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Subject: Submission Blackpool Flood Group supporting OPW FLOOD SCHEME
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Subject: submission from Traders

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Tadhg O Leary



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

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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.

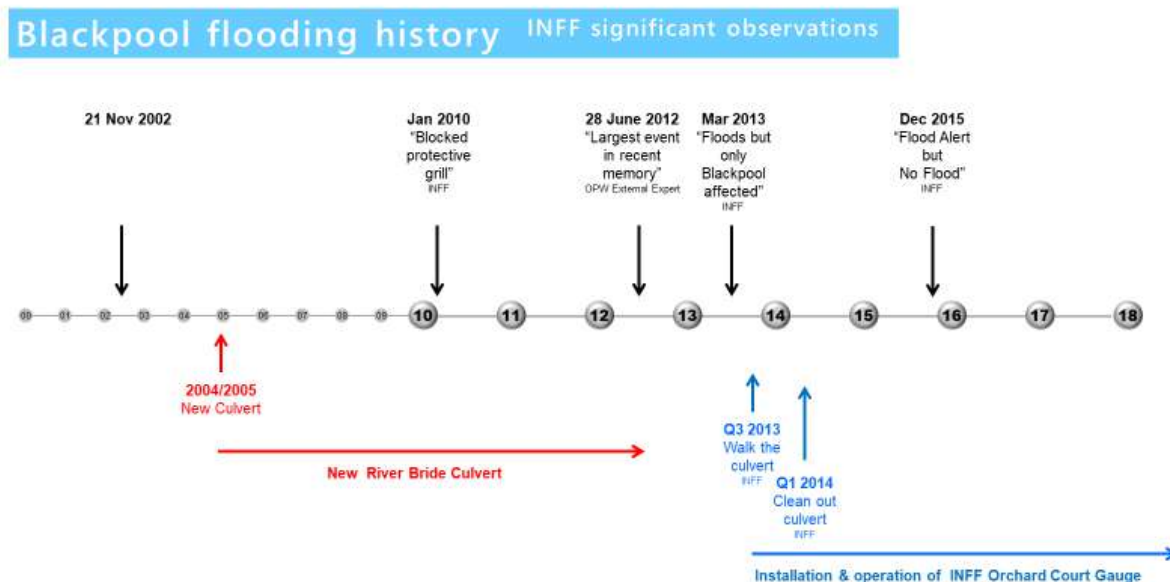


Photo 2.1: Flood water from Orchard Court flowing onto Thomas Davis Street and down into the Village. March 2013

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



9

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*

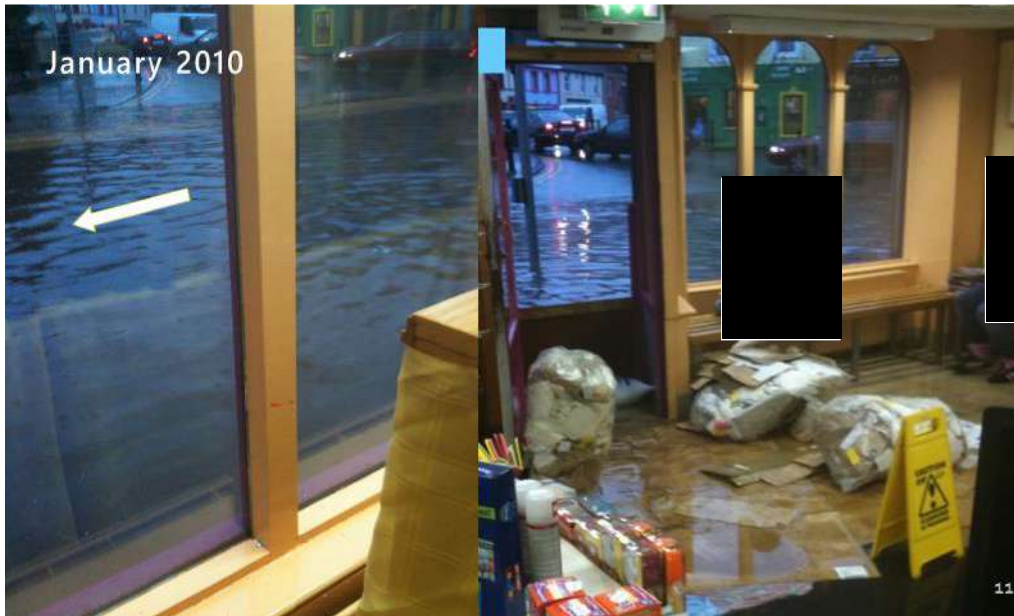


Photo 3.3: Images of flood from O'Shea's Pharmacy, Jan 2010

- *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 trolleys, 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. 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.

