area. We had many meetings with Cork City Council representatives. OPW and their consultants ARUP and JBA met us a on a number of occasions to consult with us. The local committee put forward several ideas which were considered by OPW/ ARUP.

For example, there was a history locally of the Glen river being held back in the Glen River Park by Golding Chemicals. The local group organised a visit by ARUP in October 2013. We showed the visiting group this old site, with its steep valley walls and discussed the possibility that water could be stored here and released later. It was felt locally that this could be done at modest cost.

We suggested that, if the Glen River was held back, the River Bride could flow through more efficiently at times of peak flow allowing the Bride River to clear peak flood water through to the River Lee. ARUP came back and hosted a meeting, discussing this and other ideas and showed us that the impact was negligible, 2% at peak times as I recall, for the Glen River idea.

In addition, JBA Consulting Engineers came down from Limerick and met us in Blackpool. They had modelled the 2012 event and were looking at the various impedances to flow or the River Bride around Blackpool Bridge. They were able to show 4000 to 5000 litres per second coming out of the river into the village during the 2012 event. They used Gant charts to highlight obstacles to flow down along the River. Certain objects proved a large hinderance to river flow during the 2012 event, and these were highlighted for attention, e.g. ESB service ducting in the culvert.



They also modelled current capacity in Blackpool and how we can manage, about 24m<sup>3</sup> per second, or 24000 litres a second. The 2012 event flow was approx. 29metres cubed per second, the rest exited the river via the bank in Orchard Court and the Road bridge there. Obviously, this is before we start to factor in dumping and rubbish in the culverts. So it doesn't look like solving dumping alone will solve the problem

Further upstream, on the Mallow road near McDonalds drive-through , JBA did note that water hit the roof of the culvert very early at Fitz's Boreeen at 5m<sup>3</sup> per second, suggesting a blockage very early, leading to much flooding on the Commons Rd area, then as well, which doesn't surprise us locals, it was interesting to see the computer models pointing to blockages leading to so much flooding.

In summary we feel OPW and their consultants took phone calls and made themselves available to us and to took the time to go through complex material, e.g. show us flow impedance modelling, and why some of the preferred options locally should not make final cut as options.

## **7. Comment on the Environmental Impact Assessment Report Non-Technical Summary**

On Page 7 of this document (NTS) there is a section on Human beings

*“If the proposed development were not to proceed, the opportunity to protect Blackpool and surrounding areas in Cork City from future flooding events would be lost. The construction phase of the proposed development will last approximately 18 months. Potential impacts from the project are both positive and negative, and range both from short term to long term and from insignificant to slight”*

Should the project not go ahead it would be a huge loss to the area and would create a hugely negative impact on the quality of people’s lives both residential and small business. The Human beings and the impact of continued flooding on human beings is the most important element by far of the whole environmental impact Assessment.

We have highlighted in previous sections what the status quo is and have spoken above about the continuing negative effects on people’s lives that the risk of flooding has, not to mind the reality of cleaning out your house or business again. This area (Thomas Davis St and around) has had construction before in terms of the culvert improvement scheme in 2003/2004 and the long term benefits of the proposed scheme heavily outweigh the short term construction impacts.

Page 14 of the NTS a table discusses some moderate negative impact on some cultural heritage assets but that is overridden by far by the positive impact on people’s lives by the scheme, should it be delivered.

## **8.Comment on the Nutura 2000 Report (NIS)**

None of the areas along the proposed River Bride scheme are areas of Special Protection or Special Conservation Areas, SPAs or SPCs. These come from the EU bird's directive among others. Environmental legislation requires the assessment of any potential work under the scheme for its potential impact on Natura 2000 sites. There are two of these in Cork Harbour, the Cork Harbour SPA (for birds) and the Great Island Channel SAC.

There is process of assessment where impact on Natura sites is considered. The reports states that there is a pathway where risks, say pollutants, could travel to the Natura 2000 sites, via the River. It states that the risk is slight in terms of potential impact on these Natura sites and we are pleased to note that as that is important.

Section 8 of the Natura Impact Statement conclusion notes that the project will not give rise to any direct or indirect significant adverse effects on any Natura 2000 sites and we are pleased to see that they will not be impacted and this will not be a barrier to the scheme progressing.

*“ it has been concluded, in view of best scientific knowledge and on the basis of objective information, that the proposed Project, either on its own or in combination with other plans and projects and given adherence to best practice guidelines and implementation of the mitigation measures proposed, would not give rise to any direct or indirect significant adverse effects on any European Site designated for nature conservation”*

## 9. Other Considerations

There are other considerations not touched upon in any reports such as Planning, Housing and Insurance which I will comment on here.

