

Table 1. Response to Observations

Name	Observation no.	Observation/Issue	Response
<b>Alan Massey</b>	1.1	The sheer utter devastation to property and the loss of life in the Harold's Cross area that resulted from the flooding that occurred on the night of 24th October 2011 is well documented. Harold's Cross literally became a shallow lake for the River Poddle flood waters that could not access its various blocked culverts along its river course from Ravensdale Park to Gandon Close (which borders Mount Jerome Cemetery). It was a surreal experience, like being in a real-life disaster movie. Mount Jerome Cemetery itself had great difficulty in opening graves for several days afterwards as the water table was so high in the cemetery grounds. What is so impressive about this proposed scheme is that it is not just limited to Tymon Park, but it addresses the numerous stretches of the river Poddle course that are susceptible to bursting its banks in high density urban areas. That is to be applauded.	The response reflects the broad support for the proposed Poddle FAS from the consultation events dating back to 2018. The project team were told at such events of the trauma and hardship experienced by residents and businesses who suffered in the floods of October 2011, some of whom were out of their homes for over 6 months, some nearly drowned, and one person died. The proposed Scheme responds to the need to provide adequate protection to these and other properties at genuine risk from serious flooding.
<b>Caroline &amp; Brian Keohane</b>	2.1	We strongly oppose the felling of 228 trees in the proposed Poddle FAS. It makes no sense to fell trees during a Climate and Biodiversity Emergency, and it makes no sense to cull local people's parks and green spaces given the lockdown experience we're just coming out of.	The number of trees to be felled in proposed works areas has been reduced from an overall 229 to 217, with 59 of these in DCC area, and 158 of these in SDCC area. After further consideration of construction methods and tree protection and constraints, the Scheme proposes a reduction in the number of trees to be felled in Wainsfort Manor Crescent, an increase in the number of trees to be felled in Ravensdale Park, and a reduction a reduction in the number of trees to be felled in St. Martin's Drive. There is firm commitment from the applicant Councils for replacement tree planting including the locations, and species of trees as provided in the response to RFI no. 9. This amounts to a total of 609 trees to be replanted over the whole Scheme in woodland pockets, amenity planting along pathways, enhancing established hedgerows, and along riparian corridors. The Scheme proposals do not involve "culling" of local parks and green spaces. It is a fact that access to and use of the local parks and green spaces will be restricted during construction at the works areas. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. While it is true that the modifications proposed in the Scheme, such as the flood wall in Ravensdale Park, the re-aligned channel at Whitehall, and the embankment in Tymon Park, will alter these parks and spaces and cause interruption to their use and enjoyment, they <u>will not</u> result in the loss of these spaces. Careful consideration has been given to how these parks and green spaces are used, and the wishes of the people living in close proximity to the affected areas, in the design of the Scheme. The biodiversity enhancements proposed in the Scheme represent an overall positive net gain (response to RFI no. 8). The Scheme includes for climate change as described in EIAR Chapter 5, Section 5.13.
	2.2	It makes no sense to fell trees, the very things needed for water absorption giving rise to cleaner air, cleaner water and better soil quality. The alternative, most obvious and sustainable solution which has not been given any consideration in Poddle FAS is to create extensive tree coverage in the Poddle river catchment area.	This Scheme is a proposed to provide flood protection along the River Poddle. Replacement tree planting is part of the proposals of a quantity to satisfy the requirements of the tree strategy and tree policy of the respective Councils. The majority of the replacement trees will be in those areas within the catchment which will, in time, provide natural flood management benefits.
	2.3	Given Dublin's very poor rating in city tree coverage, which stands at 10% - well below our European neighbours' average of 15%, it is imperative that we plant trees and preserve every tree we currently have. In fact, the question needs to be asked why extensive and rapid native tree planting was not the first port of call following the floods of 2011? Poddle FAS tree plans contradict SDCC Tree Management Policy, DCC Tree Strategy and contravene the aims set out in CFRAM and our Water Framework Directive.	In total, the number of trees planted will be more than twice the number removed (See response to RFI no. 9). Due to the heavily urbanised nature of the DCC area there are limited opportunities for replacement tree planting directly within the works areas. The Scheme will provide additional benefits for green and open spaces in residential areas with the tree planting and landscape enhancements. In SDCC areas, there are plans to plant a series of mini woodland areas in Bancroft and Tymon Park in addition to the standard tree planting in Tymon Park, Whitehall Park and Wainsfort Manor Crescent. This will further enhance natural flood management properties of the catchment.
	2.4	Since it cannot be determined how much damage the channelising of the Poddle will cause downstream, a more thorough EIAR report is needed to safeguard our Natura 2000 sites.	There is no proposed "channelising" of the river as stated here. River channel restoration works are proposed in the re-alignment at Whitehall Park including a natural meander as described in EIAR Chapter 8, and further in response to RFI no. 9, which will enhance and encourage natural flood management and biodiversity. The impacts of the Scheme on

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			downstream European sites is assessed in EIAR Chapter 7, and the Revised NIS submitted with the response to the RFI request.
	2.5	The Arterial Drainage Act 1945, while 'law' is an outdated model upon which to treat our rivers. Surely it is time that DCC and SDCC lead the way and be an example to other Irish cities when it comes to natural flood management. While there appears to be some attempt to work on nature-based solutions, Poddle FAS is limited and lacking in its effort to embrace NFM.	The proposed Scheme is not being carried out under the Arterial Drainage Act 1945. Further details of Natural Flood Management properties and proposals of the Scheme are contained in the response to RFI no. 2.
	2.6	The Poddle river is a truly historic river, worthy of rejuvenation, not decimation. Should Poddle FAS go ahead, it will suffer irrevocable damage. Its wildlife sanctuaries and corridors, alongside its communities will suffer. Local heritage is at stake as people are separated by walls from their historic Viking river, after which Dublin - Black Pool - 'The Pool' got its name. Poddle FAS 'flood walls' serve no purpose but to divide people from each other- St. Martin's and Ravensdale being prime examples, where proposed 'flood walls' would not protect anyone from a flood, if one studies the plans properly.	Many of the replacement trees in the Scheme will be semi-mature, and will, through time provide natural flood management and biodiversity benefits. The flood defences have been designed to protect properties at risk for events up to 1% AEP / 100-year event. A freeboard of 300mm is added to the height of the defences to allow for any uncertainties in the design process as standard in Flood Defence Schemes and in addition significant culverts such as at Ravensdale Park are modelled with 60% blockage. The final design proposed is also stress tested for a 20% increase in rainfall intensity as a result in climate change. The "do nothing" option described and illustrated in response to RFI no.6 demonstrates that the proposed flood defences in St. Martin's, as an example, will provide protection in the event of a 100-year event. The proposed channel realignment works at Whitehall Park will convert unused space to an accessible naturalised urban area that will allow people to access the river corridor.
	2.7	Wainsfort, Fortfield, Ravensdale and St. Martin's have provided safe havens for local people trapped within 2km boundaries during lockdown. Where will they go when future lockdowns are likely and forecast? Even if life returns to 'normal', will families in Terenure, Kimmage and Crumlin have to travel in cars to find their nearest park when their leafy green spaces have been eroded and lost to concrete?	The Scheme proposals do not involve "culling" of local parks and green spaces. It is a fact that access to and use of the local parks and green spaces will be restricted during construction at the works areas. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. While it is true that the modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the re-aligned channel at Whitehall, and the embankment in Tymon Park will alter these parks and spaces and cause temporary disruption to their use and enjoyment, they <u>will not</u> result loss of these spaces. Careful consideration has been given to how these parks and green spaces are used, and the wishes of the people living in close proximity to the affected areas, in the design of the Scheme. For example, the channel realignment works at Whitehall Park will convert unused space to an accessible naturalised urban area by using river naturalisation restoration methods (RFI No. 5).
	2.8	Finally, the very serious and significant issue of 'public consultation' - or rather, lack of, needs to be given heed to. Due procedure was not followed. We would not have heard about these plans had it not been brought to our attention by a D12 community group on social media. We have not been consulted or engaged in the planning process despite living metres from Tymon Park. We would have very much liked to have been involved in meaningful public engagement, but our voices have not been heard because we have been left in the dark. Thus, a more thorough, robust public consultation is needed before Poddle FAS can go any further.	Consultation relating to this project date back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the Poddle FAS project launch in 2018. Information about public information events was communicated to the public via leaflet drops, social media posts, emails and on the Poddle FAS website. Local elected representatives were notified and updated on a regular basis. Leaflet drops were made to residents of Osprey Park on January 10th and 11th 2020 informing them of the consultation days that took place on the 16th and 20th of January. Leaflets were also dropped in the letterboxes of the residents of Osprey Park in the lead up to consultation days in March 2020. See Appendix 2 to the response to RFI no. 1, and associated appendices for further details on these consultation events and how they were advertised.
<b>College Wainsfort Residents Association</b>	3.1	The catchment area of our Residents Association includes Wainsfort Drive and Wainsfort Road, Terenure. A number of houses on these roads back on to Kimmage Manor where the Poddle flows onwards towards Kimmage. In October 2011, a number of these houses were flooded. We understand that blockage at the screens at the Lake lands overflow and of the grid in Kimmage Manor were the main cause of the floods.  It is our view that extreme weather events leading to flooding will most likely be a regular occurrence in the future and that the plans provided for in the scheme will help alleviate a reoccurrence of the flooding that occurred in 2011.	This observation recognises the importance of and need for the Scheme. While the blockage of culverts exacerbated the flooding that occurred in 2011, the Scheme is necessary to protect vulnerable properties including the residents in Wainsfort Drive and Wainsfort Road who were affected in the 2011 floods (some of whom were out of their homes for over 6 months). In the Scheme analysis, the risk to flooding was identified for a 1% AEP event. The results of this analysis identified over 1,300 properties at risk from flooding. DCC and SDCC have taken measures to protect vulnerable culverts such as Kimmage Manor with CCTV and level alarms. This notifies the councils of potential blockages and allows for maintenance. It does not manage or contain the excessive flood waters that occur during a significant flood event.

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		<p>It is our view that the measures proposed such as the provision of flood walls and flood embankments and flood storage will minimise the risk to our residents on Wainsfort Drive and Wainsfort Road.</p>	
<b>Cormac McMullan</b>	4.1	<p>At the outset I would like to state that I am not against the building of flood defences. They are an essential piece of infrastructure, but they need to be fit for purpose, designed to minimize impacts on the environment, and enhance the living conditions of residents and not take away from it. The flood defence should not cause as many problems for the public as it is supposed to solve and it should not solve the problems of people in one area at the expense of creating problems for those in another. The solutions need to be functional and liveable. I hope to point out in my objection the flaws in the plans at Ravensdale Park and how they contradict the council's own policies and European law. I will discuss my objections and observations under the main broad headings of:</p> <p>Function, design and purpose. Public safety and health. Public consultation. Amenity impacts. Environmental issues.</p>	<p>The response to RFI no. 2 covers the design and need for the Scheme. The situation at Ravensdale Park is that the existing channel, pedestrian bridge to Ravensdale Drive, and culvert to Poddle Park are inadequate to control or manage the volume of flood waters that occur during extreme events.</p>
	4.2	<p>Previous flooding at the culvert in Ravensdale has been down to lack of cleaning of debris dumped into the river. This was highlighted by Councillor Mannix Flynn in the council meeting of 9th September 2019 (see link of meeting link <a href="https://ldublincity.public-i.tv/core/portal/webcast_interactive/439577">https://ldublincity.public-i.tv/core/portal/webcast_interactive/439577</a> 22mins in). This was also confirmed by project engineer David Grant in the public information meeting in Mount Argus community centre on the 16th of January.</p> <p>As my house is beside the culvert in Ravensdale Park, I personally witnessed and recorded this first hand in the flood of 2011. Lack of maintenance along the river course in Ravensdale led to the entrance to the culvert being blocked by debris. Flooding was not due to the volume of water exceeding the size of the culvert entrance but due to a blockage from illegal dumping. The entrance to the culvert does not have a double grill. Therefore, when it becomes blocked, water builds up behind the blockage, the flood water rises and buries the entrance of the culvert, and the debris causing the blockage. The water then rises up the small wall behind the culvert and back fills the park until such time as the water overtops the small wall and spills down Poddle Park.</p>	<p>David Grant stated that blocked culverts contributed to flooding but was not the main reason. As outlined in Chapter 5 and 8 of the EIAR and in the response to RFI no. 2, there is still a need for the Scheme even if there are no culvert blockages. While blockages exacerbated the flooding in 2011, it should be noted that the 2011 event was less than 1% AEP. Analysis revealed that events of this magnitude will cause severe flooding in Ravensdale and down to Poddle Park.</p>
	4.3	<p>If a similar event to 2011 occurs again, the water level around the culvert will rise burying the entrance to the culvert and any blockage. As the water rises up the wall behind the culvert it will again back fill the park in a Southerly direction. The current design of the new wall will prevent spillage down Poddle park as it will have a large amount of freeboard behind the culvert, but it means the water will backfill further down towards the southern end of the park. This will happen more rapidly than in 2011 as you will be containing a similar volume of water in half the space. The park will back fill towards the footbridge where it is likely to flood across the bridge and create a new flood point at Ravensdale Drive (see highlighted point "A11 in image below), but may also spill out at the southern end of the eastern part of the wall (see point B in image below)</p>	<p>This Statement does not consider the design proposed for the defences at Ravensdale. Firstly, there will be a new trash screen at the culvert preventing unnecessary blockage. The culvert is allowed to submerge while containing the flood peaks for a 1% AEP within the heightened defence wall to the west and north while safely storing the flood volume within the extended wall through the centre of the Park. This volume of flood waters (c. 700m<sup>3</sup>) and the maximum rise in water levels at the culvert and through the river along the channel have been determined in the hydraulic modelling exercise precisely to identify what level of defences are required and what footprint is required within the Park to safely contain the flood waters until they can drain back into the culvert. In addition to this the analysis included for 60% blockage in the culvert and 300mm standard freeboard on the defence height. The proposed flood storage is intended to use the natural green space as far back as the pedestrian footbridge but does not extend to the eastern entrance at Kimmage Road Lower as the natural ground levels in the Park rise from the culvert at the northern entrance in a southerly direction. It should also be noted that the existing footbridge is a flood hazard as it is a flat deck bridge with railings which allows overflow waters to exit the Park onto Ravensdale Drive. This, as shown on Planning Drawings, is proposed to be replaced with an arched deck bridge with parapet walls. The apex of the arch on the footbridge deck is higher</p>

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			than the 1% AEP water level which provides better hydraulic conveyance and prevents flood waters exiting the Park and the parapet walls prevent potential backing up of waters from spilling onto the deck.
	4.4	I feel this demonstrates a flaw in the defences design and it may cause houses to flood that previously never did creating a new problem for some local residents. If the water floods at point A (as seen above) it will block the only road entrance to Ravensdale Drive and the Brookfield Estate.	As explained above, the Scheme design proposes to protect properties in Ravensdale Drive, Poddle Park and surrounds by containing flood volumes within the Park that would otherwise inundate the existing park boundaries and surrounding residential areas.
	4.5	The highest point of the proposed wall defence at Ravensdale is at the entrance to the culvert. This is to stop overtopping of the wall by flood waters. In the event of the entrance of the culvert becoming blocked again, the high wall around the entrance will prevent and hamper attempts of unblocking the entrance by machinery especially in an emergency. In fact, if the culvert becomes blocked the design of the flood defence is such that it will hold water in the park. The rising flood water will bury any debris blocking the culvert deeper under water making it harder to access and unblock. Due to the design of the flood defence the entrance of the culvert will be the deepest part of the water in a flood and least accessible point in the park.	The culvert at Ravensdale Park is located at the lowest point of the river in the park as it is the furthest downstream point. As stated, this requires the highest defence at this point to contain flood waters and prevent them spilling onto Poddle Park. As explained above, the design includes for new trash screen at the culvert which reduces the risk of blockage. That said, the hydraulic analysis undertaken to determine the required flood defences has included for 60% blockage of this culvert capacity which is very conservative, and the required flood footprint in the park for the duration of the 1% AEP flood event was determined from this conservative approach and prevents flood waters from leaving the Park.
	4.6	Clearing the river of rubbish and debris by the council has been historically very poor and as some councillors have admitted it being a contributing factor to the flooding in 2011. The building of a wall around the culvert will only encourage more dumping. The highest point of the wall is at the culvert and it will hide dumped materials and make it more difficult to remove this debris due to the restricted access the new wall would create. The culvert is a potential flooding point that needs to be kept free of debris.	<p>The Hydraulic Report (Refer to response to RFI no. 2, and in response to RFI no. 10, at Appendix 3) has determined that the risk of flooding at Ravensdale exists for large flood events irrespective of blockages at the culvert. Blockages at the culvert exacerbate this flooding, as happened in 2011. DCC drainage maintenance have a plan in place to check culverts on a weekly basis and in the event of forecast rain. There is currently no trash screen at Ravensdale which is problematic. As part of this Scheme a new trash screen will be installed and monitored by DCC drainage. Illegal dumping is a blight on society and noted in this area and the ongoing co-operation between local residents and DCC to prevent, notify and respond to such events is important.</p> <p>Since the economic crash in 2008, City Council operational crews have reduced by approximately 20% and these numbers have never been replaced.</p>
	4.7	In the plans the developers state that in Tymon Park "a storage volume of 66,000m <sup>3</sup> will be provided, which is sufficient to accommodate the attenuated volume in excess of the 100-year return period event". If this is the case then the need for storage at Ravensdale may not be necessary.	<p>As detailed in Appendix 3 of the response to RFI no. 2, the flood storage at Tymon is critical to the reduction in hard defences required downstream. However, as it is in the upper middle catchment it cannot control catchment run-off further downstream. Peak flow gradually increases due to inflows from the urban surface water drainage network. and due to the location of these inflows from the network at Perrystown, Brookfield Road and Captains Road, there is a requirement for flood storage at Ravensdale Park. If flood storage was not included at Ravensdale Park then flood defences along the river channel through the Park of a height in excess of 2m would be required.</p> <p>Waters will be contained in the Park so access will still be available for emergency response in an 100 year event as opposed to 2011 where the park couldn't be accessed due to the flood waters on access routes in the Kimmage and Harold's Cross area.</p>
	4.8	Detailed on the plans are the water height at Ravensdale for a one in 100-year event. It appears this water level height was calculated without factoring in the reduced flow due to flood storage upstream at Tymon and Whitehall that will actually reduce the flow downriver at Ravensdale. If this is the case the flood modelling for Ravensdale needs to be re-calculated (taking into the factors of the reduced flow at this spot as a result of upstream defence in Tymon) and its design reassessed.	The flood defences are designed as a contiguous flood defence system for a 100 year or 1% AEP flood across the entire catchment of the Poddle ( <i>i.e.</i> the required flood volumes to be stored at Ravensdale and the required defence wall heights were determined with flood storage operating in Tymon Park together with all other proposed flood defences upstream and downstream). The defence requirements at Ravensdale would be more extreme if no flood prevention measures were provided elsewhere in the catchment ( <i>i.e.</i> flood storage).