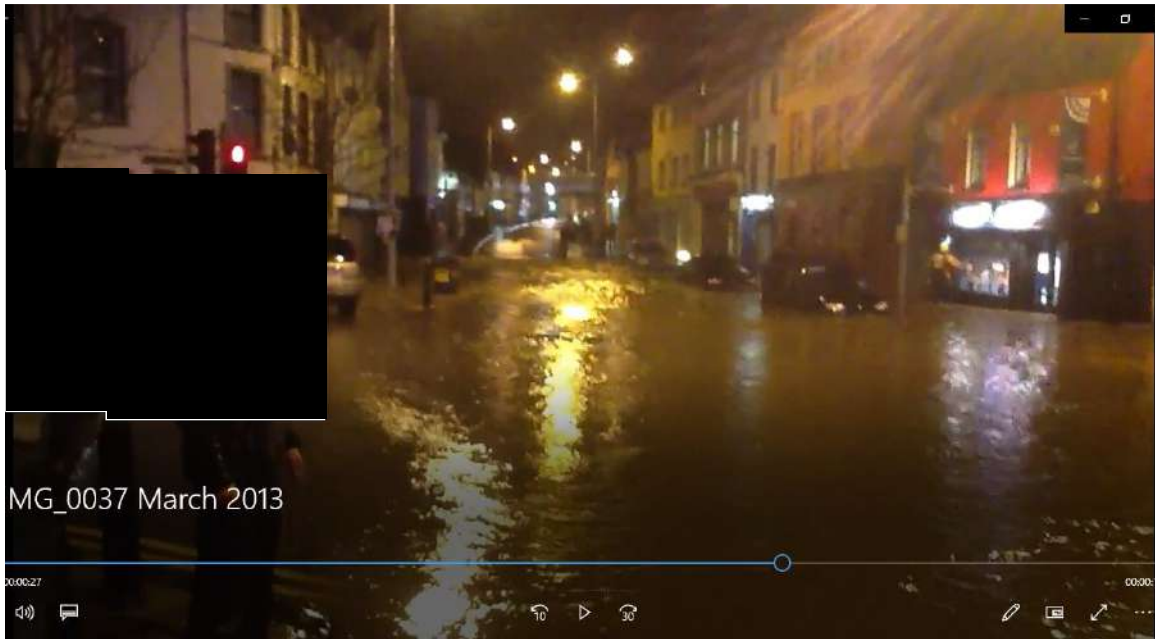


Photo 6.2: Arriving to Blackpool but the property is already under water

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 24m³ (24,000 litres) of water per second in the river around Blackpool Bridge.

