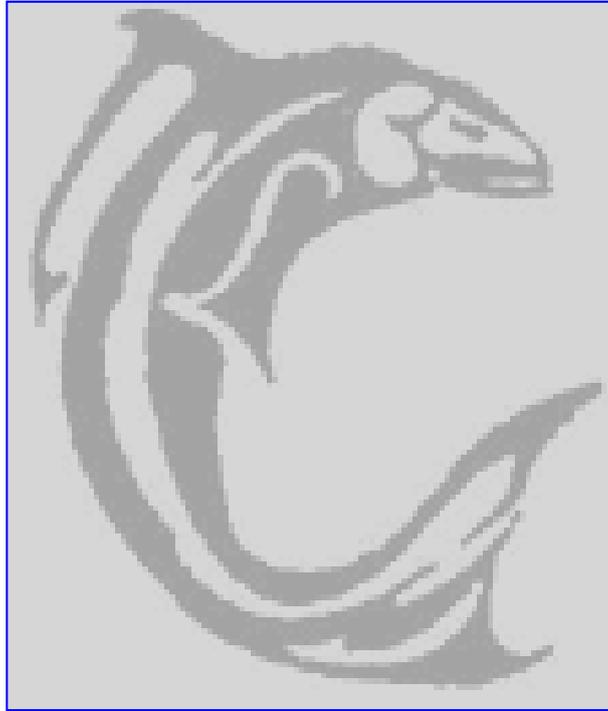


River Bride (Blackpool) Drainage Scheme – Public Consultation

(Scheme Reference: DPE63-18-2018)



submitted via BlackpoolSchemeConsultation@per.gov.ie

by

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“Land management practices can play a vital role in managing flood risk at a local level. For example, the creation and restoration of wetlands and woodlands can reduce the level of flooding, and in some cases remove the risk of local flooding altogether. These practices also produce wider environmental benefits at a local level, including encouraging an increase in wildlife species and habitats, reducing carbon emissions and improving water quality.” Department for Environment, Food and Rural Affairs (UK)

Regarding the 1993 floods in the Missouri/Mississippi system in the USA: “The importance of wetlands in reducing flood crests by soaking up rain and releasing it slowly was demonstrated in Illinois, where the ratio of peak stream flow to average rainfall decreased by 3.7% for every one percent increase in wetland area within a watershed”.

“Underpinning the whole presentation was the concept of the drainage basin as an integrated system, emphasising in particular the links between hill-slope runoff processes and channel response. This forms the basis for understanding both water quality variations in upland basins, and the integrated management of upland catchment systems...the movement of water and sediment in upland catchments is closely related. Rapid erosion and high sediment yields are often associated with periods of rainfall and high run-off. Evaluating the importance of such events and the cumulative significance of slower and less dramatic geomorphic processes can only be assessed if a systematic evaluation of sediment, production transfer and storage in upland catchments is undertaken.” Warburton, Evans, 2003

“Upland catchment management is vital to the supply of water, and involves many stakeholders. However, water suppliers at present deal with problems such as: catchment run off; bankside erosion; and effluent (agricultural/industrial/domestic) through end of pipe methods, at great cost to the tax-payer. Management practices upstream could considerably reduce these costs”. Spray, 2003

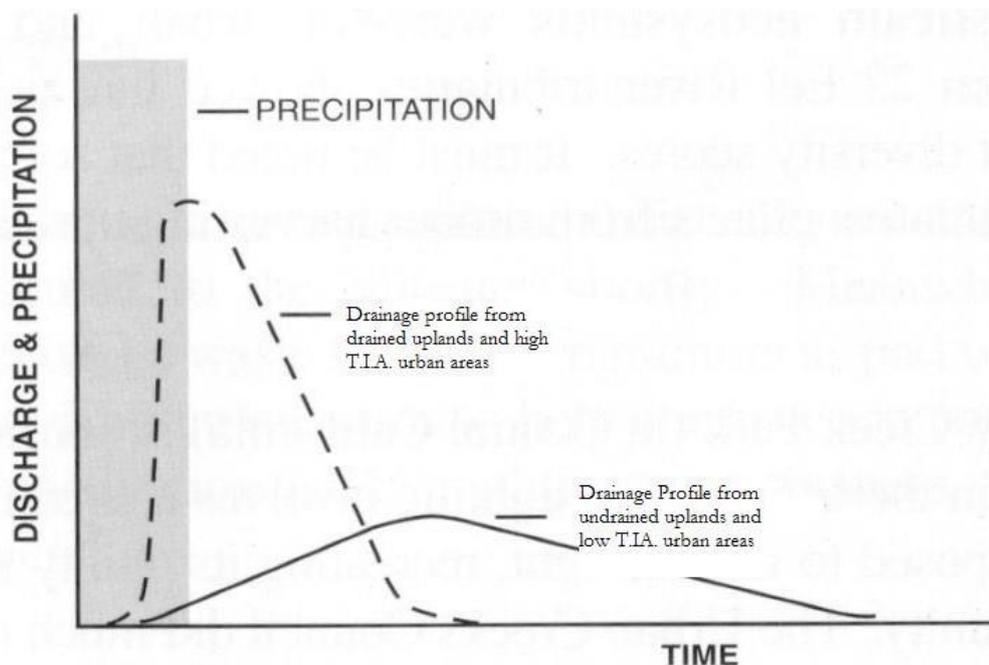
I. Proposed Scheme Observation & Comment