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	4.9	If the levels and flow calculated do take into account the upstream defences during a one in 100 year event then it will cause the flooding issues I mentioned earlier in my objection.	As above, The flood defences are designed as a contiguous flood defence system for a 100 year or 1% AEP flood across the entire catchment of the Poddle (i.e. the required flood volumes to be stored at Ravensdale and the required defence wall heights were determined with flood storage operating in Tymon Park together with all other proposed flood defences upstream and downstream). The defence requirements at Ravensdale would be more extreme if no flood prevention measures were provided elsewhere in the catchment (i.e. flood storage).
	4.10	The proposed design is to hold the flood water in the park during an extreme flooding event. The designers site one of the main reasons for the flood defence is for public health and safety. In section 6.4.2 of the FAS proposal on the subject of "public health and safety" it states: "Floodwater contaminated by sewage or other pollutants (e.g. chemicals stored in garages or commercial properties) can potentially cause illness, either directly as a result of contact with the polluted floodwater or indirectly as a result of sediments left behind".	Flood waters can be contaminated with sewerage and commercial pollutants, particularly when unmanaged and allowed to inundate sewers, commercial properties and surcharge surface water drainage pipes. The purpose of these defences is to contain these flood waters in a controlled area and prevent them from entering residential properties where the risks to health and safety would be high.
	4.11	There is no mention in the proposal of the environmental and public health impacts of storing such sediments in a public park in the middle of a residential area. As a result of the flood in 2011 there were deposits of raw sewerage and toilet paper deposited in the park. Building a structure designed to store 800m <sup>3</sup> of floodwater, runoff and sewerage in a built up residential area will be a public health hazard. Any design of flood defence must take into account public health and safety. This is not addressed in the plans and is grounds for objection.	As stated above, the safe and effective management of the predicted flood water volumes is the purpose of this Scheme. As occurred in 2011, without this management the river bursts its banks, and inundates foul and storm sewers causing them to surcharge onto roads bringing sewage together with surface water contaminants and debris through residential areas and unfortunately into people's properties. The predicted duration of the large floods is 9 hours, similar to 2011. Within 9 hours the storage volume at Ravensdale will rise, peak then begin to recede as the flood waters have space to drain back into the culvert. Following this, the local authority will inspect the area and undertake any required post flood maintenance and cleaning works including removal of debris which would be contained within the area after a flood.
	4.12	The council state on the FAS web page that "Key to the success of the project will be ongoing open and transparent communication with stakeholders and all impacted parties". This not been done and the lack of consultation on this project and its design has been a big issue for many.	Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the Poddle FAS project launch in 2018. Information about public information events was communicated to the public and local elected representatives <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See response to RFI no. 1, Appendix 2 and its associated appendices for further details on these consultation events.
	4.13	I first became aware of the proposed works in mid December 2019 when I received a letter from David Grant the resident project engineer (letter enclosed). This letter informed me there were to be works on the Poddle to protect homes from flood events greater than the 2011 event. It describes that there are water containment areas to be built in Tymon park and in Whitehall as part of the plan (which are several kilometres away from my home). The letter completely omits that there will also be an emergency water containment area built in Ravensdale 30 feet from my home. The letter went on to inform me that my property won't be directly affected by the proposed works. This is untrue as my house is only 30 feet away from the park, the works will directly affect my property from construction noise, dust, vibration and access to my home during the construction phase as clearly laid out in the submitted plans. The letter does not mention any up coming information days on the plans or the statutory consultations. Neither did it re-direct me to the Poddle FAS website for further information on the project. I found out about the consultation by accident through a work colleague. It was at this point I mailed David Grant to complain re the lack of information on the project and to keep me updated on any public information or consultation days. The statutory consultation days happened on the week of the Lockdown. David Grant emailed me that there would be restrictions to the amount of time people had to engage with the engineers and ask questions (Please see enclosed email explaining the restrictions). This meant there was not enough time to ask questions and view the plans. The meeting I attended on Thursday the 12th of March 2020 wasn't very well attended as many people stayed at home after	<p>Evidence of all the efforts made to communicate with the public are provided in Chapter 3 of the EIAR as well as in Appendix 2 (and its associated appendices) of the RFI response no. 1. It is an incorrect statement to say public consultations were held during the week of "lockdown". The statutory consultation meeting that was held on the 10th of March 2020 occurred before any lockdown measures were introduced by the government (16th March 2020). David Grant (SDCC Project Manager) sent out an email to all email addresses on the Poddle FAS database advising them of the HSE guidelines with respect to COVID-19 prior to the events. At lunchtime on the 12th of March the government made the decision to close schools from 6pm that day. Given the short notice of the government announcement it was agreed to proceed with the consultation meetings as planned and with the agreement of Harold's Cross National School, the 4th and final location for public consultations that week.</p> <p>The consultation events on March 12th 2020 were held at two locations at two separate times and 27 people were recorded as attending over the course of the day. See response to RFI no. 1, Appendix 2 for more details. David Grant also responded to the email that is attached to this submission informing the person in question that they would be given the time they require for queries to be made. Leaflets were dropped in the letterboxes of the residents of Ravensdale Park in the lead up to the public information days in January and March 2020. Response to RFI No. 1, Appendix 2 lists the areas that received these letter drops. Information about public engagement events were published in the EIAR and a further update has been provided in the Consultations Report contained in Appendix 2 to the</p>

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		<p>the lockdown announcement earlier in the week. The council had also announced on Monday of that week that it was suspending all public meetings yet it kept the public statutory meetings open. I mailed Mr Grant on Tuesday to see if the statutory consultations would go ahead and he replied that they would (email enclosed). Despite email assurances from David Grant that residents would be informed by flyer re the statutory consultation days none were delivered in my area (see email enclosed). Mr Grant specifically asked me if I received an information flyer at the statutory consultation on Thursday the 12th to which I replied that I had not. He apologised and said they had an issue with the flyer distribution company and that he must look into it. As far back as the council meeting on the 9-9-2019 Councillor Deasy specifically asked G O'Connell and D Grant (engineers on the project) when Residents of Ravensdale and Poddle would be informed of the plans. G O'Connell replied that letter drops would be done to the residents during the consultation stage (see link <a href="https://jdublincity.publici.tv/core/portal/webcast/interactive/439577">https://jdublincity.publici.tv/core/portal/webcast/interactive/439577</a> 28min 30sec in). In the scheme planning report section 3 on CONSULTATION AND ENGAGEMENT it states SDCC maintains a project website <a href="http://www.poddlefas.ie">www.poddlefas.ie</a> which provides information on the Scheme. The website will be the main means to communicate with the public on the progress of the planning".When seeking information on the project I discovered the Poddle FAS website in late December 2019. The Public Engagement content of the Poddle FAS website had no content at this point that outlined the plans or public information. Yet in June of this year it had all the info and dates of meetings meaning that it was post-populated with this public information content.</p>	<p>response to RFI. Information relating to public consultation events and updates on the Project could be viewed on the Poddle FAS website in the "news" section. The news section presents a news feed of all project updates and information on public engagement.</p> <p>David Grant never stated that there was a problem with the distribution company.</p>
	4.14	<p>There hasn't been enough time set aside for people who don't have the internet to view the plans. Under statutory rules the plans need to be displayed in public libraries for 6 weeks. I would like to point out that the public libraries have been closed since 13th of March and are only opening on Monday June 6th four days before objections are due. That means the plans weren't publicly accessible for the correct duration of the 6 weeks of statutory consultation.</p>	<p>The consultation period for the Poddle FAS was extended to June 11th 2020. During the period of time that libraries were closed, all documentation was publicly available on the Poddle FAS website. An Bord Pleanála offices were also open (if only part time) where information was available, and also could be provided electronically.</p> <p>In the leaflet distributed in May 2020, a call back or opportunity to write in to discuss the plans was offered to any residents who couldn't access the information on-line.</p>
	4.15	<p>On the Feb 27 2020 the libraries had the plans on view. The Public Libraries closed on Friday 13th due to COVID 19. They only opened again on Mon 8th of June, with submissions due on the 11th of June. That means the plans were only available to view for a total of 17days. They should be available for the 6 weeks of statutory consultations which would have been for a total of 36 days.</p>	<p>This is not within the applicant's control.</p>
	4.16	<p>In the planning report Section 3 on CONSULTATION AND ENGAGEMENT it states that "The Councils have engaged with representative residents' associations and individual property owners affected by past significant flooding events throughout the project". In light of both councils claims it would be important to know what process was used to determine who was affected by floods and who the council would contact re the plans be they individuals or residents groups as it doesn't seem to be a transparent process representative of the community living along the river. My house is closest to the culvert that floods at Ravensdale. My house is on the council's map of properties that flood or are in danger of flooding. The council were able to send me a letter in December 2019 telling me work would begin on the project beside my house in late 2020 but couldn't contact me earlier to involve me and my neighbours to work on these plans.</p>	<p>Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM and since the Poddle FAS project launch in 2018. Information about public information events was communicated to the public and local elected representatives <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. Refer to Appendix 2, Section 2.3.1, for further details on how engagement with property owners and affected communities was carried. Appendix 2-4 also provides details of the meetings that were held between SDCC's Project Manager and Property Owners as part of the information gathering process.</p>
	4.17	<p>I hope the previous passage clearly highlights the fact that the proposers of the project have failed to in their responsibilities to properly inform or consult the public re the plans. This would contravene Aarhus Convention, which provides for:</p> <p>The right of everyone to receive environmental information that is held by public authorities "access to environmental information", The right to participate in environmental decision-making, And access to justice in environmental matters. But also it highlights their lack of compliance with the 6 weeks of statutory consultation.</p>	<p>Refer to response to RFI no. 1, Appendix 2 and associated appendices for full details on how the applicant informed the public of the proposed plans. Throughout the project design and preparation of the EIAR, every effort was made to engage with and respond to queries from local communities, local elected representatives and representatives of resident's groups or individuals who have made contact through the project website. Where available, proposed plans were shared with members of the public or residents' organisations to clarify any queries that they had. Evidence for this is documented in Appendix 2 to the response to RFI no. 1.</p>

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	4.18	<p>In the City development Plan chapter 9 on Sustainable Environmental Infrastructure, section S111 states: "that flood defence infrastructure has regard also to nature conservation, open space and amenity issues". Also In Chapter 10 "Green Infrastructure", Open Space &amp; Recreation of the Dublin CDP the following policies are outlined:-</p> <ul style="list-style-type: none"> <li>• GI4: To co-ordinate open space, biodiversity and flood management requirements, in progressing a green infrastructure network.</li> <li>• GI10: To continue to manage and protect and/or enhance public open spaces to meet the social, recreational, conservation and ecological needs of the city and to consider the development of appropriate complementary facilities which do not detract from the amenities of spaces.</li> </ul> <p>As a resident who lives 30 feet away from the Park I can say I don't see how turning it into an emergency storage facility for sewage and flood water falls inside the above mentioned policies. The design of the proposed development at Ravensdale Park will significantly negatively impact the amount of usable open space in the park.</p> <p>In the council meeting of September 9th 2019 David Grant the resident project engineer on the project clearly states that the flood defence in the park was re designed to cut the southern half of the park in half (see link <a href="https://ldublincity.public-i.tv/core/portal/webcast/interactive/439577">https://ldublincity.public-i.tv/core/portal/webcast/interactive/439577</a> 29m 40sec in).</p>	<p>The Scheme proposals do not involve culling of local parks and green spaces. It is a fact that access to and use of the local parks and green spaces will be restricted during construction at the works areas. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. The modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the re-aligned channel at Whitehall, and the embankment in Tymon Park will alter these parks and spaces and the way they are used and enjoyed by the public, but they will not result in the loss of these spaces. Careful consideration as to how these spaces are used has been given in the design of the Scheme.</p> <p>See Drawing RPFS-NOD-XX-XX-DR-C-08164 for proposed plans for Ravensdale. In RFI No. 2, it is established that flood storage in Ravensdale is necessary. There are no flood alleviation works proposed in the southern section of Ravensdale Park. The proposals for Ravensdale Park are designed to provide flood storage with the aim of minimising tree loss and visual impact. The options assessment for the design of the flood defence is outlined in the Chapter 4 of the EIAR. The option of creating an embankment would have divided the park and would have resulted in unacceptable tree loss.</p>
	4.19	<p>The reason for this he said was so as to accommodate the plans of Bus Connects who he said wanted to take the other side of the park. This brings into question the Councils priority on the flood defence and their decision-making process in relation to their own CDP and the promotion of Green spaces. At one point they deemed the whole park necessary to store water but as Bus Connects needed it the plans were changed.</p>	<p>The proposals from CFRAM Options Report were to construct a defence wall around the western, northern and eastern perimeter with height ranging from 0.81m to 2.3m on Ravensdale Drive side. This would cut off the northern and western entrances to the park. The first option considered, as outlined in EIAR Chapter 4, was to replace this with earthen embankments and slopes to keep access open, however, this resulted in large loss of trees in the park and loss of park space. The option progressed had the minimal impact on trees, and on the access and use of the park while providing the necessary flood protection.</p>
	4.20	<p>When questioned on the relationship between Poddle FAS and Bus Connects at the public information meeting in Mount Argus community Centre on the Mr Grant flatly denied that they spoke to Bus Connects.</p>	<p>The revised BusConnects proposals were submitted in March 2020 after the planning application for the Poddle FAS was submitted to An Bord Pleanála. The revised BusConnects proposals do not alter the proposed flood defences in any way and require a separate consultation and planning process that is unrelated to this Scheme.</p>
	4.21	<p>The building of the wall will diminish the park as a useable amenity. The wall will encourage anti-social behaviour in the area. I work as a professional Youth Worker in the area and have a unique perspective of the social problems this wall in Ravensdale Park will encourage. Already in the southern end of the park there is a wall that is constantly graffitied. The council has struggled to keep it clear of graffiti to the point where they have now stopped cleaning it altogether and haven't done so for over a year. Any new wall in the Northern end of the park will suffer the same fate.</p>	<p>The proposal for wall finishes in the Park are stone clad on the western side and fair finished concrete to the north and through the Park. Comments on the fair finish concrete were noted in the statutory Public Consultations and from discussions with DCC Parks and Realm it was agreed that stone cladding would be used for the whole section of the works. Random Rubble stone clad finishing is less prone to graffiti than fair faced concrete.</p>
	4.22	<p>The southern end of the park is less visible and as such is also prone to drug users frequenting it for consuming and dealing illegal drugs. The wall at the north end of the park will provide further cover for this type of activity. The council has removed walls in nearby Pearce Park and replaced them with railings to increase visibility in the park so as to improve public safety and combat illegal drug use and dealing in the park (a tried and tested passive security measure).</p>	<p>The wall heights proposed are required for flood protection purposes as described previously.</p>
	4.23	<p>The building of a wall around the entrance to the culvert will also only increase the incidents of illegal dumping at the site and lead to the entrance of the culvert becoming blocked more often.</p>	<p>As stated above DCC have a maintenance scheme in place as well as a reporting facility for people to notify them if dumping has occurred. The proposed trash screens and ongoing maintenance programme operated by DCC will limit the flood risk from any dumping.</p>

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	4.24	The biggest and most pressing issue in relation to the degradation of Ravensdale Park as an "amenity" is the COVID19 pandemic. During the pandemic the park has been an invaluable resource for local residents to exercise and meet with social distancing, especially for those who cannot travel and in light of travel restrictions or reduced mobility. It has been a vital resource that has sustained peoples physical and mental health during the lockdown. If it is divided it would be in direct opposition to the CDP.	The proposed works in Ravensdale will not remove or change any access to the park once complete and will have a minimal loss of green space in the construction of the central wall along the route of the existing footpath.
	4.25	There should be no development here until such time as the impacts of the reduction and division of usable open space in Ravensdale Park will have on the mental and physical health of local residents.	As above. There is minimal loss of greenspace in the park and the wall replaces a line of trees on one side of the tree lined footpath which already has the effect of splitting the green space.
	4.26	On one Sat 16th of May I informally noted the following uses of the park for recreation over a 3 hour period in the afternoon: Soccer, Gaa, Hurling, Cycling, Yoga, MMA training, Jogging, Cricket, socially distant meeting neighbors and friends, family picnics, dog walking and dance practice.	The revised tree removal drawings contained in Appendix 4 required removal of some tree clusters for the works. The landscape mitigation plans for Ravensdale, as modified by the updated tree removals now proposed, will increase the green space available in the Park. There is no reduction in the use of the Park for amenity and this is something the local authority encourage.
	4.27	<p>If the flood plans are there to negate a one in 100 year flooding event, they must also factor in a one in 100 pandemic event and weigh up the huge benefits of having an open space amenity that the public can use in an extreme event like the COVID19 pandemic. As stated in the proposed plan section 6.3.1.3 The works planned at Ravensdale Park are located within an area zoned Amenity/Open Space Lands/Green Network (Zone 29) in the Dublin City Development Plan which has as its objective "To preserve, provide and improve recreational amenity and open space and green networks." There are 10 trees not on plans that will be affected by the construction of the wall on the West side of Ravensdale park. These trees lie within the project boundary. This was pointed out to the engineers in the meeting of the 12th of March in Harold's Cross National School. I questioned if they would need to be removed to allow for the foundations to be dug. The OPW worker I spoke to was surprised at this and highlighted this to D. Grant. They said that the trees will be included on the submission. A third worker then said the trees didn't need to be on the plans as they would not be affected as they will be building on top of the existing old wall. These were two different responses from the workers on the same project leaving a stakeholder with no idea of the truth and no way to make an objective decision on the plans.</p> <p>In the plans itself, it is outlined that the wall will now be placed inside the existing old wall. This is not shown on the project drawings that depict Ravensdale park. It is hard to imagine how construction of the wall will happen without damaging the trees on Ravensdale Drive. In the EIAR it does have a small section where they claim they can insert the new wall inside the old wall and the majority of construction access is to be from the river side of the old wall (The eastern side of the river). If this is done then there are a further 10 trees that will be in danger of damage as they border closely to the eastern bank of the river and will block access to construction laying the new wall. These would be trees marked T816 to T825 in the tree survey. The majority of these trees are classed as: CLASS A INDIVIDUAL TREE HIGH QUALITY- RETENTION HIGHLY DESIRABLE by the consultants. I have included images of the 10 trees not on the plan that highlights the proximity of the trees to the proposed wall. It also shows the some of the 10 trees on the eastern side close to the river bank. I have also included an independent arborists report that further highlights the issue of the missing trees on Ravensdale Drive. Looking north along the Poddle showing the proximity of the trees to the proposed wall to be built on the river side of the old wall in the image. Looking South along the Poddle showing the proximity of the trees to the proposed wall to be built on the river side of the old wall in the image.</p>	<p>The 10 no. trees on Ravensdale Drive are not required to be felled for the works as per response to RFI no.7 and Appendix 4. It has been confirmed in the Arborist's report that these trees will not be removed.</p> <p>The method of construction works for the defence walls at Ravensdale are to facilitate working in the gaps between the large specimen and high value trees where possible. Smaller and lower value trees will be removed to provide access points to the works areas, and those trees will be replaced by compensatory replanting.</p> <p>For the large specimen and high value trees, a professional tree surgeon will be employed to undertake selective cropping and branch trimming of the canopies to facilitate the construction plant working along the river channel. Ground protection matting and tree protection fencing will be employed to protect the retained trees.</p> <p>There will be no impact on the trees outside the Park on Ravensdale Drive as the existing left bank wall along the river channel will be used to support the new wall which will be built against it from the channel side thus not interfering with the trees or their roots on Ravensdale Drive. It is proposed to utilise precast concrete wall units for the straight sections of the flood defences where site conditions allow. These units are prefabricated off site and consequently reduce the site construction durations.</p> <p>The use of precast units reduces the processes of shuttering, placing reinforcement and pouring concrete on site, thereby reducing the need to transport multiple materials to site, reducing storage areas on site, reducing site waste and reducing the environmental risks associated with using with wet concrete on site.</p>
	4.28	In the plans the consultants describe one of the reasons the project aims to alleviate the stress and fear of potential flooding can bring to residents along the Poddle river. Since I was made aware of the plans I have suffered extreme stress at the thought of the	The Scheme is designed to reduce the very real and present risk of flooding that persists in the Ravensdale Park and Kimmage area and which occurred in 2011.