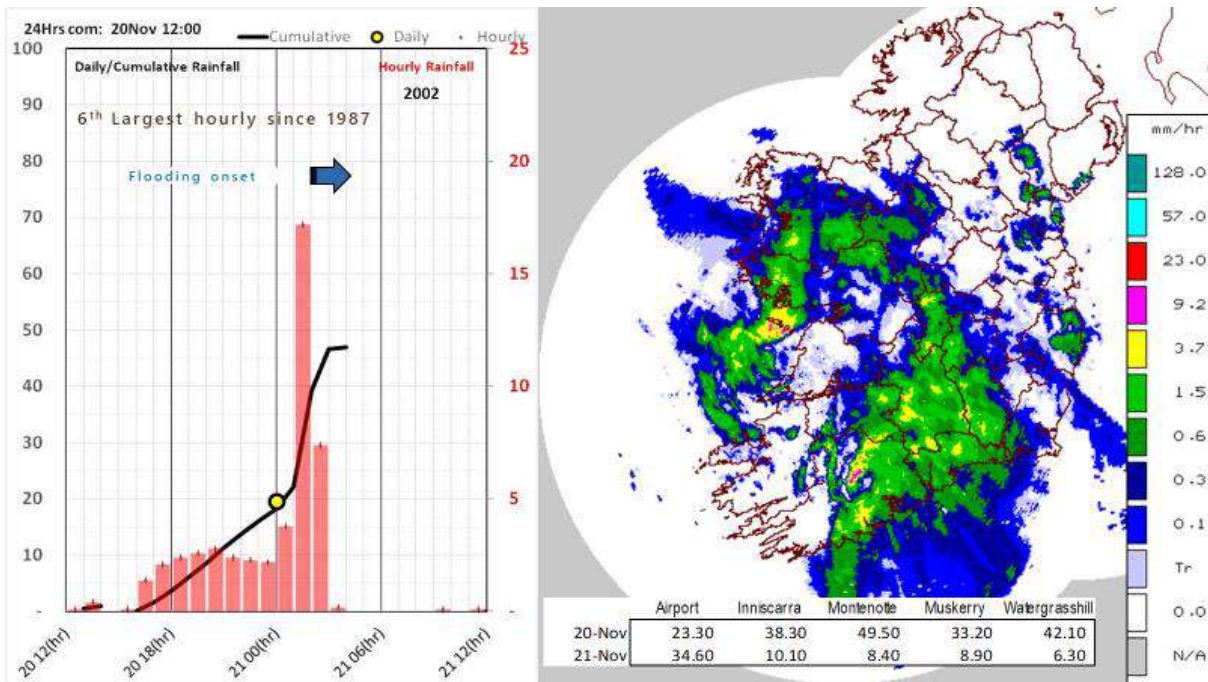


Figure 6.1 Cork Airport Data Nov 2002 Event & Met Eireann data by kind permission of Gerard Fleming

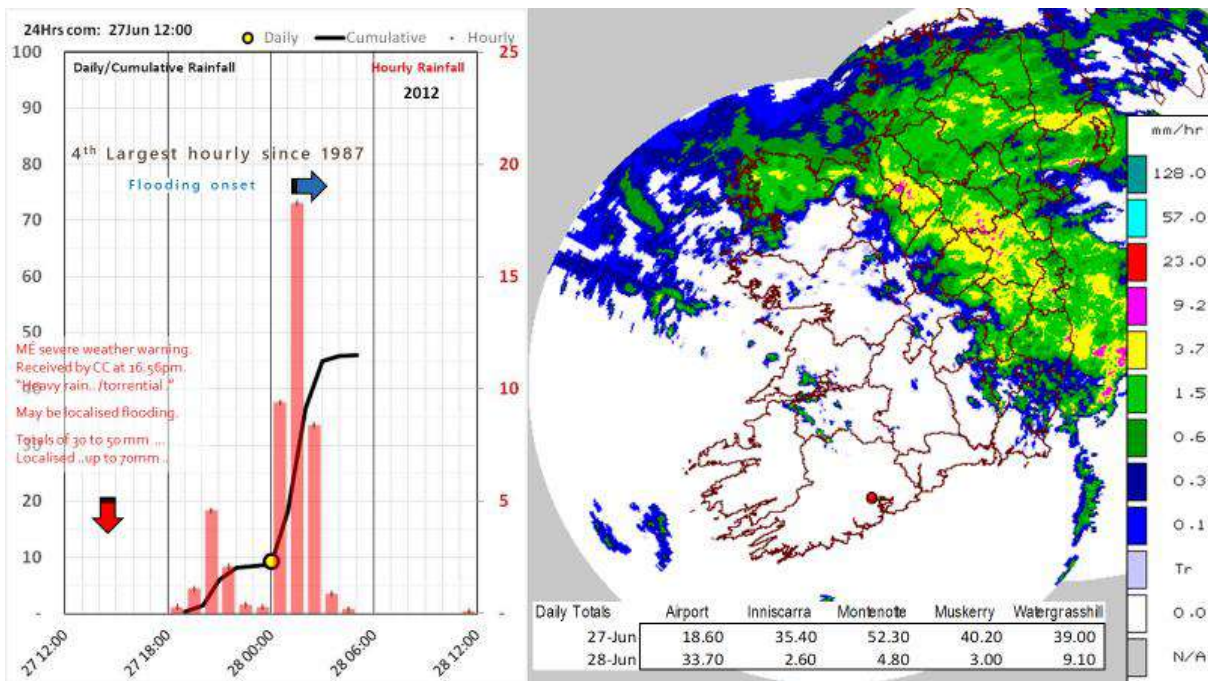


Figure 6.2: Cork Airport Data 2012 event.