Coomhola Salmon Trust welcomes the opportunity to comment upon the proposed River Bride (Blackpool) Drainage Scheme. The Proposal rightly concerns itself with a paramount concern of alleviating human suffering and property loss but, given an €18m budget, falls far short of achieving both state-of-the-art holistic vision of the River Bride Catchment as well as environmental ‘best-practice’ which would conserve and enhance existing habitats as well as restoring habitats degraded by previous interventions. Following are Coomhola Salmon Trust observations and comments:

- 1) The Scheme departs from current international best-practice, forsaking a ‘proactive’ approach (which would have considered Catchment-wide factors) in favour of a ‘reactive’ (extremely localised) approach by intentionally narrowing the scope of study, consideration, and potential actions (cf Figure 1 and Figure 2 from the Document):

From Pg. 1, ‘Introduction...’: *“When the River Bride (Blackpool) Certified Drainage Scheme was pursued as a separate project to the Lower Lee Flood Relief Scheme, the Study Area for the proposed scheme encompassed a large area covering the entire catchment of the River Bride (including its tributaries, the Glenamought and the Glen) in order to allow for the consideration of all potential scheme options and their various impacts on the receiving environment (Figure 1). For most studies conducted as part of this EIAR, the Study Area was reduced to the channel and immediate surrounding areas of the River Bride extending from upstream of Glenamought Bridge, downstream through Blackpool, to the confluence with the River Lee at the Christy Ring Bridge.”*

- 2) Moreover, a given undisturbed Catchment has a given attenuation capacity. When that capacity has been historically compromised (by poorly-informed drainage, road building, imposition of impermeable surfaces, and other necessary human activities) then response time to water level rising in a main channel is reduced thus exacerbating ‘flooding’.



- 3) Therefore, from an environmental perspective, the incorrect 'reactive' response to largely anthropogenically-induced flooding is to consider only 'flood defences', and to ignore opportunities to a) consider the issue on a catchment-wide basis and, b) to institute measures which will assist (catchment-wide as well as localised) environmental conservation.
- 4) With regard to the 'Human Beings' section of the non-technical summary, we are surprised that there is no mention of 'quality-of-life' considerations, e.g., what negative impacts the development as proposed would have on local citizens' 'nature-deficit' indices by not only the elimination of riverside amenity, but missing the opportunity to enhance this facility for purposes of human 'quality of life' as well as wildlife habitat creation. The section furthermore needlessly skews the argument in favour of the current proposal by claiming that:

"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."

We consider this statement blatantly untrue; inconsistent with what should be an unbiased reporting in the context of a Consultation document, and unfairly pre-empts the opportunity to envisage more holistically-conceived and environmentally-friendly alternatives.

- 5) We note that the 'Flora and Fauna' section of the 'non-technical summary' (which commences on Page 8) mentions:

"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 final two sentences therefore confirm for the Minister's benefit that the scheme will have "a significant impact upon the environment".

- 6) Flood defence walls and culverts, as portrayed in the Scheme, will be anathema to all local wildlife habitats.

II. Conclusions & Recommendations

With regard to the parameters of the consultation, vis-a vis:

“Before the Minister can confirm the scheme, he must first determine if the scheme is likely to have

A) a significant effect on the environment or

B) have an impact on the integrity of a Natura 2000 Site (Sites)”

1) Coomhola Salmon Trust concludes:

- a) That Flood Relief in the affected areas must be achieved to alleviate human suffering;
- b) That the Scheme as proposed will have irrecoverable impacts upon “the environment” (taken to mean wildlife species and habitats);
- c) That the Scheme as proposed will have a deleterious impact upon the local Blackpool human environment (Sociological and ‘quality-of-life’ issues) by denying the local populace the enjoyment of a visible river (and assert that these considerations should have formed a central part of the planning aspects of this Scheme).

2) Coomhola Salmon Trust recommends:

- a) That, given the ‘small’ size of the overall Bride Catchment (53.6km²), that efforts are made to quantify both the Catchment’s existing attenuation capacity as well as to identify measures (including new upstream native woodlands, constructed wetlands, etc., and downstream development and implementation of permeable surfaces) sufficient to mitigate flooding events;
- b) That, for the ‘final run’ to the River Lee (through lower Blackpool village etc.) that the zone allowed for the river is widened from the existing (wherever feasible) to allow for the creation of a more natural continuum of habitats including instream, riparian, and other features to the benefit of wildlife as well as the human population;

The Bride Catchment provides a superb opportunity to incorporate international state-of-the-art techniques and methodology to achieve flood protection as well as environmental conservation. One only has to look at current practices in The Netherlands, the UK, and the USA for examples of how previously straightened channels are being turned back into meandering flows, and culverts are being dug up in a practice called ‘Daylighting’, to correct the errors of past drainage Schemes.

The Bride presents an occasion where Irish engineering response could move into the vanguard of international ‘best-practice’ concerning flood alleviation which conserves and enhances natural ecological assets, thus benefitting the environment as well as the Catchment’s human population.