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		potential damage the proposed plans will make to my local areas' amenities, environment, visual aesthetic and the potential creation of a new flood point at the back of my home.	
	4.29	At the public information meeting in January of this year it was suggested by project representatives that if the project doesn't go ahead the money for it will be lost. This is not a good enough reason to push forward with a badly planned project that will cause more problems for residents in Ravensdale Park than it will solve. On the grounds that the project contravenes the Aarhus convention, goes against the policies of the Dublin City Development plan and is a potential danger to public health and safety planning should be refused.	The applicant councils have made every effort to consult and inform the local community as plans in the project progressed through design. Refer to Consultations Report, response to RFI no. 1 Appendix 2.
<b>Deirdre Fagan</b>	5.1	The small habitat at Wainsfort Manor Crescent is a precious habitat of nature in an urban setting. In the past few difficult months it has brought piece of mind not just to the residents of Wainsfort Manor Crescent but to many residents of Dublin 12 and Dublin 6w who take their daily permitted walks, cycles, dog walks etc along this stretch of river. Children, in particular, in this urban built up area, have the benefit of seeing nature at first hand. There are bats, foxes, squirrels, birds including little egrets, grey wagtails, all manner of song birds and ducks and ducklings. These birds and animals only congregate here as the habitat allows them to do so.	As stated in the EIAR, there will be a temporary impact on the habitat at Wainsfort Manor Crescent area. Access is required to the works area to reinforce the block boundary walls on the left bank which are structurally not capable of withstanding flood flow. There is a requirement to remove some trees to access the river to complete these works, but this has been kept to a minimum by the construction methods chosen. The reinstatement, as agreed with SDCC Parks, will see full riverbank restoration and additional planting of native trees alongside the channel to protect and enhance the amenity and biodiversity of this area.
	5.2	Specifically relating to the EIAR and the Tree Assessment it is not clear to me the benefit of destroying this habitat by removing the tree cover has to the FAS other than being the easiest and cheapest method.	Following further consideration of construction methods at detailed design stage, and meetings with Council officials in SDCC and DCC, additional areas were surveyed by the project Arborist, Keith Mitchell of CSR. An updated Tree Survey and Arboriculture Impact Assessment is submitted as Appendix 4 in response to RFI no. 7 and includes updated Tree Removal and Protection Drawings.
	5.3	Several of the trees earmarked for removal in Wainsfort Manor Crescent are A and B grade trees (and their retention recommended) but there does not appear to be any rationale for removal given that the retaining wall proposals are on the north side of the river at Wainsfort Manor Crescent and the trees earmarked for removal are on the south side of the river. Why is it necessary to remove 36 trees this seems excessive.	After further review of the construction methods, the number of proposed trees to be felled for the Scheme in Wainsfort Manor Crescent has been reduced from 36 to 20. Information on this is available in Appendix 4 in response to RFI no. 7.
	5.4	In relation to the value of the nature these are dismissed as being of negligible value in the EIAR (Volume 2 Main Report Appendix 7-2). This does not take into the context of the setting, in a rural setting this type of wildlife may be considered of low value, but in an urban setting they are extremely important.	<p>The text cited in the submission is from Appendix 7-2, which is supporting information, not part of the impact assessment. It has been superseded by information in Vol 2: Chapter 7 of the EIAR.</p> <p>Under the Fossitt 2000 habitat classification scheme, it is standard practice to assess groups of trees as part of a defined habitat rather than as individual units, because ecological value increases as the number and diversity of trees increases. Six woodland / shrub habitats were described in Section 7.4.1 of the EIAR: broadleaved woodland (Fossitt code WD1), wet willow-alder-ash woodland (WN6), treelines (WL1), hedgerows (WL2), scrub (WS1) and scattered trees and parkland (WD5). The first five of these habitats are considered to be of Local ecological value (as defined in the CIEEM Guidelines for Ecological Impact Assessment), because broadleaf woodlands are uncommon in an urban context, and because they are associated with a riparian corridor. They were not assigned a higher ecological value (e.g. County value), because the habitat is fragmented, many trees are non-native, and they are 'modified woodlands' (i.e. planted trees that are managed or landscaped). Scattered / isolated trees within parkland are considered to be of Negligible ecological value, because most trees are non-native, and because isolated trees are less likely to be used by nesting birds or other arboreal fauna.</p> <p>Potential impacts on woodland have already been assessed in Chapter 7 of the EIAR. The revised tree felling proposals will not change the residual impacts of the development, as outlined in Chapter 7: Biodiversity of the EIAR</p>

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	5.5	I don't believe the report EIAR is fair and balanced and does not take the setting of the habitat or the surrounding very built up urban environment.	The process by which the EIAR was carried out is described in Section 1.7, Chapter 1 of the EIAR report.  More specific to ecology, the EIAR has been prepared in accordance with the Guidelines for Ecological Impact Assessment in the UK and Ireland (2018), which is the primary resource used by members of the Chartered Institute of Ecology and Environmental Management (CIEEM).
	5.6	Given that the report itself acknowledges the magnitude of change which will result in a change in character of the area and that the removal of the vegetation and the large trees is considered an adverse effect to Wainsfort Manor Crescent, the effort to make this known to residents of Wainsfort Manor Crescent has been poor. A leaflet shoved through a letterbox just before the pandemic restrictions were implemented is hardly the correct level of public engagement.	Refer to response to RFI no. 1, Appendix 2 and its associated appendices for full details on how the applicants informed the public of the information events. Leaflet drops were made to residents of Wainsfort Manor Crescent on January 10th and 11th 2020 informing them of the consultation days that took place on the 16th and 20th of January. Leaflets were also distributed to Wainsfort Manor Crescent residents in March 2020 informing them of the consultation events that took place on the 10th and 12th of March. There were other residents from Wainsfort Manor Crescent in attendance at meetings on 20 <sup>th</sup> January 2020 and 10 <sup>th</sup> of March 2020.
	5.7	The tree survey report is difficult to decipher, and it appears some of the trees have been misidentified and mislabelled. T970 and T971 have not been tagged. TG10 is not included on FAS map but on the Fortfield Road map. This is confusing and misleading and undermines the validity and efficacy of the tree survey. I would say it is not easily readable or accessible for a lay person which is shocking given the impact.	The updated tree survey report has addressed the issues raised on the information provided on trees in Wainsfort Manor Crescent and Fortfield Road (see Section 2.2 of Appendix 4).
	5.8	There has been no photomontage provided (at Wainsfort Manor Crescent)(unlike other locations affected) so that the residents can see what the changed area and the adverse effect will look like and what the impact will be. There will be flood walls and 36 trees removed. Why has this not been provided to the location with the most adverse effect potential?	The flood walls are on the far side of the river (left bank) when viewed from Wainsfort Manor Crescent against the existing high block boundary walls which is a minimal change in visual impact.
	5.9	As has been noted in the EIAR report the removal of vegetation and 36 trees will change the character of the area in Wainsfort Manor Crescent from an urban nature sanctuary to something more concrete and urbanised.	There is no material change to the natural right bank of the river in this location. The concrete walls are to be erected to replace or reinforce the existing boundary walls which make up the left riverbank.
	5.10	This is unknown to many residents due to the poor communication by SDCC and DCC.	Refer to response to RFI no. 1, Appendix 2 and its associated appendices for full details on how the applicant informed the public of the proposed plans.
	5.11	It appears that no care or creative thinking has gone into these plans or proper alternatives to the destruction of wildlife habitat or removal of 36 trees proposed.	Construction methods have been chosen and further refined at detailed design stage to reduce the impact on trees. Further information is contained in Appendix 4 as part of RFI No. 7 where the number of trees lost has been reduced from 36 to 20.
	5.12	During the current pandemic we have had the opportunity to reassess how we approach matters such as our environment and many people are only now beginning to appreciate their own local environment.	There will be no loss of green space at this location as result of the proposed Scheme.
	5.13	The change to a more concrete environment will lead to more anti-social behaviour where there is currently none.	The defence proposed are to replace or reinforce existing concrete block walls on the left bank of the river so there is no effective increase in urbanisation.
<b>Irish Wildlife Trust</b>	6.1	The IWT would like to make it clear that we are not opposed to flood prevention or alleviation measures. However, traditionally in Ireland these schemes have been based upon heavy engineering solutions, These are associated with enormous ecological damage which, in many cases, are likely to have exacerbated flood problems elsewhere or which now limit landscape adaptation to a climate-altered future with increased flood risk. We believe that restoring natural flood landscapes must be a priority for any future flood schemes even where some hard engineering may be required. The Poddle Flood Alleviation Scheme is an example in point.	This response should be viewed as positive in relation to the Scheme where Natural Flood Management measures have been incorporated to the Scheme and the detailed and revised proposals for replacement tree planting, mini woodland planting, and channel naturalisation.  See response to RFI no. 2 of the main response document and Appendix 3 for details on how Natural Flood Management has been incorporated into the Scheme designs.

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	6.2	<p>The IWT welcomes the use of nature-based solutions in the scheme, especially in the Tymon Park area. South Dublin County Council is to be commended for its approach here, which will result in greater wildlife and amenity benefit as well as addressing flood risk. However, we have serious concerns regarding proposed tree loss in the Ravensdale Park (Kimmage Road), St. Martin's Drive and Wainsfort Manor Crescent areas. The Environmental Impact Assessment Report (EIAR) for the scheme identified mature treelines in these areas as of local value to biodiversity and that their removal will result in a significant negative effect to biodiversity. Many of the trees were identified in the tree survey as "CLASS A - High Quality - Retention Highly Desirable". Due to the size of many of these trees, they are effectively irreplaceable and even the EIAR recognises that any new, compensatory planting could take 20 years to approach equivalence (in fact, it is more like that new trees would take at least twice this length of time to replace the trees which are currently standing).</p> <p>The biodiversity chapter in the EIAR fails to quantify this impact and there is no evidence that the mitigation which is proposed is adequate in compensating for this significant effect to the environment. It suggests that two new trees will be planted for every tree lost, however the species and/or age of the trees to be planted is not stated and so a 2:1 ratio in this case is not appropriate.</p>	<p>In total, the number of trees to be re-planted will be more than twice the number removed for the Scheme (See RFI no. 9 of the main response document). Due to the heavily urbanised nature of the DCC area there are limited opportunities for replacement tree planting directly within the works areas for Ravensdale Park and St Martin's Drive. It is proposed that 20 no. trees will be replanted in Wainsfort. The Scheme will provide additional benefits for green and open spaces in residential areas with tree planting and landscape enhancements. In SDCC areas there are plans to plant a series of mini woodland areas in Bancroft and Tymon Park in addition to the standard tree planting in Tymon Park, Whitehall Park and Wainsfort Manor Crescent. This will further enhance the natural flood management properties of the catchment.</p> <p>As stated in the response to RFI no. 8, the proposed mitigation measures will all achieve at least a neutral impact on ecological features. It is noted that treeline and woodland habitats will take some time to re-establish to baseline levels, because there is a size / age limit at which replacement trees can be planted, and they will take some time to re-establish to baseline levels. Therefore, this is recorded as a slight negative impact in the short-term, but as a neutral impact in the medium term (est. 10 years).</p>
	6.3	<p>We would like to point out that trees in urban areas are vitally important not only for biodiversity but for human health and welfare. According to South Dublin County Council's Tree Management Policy ('living with Trees, 2015-2020): "they provide significant economic, social, environmental, ecological and aesthetic benefits to our communities and to our urban and residential streets, parks and open spaces. They also enhance biodiversity and play a crucial role in mitigating climate change." With regard to flooding this document recognises the important role that trees play in alleviating flooding, stating "Trees help mitigate the risk of flooding - tree canopies intercept rainfall. Among the stated aims of the tree management policy is: - maintaining and improving the tree cover for the future; - promoting the importance of trees in shaping the distinctive local character and appearance of South Dublin's urban landscape; - recognising the significant aesthetic, landmark, ecological, social and economic value that trees provide</p>	<p>Due to the heavily urbanised nature of the DCC areas there are limited opportunities for replacement tree planting directly within the works areas for Ravensdale Park and St Martin's Drive. While replacement trees are being suggested for the parks and green spaces affected by the proposed Scheme, these areas are not of a sufficient scale to accommodate the proposed 2:1 ratio for replacements. There are green spaces within 2km of the affected parks and green spaces that could benefit hugely from tree planting and other measures for ameliorating against biodiversity loss. There is a commitment on the part of both applicant councils in respect of replacement tree planting, landscape enhancements and ecological enhancements in the Scheme (see below).</p>
	6.4	<p>At the same time, South Dublin County Council (SDCC) have acknowledged that the extent of tree canopy in their area is extremely low. Figure 1 below is taken from their document 'Amendments to Tree Management Policy 2015-2020 'living with Trees' following interim internal review in February 2019'. These amendments were made following the publication of the Dublin Tree Canopy Study undertaken by the School of Geography, University College Dublin and published in March 2017. The amendments document highlights how Dublin as a whole has a tree canopy of 10% (below the European average of 15%) and approximately two thirds of urban SDCC has less than 10% canopy cover. Indeed, as highlighted in figure 1, the area of the proposed flood alleviation scheme has substantial areas where tree cover is less even than 5%. Yet the scheme fails to address this 'tree poverty' even though it is recognised that that trees are part of the solution to flooding issues. In this light it seems incredible that any loss of mature trees could be considered in this area.</p> <p>Even where open green space is present, such as at Tymon Park, there is a noticeable absence of trees. Figure 2 shows the portion of the Poddle catchment where open, treeless green spaces can be seen in Tymon Park (east of the M50 motorway) and elsewhere. There seems to be no strategy to increase tree cover in these areas.</p>	<p>In the response to RFI no. 9 of the main response document, DCC and SDCC have provided the commitments for tree replanting in their respective areas. DCC provide commitments for 166 trees to be replanted in green spaces within 2km of the affected parks that could benefit hugely from tree planting and other measures for ameliorating against biodiversity loss. SDCC had proposed that 350 trees be replanted across Tymon Park, Wainsfort and Whitehall Park. In addition to these 350 trees they have proposed the planting of mini woodland areas in Tymon Park and Bancroft Park. These woodlands will facilitate the planting of approximately 14,000 trees and shrubs. This will further enhance the NFM properties of the river.</p>

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	6.5	<p>One of our principle observations on the Poddle Flood Alleviation Scheme is the absence of any analysis of tree cover in the catchment. The 'Alternatives' section of the EIAR should outline the alternative approaches to the scheme which were analysed however this is deficient as there is no analysis of increasing the tree canopy cover as a contribution to flood alleviation. We would have expected to see modelling to assess the benefits of increasing tree cover to the Dublin average of 10%, the European average of 15% and greater than this. However, this analysis is absent.</p>	<p>The proposed Poddle FAS arose from the CFRAM Study for the Eastern Area, as undertaken by OPW. This Study was subject to extensive public engagement, and Strategic Environmental Assessment. From this Study two main options for flood alleviation along the River Poddle were brought forward to be further investigated and designed in the Poddle FAS. The CFRAM Study also recommended that certain flood risk management methods are employed on a catchment and sub-catchment basis. Listed were planning and development control, building regulations, catchment wide SuDS, land use management, strategic development management, and flood warning/forecasting. These flood risk management measures were recommended in ADDITION to flood storage and flood protection. Land use management is defined in the CFRAM Study as "<i>Changing how the land is used in order to store or slow surface water runoff and slow in channel and out of bank flow along the river in order to store flood water in suitable locations. This may consist of the creation of wetlands, restoring river meanders, increasing the amount of boulders and vegetation in channel, perpendicular hedges or ditches in the floodplain, tree rows and planting in floodplain to either slow flow or direct flow, planting along banks parallel to flow, fencing off livestock from riparian strip, changing agricultural practices to decrease soil compaction and increase water infiltration.</i>" The proposed Scheme includes land use management including creation of wetlands and restoring river meanders and channel naturalisation which are part of the proposals. In addition, significant replacement tree planting and mini woodlands are proposed in the catchment, which will in time improve natural flood management in the catchment. This is a proposal for a flood alleviation scheme, which with solid commitments from the applicant councils, will increase tree cover in the catchment.</p>
	6.6	<p>The other main observation we would like to make is that the EIAR does not provide adequate reasoning to justify the loss of mature trees in the Ravensdale Park, St. Martin's Drive and Wainsfort Manor Crescent areas. It is simply stated that the scheme design is not compatible with retaining these trees. The IWT believes that a full analysis of alternatives should have been provided including the imposition of flood walls etc. on areas which are currently hard surfacing, rather than encroaching on the root zones of the few mature trees present in these neighbourhoods. No such analysis is presented and we believe that insufficient effort went into finding alternatives. In short, we believe that the trees could be preserved if the will was there to do so.</p>	<p>Following further consideration of construction methods at detailed design stage, and meetings with Council officials in SDCC and DCC, additional areas were surveyed by the Arborist, Keith Mitchell of CSR. An updated Tree Survey and Arboriculture Impact Assessment is submitted as Appendix 4 and includes updated Tree Removal and Protection Drawings. Following a site meeting with SDCC, DCC Parks, OPW, CSR and NOD on 14th September 2020, where proposed construction methods were clarified and the number of trees to be removed for the Scheme was amended and agreed.</p>
<b>Jane McKeivitt</b>	7.1	<p>I appreciate that there is a need control the periodic flooding that occurs along the river Poddle and I have no objection to a proper flood control programme. However, the plan as presented to date is flawed in significant ways. In general it is flawed in three ways; firstly that the process has been so flawed it has not complied with the legal requirements, secondly the plan itself contains factual flaws, and thirdly it is contrary to the SDCC and DCC's own policy. One is left with no confidence in the proposal let alone how it will be executed. I ask that it be rejected.</p> <p>In detail I object to Poddle FAS on '3 grounds because the planning process lacked:</p> <ul style="list-style-type: none"> <li>A. Proper public engagement, in accordance with statutory laws.</li> <li>B. A full EIAR (that also takes into account concurrent planning proposals), in accordance with Irish and EU Law.</li> <li>C. Cognisance of social and environmental impact on community , in accordance with The Sustainable Development Goals, CFRAM objectives. DCC and SDCC Development Plans.</li> </ul>	<p>Response is provided to each of the points below.</p>
	7.2	<p>A 1. I am reliably informed that claims made in the plans in relation to public participation are inaccurate. A local resident relates the following:</p> <p>A The first time I heard of Poddle FAS was when the proposed plans were presented to local councillors on 9th September 2019 on a DCC South East Area Committee webcast. I live less than 200 meters away from the Poddle and despite my active involvement in</p>	<p>Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the Poddle FAS project launch in 2018. Information about public information events was communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See response to RFI no. 1, Appendix 2 and its associated appendices for further details on these consultation events. The update presentation of scheme at the DCC SE Area Committee meeting of 9th September 2019 was</p>