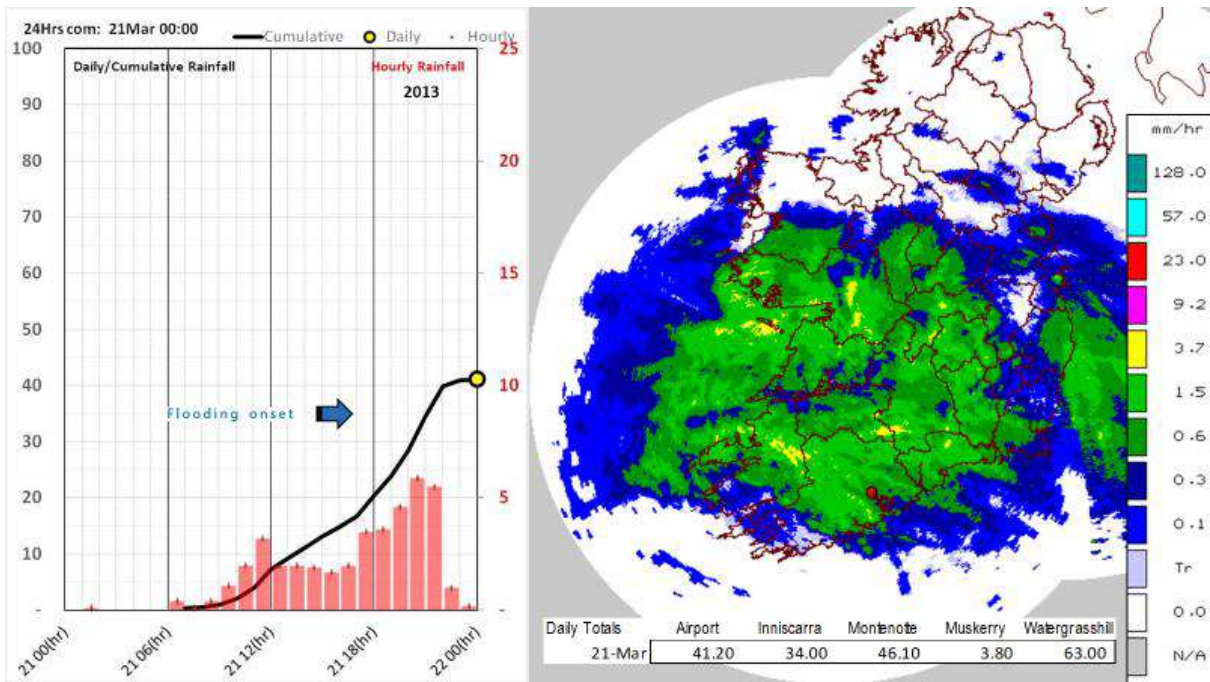


Figure 6.3: Cork Airport Data 2013 Event.