### *9.1 Planning & Housing in Blackpool*

We would expect that should the scheme meet with approval from the Minister, as the scheme begins, Blackpool village will begin to rebuild. Businesses will return to replace those that left the flood risk area. Currently, there are many derelict housing units and vacant sites around Thomas Davis St. Employees in multinationals such as local gaming company World of Warcraft and Apple which are located close by, regularly talk of a lack of accommodation in the area. The vacant housing units could be put to good use once the flooding risk is removed. We have a good relationship with World of Warcraft employees as the company GP is ██████ across the road on Gt William O'Brien St. They have a few hundred employees in the retail park.

There are several bus routes passing through the village to and from the City centre and the retail park as the village is in a busy corridor between the retail park and the city. The national broadband cable passes underneath Thomas Davis street, right through the village so there is ample connectivity.

One aspect not discussed in detail here is the amount of planning permission that has been granted in areas around Blackpool village. There will be a large future cost of the 'do nothing' scenario. For example there is planning for apartments at 40 Thomas Davis Street; also 37 apartments beside Corcoran's Quay, Blackpool (on the old OS forklifts site), approved by Cork City Council on c. 10 February 2020; and circa 9 apartments currently under construction on Corcoran's Quay (these are currently partly constructed). This accommodation is sorely needed in the area to support both local businesses and multinationals location in the vicinity such as World of Warcraft and Apple.



*Photo 9.1: This photo taken from the Blackpool By-pass at Corcoran's quay looking west towards the church, 18/02/2020. See apartments under construction on the right-hand side at Corcoran's Quay., under the Blue tarp. Approx. 9 apartments here. Also see old OS forklift site on the left hand side of the parked cars with planning for 37 apartments, (planning notice below in Photo 9.3)*

*Photo 9.2: This photo shows the road where the lane leads onto opposite the church. This was significantly impacted by the flood in 2012.*



OS forklift site, to right of Berehaven Bar, from 2012. Still from video footage on my phone. Full footage attached. New developments will also need to be protected



Photo 9.3: Site Notice for new development by The Berehaven

If one is to look at the photos from the 2012 event, these sites can be seen flooded to a considerable depth. Consult flood mapping of extent of 2012 event if necessary. This illustrates that the apartments listed above will have the potential to be flooded to a considerable depth, see photo below from 2012. Yet these apartments and extra housing are badly needed in Cork, as is the case across the country.



*Photo 9.4: This Photo is taken from Thomas Davis street in 2012, looking north. The church is on your left hand side, and you are standing roughly in front of the OS forklift site, with both these apartment sites to your direct left.*

In addition to protecting existing property there is a need to protect all the newly planned residential units and sites around the village. I encourage anyone evaluating the potential scheme to look at the number of residential units planned for the area over the next 18 months to two years. As is the case, across the country, housing is urgently needed in Cork City. Therefore, the new developments need to be flood protected.



Photo 9.5 This building has also been recently converted to apartments.

### ***9.2. Insurance and Property Values***

A major problem created by the continuous flooding is the lack of insurance for businesses and residents in the area. While this might seem insignificant, it raises significant difficulties for people. It prevents people getting a mortgage on property that doesn't have full insurance. It's difficult to get loans to invest in modernising a business not to mind the issue of whether it's wise as the water may come back in the door on top of new equipment.

To pick just one example the food fridge's in Centra, represent a significant capital outlay and must be located on the floor of the retail space and were destroyed twice in November 2002, and then again in both 2012 and 2013. There are videos of the damage in the attached photo and video collection. So next time, with no insurance, what's the future for all these small local businesses?

Homes in the area should have a reasonable value given the amount of infrastructure close by, without writing an exhaustive list the area is circa 1 km from Cork Opera house, and has access to everything a urban setting should have , e.g. on four bus routes, along a corridor between the retail park and the city centre. The history of flooding doubtless prove a deterrent, So, we



have some difficulties with dereliction instead. This is in an area so close to the city centre and having so much infrastructure already in place.

These are also good reasons to go ahead with the scheme and remove the uncertainty hanging over the village.

## **10. Conclusion**

Thank you for taking the time to read and consider this submission. I hope we have illustrated the need for the River Bride (Blackpool) Scheme is go ahead without further delay. The residents and small businesses around Blackpool Bridge have suffered through many floods and, unfortunately, they may suffer through more before the issue is resolved.

We hope the Minister will implement the scheme as exhibited to enable residents and small businesses in the village to put this chapter behind them. The preferred options exhibited were chosen after much debate on alternatives, some proposed by locals.

**From:** [REDACTED]  
**To:** [Per BlackpoolSchemeConsultation](#)  
**Subject:** Public Submission  
**Date:** Thursday 27 February 2020 13:19:34

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Dear Minister,

I'm writing to voice my objection to the planned culverting of 350m of the River Bride in Blackpool as proposed under the Blackpool Flood Relief Scheme.

Culverting the river goes against modern best-practice for flood control and will be devastating to urban wildlife that lives in and on the banks of the river. It will destroy that stretch of this vibrant natural amenity enjoyed by those of us living in the environs of the river.

Thank you for your consideration,  
Michelle Ross

[REDACTED]

[REDACTED]