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		<p>both my community and local politics, I never heard of the plans until I stumbled on them accidentally on DCC webcast 9.9.19: <a href="https://dublincity.publici.tv/core/portalfwebcast_interactive/455060">https://dublincity.publici.tv/core/portalfwebcast_interactive/455060</a>". Although I am not a local to the scheme, I am a long term resident of Dublin and I have a legitimate interest in a proper public engagement for planning.</p>	<p>the first area meeting for the newly elected council, with presentations and updates on the scheme having being carried out with the previous Council members prior to the summer elections.</p>
	7.3	<p>A 2. Lack of public information regarding Poddle FAS is of grave concern. Poddle FAS website is not fit for purpose. The retrospective updating of information in recent days and weeks highlights the last-minute efforts to correct this serious shortcoming in the planning process. I am aware this was flagged this with Project Manager, David Grant several times since October 2019, and the solution he offered was to contact him directly. This is not an open way to engage communities and individuals who do not have a direct line to Mr. Grant. The contract portal was/is defunct on Poddle FAS website, thus communication of Poddle FAS has not been far reaching or anywhere near inclusive.</p>	<p>As above. Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the Poddle FAS project launch in 2018. Information about public information events was communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See response to RFI no. 1, Appendix 2 and its associated appendices for further details on these consultation events.</p>
	7.4	<p>A 3. All stakeholders have not been engaged in the process with parity. Some residents have been engaged since 2011 others more recent. The community, in Dublin 12 only became aware when it was brought to their attention by a resident in October 2019. There are over 12,000 people living in Crumlin. For example, Bangor Road is meters from the Poddle. Bangor Road residents have not been engaged in the process. Many still have no idea it is happening and are unaware of the environmental impact on a large scale. The 'reach' of information has been selective. I believe 1000s still do not know about it. 'Early public participation' therefore for 'effective public participation' did not take place with equity - thus breaking a fundamental right to include all stakeholders equally as set out in the Aarhus Convention.</p>	<p>As above. Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the Poddle FAS project launch in 2018. Information about public information events was communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See response to RFI no. 1, Appendix 2 and its associated appendices for further details on these consultation events.</p>
	7.5	<p>A 4. There is no reference to those who oppose or voiced concerns and objections to the plans in the planning documents. Where is evidence of concerns to date? How have they been recorded, collated, and integrated in the plans?</p>	<p>Records of concerns raised on the Poddle FAS portal can be seen in the Consultations Report in response to RFI no. 1, Appendix 2.</p> <p>Concerns raised by the public have been integrated throughout the design phase of the Poddle FAS especially when examining the different proposed options at various locations.</p>
	7.6	<p>A5. A friend had to organise public meetings and invite council representatives to open public meetings to share information, to seek clarity and to ask questions about the plans - further illustration that the 'consultation' process has been exclusionary. Closed meetings were arranged privately thus creating exclusive participation - not inclusive or equal.</p>	<p>See Consultations Report in response to RFI no. 1, Appendix 2, Section 2.3.1 and 2.3.2.</p> <p>As outlined in the Consultations Report (Appendix 2) in Section 2.3.1 these meetings were not private and were held as part of the information gathering process. Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the project launch in 2018. Information about public information events was communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See Appendix 2 and its associated appendices for further details on these consultation events and how they were advertised. Where a member of the public or elected member contacted SDCC through the website or directly, a member of the project team responded by email, telephone or face to face meeting to assist in their query which is a very open form of engagement.</p>
	7.7	<p>A 6. Exclusive access to planning documents is in breach of the public's right to equal access to information and compromises transparency. One-to-one meetings with project manager David Grant are not only professionally inappropriate but also deny full, open, transparent public participation and open representation. One-to-one meetings have also given rise to different information being passed around to different stakeholders thus giving rise to ambiguous, and often ambivalent information. I am aware that one resident was told by David Grant in October 2019 that tree tagging at Ravensdale and St. Martin's was nothing to do with Poddle FAS and he had no knowledge of same. In November, he retracted this statement and said some of the trees 'might' have been tagged by SDCC appointed arborist, but he wasn't sure. In December he said trees had been tagged months ago. Further, public feedback given at 'information days' was not recorded from</p>	<p>As outlined above and in the Consultations Report (Appendix 2) in Section 2.3.1 these meetings were not private and were held as part of the information gathering process. Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the project launch in 2018. Information about public information events was communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See Appendix 2 and its associated appendices for further details on these consultation events and how they were advertised. Where a member of the public or elected member contacted SDCC through the website or directly, a member of the project team responded by email, telephone or face to face meeting to assist in their query which is a very open form of engagement.</p>

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		the get-go and despite requests by residents, nor have minutes of meetings been furnished of meetings conducted in private between David Grant and other residents/stakeholders. The 'consultation' process lacks transparency and integrity. For this reason, the plans must be paused until proper and meaningful public consultation can be guaranteed.	
	7.8	A 7. Misinformation has permeated the process. A local councillor cited the felling of 6 trees at Ravensdale in DCC South East Committee meeting (9.12.19) - she quotes a report which she says was given to her by David Grant. This is an example of the spreading of misinformation which leads to confusion, mistrust and lack of transparency. See webcast <a href="https://dublincity.publicl.tv/core/portal/webcast_interactive/455060">https://dublincity.publicl.tv/core/portal/webcast_interactive/455060</a> The 'misquote' was not corrected in council chamber by DCC/SDCC or David Grant. The number of trees reported to be felled for Poddle FAS have been misquoted as 6, 12, 18, 20, 28 and 29 over the course of recent months. In response to a direct query from a resident about the approximate total tree loss David Grant and another representative from O'Dwyer's said they estimated 30 max trees in total for the entire project. The figure of 228 trees in the final proposed plans were a shock to many who had asked the same question, but who were never given a figure over 30. In March, David Grant confirmed in public that 29 would be felled at St. Martin's; however, according to Appendix 5-2 under Volume 4 of Poddle FAS plans, 45 trees will be felled at St. Martin's. Furthermore, a number of trees on Poddle FAS map are not tagged. A number of trees at Wainsfort and Fortfield are mixed up. We have photographic evidence of this. The tree survey is unreliable due to a number of errors regarding tagging. In this instance public information is not trustworthy and undermines the integrity of the entire project.	<p>Details of the final number of trees to be felled as part of the project is reported in response to RFI No 7 of the main response document and in Appendix 4.</p> <p>In some cases it was found that some tags had either fallen off trees or had been removed by persons not relating to the Poddle FAS. These trees (T455 and T456 at Wainsfort Manor Crescent) have been re tagged where necessary (see updated tree survey drawings as part of Appendix 4).</p> <p>The updated tree survey report has also addressed corrected an error in reporting on Wainsfort Manor Crescent and Fortfield Road (see Section 2.2 of Appendix 4.)</p>
	7.9	A 9. Last minute 'consultation' days were called for by communities who had not been included from the beginning and were scheduled by DCC/SDCC at Christmas during working hours. This is exclusionary and overly burdensome on the availability of concerned citizens to engage with the process. The final 'consultation' day occurred on Day 1 of Lockdown - on school grounds - when schools had been officially closed - thus only a handful of people showed up, excluding many who had questions and concerns. This is another reason why the plans must be paused so that public consultation can be meaningful and carried out with integrity.	<p>Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the project launch in 2018. Information about public information events was communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See response to RFI no. 1, Appendix 2 and its associated appendices for further details on these consultation events. In addition to the consultations undertaken the public information events following submission of planning documents were held on week commencing 9th March after which time the documents had been available for view by the public from 27th February on the project website, planning portal for SDCC and DCC and at the library and council offices as detailed in the planning notice. Following this the deadline for submitting observations was extended from 16th April to 11th June.</p>
	7.10	A 10. The term 'consultation' is misleading as there was no formal consultation other than one-to-one brief 'chats' with 3 representatives who preferred conflicting information regarding tree loss, defence wall heights, defence wall locations and the purpose of the wall at St. Martin's and Ravensdale. Questions from the public were not made public. Answers to the public were not made public, and are not, to date in the public domain. Official records documenting private meetings with individuals and residents' associations need to be made available to all in the interest of transparency.	<p>Records of meetings between SDCC's resident engineer are presented in response to RFI no. 1, Appendix 2-4. The general topics of questions from the public are presented in Appendix 2.</p>
	7.11	A 11. Covid-19 restrictions mean that all stakeholders have not had equal access to engage in the submissions process. Library closures and lack of access to online plans have inhibited 100s, perhaps 1000s from engaging in the process. Isolating and cocooning guidelines and social distancing continue to inhibit full and inclusive public involvement in this process, thus more time is needed to ensure meaningful public engagement can happen.	<p>This is not within the applicant's control.</p>
	7.12	A 12. Submission fees prohibit all stakeholders from having a voice in this process. Given that large number of Crumlin residents rely on social welfare and live in social housing the majority of those most affected by Poddle FAS on low incomes would find it impossible to find a spare 50 euro to make a submission. That fee far exceeds a bar to	<p>This is not within the applicant's control.</p>

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		prevent spurious submissions and results in denying directly affected citizens from participation. The process discriminates against those who cannot afford to pay to be involved.	
	7.13	B 1 The realignment of the river at Whitehall will involve in-stream works. Mitigation measures have not been described in detail in the plans. The need for definitive data is imperative and has not been furnished in these plans, thus they do not comply with EU Law. The creation of a new section of channel, diversion of the river to the new channel, and the infilling of the existing channel is of concern. Temporary crossings of the River Poddle will be required to facilitate works in some locations, notably Tymon North and Tymon Park. In these cases, all in-stream works should comply with current best practice, as laid out in : Managing Natura 2000 sites : The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" Brussels, 21.11.2018 C(2018) 7621 final.	See Revised NIS for further information on mitigation measures.
	7.14	The mitigation measures in Poddle FAS Natura Impact Statement clearly do not comply with the above, therefore in the opinion of the European Commission they do not comply with E.U. Law. (See, supporting submission from Peter Sweetman).	See Revised NIS for further information on mitigation measures.
	7.15	B 2 Poddle FAS tree survey is not fit for purpose. Tree tagging is erroneous and many trees mapped in Poddle FAS document are without tags in real life. Specific errors are set out in the submission of Roisin McAleer. See also independent arborist report of Ravensdale Park (CMK Horticulture and Arboriculture Ltd .) Such extensive tree loss is at odds with DCC Climate Change Action Plan, SDCC and DCC Tree Management Policies. The promotion of nature-based solutions to climate problems by both local authorities is in direct contradiction to many proposals in Poddle FAS; most especially where hard defences will be erected for flood mitigation.	In some cases, it was found that some tags had either fallen off trees or had been removed by persons not relating to the Poddle FAS. These trees (T455 and T456 at Wainsfort Manor Crescent) have been re tagged where necessary (See updated tree survey drawings as part of Appendix 4). The updated tree survey report has also addressed the issues raised in relation to an error in the information provided for Wainsfort Manor Crescent and Fortfield Road (see Section 2.2 of Appendix 4). See also Keith Mitchell / CSR's response to the CMK independent arborist report attached.
	7.16	There are no street trees from Fortfield Road to Clonbrassil Street - stretch of 1.5km. As UCD survey in DCC Tree Management Policy highlighted, 0-5% tree coverage is starkly apparent in the. Crumlin/Kimmage vicinity. The European average for city tree coverage stands at 15%, according to DCC own figures. The proposed loss of more tree coverage in already deprived areas contravenes DCC's own goals to improve this and further illustrates that tree poverty is inextricably linked to social poverty. An alternative solution to Poddle FAS should start with increasing tree cover in the Poddle river catchment area. A more sustainable, natural and cost effective way is to create extensive tree coverage along catchment areas. New trees will not mitigate flooding or create the same benefits as mature trees, which absorb more water, CO2, encourage nesting and create shelter during hot periods.	DCC provide commitments for 166 trees to be replanted in green spaces within 2km of the affected parks that could benefit hugely from tree planting and other measures for ameliorating against biodiversity loss. SDCC have committed to replanting 350 trees across Tymon Park, Wainsfort and Whitehall Park. In addition to these 350 trees they have proposed the planting of mini woodland areas in Tymon Park and Bancroft Park. These woodlands will facilitate the planting of approximately 14,000 trees and shrubs. This will further enhance the natural flood management properties of the catchment.
	7.17	B 3 Poddle FAS wildlife survey is inaccurate and deficient. The omission of red-listed birds such as The Grey Wagtail and The Kingfisher at Wainsfort and St. Martin's, amongst other omissions undermines its credibility. Both species have been seen a number of times at St. Martin's, Ravensdale and Wainsfort this spring 2020 alone. Recordings of bats at St. Martin's proves how important this corridor is for a wide variety of bats, not just most common ones as recorded in Poddle FAS survey. The riverine corridor serves as a habitat for a large number of birds, otters, ducks, swans, frogs etc. The EIAR also fails to record the many natural occurring pollinators along the river, most especially at St. Martin's and Wainsfort.	Grey wagtail, kingfisher, grey heron and little egret were all named individually under sub-heading ' <i>Other bird species</i> ' in Section 7.4.2.6 of the EIAR, and the suitability of the habitat was discussed. Similarly, swans and ducks were discussed under the subheadings ' <i>Breeding waterfowl</i> ' and ' <i>Other over-wintering waterfowl</i> '. On this basis, we contest the claim that these species were omitted from the EIAR.
	7.18	B 4 Poddle FAS EAIR does not take into account environmental impact assessment of other proposed and concurrent planning projects. For example, Bus Connects planning is currently in progress. Its development will impact Ravensdale Park and other sites along the Poddle. Another question arises: why did ABP give planning permission to developments at Ravensdale, and to Marlet developments at Mount Argos and Harold's Cross if these areas are considered to be at risk of flooding? Is Poddle FAS a means of facilitating developers to gain planning permission, or is it to protect properties that were flooded in 2011? Building on flood plains or where flooding historically happens, is	BusConnects proposals here refer to proposals released by BusConnects in March 2020 after the submission of the Poddle FAS in February 2020 which were significantly altered from proposals in circulation prior to this where there were no BusConnects works proposed within Ravensdale Park flood defence locations. This scheme has no control over the planning approvals or controls of existing or historical developments.

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		misguided, reckless and put lives at risk. The flaws the process have undermined any confidence in the planning.	
	7.19	C 1. Risk to social infrastructure and other trees not identified on the plans is very high due to the extensive excavations required for the proposed flood defence measures, including the erection of walls and other extensive excavations required for the proposed scheme. Consequently, there will be an overall loss of several social park/green amenities due to the extensive flood walls. The river is a vital part of the identity of Dublin and to cut it off in an extremely insensitive way using alien materials will degrade the wildlife corridor and its unique green fabric of this locality in the south side of the city. In particular, the walls at St. Martin's and Wainsfort will separate whole communities from their connection to the river and will further cement social and class divisions across the community. For example, socially deprived areas like Crumlin will be even more pronounced with the proposed loss of 2 nearby parks at St. Martin's and Ravensdale. Covid-19 experiences have highlighted the need for all communities to have access to green space, now more than ever. Access to green spaces will be diminished if the proposed walls are built and the huge number of trees are removed along the Poddle catchment area of Kimmage and Terenure especially. A less socially destructive plan should be considered.	The Scheme proposals do not involve culling of local parks and green spaces. It is a fact that access to and use of the local parks and green spaces will be restricted during construction at the works areas. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. The modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the re-aligned channel at Whitehall, and the embankment in Tymon Park will alter these parks and spaces and the way they are used and enjoyed by the public, but they will not result in the loss of these spaces. Careful consideration as to how these spaces are used has been given in the design of the Scheme
	7.20	C 2. It is known that where there are more trees, anti-social behaviour decreases, and where there are walls, antisocial behaviour increases. The area at St. Martin's -Poddle Park is particularly prone to illegal dumping and antisocial behaviour. This is likely to increase if walls are built where anti-social behaviour will be more covert and go unnoticed behind walls and enclosures. The wall at St. Martin's in particular was selected without giving any serious consideration to viable alternatives and in engineering terms it does not appear to act as a flood defence wall but instead appears to be a wall dividing 2 neighbourhoods. The wall down the centre of Ravensdale does not make sense. It is referred to as flood wall. A wall that tapers to 70cm is not a flood wall in any engineering terms. It is not clear what purpose the centre wall at Ravensdale will serve, other than to split the park in half. Will one half be used as a flood basin or wetland? Will the other be used for Bus Connects? No one on the Poddle FAS 'consultation' team could explain this wall to me. Thus, it needs to be called into serious question as to whether or not it serves any reasonable purpose related to flood mitigation.	The proposals at Ravensdale are necessary to protect the surrounding area from risk of flooding. where possible the wall heights have been reduced and located to minimise impact on the existing park. This is described in the EIAR Volume 2, Part 1 Section 4 and further commented on in Appendix 3 in response to RFI No. 2.
	7.21	C3. Dumping has been cited by David Grant as a major cause for concern in relation to previous flooding of the Poddle (see webcast DCC - <a href="https://dublincity.pu_biici.tv/core/portal/webcast_interactive/439577">https://dublincity.pu_biici.tv/core/portal/webcast_interactive/439577</a> ). Unsolicited dumping continues despite a consensus that it is a serious risk to the river both in terms of pollution and flooding. Despite requests for DCC records for the council 's rubbish removal from Poddle river at Poddle Park, St. Martin's and Ravensdale none has been forthcoming. A volunteer who removes rubbish weekly from the river informs me there is no reason to believe that a serious or concerted effort is being made by SDCC or DCC to safeguard our river, its wildlife and aquatic life from fly-tipping. The threat of flooding due to blocked culverts and drains remains and will continue to remain a threat to our river, unless a policy is put in place and enforced, to protect our river from dumping. A more cost effective and sustainable measure for flood alleviation and river restoration is to start with local authorities removing litter and rubbish from the river. While the last point, it is possibly the most important issue that ABP must consider. Despite spending millions on Flood defences, if dumping continues, and culverts are blocked, no flood wall, no matter how high it is built, will stop the river bursting its banks if the river is clogged with illegally dumped waste. This issue is not addressed in Poddle FAS.	Illegal dumping is a blight on all communities and as shown in 2011 can lead to increased flooding - however, as stated in EIAR and above - the inclusion of trash screens at key culvert locations together with unified maintenance programme from SDCC/DCC limits the risk of blockage from dumping. Within the flood defence design, the inclusion of 60% blockage at these sensitive culverts has allowed for robust defence.  We have been informed by local residents that most of the anti-social behaviour in Ravensdale Park is mostly at the western end of the park due to the amount of tree cover here.
	7.22	C 4 There is no guarantee that Poddle FAS will achieve the goal of property and lives will be protected from floods. There is no evidence that insurance will become available to	DCC have provided letters of comfort to residents seeking house insurance on similar Schemes, however, there are no obligations on commercial insurance companies to provide