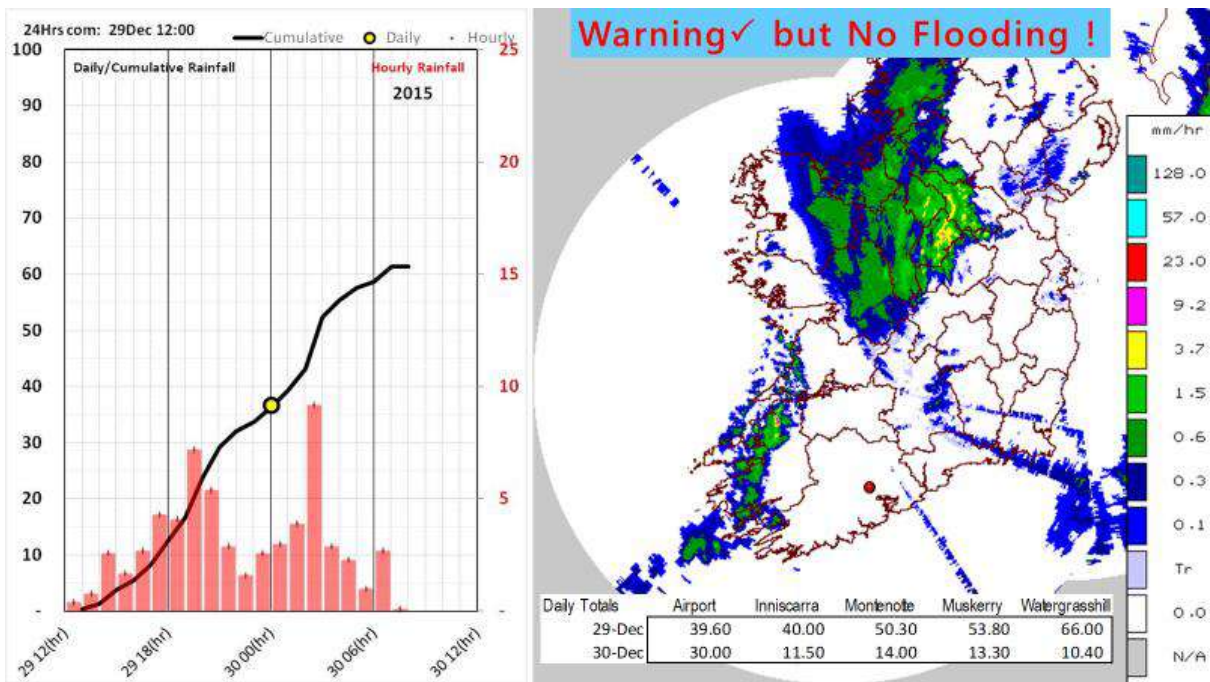


Figure 6.4: Data from Cork Airport 2015 event.

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

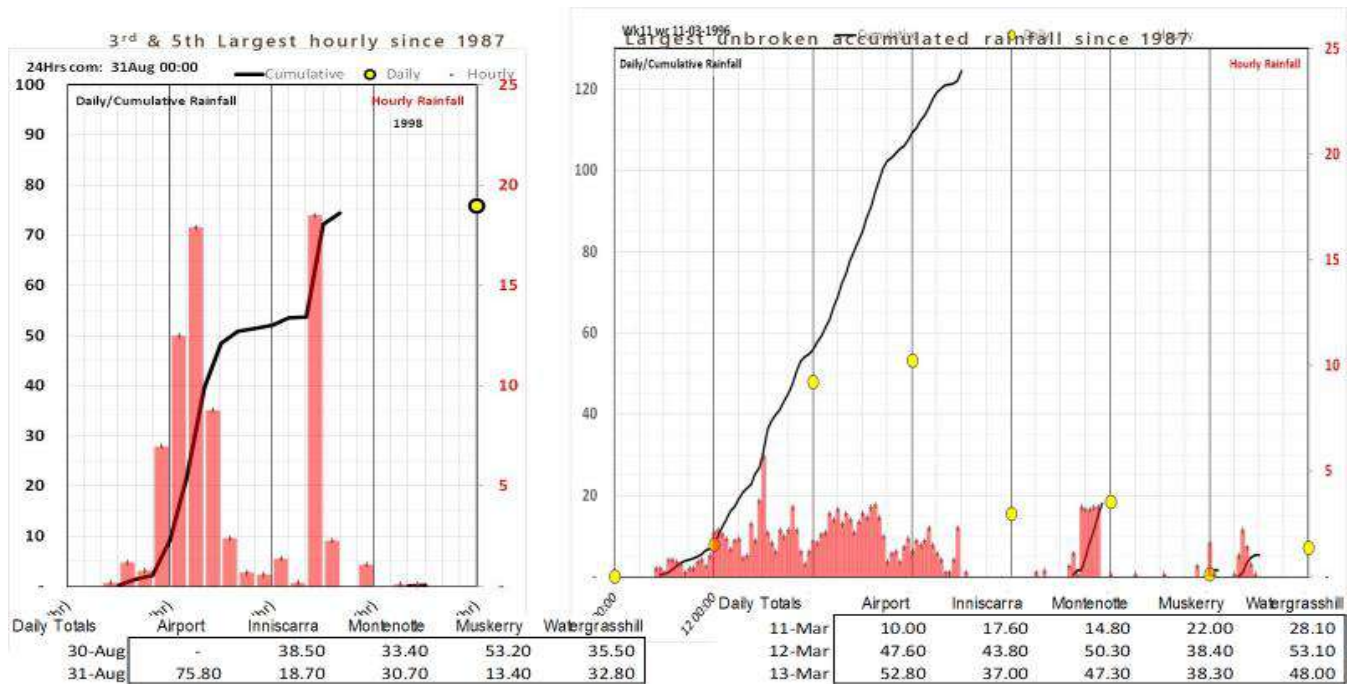


Chart 6.1: The above chart is a comparison of largest cumulative 24 hr rainfall (where break in rainfall is not more than 1hr) and largest hourly rainfall totals for Cork Airport 1987 to 2017.

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 24m³ 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 5m³ 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 Nautra 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 [REDACTED] 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.