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		householders even if a flood alleviation scheme is in place. In conclusion the Poddle FAS is so flawed it cannot stand as is. The only recourse is to deny it in its current form.	insurance to members of the public. The policy of providing guarantees for insurance is outside of the scope of this Scheme.  A Memorandum of Agreement is in place with the OPW and Insurance Ireland since June 2014. While the provision of insurance cover, the level of premiums charged and the policy terms applied are a matter for individual insurers, the Memorandum requires that insurers take full account of information provided by the OPW on completed flood defence schemes.
<b>Margaret Docherty</b>	8.1	It is not clear to me what actual works are intended, other: than an oblique reference to the construction of flood walls and a definitive reference to cutting down c, 36 trees, many of which are well-developed at this time. No visuals seem to have been included to allow me to properly understand the nature or likely impact of the proposed works and to make an informed decision on the acceptability and necessity, or otherwise, of the proposed works. The reference below seems more likely to suggest that the works in-Wainsfort Manor will merely be the temporary "works site" for works elsewhere: Temporary works include establishing a main construction compound in Tymon Park with access off Limekiln Road, Tallaght which will be in operation for the entire duration of the works; and temporary works/ set down areas at Wainsfort Manor Crescent.  It would be unacceptable to me that there would not be absolute clarity on what is happening within the 'Wainsfort' section prior to any works being approved by ABP.	As shown in the planning drawings No. RPFS-NOD-01-XX-DR-C-08150 TO 08154 and RFI no. 7 Appendix 4, the works required at Wainsfort consist of the construction and reinforcement of walls along the left bank of the River which make up the rear boundary of properties on Whitehall Road and Glendale Park. The existing boundaries form the riverbank and they consist of high block walls, elements of concrete walls and large gaps in between which have no structural integrity in withstanding flood waters. The proposed works are intended to provide a uniform flood resistant wall against these boundaries. The construction of these walls will require access via Wainsfort Manor Crescent and a temporary compound in the green area for securely storing machinery while works are being carried out here. Some trees are required to be felled in order to carry out the work but under the revised construction plans where the use of precast units is proposed, the number of trees needing to be removed has reduced. As the proposals consist of reinforcing existing boundaries additional visualisations were not deemed necessary.
	8.2	I would be deeply concerned at the removal of 36 maturing trees from alongside the Poddle in the 'Wainsfort' section of the proposed works, both from an aesthetic and functional perspective. Whilst replanting might occur as part of the works, it would take many years to replace the amenity benefit of the current trees during which time the natural habitat (and the flora/fauna supported by the current trees and surrounding bushes, ditch, grass, lands, etc.) would be significantly and negatively impacted.	After further review of the construction methods, the number of proposed trees to be felled in Wainsfort Manor Crescent has reduced from 36 to 20. See RFI no. 7 and Appendix 4. SDCC have also committed to planting 20. no. replacement trees in Wainsfort Manor Crescent as described in response to RFI no. 9
	8.3	On a related point, I believe that there are a number of errors and inconsistencies which lead me to legitimately question the quality of the tree survey, at least for the above section of the Poddle FAS, the T977 picture in the tree survey does not correspond to the T977 tree which is in fact a "Fagus sylvatica 'Purpurea'", easily identifiable with its red leaves; the TG10 (tree section; group number 10) appears in the tree pictures for that section (the "Wainsfort" section) whereas it does not appear on the tree survey mapping for that section (it is located on the "Fortfield Road" section); or, put another way, there are two different TG10 pictures, one in the "Wainsfort" section and one in the "Fortfield"	The updated tree survey report has addressed the error in the information on Wainsfort Manor Crescent and Fortfield Road (see Section 2.2 of Appendix 4).
	8.4	Further, I believe that not all trees planned for removal were properly tagged, namely T970 and T971 didn't have any tag as of 08/06/2020. Therefore, the tree survey for the "Wainsfort" section is incomplete and hence misleading;	In some cases, it was found that some tags had either fallen off trees or had been removed by persons not relating to the Poddle FAS. These trees (T455 and T456 at Wainsfort Manor Crescent) have been re tagged where necessary (See updated tree survey drawings as part of Appendix 4).
<b>Mary and O'Hagan James Corbett</b>	9.1	Covid 19 restrictions mean that all stakeholders have not had equal access to engage in the submission process. Library closures and lack of access to online plans have inhibited hundreds if not thousands from engaging in the process. Isolating guidelines and social distancing continue to inhibit full and inclusive public involvement in this process.  An Bord Pleanála offices only reopened on May 25th 2020 with libraries reopening to the public on June 8th 2020 under the governments Phase 2 roadmap. As you are aware under strict public health advice cocooners (over 70's) have been advised to remain at home during this time. How then, were people who don't have the online capacity in their own homes expected to give their considered observations to this proposed plan? It is simply inequitable, undemocratic and unfair to exclude this cohort of our community from the right to submit their concerns.	This is not within the applicant's control.

Name	Observation no.	Observation/Issue	Response
	9.2	Submission fees prohibit all stakeholders from having a voice in this process. Given that large number of local Kimmage/ Crumlin/ Terenure residents rely on social welfare and live in social housing -how then can the majority of those most affected Poddle FAS on low incomes afford the 50 euro submission fees? The process discriminates against those who cannot afford to pay to be involved.	This is not within the applicant's control.
	9.3	On a personal level we the householders of Wainsfort Manor Crescent only became aware of the extent of plans in the past week when communication was hand delivered to our house last Friday June 5th". This is totally unacceptable as we live in very close proximity to the river (only 20 metres) away and we should have had direct consultation long before this. The removal of trees directly in front of our property will not only have adverse effects on our health and wellbeing but also on the property valuation of our home. As we are both working from home for the past 3 months in line with government guidelines' to work from home wherever possible' it's surprising that we didn't receive any correspondence and/or any visits from officials involved in the project during the period prior to receiving the most recent communication last week. Why was that?	<p>A number of residents from Wainsfort attended the public information events since December 2018. Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the Poddle FAS project launch in 2018. Information about public information events were communicated to the public and local councillors <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. Leaflets were dropped in the letterboxes of the residents of Wainsfort Manor Crescent in the lead up to the Public information days in January and March 2020. See Appendix 2 and its associated appendices for further details on these consultation events and how they were advertised.</p> <p>David Grant met with Ms O'Hagan on June 2<sup>nd</sup> so she was aware before the 5<sup>th</sup> of June as stated.</p>
	9.4	We're now aware following research for this submission that public information days were held on March 10th and 12th. At that stage we were already working from home as the effect of Covid19 became apparent in terms of social distancing. On March 12th, An Taoiseach Leo Varadkar addressed the nation from the United States announcing that schools, colleges and childcare facilities would close until March 29th because of Covid-19 commencing at 6pm that evening. A public information event was scheduled to be held that same evening in Harold's Cross National School, Clareville Road DGW until 8pm. How were people expected to attend an event that should have been cancelled because of the threat of Covid19 as outlined by An Taoiseach? No further information sessions were organised for public health reasons as the lockdown began. The subsequent complete lack of public consultation on the River Poddle Flood Alleviation Scheme in the midst of a global pandemic should be grounds to immediately halt this project from proceeding.	The statutory consultation meeting that was held on the 10th of March occurred before any "lockdown" measures were introduced by the Government. David Grant sent out an email to all email addresses on the Poddle FAS database advising them of the HSE guidelines with respect to COVID-19 prior to the events. On the 12th of March 2020 the Government made the decision at lunchtime to close schools from 6pm that day. Given the short notice of the Government announcement it was agreed to proceed with the consultation meetings as planned and with the support of Harold's Cross National School. The consultation events on March 12th were held at two locations at two separate times and 27 people were recorded as attending over the course of the day. See Appendix 2 for more details.

Name	Observation no.	Observation/Issue	Response
	9.5	<p>We want to strongly object to the plans to remove trees from Wainsfort Manor as per the 'Tree Survey and Arboriculture Impact Assessment' conducted by Cunnane Stratton Reynolds dated February 2020. The existing trees in the estate offer residents a valuable social, environmental and visual amenity with a significant ecological benefit to our locality and the community. The recent Covid19 restrictions where people were confined to a 2k radius of their homes for daily exercise really highlighted the value of the river, the walkway and the beautiful trees that line it. According to the plans 'a considerable number of riverbank trees are required to be removed to facilitate the construction process which will necessitate the use of heavy plant machinery along the rivers edge reaching across the river to the far bank'. Why can't an alternative access route be used on the other side of the existing concrete wall at Wainsfort Manor Crescent for the heavy machinery thereby saving the existing trees? We do not under any circumstances want any of the following trees to be removed- T980, T981, T982, T983, and T984. Sadly, they are all earmarked for removal under this environmentally destructive plan. As you may be aware trees provide the following:</p> <ul style="list-style-type: none"> <li>• Air quality- Trees absorb carbon dioxide and other gases from the air producing oxygen in the photosynthesis process. Each year a mature tree produces enough oxygen for 10 people. Trees also trap dust particles thus improving air quality.</li> <li>• Flooding - Trees help mitigate the risk of flooding - tree canopies intercept rainfall.</li> <li>• Noise barrier -Tree can reduce noise by acting as a sound barrier, this is particularly important in absorbing traffic noise in built up areas.</li> <li>• Carbon - trees are carbon sinks, they store carbon as they grow, temporarily reducing carbon dioxide (CO2) in the atmosphere.</li> <li>• Habitats - trees and their ecosystem provide habitats for wildlife - trees and timber with cavities are especially valuable for animals such as bats and birds.</li> <li>• Habitat connectivity-trees provide green links between parks and open spaces allowing opportunities for wildlife to travel from place to place to access new habitats.</li> <li>• Sense of place - trees create a distinctive landscape, making important landmarks and providing a unique sense of place and location.</li> <li>• Nature - trees connect people with nature, marking changing seasons with leaf colour changes and floral displays.</li> <li>• Community links - trees are long lived and are a part of the social fabric, culture and history of an area, linking people and building community networks.</li> <li>• Property values - research has shown that the presence of trees can increase the value of residential and commercial properties by between 5-18%</li> <li>• Physical benefits - trees have a positive effect on health through the provision of shade, outdoor recreation amenity and clean air.</li> <li>• Mental benefits - research has shown that trees reduce stress and give a greater quality of life.</li> <li>• Emotional well being- trees with seasonal changes, flowers, colours and aromas can stimulate positive emotional feelings.Considering all of these myriad benefits it beggars belief that South Dublin County Council would stand over their removal from the Wainsfort Manor estate.</li> </ul>	<p>After further review of the construction methods, the number of trees proposed to be felled in Wainsfort Manor Crescent has fallen from 36 to 20. See RFI no. 7 and Appendix 4 for further details. SDCC have also committed to planting 20. no. replacement trees in Wainsfort Manor Crescent as per RFI no. 9 and associated drawings.</p>
	9.6	<p>The risk to social infrastructure and other trees not identified on the plans is very high due to the extensive excavations required for the proposed flood defence measures including the erection of walls and other extensive excavations required for the proposed scheme. Consequently, there will be an overall loss of several social park/green amenities due to the extensive flood walls.</p>	<p>There is no effective loss of green space from this Scheme. The works at all park and green spaces locations does not reduce the natural footprint of green space but in most cases enhances the green space with the inclusion of additional tree planting and biodiversity through wetland development and pollinators.</p>
	9.7	<p>The river is a vital part of the identity of Dublin and to cut it off in an extremely insensitive way using alien materials will degrade the wildlife corridor and its unique green fabric of this locality in the south side of the city. Given Covid-19 experiences, communities need green space more than ever and their access to both green spaces will be diminished if walls are built and trees removed.</p>	<p>Only native species will be used in the replanting programme and in the enhancements proposed in the Scheme. At Whitehall, the river is being brought back to a natural state through measures to encourage channel naturalisation. Through measures such as at Whitehall, the ICW at Tymon Park, and replacement tree planting throughout the Scheme, a wildlife corridor contained in the River Poddle and its riparian margins will be enhanced, not degraded.</p>

Name	Observation no.	Observation/Issue	Response
<b>Michael Dempsey &amp; Siobhan O'Connor</b>	10.1	<p>Before addressing these issues let me state at the outset that I am not against the Poddle FAS in general, as a concept or a project. I accept there may be potential for negative impacts from flooding on the River Poddle in certain locations in future, and there is a case for river management interventions to mitigate these.</p> <p>However, it is my strongly held opinion that this project has not been correctly managed from a planning viewpoint, and as a result no more public funds should be spent on it until this has been independently investigated and remedied. I have formed this view over the period of time since I first heard about the scheme from a local clean up group in November 2019.</p> <p>Despite the fact that some of the proposed works will take place meters from my house, and involve the building a 1.1m wall and cutting down 45 trees in the wonderful amenity of St. Martin's Park, the first I heard of it was on Twitter in November 2019, thanks to a tweet from the Crumlin Clean-Up group. This, in and of itself, testifies to the fact that up to this point there had not been adequate public consultation on the plan. This is despite the fact that it has been in gestation, apparently, for a number of years.</p>	<p>Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the Poddle FAS project launch in 2018. Information about public information events were communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. Leaflet drops were made to residents of Poddle Park on January 10th and 11th 2020 informing them of the consultation days that took place on the 16th and 20th of January. Leaflets were also dropped in the letterboxes of the residents of Poddle Park in the lead up to the consultation days in March 2020. Evidence of all the efforts made to communicate with the public are provided in Chapter 3 of the EIAR as well as in Appendix 2 (and its associated appendices) of the RFI no. 1 response.</p>
	10.2	<p>After learning of the project, I spent much time trying to find details on what was being proposed. However, despite my best-efforts I could find no evidence of the process followed in developing the plan, nor indeed what was in the plan itself. I wanted to know, like I imagine anyone in the community would, the following:</p> <ul style="list-style-type: none"> <li>• the objective of the project;</li> <li>• details on the different options considered;</li> <li>• information on the social and environmental impacts of the different options; and</li> <li>• mitigation measures proposed.</li> </ul> <p>This information was not available throughout the period December 2019-February 2020. The project website (www.poddleFAS.ie.), to which I was directed by the SDCC project team when I sought information, had absolutely no useful information on it. I received no reply when I emailed the address listed on the website. For your information I append emails sent to Mr David Grant, Poddle FAS Project Manager, on December 24th 2019 and 7th January 2020 setting out my concerns in this respect.</p>	<p>Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the Poddle FAS project launch in 2018. Information about public information events were communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. Leaflet drops were made to residents of Poddle Park on January 10th and 11th 2020 informing them of the consultation days that took place on the 16th and 20th of January. Leaflets were also dropped in the letterboxes of the residents of Poddle Park in the lead up to the consultation days in March 2020. Evidence of all the efforts made to communicate with the public are provided in Chapter 3 of the EIAR as well as in Appendix 2 (and its associated appendices) of the RFI no. 1 response. Local elected members for SDCC and DCC were given periodic updates on the scheme from October 2018 to December 2019 and efforts were made to inform residents in the area through attendance by members of the project team at all local events organised by SDCC/DCC, as well as those organised by elected members, Residents' Associations and the Crumlin Clean Up Group. Evidence of all the efforts made to communicate with the public are provided in Chapter 3 of the EIAR as well as in Appendix 2 (and its associated appendices) of the RFI no. 1 response.</p> <p>All Planning Documents were uploaded onto the website in line with the planning submission to ABP on 27<sup>th</sup> February 2020.</p>
	10.3	<p>This only changed when planning was submitted to ABP in March 2020. The website has subsequently been retrospectively populated with details of some 'information days' held in January / February. However, there were no detailed plans made available for the community to study in their own time, either before, during, or after these information days, and so it is clear these events do not qualify as appropriate public consultation.</p>	<p>As described in Appendix 2 (and its associated appendices) of the RFI no. 1 response, Section 2.3.3, at each of the consultation days, a presentation was made, maps and plans were on display and members of the Project Team were on hand to answer questions and receive further information on the project.</p>
	10.4	<p>In addition, these 'information days' were organised hastily, after my neighbours and I became aware of the project and started contacting SDCC in relation to it. They were held at inappropriate times, in the run up to Christmas, during the working day, and were initially only publicised on social media. This is exclusionary from any number of perspectives and does not come near to being an honest attempt at broad based, effective, community consultation.</p>	<p>Information about public information events were communicated to the public via leaflet drops, social media posts, emails and on the Poddle FAS website. See Appendix 2 of the RFI no. 1 response and its associated appendices for details on how information days were advertised to the public.</p>
	10.5	<p>Early public participation' necessary for 'effective public participation' (Aarhus) did not take place - thus breaking a fundamental right to include all stakeholders equally as set out in the Aarhus Convention.</p>	<p>As above, Refer to Appendix 2 of the RFI no. 1 response and associated appendices for full details on how the applicant informed the public of the proposed plans.</p>

Name	Observation no.	Observation/Issue	Response
	10.6	<p>Another worrying issue with this project is that it is clear that selected residents groups were informed of the plans and consulted on their views in the months (possibly years) preceding my neighbours and learning of the scheme. This is inequitable and lacks transparency. In fact, it feels like a return to the old days of poor planning practices in Ireland. This seems to be particularly evident in the rationale presented ex-post for the selection of Option 2 at St. Martin's Park Option 2 (1.1 m wall along riverbank) over Option 1 (primarily a lower 0.5m wall in existing grey space). This is evidenced by the following extract from the EIAR Volume 2 - Main Report, Section 4.7.4 Flood protection walls at St. Martin's Drive:</p> <p>This option (Option 1) would have resulted in the loss of fewer trees, especially from the bank side, however, local residents expressed a concern about anti-social behaviour at this location and did not wish to see any improvements to the green area to change its use from a passive space to an active space. It was considered that a wall 0.5m in height would constitute such a change, cutting off the green space from the houses adjacent, and in spite of the loss of bank side trees and vegetation, the preferred option (Option 2), and the one that is proposed, is to construct the flood protection wall close to the bank.</p> <p>My neighbours and I in the Poddle Park, Bangor Road, Ravensdale Park, Poddle Close, Clonard Road areas and surrounds in Dublin 12 were excluded from any input to this key decision, although some local residents were consulted and had their views taken on board, as evidenced by the project's own documentation.</p> <p>In summary, as a local resident affected by the project, I received no detailed information on the proposals, options considered, impacts of this project etc., and so I do not feel there was any 'effective public participation,' as required under legislation, for the project. It is clear also that only selected residents were provided with an opportunity to input their views at the crucial design phase of the project.</p>	<p>As outlined in the consultations report (Appendix 2) in Section 2.3.1 these meetings with local residents were not private and were held as part of the information gathering process. Efforts were made to inform residents in the area with local events held at the 4 Provinces Pub and the Mount Argus Community Centre. Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the Poddle FAS project launch in 2018. Information about public information events was communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See Appendix 2 and its associated appendices for further details on these consultation events and how they were advertised.</p> <p>All options were discussed with residents of St Martin's.</p>
	10.7	<p>Cumulative impacts on the environment of the proposed development along with other potential future developments in the locality (including planned and permitted developments) must be taken into account in conducting Environmental Impact Analyses (see the EPA's Guidelines on Information to be contained in Environmental Impact Assessment Reports. This has not happened in the case of Poddle FAS.</p>	<p>BusConnects proposals here refer to proposals released by BusConnects in March after the submission of the Poddle FAS planning application in February which were significantly altered from proposals in circulation prior to this where there were no BusConnects works within Ravensdale Park.</p>
	10.8	<p>The most glaring omission in this respect is the failure to consider the combined impact of Poddle FAS and BusConnects on Ravensdale Park. Both projects have, quite literally, designs on this small island of green space in the surrounding sea. of concrete and tarmacadam. The Bus Connects programme proposes a cycleway through Ravensdale Park, entailing a reduction in green space and the loss of trees (Figure 1)</p>	<p>BusConnects proposals here refer to proposals released by BusConnects in March after the submission of the Poddle FAS planning application in February which were significantly altered from proposals in circulation prior to this where there were no BusConnects works within Ravensdale Park.</p>
	10.9	<p>The overall Bus Connects programme may well enhance the Ravensdale Park environment through a reduction in the noise and pollution associated with traffic on Kimmage Road, Ravensdale Park and Poddle Park; however. it is alarming that there has been no analysis of the combined impact of these 2 schemes on the fabric of Ravensdale Park. This is a fundamental flaw in the planning of the Poddle FAS which needs to be rectified before the project can be progressed any further</p>	<p>BusConnects proposals here refer to proposals released by BusConnects in March after the submission of the Poddle FAS planning application in February which were significantly altered from proposals in circulation prior to this where there were no BusConnects works within Ravensdale Park.</p>
	10.10	<p>In addition to the space lost due to Bus Connects, the Poddle FAS proposes to slice off a quadrant of Ravensdale Park (roughly from KCR Builders' Providers to the junction of Poddle Park and Ravensdale Park and back along the existing path) for flood storage. A flood wall (1.1m to 1.3m in height) is proposed along the existing path, to provide excess volume storage of up to 800m<sup>3</sup>.</p>	<p>The wall within the park extends from 0.7m high to 1.5 at the culvert. This area designated for flood storage would only be needed during extreme flood events and for the remainder of the time remains as parkland greenspace fully accessible to the public. It is necessary to protect the surrounding areas from flooding when those events do occur.</p>

Name	Observation no.	Observation/Issue	Response
	10.11	<p>I find this objectionable on two fronts:</p> <ul style="list-style-type: none"> <li>The excess volume storage of 800m<sup>3</sup> achieved by removing this section of Ravensdale Park is just over 1% of the excess volume storage of 66,000m<sup>3</sup> planned for Tymon Park. It is not worth the loss of this area of a small park to gain minimal excess storage.</li> </ul>	<p>As stated in EIAR Volume 2 and contained in Appendix 3 of the response to RFI no. 2, the flood storage proposed for Tymon lakes is in the upper catchment, and there is still a requirement for flood storage at Ravensdale Park to provide flood protection. Not utilising the space at Ravensdale park would require over 2.4m high walls either side of the river channel through the park.</p>
	10.12	<ul style="list-style-type: none"> <li>It is proposed to make a feature of this flood wall along the existing path, by inserting seating areas along it, as if it was the pier in Dun Laoghaire. Rather than create a beautiful, tranquil area for thought and reflection, it will instead encourage loitering, public drinking and other anti-social behaviour. It means pedestrians will be wedged between a bike lane on one side, and a high concrete structure (polished concrete, no less) on the other. Think of how that pedestrian experience will be in the low light of a winter's afternoon, when it will be impossible to spot people hanging around the seating areas. Think also of the pedestrian experience at the height of summer, when the seating areas and the wall provide ideal cover for public drinking. The wall and its seating plans will make the park feel unsafe for those walking alone, those walking with children and those with mobility or sensory difficulties.</li> </ul> <p>The loss of this space and the negative consequences of erecting the wall are greater than the miniscule excess volume storage achieved, and I strongly believe these proposed works for Ravensdale Park should be outrightly rejected.</p>	<p>There is a need for flood storage at Ravensdale Park to protect the surrounding properties. The proposed wall defences have the minimum impact on the current use of the park or access to the park. At the highest point at the wall is 1.5m at the north west corner and is below this height elsewhere which allows visibility through the park.</p>
	10.13	<p>Accurate and reliable information on the number of trees to be removed under the scheme has not been made available. This means the community cannot fairly judge the social and environmental costs and benefits of the scheme. It breeds distrust amongst the community of the scheme promoters.</p> <p>A local councillor cited the felling of 6 trees at Ravensdale in DCC South East Committee meeting (9.12.19), quoting a report which she says was given to her by David Grant. The number of trees reported to be felled has been quoted as 6, 12, 18, 29 over the course of recent months and then finally 228 in the proposed plans which were eventually released for public viewing in March, David Grant confirmed in public that 29 would be felled at St. Martin's - however according to Appendix 5-2 under Volume 4 of Poddle FAS plans, 45 trees will be felled at St. Martin's.</p>	<p>The number of trees to be felled in proposed works areas has been reduced from an overall 228 to 217. 59 of these are in DCC area. 158 of these are in SDCC area. After further consideration of construction methods and tree protection and constraints, the Scheme proposes a reduction in the number of trees to be felled in Wainsfort, an increase in the number of trees in Ravensdale Park, There is firm commitment from the Councils on plans for tree replacement including the locations, species and age of trees (See RFI no. 9). This amounts to a total of 609 trees to be replanted over the whole Scheme in woodland pockets, amenity planting along pathways, enhancing established hedgerows, and along riparian corridors. See Appendix 4 of the RFI response for the Updated Tree Survey &amp; Arboriculture Impact Assessment.</p>
	10.14	<p>According to the Tree Survey and Arboriculture Impact Assessment (APPENDIX 5-2), 45 trees are in direct conflict with the proposed development in St. Martin's Drive Park, therefore proposed for removal (this represents a 35% reduction in tree canopy cover within the park). The tally of 45 trees appear to exclude small trees and young trees (for example, hawthorn, hazel, young alder trees are present in this location but are not listed on page 26 of APPENDIX 5-2). I have appended an arborist report that focuses on the neighbouring Ravensdale Park. This report further questions whether the number of trees that will be removed by the Poddle FAS scheme has been accurately reported/assessed.</p>	<p>Further consideration of construction methods at detailed design stage, and meetings with Council officials in SDCC and DCC, additional areas were surveyed by the project Arborist, Keith Mitchell of CSR. An updated Tree Survey and Arboriculture Impact Assessment is submitted as Appendix 4 in response to RFI no. 7 and includes updated Tree Removal and Protection Drawings. The trees in Ravensdale Park, and St. Martin's Drive are proposed for removal following a site meeting with SDCC, DCC Parks, OPW, CSR and NOD on 14th September 2020 where proposed construction methods were clarified and the number of trees to be removed for the Scheme were agreed.</p>

Name	Observation no.	Observation/Issue	Response
	10.15	<p>The planning documentation for the project does not adequately represent the richness of the flora and fauna in this area, nor the beauty and importance of the tree canopy along the Poddle.</p> <p>A local ecologist" describes the area at St Martins as follows: "This strip of riparian habitat is 'semi natura/' in character. It is dominated by large multi-stemmed willows (<i>Salix alba</i>) that have a layer canopy structure. This is one of the largest willow species that can grow up to 25 meters. The habitat value of this tree is notable given its structural diversity, which includes a deeply fissured bark and insect-pollinated catkins. This tree also plays an important role in stabilising the natural riverbank, with the roots of these willows visibly interwoven into the banks and the river bed. Hawthorn, hazel, alder and field elm are present in the understorey, with young regenerating ash and alder also present. The non-native tree sycamore also occurs. Invasive non-natives present include a discrete patch of winter heliotrope, dogwood, cherry laurel and butterfly bush. The luxuriant field layer of the riverbank is dominated by alexanders, an important plant for pollinators, with other species comprising nettle and <i>Carex pendula</i>. Between this narrow strip of riparian woodland and the adjacent path, other trees are present that have either been planted singly and/or in small groups - mimicking a woodland setting. A list of twenty-nine birds have been recorded in the park. The natural riverbank vegetation is particularly important for invertebrates. It is both a foraging and commuting route for mammals such as bats and foxes."</p>	<p>See Section 7.4, Chapter 7 of the EIAR for various biodiversity field survey results.</p> <p>It is important to note that impact assessments for trees are considered under two environmental disciplines: impacts relating to the ecological value of trees are addressed in Chapter 7: Biodiversity of the EIAR, whereas impacts relating to the amenity / aesthetic value of trees are addressed in Appendix 5-2: Tree Survey &amp; Arboriculture Impact Assessment.</p> <p>Under the Fossitt 2000 habitat classification scheme, it is standard practice to assess groups of trees as part of a defined habitat rather than as individual units, because ecological value increases as the number and diversity of trees increases. Six woodland / shrub habitats were described in Section 7.4.1 of the EIAR: broadleaved woodland (Fossitt code WD1), wet willow-alder-ash woodland (WN6), treelines (WL1), hedgerows (WL2), scrub (WS1) and scattered trees and parkland (WD5). The first five of these habitats are considered to be of Local ecological value (as defined in the CIEEM Guidelines for Ecological Impact Assessment), because broadleaf woodlands are uncommon in an urban context, and because they are associated with a riparian corridor. They were not assigned a higher ecological value (e.g. County value), because the habitat is fragmented, many trees are non-native, and they are 'modified woodlands' (i.e. planted trees that are managed or landscaped). Scattered / isolated trees within parkland are considered to be of Negligible ecological value, because most trees are non-native, and because isolated trees are less likely to be used by nesting birds or other arboreal fauna.</p> <p>Table 7-7 in Section 7.5.1.2 of the EIAR summarises the impacts of each component of the development on woodland, noting areas of woodland / treeline / hedgerow removal habitat in each location.</p>
	10.16	<p>By my own eyes I can vouch for the important role these areas play in supporting wildlife in the form of herons, egrets, foxes, kingfishers and other birds, ducks etc. All of this is now threatened by the proposed solution at St. Martins (Option 2), as at least 45 trees will be cut down at St Martins (228 in total for the project). The riverbank will be disturbed as a result of building a 1.1m high wall next to it, and it is likely that further damage will be done to remaining trees and shrubs with knock-on impacts to animal life along this stretch of the Poddle.</p>	<p>The original CFRAM proposals consisted of 3km of hard defences which have now been reduced to approximately 800m across the 6km length of River. The existing lakes at Tymon have allowed for increase of flood storage here as have the low-lying nature of Ravensdale Park - see RFI no.2, Appendix 3. The green space at St Martins is not conducive to natural flood plain with Poddle Park Road to the left significantly higher than the right bank and no natural flood plain available on the left at St Martin's Drive where out of bank flow enters the road and runs north towards existing properties which need to be protected. Also refer to RFI no. 6 for further information on the options assessment for St Martin's Drive.</p>
	10.17	<p>During the Covid 19 lockdown, the true value of these areas has become even more apparent to the community, providing as they do areas where people can relax, exercise, and enjoy the balm of nature in these stressful times.</p>	<p>The Scheme proposals do not involve culling of local parks and green spaces. It is a fact that access to and use of the local parks and green spaces will be restricted during construction at the works areas. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. The modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the re-aligned channel at Whitehall, and the embankment in Tymon Park will alter these parks and spaces and the way they are used and enjoyed by the public, but they will not result in the loss of these spaces. Careful consideration as to how these spaces are used has been given in the design of the Scheme</p>
	10.18	<p>It is also goes to the most fundamental debate in relation to the whole scheme - can we really now afford to be cutting down mature trees given their accepted benefits in:</p> <ul style="list-style-type: none"> <li>• Assisting the fight against climate change in their role as carbon sinks;</li> <li>• Flood mitigation (through enhanced soil drainage); and</li> <li>• Improving mental health (benefits of green space)</li> </ul>	<p>Proposals for replacement tree planting are outlined in Section 5.4 of the EIAR, and recommended locations are displayed on the planning drawings. Details of the commitments made by SDCC and DCC for additional tree planting, woodland planting and ecological and landscape enhancements are provided in RFI no. 9 and associated drawings. Replacement tree planting will be carried out in line with each Council's tree strategies and policies, and as agreed with each Council at detailed design stage.</p>
	10.19	<p>Green spaces with mature trees can only help to prevent flooding. We should be planting more trees, not cutting them down. The solution proposed, particularly at St Martins, unfortunately represents a hard engineering mind-set reminiscent of another age.</p>	<p>The proposed Poddle FAS arose from the CFRAM Study for the Eastern Area, as undertaken by OPW. This Study was subject to extensive public engagement, and Strategic Environmental Assessment. From this Study two main options for flood alleviation along the</p>

Name	Observation no.	Observation/Issue	Response
		Natural flood management techniques and practices should be given far greater consideration	River Poddle were brought forward to be further investigated and designed in the Poddle FAS. The CFRAM Study also recommended that certain flood risk management methods are employed on a catchment and sub-catchment basis. Listed were planning and development control, building regulations, catchment wide SuDS, land use management, strategic development management, and flood warning/forecasting. These flood risk management measures were recommended in ADDITION to flood storage and flood protection. Land use management is defined in the CFRAM Study as " <i>Changing how the land is used in order to store or slow surface water runoff and slow in channel and out of bank flow along the river in order to store flood water in suitable locations. This may consist of the creation of wetlands, restoring river meanders, increasing the amount of boulders and vegetation in channel, perpendicular hedges or ditches in the floodplain, tree rows and planting in floodplain to either slow flow or direct flow, planting along banks parallel to flow, fencing off livestock from riparian strip, changing agricultural practices to decrease soil compaction and increase water infiltration.</i> " The proposed Scheme includes land use management including creation of wetlands and restoring river meanders and channel naturalisation which are part of the proposals. In addition, significant replacement tree planting and mini woodlands are proposed in the catchment, which will in time improve natural flood management in the catchment. This is a proposal for a flood alleviation scheme, which with solid commitments from the applicant councils, will increase tree cover in the catchment.
	10.20	In this day and age, with all the concerns around climate change, the biodiversity crisis, and what we know about the consequences of building on flood plains, it seems truly bizarre to be pouring concrete and ripping up trees instead	Hard defences are located in areas where there is no space to allow the river flow out of bank without flooding properties.
	10.21	Properly maintaining culverts and drains is surely a far more cost effective way to ensure the Poddle does not overflow its banks in the first instance; green spaces, mature trees and vegetation along river banks, will, if left alone, help to contain any residual flooding naturally.	The Scheme has identified the need for flood protection measures along the river course where it does not have sufficient capacity to contain the flood waters within its banks nor have adequate flood plain. While culvert blockages exacerbate flooding, flooding from large storm events still occurs without culvert blockage. No existing natural flood plain space has been removed in the Scheme and the additional planting will provide a long term sustainability to the project
	10.22	<p>Lastly, the option proposed for St Martins has been influenced by a desire to mitigate anti-social behaviour in the area. I know this from speaking to a project engineer at a community meeting organised by local residents. This is profoundly wrongheaded, and it is archaic thinking.</p> <p>The urbanist Jane Jacobs believed that vibrant and safe urban communities are created when there are eyes on the street, i.e. neighbours and visitors to an area self-police it when they have a good line of sight across a street or park, and act as a deterrent to crime and anti-social behaviour.</p> <p>I accept there are problems with dumping and anti-social behaviour at St Martins. However, a segregationist mind-set will not solve this, in the same way that building walls did not help communities come together in Berlin, Belfast nor Bloemfontein.</p>	RFI no. 6 details the direct need for flood protection measures at St Martin's Drive and clearly demonstrates the vulnerability in not carrying out protection works. Neither of the options considered can prevent works along the river bank and removal of some existing trees however, it should be noted that the proposed works extend for 120m along the St Martin's Drive area and the remainder of the existing channel will not be affected. Added to this the proposed replanting plan as well and riverbank restoration planting on the inside of the proposed defence wall.
	10.23	<p>Building a wall only invites people to fly tip, as it provides an obstacle to hide dumped rubbish behind. Building a wall next to the river will cut the river off from people and will reduce passive security, thereby attracting anti-social behaviour rather than reducing it. It invites people to jump over the wall to be shielded from view. In my opinion this will only increase anti-social behaviour in the area, as well as cutting the river off from people.</p> <p>The CMK Arboriculture Report has also been attached.</p>	<p>The segment of defence wall along St Martin's Drive begins at the cul-de-sac in front of the residential houses and will not promote fly-tipping any more than at present. It is acknowledged that the illegal dumping occurs on the Poddle Park side.</p> <p>See Keith Mitchell / CSR's response to the CMK independent arborist report in Table 2 attached.</p>

Name	Observation no.	Observation/Issue	Response
<b>Mick Dougan</b>	11.1	<p>It is not clear to me what actual works are intended, other: than an oblique reference to the construction of flood walls and a definitive reference to cutting down c, 36 trees, many of which are well-developed at this time. No visuals seem to have been included to allow me to properly understand the nature or likely impact of the proposed works and to make an informed decision on the acceptability and necessity, or otherwise, of the proposed works. The reference below seems more likely to suggest that the works in-Wainsfort Manor will merely be the temporary "works site" for works elsewhere.</p> <p>Temporary works include establishing a main construction compound in Tymon Park with access off Limekiln Road, Tallaght which will be in operation for the entire duration of the works; and temporary works/ set down areas at Wainsfort Manor Crescent.</p> <p>It would be unacceptable to me that there would not be absolute clarity on what is happening within the 'Wainsfort' section prior to any works being approved by ABP</p>	<p>The development is described in Section 5.2, Chapter 5 of the EIAR. The associated planning drawings (See Dwg No. RPFS-NOD-01-XX-DR-C-08152 to RPFS-NOD-01-XX-DR-C-08154) also provide details of the proposals during the construction phase and the proposed final site plan. Details of replacement tree proposals are also provided in RFI No 9 and in Figure 10-3 of the RFI response.</p>
	11.2	<p>I would be deeply concerned at the removal of 36 maturing trees from alongside the Poddle in the 'Wainsfort' section of the proposed works, both from an aesthetic and functional perspective. Whilst replanting might occur as part of the works, it would take many years to replace the amenity benefit of the current trees during which time the natural habitat (and the flora/fauna supported by the current trees and surrounding bushes, ditch, grass, lands, etc.) would be significantly and negatively impacted. To expedite matters towards regeneration, could consideration be given to reducing the number of affected trees and/or lifting out the existing trees and replanting them close by- see example per the link: <a href="https://www.youtube.com/watch?v=BFTjOhM3DHM">https://www.youtube.com/watch?v=BFTjOhM3DHM</a>;</p>	<p>After further review of the construction methods, the number of proposed trees to be felled in Wainsfort Manor Crescent has fallen from 36 to 20. See RFI no. 7 and Appendix 4 for further details. SDCC have also committed to planting 20. no. replacement trees in Wainsfort Manor Crescent as per RFI no. 9 and associated drawings.</p>
	11.3	<p>Further, I believe that not all trees planned for removal were properly tagged, namely T970 and T971 didn't have any tag as of 08/06/2020. Therefore, the tree survey for the "Wainsfort" section is incomplete and hence misleading;</p>	<p>In some cases, it was found that some tags had either fallen off trees or had been removed. These trees (T455 and T456 at Wainsfort Manor Crescent) have been re tagged (See updated tree survey drawings as part of Appendix 4).</p>
	11.4	<p>I am not against the plan to attempt to mitigate the flood risk along the Poddle, to better protect nearby property owners particularly, but I would certainly be concerned that ABP might make it too easy for the engineers to clear away trees along the Poddle in Wainsfort Manor, with their high amenity value as mentioned above, without getting them to clearly identify those under threat, and to justify the removal of every single one, irrespective of whether they will be replaced on a '2 for 1' basis. There have been far too many instances in this country of builders/developers/engineers "acting now (with apparent impunity), and answering questions later", after the damage has been done and cannot be rectified.</p>	<p>As described in RFI no. 9 the felling of trees will have a slight negative impact in the short-term but will have a neutral impact in the medium term (est. 10 years).</p>
<b>Orla Daly and Victor Kamansky</b>	12.1	<p>I object to Poddle FAS on 3 grounds - these comprise:</p> <ol style="list-style-type: none"> <li>1. Environmental grounds - contravene of climate, biodiversity and green infrastructure policies</li> <li>2. Public engagement grounds - contravene of the Aarhus Convention</li> <li>3. Social and visual grounds Case study: St Martins Drive Park</li> </ol> <p>Below I will focus on the area that will be removed at St Martins Drive Park, as a resident that lives directly opposite this park and as a professional ecologist, I have a particular interest in this park from both a visual, recreational and most importantly from a biodiversity viewpoint. I will also make reference to Ravensdale Park which is located 250m south of St Martins Drive Park. I have made one professional observation with regards the development at Tymon Park.</p>	<p>Response is provided to each of the points below.</p>

Name	Observation no.	Observation/Issue	Response
	12.2	<p>I would like to see flood alleviation solutions that protect the integrity of this river system and its function as an urban wildlife corridor across its entire length. I have highlighted the 'option' that could prevent loss of riparian habitat in my local park i.e. the location of 45 (20%) of the 228 trees to be removed by the scheme. I will also highlight the biodiversity value of this river not captured by the EIAR.</p> <p>Author's account of the area to be removed at St Martins Drive Park to place the observations on the proposed development in context: This strip of riparian habitat is 'semi-natural' in character. It is dominated by large multi stemmed willows (<i>Salix alba</i>) that have a layer canopy structure. This is one of the largest willow species that can grow up to 25 meters. The habitat value of this tree is notable given its structural diversity, which includes a deeply fissured bark and insect-pollinated catkins. This tree also plays an important role in stabilising the natural riverbank, with the roots of these willows visibly interwoven into the banks and the riverbed. Hawthorn, hazel, rowan and field elm are present in the understorey, with regenerating ash and alder also present. The non-native trees sycamore and maple spp. also occur. Invasive non-natives present include a discrete patch of winter heliotrope, dogwood, cherry laurel and butterfly bush. The luxuriant field layer of the riverbank is dominated by alexanders, with other species comprising nettle and <i>Carex pendula</i>. Between this narrow strip of riparian woodland and the adjacent path, other trees are present that have either been planted singly and/or in small groups - mimicking a wood/and setting. A list of twenty-nine birds have been recorded in the park. The natural riverbank vegetation is particularly important for invertebrates. It is both a foraging and commuting route for mammals such as bats and foxes. The rest of the park is managed as amenity grassland by Dublin City Council (DCC) and is under a regular mowing regime. This park is hydrologically connected to the adjacent Ravensdale Park to the south and Mount Argus Park to the northeast, but the River Poddle has been culverted and runs underground in between these parks.</p>	<p>See Section 7.4, Chapter 7 of the EIAR for various biodiversity field survey results.</p> <p>It is important to note that impact assessments for trees are considered under two environmental disciplines: impacts relating to the ecological value of trees are addressed in Chapter 7: Biodiversity of the EIAR, whereas impacts relating to the amenity / aesthetic value of trees are addressed in Appendix 5-2: Tree Survey &amp; Arboriculture Impact Assessment.</p> <p>Under the Fossitt 2000 habitat classification scheme, it is standard practice to assess groups of trees as part of a defined habitat rather than as individual units, because ecological value increases as the number and diversity of trees increases. Six woodland / shrub habitats were described in Section 7.4.1 of the EIAR: broadleaved woodland (Fossitt code WD1), wet willow-alder-ash woodland (WN6), treelines (WL1), hedgerows (WL2), scrub (WS1) and scattered trees and parkland (WD5). The first five of these habitats are considered to be of Local ecological value (as defined in the CIEEM Guidelines for Ecological Impact Assessment), because broadleaf woodlands are uncommon in an urban context, and because they are associated with a riparian corridor. They were not assigned a higher ecological value (e.g. County value), because the habitat is fragmented, many trees are non-native, and they are 'modified woodlands' (i.e. planted trees that are managed or landscaped). Scattered / isolated trees within parkland are considered to be of Negligible ecological value, because most trees are non-native, and because isolated trees are less likely to be used by nesting birds or other arboreal fauna.</p> <p>Table 7-7 in Section 7.5.1.2 of the EIAR summarises the impacts of each component of the development on woodland, noting areas of woodland / treeline / hedgerow removal habitat in each location.</p>
	12.3	<p>In Table 1, I provide a list of casual bird observations within St. Martins Drive Park. This represents only one location of the proposed development and only one location surveyed by the Poddle FAS ecologists (APPENDIX 7-2: Keeley &amp; Goska Wilkowska, 2018). Bird activity in the park is notably high given the presence of suitable structurally diverse habitat. Three Red listed species and eight Amber listed species were recorded in this park. The presence of Little egret is also of note with this species protected by EU legislation (i.e. listed on Annex I of the EU Birds Directive). Table 1 lists casual observations by the author of birds within St. Martins Drive Park with their status on the EU Birds Directive and/or national conservation status as outlined in Colhoun &amp; Cummins (2013). Red listed species are those of high conservation concern nationally, Amber listed are medium conservation priority and Green listed are of least concern. With regard to the ecological surveys conducted in the DCC area (including St. Martins Drive Park) as presented in the EIAR APPENDIX 7-2 (Keeley &amp; Goska Wilkowska, 2018), the level of detail in the bird surveys was not sufficient for the EIA report to draw conclusions regarding the impact of the development on birds of 'ecological importance'. The methodology for the bird survey in APPENDIX 7-2 of the EIAR states: 'all vegetation within the site was examined for evidence of nests, adult pairs, birds returning to dense vegetation with food in their beaks, chicks, fledglings, territorial birds, bird dropping stains under branches or any other evidence of breeding birds within the site under examination. Discussions with residents also sought to identify any observations or sightings of unusual or uncommon birds' The only bird survey results in the APPENDIX 7-2 of the EIAR is as follows: 'all of the species noted are common and widespread and included songbirds, gulls and ducks all of which are ubiquitous in Dublin. These included robin, wren, chaffinch, blackbird, song thrush, blue tit, great tit, herring gull, black-headed gull, mallard, rook, jackdaw, hooded crow'. With the summary in APPENDIX 7-2 of the EIAR stating: 'No otters or endangered bird species are present within the area within which work would be undertaken for flood relief purposes' I have the following observations regarding the bird survey:</p>	<p>It is noted that this submission refers to text in appendices to the EIAR, which include mammal, bird and botanical reports prepared by Brian Keeley and Malgorzata Goska Wilkowska in 2018 (Appendix 7-2), and winter bird, mammal and habitat surveys in Tymon Park prepared by Roughan O'Donovan Consulting Engineers in 2018 (Appendix 7-1). It is important to note that these surveys were commissioned at an early stage of the design process in order to identify ecological constraints, and that they are separate to the EIAR surveys carried out by NM Ecology Ltd. For the avoidance of doubt, neither Mr Keeley, Ms Wilkowska nor Roughan O'Donovan Consulting Engineers were involved in the preparation of the Biodiversity chapter of the EIAR. The 2018 reports were reviewed by NM Ecology Ltd. during the preparation of the EIAR, and relevant information has been referenced in Chapter 7: Biodiversity. However, where there is any ambiguity between the 2018 reports and Chapter 7: Biodiversity, the latter takes precedence. As outlined in Section 7.4.2.6, a range of common garden and urban bird species were observed during surveys of the Scheme, including tits, finches, corvids, pigeons, robin, wren, etc. With the exception of the Tymon Park, most of the woodland / treeline habitats along the Poddle FAS are small and fragmented and are not large enough to provide a permanent territory for individual birds. Therefore, it is expected that most birds will move between fragments of suitable habitat along the river corridor, as well as in nearby gardens and green spaces. For this reason, it is not necessary to list individual species in each habitat fragment, because this is likely to change on a regular basis.</p> <p>For the purposes of the impact assessment it was assumed that most or all common garden / urban bird species are present in each of the proposed working areas at different times of the year. Furthermore, the mitigation strategy for these species will be the same throughout the scheme; that vegetation clearance will take place outside the bird nesting season. This is a standard method that is regularly applied for construction projects throughout Ireland, and thus is considered to be best practice, e.g. in the National Roads Authority (now Transport Infrastructure Ireland) guidelines on <i>Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes</i>.</p>

Name	Observation no.	Observation/Issue	Response
		<ul style="list-style-type: none"> <li>• the locations of individual bird species along the Poddle were not identified. where were the above list of birds recorded? Ravensdale, St. Martins Drive Park, Mount Argus, etc? The impact of the development is not equal in these locations, therefore, knowing the locations of individual bird species is.</li> <li>• what were the results of the detailed survey? Was there 'evidence of nests, adult pairs, birds returning to dense vegetation with food in their beaks, chicks'?</li> <li>• what was the survey effort (i.e. hours spent surveying for birds at each location 11). This is a standard and vital piece of information that has been omitted.</li> <li>• National Red Listed/ Rare and Legally Protected Species lists should be consulted to identify 'important ecological features' (CIEEM, 2018). This report failed to acknowledge that their survey recorded two Red listed species (ie. herring gull, black headed gull). This report provided an overarching statement that 'non endangered birds are present within the area'. Since birds of 'ecological importance' were not detected during the Poddle FAS surveys within the DCC area - the impact of the development has not been properly assessed.</li> </ul>	
	12.4	<p>The EIAR Volume 2 Main Report then broadly summarises 'Other bird species' in Section 7.4.2.6 as follows:  "A number of other common urban I garden birds were recorded in woodland / scrub vegetation alongside the river, including robin, wren, chaffinch, blackbird, song thrush, blue tit, great tit, rook, jackdaw and hooded crow. It is highly likely that some of these species will nest in riverside vegetation. No rare bird species were recorded in the area, and there is extensive nesting habitat in the surrounding area. so the vegetation along the banks of the River Poddle is considered to be of Negligible ecological value for these species. Nonetheless, all birds (including nests, eggs and chicks) receive protection under the Wildlife Act 1976 (as amended)"</p>	<p>As stated above, for the purposes of the impact assessment it was assumed that most or all common garden / urban bird species are present in each of the proposed working areas at different times of the year. Furthermore, the mitigation strategy for these species will be the same throughout the scheme; that vegetation clearance will take place outside the bird nesting season. This is a standard method that is regularly applied for construction projects throughout Ireland, and thus is considered to be best practice, e.g. in the National Roads Authority (now Transport Infrastructure Ireland) guidelines on <i>Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes</i>.</p>
	12.5	<p>The EIAR text underlined in red is a broad, non-localised statement, which should be avoided when conducting impact assessments. Each location along the River Poddle where significant habitat removal is planned (as is the case with St. Martins Drive Park) should be considered individually (and in combination) in order to effectively assess the impact of the development on a particular species group.</p>	<p>The process by which the EIAR was carried out is described in Section 1.7, Chapter 1 of the EIAR report.</p> <p>More specific to ecology, the EIAR has been prepared in accordance with the Guidelines for Ecological Impact Assessment in the UK and Ireland (2018), which is the primary resource used by members of the Chartered Institute of Ecology and Environmental Management (CIEEM).</p> <p>In combination effects relate to other plans or projects, not the discrete works areas in the Scheme.</p>
	12.6	<p>As you can see in Figure 1, nesting habitat is not extensive in the surrounding area, as claimed by the EIAR. We live in a highly urbanised area where street trees are lacking and/ or remain undeveloped specimens due to surrounding concrete. Gardens are typically small so mature trees and/ or tree groups are rare, leaving birds with a preference for nesting in a woodland setting with little options. Much of the green space shown in Figure 1 is managed amenity grassland that has limited value to wildlife. Large industrial estates are also present in our locality comprising the extensive Leos Pharma and KCR Industrial Estate. In this context, the value of the River Poddle and its urban parks as a wildlife corridor and refuge for urban biodiversity cannot be understated. According to the EIA guidelines by the EPA, an environmental impact assessment shall identify, describe and assess in an appropriate manner the direct and indirect significant effects of a project on biodiversity. The following questions should have been explored in relation to birds and bats, will there be: • a reduction in suitable nesting/ roosting sites? • a reduction in food availability (invertebrates)? • an increase in habitat fragmentation - how will this impact commuting routes, gene flow? • an increased impact of pollution (noise, light, air)? • an increased risk of predation (magpies, gulls, domestic cats)?</p>	<p>Potential impacts on tree-nesting birds and bats have already been assessed in Chapter 7 of the EIAR. The mitigation strategy will be updated based on a request from the National Parks and Wildlife Service (Submission #23) that "any clearance of vegetation from the banks of the Poddle or adjacent areas as part of this Scheme should only take place outside the main bird nesting season, i.e. in the period from September to February inclusive". In response, references to pre-clearance surveys during the nesting season will be omitted from Section 7.6.6 of the EIAR. See also RFI no. 8 and RFI no. 9 for further information on net biodiversity gain and ecological enhancement measures. As outlined in Section 7.4.2.6, a range of common garden and urban bird species were observed during surveys of the Scheme, including tits, finches, corvids, pigeons, robin, wren, etc. With the exception of the Tymon Park, most of the woodland / treeline habitats along the Poddle FAS are small and fragmented and are not large enough to provide a permanent territory for individual birds. Therefore, it is expected that most birds will move between fragments of suitable habitat along the river corridor, as well as in nearby gardens and green spaces.</p>

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	12.7	<p>Despite its fragmented nature (including several culverted sections), the River Poddle represents an important wildlife corridor. It has been recognised as 'green infrastructure' by the Eastern &amp; Midland Regional Assembly. Further fragmentation and degradation of this natural resource should be avoided at all costs and existing remnants should be sustainably managed and enhanced. This last statement is supported by EU, National and Regional legislation, policy and guidance documents including:</p> <ul style="list-style-type: none"> <li>-European legislation</li> <li>-EU Water Framework Directive</li> <li>-Environmental Liability Directive (ELD)</li> <li>-EU Habitats Directive</li> <li>-National/ Regional Legislation, Policy and Guidance</li> <li>-Eastern &amp; Midland Regional Assembly Regional Spatial &amp; Economic Strategy (RSES)</li> <li>-Dublin City Development Plan (2016-2022)</li> <li>-South Dublin County Development Plan (2016-2022)</li> <li>-Climate Change Action Plans (2019)</li> <li>-National Biodiversity Action Plan (2017-2021)</li> <li>-Dublin City Biodiversity Action Plan (2015-2020)</li> </ul>	<p>The value of the River Poddle as an ecological corridor has been recognised in the EIAR, although it is a fragmented corridor due to extensive culverting. The FAS will not prevent dispersal of fauna along the corridor.</p>
	12.8	<p>The 'important ecological features' listed in the EIAR that are present at St. Martins Drive Park and the adjacent Ravensdale Park comprise:</p> <ul style="list-style-type: none"> <li>• Low/ and watercourse (FW2)</li> <li>• Treeline (WL2)/Native hedgerows (WL1) - permanent removal</li> <li>• Common pipistrelle, soprano pipistrelle and Leislars bats</li> <li>• All other nesting birds</li> </ul> <p>Note: The 'important ecological feature' grey wagtail, grey heron little egret are also present in these parks but were not detected during the DCC Poddle FAS surveys. The presence of the Red listed grey wagtail at both St Martins Drive Park and Ravensdale is notable as this species is typically only associated with higher quality waters. What will the indirect effect of a temporary reduction in water quality during construction mean for this Red listed species?</p>	<p>This submission raised concerns about riparian bird species, including references to grey wagtail, kingfisher, grey heron, little egret, swans, ducks, and other species. However, grey wagtail, kingfisher, grey heron and little egret were all named individually under sub-heading 'Other bird species' in Section 7.4.2.6 of the EIAR, and the suitability of the habitat was discussed. Similarly, swans and ducks were discussed under the subheadings 'Breeding waterfowl' and 'Other over-wintering waterfowl'. On this basis, we contest the claim that these species were omitted from the EIAR</p>
	12.9	<p>The EIAR Volume 2 - Main Report states under Section 7.5.1.2 Habitats that: "The permanent impacts are considered to be unavoidable because the locations for proposed works are spatially constrained, e.g. in topographical depressions. Trees are widespread along the river corridor, and are often growing in close proximity to existing retaining walls that require reinforcing / replacement, so it would not be possible to implement the proposed development without removing some trees. However, the project has been designed with the aim of removing trees only where necessary"</p>	<p>In RFI no. 9 of the main response document the DCC and SDCC have provided the commitments for tree replanting in their respective areas. DCC provide commitments for 165 trees to be replanted in green spaces within 2 km of the affected parks that could benefit hugely from tree planting and other measures for ameliorating against biodiversity loss. SDCC had proposed that 350 trees be replanted across Tymon Park, Wainsfort and Whitehall Park. In addition to these 350 trees they have proposed the planting of mini woodland areas in Tymon Park and Bancroft Park. These woodlands will facilitate the planting of approximately 14,000 trees and shrubs. This will further enhance the NFM properties of the river.</p>
	12.10	<p>St Martins Drive Park is less spatially constrained than other project locations, and this is likely why Nicholas O'Dwyer considered two options for this location. These two options are outlined below. Adapted from EIAR Volume 2 - Main Report Section 4.7.4 Flood protection walls at St. Martin's Drive Option 1: Construct the wall on the border of the park, thereby, reducing the impact of the development on this public amenity and protect the integrity of the natural riparian habitat in this location Option 2: Construct the wall along the riverbank Option 2, the most destructive option from an environmental viewpoint, was the option they chose citing "local residents concerns about anti-social behaviour" as the main reason. Not only does this 'exclusive' decision about a public amenity not abide by 'Sustainable Development' principals. This decision-making process appears to be in direct conflict with how Nicholas O'Dwyer said they chose the final design for each location.</p>	<p>Referring to RFI no. 6 there is no avoidance of flood defence works for 60m of the river bank in both option 1 and 2 and while there are less trees removed in option 1 there are losses of other trees and the change of use of green space. Riparian replanting in the channel will restore much of the temporarily removed habitat for this segment of works. While removing more trees, option 2 minimises the changes in landscape and public use of green space when compared with option 1.</p>

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	12.11	<p>The Option 2 decision is also in direct conflict with policy:</p> <p>Eastern &amp; Midland Regional Spatial and Economic Strategy Regional Policy Objectives related to Flooding</p> <ul style="list-style-type: none"> <li>- RPO 7.15: "Local Authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned ABP Green infrastructure policies/ objectives in the South Dublin County Development Plan (2016-2022). Examples are provided below (non-exhaustive):</li> <li>- Green Infrastructure (G) Policy 2 Green Infrastructure Network, G2 Objective 2 "To protect and enhance the biodiversity value and ecological function of the Green Infrastructure Network"</li> <li>- Green Infrastructure (G) Policy 3 Watercourses Network G3 Objective 2 'to maintain a biodiversity protection zone a minimum of 1 Om from the top of the bank of all rivers in the County'</li> <li>- Green Infrastructure (G) Policy 3 Watercourses G3 Objective 5 'provide/or protection measures to watercourses and their banks, including preventing pollution of the watercourse, protecting the riverbank from erosion, and the retention and I or provision of wildlife corridors' Green infrastructure policies/ objectives in the Dublin City Development Plan (2016-2022). Examples are provided below (non-exhaustive):</li> <li>- Green Infrastructure GI4: To co-ordinate open space, biodiversity and flood management requirements, in progressing a green infrastructure network.</li> <li>- Green Infrastructure GUO: To continue to manage and protect and/or enhance public open spaces to meet the social, recreational, conservation and ecological needs of the city and to consider the development of appropriate complementary facilities which do not detract from the amenities of spaces. Eastern CFRAM Strategic Environmental Objectives (SEA):</li> <li>- Environmental Objective A 'Support the objectives of the WFD' NALA</li> <li>- Environmental Objective C 'Avoid damage to, and where possible enhance, the flora and fauna of the catchment'</li> <li>- Environmental Objective F 'Protect, and where possible enhance landscape character and visual amenity within the river corridor '</li> </ul>	<p>National, Regional and Local Policy context is outlined in Section 6 of the Planning Report which was submitted as part of the planning application.</p> <p>The proposed Scheme is a cross-boundary, multi-faceted project that demonstrates co-operation across local authorities to resolve flooding, supported by OPW. The need for the Scheme has been demonstrated and is supported by the following:</p> <ul style="list-style-type: none"> <li>• National Flood Policy</li> <li>• National Climate Change Adaptation Framework</li> <li>• National Planning Framework's National Flood Risk Appraisal</li> <li>• The Eastern and Midlands Regional Spatial and Economic Strategy</li> </ul> <p>The proposed Scheme is also compliant with the current Development Plans for SDCC and DCC including their tree strategies and policies. It delivers on policies and objectives on flood protection, climate change, water quality, biodiversity and green infrastructure and, as such relates to the proper planning and sustainable development of the areas.</p> <p>The scheme also complies with the Dublin Climate Change Action Plan 2019-2024 where Flood Alleviation is one of the main 5 themes.</p> <p><a href="http://www.dublincity.ie/main-menu-services-water-waste-and-environment-climate-change/climate-change-action-plan-2019-2024">http://www.dublincity.ie/main-menu-services-water-waste-and-environment-climate-change/climate-change-action-plan-2019-2024</a></p>
	12.12	<p>According to the Tree Survey and Arboricultural Impact Assessment (APPENDIX 5-2), 45 trees are in direct conflict with the proposed development in St. Martins Drive Park, therefore proposed for removal (this represents a 35% reduction in tree canopy cover within the park). The tally of 45 trees appear to exclude small trees and young trees (for example, hawthorn, hazel, young alder trees are present in this location but are not listed on page 26 of APPENDIX 5-2). I have appended an arborist report that focuses on the neighbouring Ravensdale Park. This report further questions whether the number of trees that will be removed by the Poddle FAS scheme has been accurately reported/ assessed.</p>	<p>After further review of the construction methods, the number of proposed trees to be felled in Wainsfort Manor Crescent has fallen from 36 to 20. See RFI no. 7 and Appendix 4 for further details. SDCC have also committed to planting 20. no. replacement trees in Wainsfort Manor Crescent as per RFI No. 9 and associated drawings.</p> <p>See Keith Mitchell / CSR's response to the CMK independent arborist report in Table 2 attached.</p>
	12.13	<p>The absence macroinvertebrate sampling from the Poddle FAS, a development primarily focused on a river, is notable, particularly since the development involves rechanneling, bank alterations and the development of an ICW system to improve water quality. Macroinvertebrates are bio-indicators of the health/ condition of water bodies. They respond to pollution including chemical pollution and physical disturbance to the</p>	<p>An electrofishing survey of sections of the River Poddle in Co. Dublin was carried out by AQUAFAC on August 4th and September 8th, 2020. Details of this macroinvertebrate sampling are provided in RFI No. 10 and Appendix 5.</p>

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		landscape around the site. Macroinvertebrate sampling should have been incorporated into the baseline ecological surveys and subsequent monitoring programme.	
	12.14	<p>According to CIEEM guidelines (2018) the Ecological Impact Assessments should also set out the ecological monitoring required to:</p> <ul style="list-style-type: none"> <li>- Audit predicted impacts against the actual situation</li> <li>- Take measures to rectify unexpected negative impacts and ineffective mitigation, compensation and enhancement measures.</li> </ul> <p>Was up-to-date water quality data collated for the purpose of the project? Will water quality be monitored in DCC to accurately assess the environmental impact of the development?</p>	<p>Water quality in the Poddle River has been monitored monthly since 2009 by the SDCC. SDCC share these results with the EPA which are then made available for download on <a href="https://catchments.ie/EPA">catchments.ie/EPA</a> mapping portal. See Table 11-1 in the main response document as reported in Appendix 5-3 of the EIAR. See RFI no. 10 and Appendix 5 for further information on water quality assessments.</p> <p>Further water quality sampling was completed by SDCC in May 2020 at 4 locations along the River Poddle during two sampling events (See <b>Table 11-2</b> and <b>11-3</b>). The purpose of this sampling was to get baseline information for the design of the ICW and to determine what improvements in water quality are achieved as the ICW matures and develops.</p>
	12.15	<p>Under the EIAR Main Report, PART II Section 7 .8 Monitoring, it states: "All working areas will be surveyed in the year following construction in order to assess the re-establishment of vegetation. If any areas are found not to be revegetating or are found to be susceptible to localised bank erosion, additional landscaping work will be carried out. If any replanted trees or shrubs fail to establish, they will be replaced with a suitable alternative. If Nuttall's waterweed or another invasive species is found to have spread during construction works, the contractor will be required to eradicate any new growth"</p> <p>Sites will require on-going monitoring and on-going eradication, depending on the ecology of the species in question, and in some cases the development of 'Invasive Species Management Plans'. It is notable that the duration of the monitoring has not been specified. It is also worth getting SDCC to clarify if they plan to eradicate invasive non-native species that are currently NOT listed in the Third Schedule (e.g. Winter heliotrope, Cherry laurel). In March 2019, I reported the occurrence of these two invasive species in St. Martins Drive Park to DCC only to be told that they are not a priority since they were not 'legally designated' as invasive species. They have since spread at the site at the expense of native flora. In the absence of an effective monitoring/ eradication programme, the Poddle FAS scheme will likely increase the cover of these species. The EIAR does not give any reassurance otherwise. The above text explicitly puts the onus on 'the contractor' rather than a particular County Council (SDCC, DCC) let alone Council Department.</p>	Invasive species have been addressed in Chapter 7 of the EIAR, and invasive species management plans will be developed at the detailed design stage.
	12.16	The removal of riparian vegetation, including the willows that are protecting the integrity of the riverbank and bed, will likely lead to increased river siltation, during and for some period after the planned wall construction due to soil exposure. This is an added pressure on a river already subject to frequent siltation and chemical pollutant events.	Pollution control measures will be implemented as described in Chapter 8, Section 8.8 of the EIAR, further mitigation measures are also presented in the revised Natura Impact Statement and accompanying Surface Water Management Plan.
	12.17	<p>I have the following queries: Does the highly modified nature of the river (e.g. culverted underground for long distances concrete banks and concrete riverbed) reduce the buffering capacity of the river in the event of a significant pollution/ siltation incident?</p> <p>And if so, what would that mean for the hydrologically connected Natura 2000 sites downstream?</p> <p>This is something that has not been discussed in the EIAR - with the impact of the development on downstream Nature 2000 sites ruled out on 'distance' alone.</p>	Impacts on downstream Natura 2000 sites were not ruled out of the Appropriate Assessment, they were 'screened in' to the assessment, and were the reason that a Natura Impact Statement was carried out. The mitigation measures outlined in the NIS are designed to avoid any significant pollution / siltation incidents. The NIS uses the current condition of the river (culverted and concrete channels) as the baseline for the assessment.
	12.18	I also question the practicalities of graffiti removal from riverside walls. This activity is normally conducted using high powered hoses and chemicals. Potential impacts include: chemical pollutants, siltation and damage to riparian vegetation.	The proposal for wall finishes in the park are stone clad on the western side and fair finished concrete to the north and through the park. Comments on the fair finish concrete were noted in the statutory Public Consultations and from discussions with DCC Parks and Realm it was

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			agreed that stone cladding would be used for the whole section of the works. Random Rubble stone clad finishing is less prone to graffiti than fair faced concrete.
	12.19	<p>In Environmental Impact Assessment Report Volume 2 - Main report, the text states 'WN6 Wet willow-alder-ash woodland' was recorded in Tymon Park. "Some of the ponds in Tymon Park are surrounded by willows <i>Salix</i> spp and alder <i>Alnus glutinosa</i>, and thus are considered to be semi-natural wet willow-alder-ash woodland. These areas grade into mixed broadleaved woodland away from the water's edge, and much of the ground flora is the same. This habitat is also considered to be of Local ecological value". WN6 wet willow-alder-ash woodland is not present on the maps in EIAR Volume 4 - APPENDIX 7-1. Without knowing the exact location it is unclear whether it is in the direct footprint of the development. There are two mentions of permanent removal of 'mixed broadleaved woodland' in Table 7-7 in the EIAR Volume 2 but no mention of wet woodland. Has this habitat been considered for its affinity to the 'Priority' Annex I habitat 91E0 Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, <i>Alnus incanae</i>, <i>Salicion albae</i>) which is a protected habitat under the EU Habitats Directive? The Irish Vegetation Classification (IVC; Perrin, 2016) primarily places 91E0 habitat within the WL3 <i>Alnus glutinosa</i> - <i>Filipendula ulmaria</i> group. Both trees listed above, including salix (the use of 'spp' indicates two or more salix species) and alder, are target positive indicators species for this protected habitat type according to the National Parks and Wildlife Service (NPWS) monitoring report for this Annex I habitat type (O'Neill &amp; Barron, 2013). The phrase 'these areas grade into mixed broadleaved woodland away from the water's edge, and much of the ground flora is the same' also raises the question whether the mixed woodland is also in fact degraded Annex I 91E0 habitat that has been impacted by non-native trees. This habitat needs to be located and its affinity to the 'Priority' Annex I 91E0 habitat either confirmed or ruled out, so that the ecological valuation of this habitat can be correctly identified (i.e. local value v's International value). Protection for Annex I habitats outside of Special Areas of Conservation (SACs) is available through the environmental Liability Regulations (SI 547 of 2008), which came into force in Ireland in 2009. The regulations aim to prevent and remediate environmental damage to protected habitats and species (EPA, 2011).</p>	<p>The woodland in question occurs in a narrow strip (&lt;5 m radius) around some of the ponds in Tymon Park. It was noted in the EIAR that "these areas grade into mixed broadleaved woodland away from the water's edge, and much of the ground flora is the same". This was to indicate that the ground flora in the wet willow-alder-ash woodland (hereafter referred to as 'wet woodland') was similar to that of the mixed broadleaved woodland described previously in the document, rather than that the ground flora in the mixed broadleaved woodland was similar to that of the wet woodland. Therefore, for the avoidance of doubt, the ground flora in the wet woodland habitat consists of common woodland species.</p> <p>The Annex I habitat 9E10 'Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, <i>Alnus incanae</i>, <i>Salicion albae</i>)' is described in rather broad terms, and could conceivably apply to this wet woodland around Tymon Lake. However, it is important to note that the wet woodland around Tymon Lake was planted during the creation of the ponds in the late 1990s, so it is not a long-established woodland. Furthermore, the habitat in Tymon Park is very small in extent and is fragmented (i.e. not part of a continuous riparian corridor), so it would not meet the criteria for an Annex I habitat. Therefore, the valuation of the habitat as 'Local ecological value' is considered to be appropriate.</p> <p>Regardless of the valuation, the proposed development will not require the removal or disturbance of any wet woodland habitat. The construction of embankments in Tymon Park will involve the clearance of some small patches of mixed broadleaved woodland, as outlined in Table 7-7 of the EIAR. These areas will be more than 30 m from the wet woodland habitat, and are not part of the same woodland unit, so there will be no direct or indirect impacts on the wet woodland habitat.</p>
	12.20	<p>I am a resident of Poddle Park road and live directly opposite St Martins Drive Park, which is known locally as Poddle Park. I found out about the proposed development on 14th December 2019 after questioning the Crumlin clean-up volunteers as to why they were tying ribbons around trees. I followed up with emails to SDCC and DCC to express my dismay of the significance of the events that were planned for the Park - that local residents living opposite were completely unaware of - let alone the greater Kimmage and Crumlin community that value this public amenity.</p> <p>After contacting SDCC on 17th December, I got my first formal notification of the development on 3rd January 2020 via email. I was offered a private meeting to go through the plans and told there would be upcoming information days. I never received a response from the Poddle FAS information email (info@poddlefas.ie) or DCC. I later found out that Poddle FAS was actually due to be submitted to ABP on 9th January 2020 (South East Area Committee DCC webcast at 3:30: <a href="https://dublincity.publici.tv/core/portal/webcast/interactive/455060">https://dublincity.publici.tv/core/portal/webcast/interactive/455060</a>).</p> <p>I attended my first "Pre-planning Public Information Meeting" on 15th January 2020. At this meeting and the ones that followed, my neighbours and I were not presented with options:</p> <p>Option 1: Construct a smaller wall on the border of the park, thereby, reducing the impact of the development on this public amenity and protect the integrity of the natural riparian habitat in this location or Option 2: Construct the wall along the riverbank</p> <p>We were only presented with Option 2 and told by SDCC and Nicholas O'Dwyer that 20</p>	<p>Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project and since the project launch in 2018. Information about public information events was communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. Leaflet drops were made to residents of Poddle Park on January 10th and 11th 2020 informing them of the consultation days that took place on the 16th and 20th of January. Leaflets were also dropped in the letterboxes of the residents of Poddle Park in the lead up to the in January and March 2020. See Appendix 2 and its associated appendices for further details on these consultation events and how they were advertised.</p> <p>Note that David Grant of SDCC responded to Orla Daly's email sent to him not to the email sent <i>via</i> the website.</p> <p>The landscape mitigation proposals for the Scheme at St. Martin's Drive is contained in EIAR Volume 3, St. Martin's Drive Landscape Mitigation Plan and planning Drg. No. RPFS-NOD-XX-XX-DR-C-08167. These proposals were prepared in consultation with Dublin City Council Public Realm Section and will reduce the effects of habitat loss and tree removal required to accommodate the flood defence walls in this location. In addition, the applicant Councils have commissioned CBEC to undertake a feasibility study for channel naturalisation along the channel at St. Martin's Drive. See also RFI No. 6 for the Options assessment for St Martin's Drive. As outlined in Table 8-1 of the main response document, a total of 38 trees are to be lost in St. Martin's Drive, 7 less than the original count according to the updated tree survey report.</p>

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		trees would be removed from St Martins Drive Park (with the EIAR now stating 45 trees would be removed). We only discovered there was another 'feasible option' after the project had been submitted to ABP (by reading the available EIAR documents).	
	12.21	<p>A flurry of Poddle FAS information evenings occurred from January onwards as a result of mounting pressure from local residents (who were just finding out) and their contacted Councillors and TDs. The injustice and exclusion of the greater community from the Poddle FAS scheme cannot be ignored. Decisions were made behind closed doors and only a small number of residents consulted. This contravenes the Aarhus Convention, which provides for:</p> <ul style="list-style-type: none"> <li>• The right of everyone to receive environmental information that is held by public authorities ("access to environmental information")</li> <li>• The right to participate in environmental decision-making</li> <li>• Access to justice in environmental matters</li> </ul>	<p>Refer to Appendix 2 and associated appendices for full details on how the applicant councils informed the public of the proposed plans. Throughout the project design and preparation of the EIAR, every effort has been made to engage with and respond to queries from local communities, either representatives of resident's groups or individuals who have made contact through the project website. Where available, proposed plans were shared with members of the public or residents' organisations to clarify any queries that they had.</p> <p>The schedule of Poddle FAS information evenings was arranged by Stages during the design and EIA process, and for once the application was submitted to the Board, in March. The "flurry" of information evenings referred to here relates to the events held by a local councillor and local environmental group, which the applicant councils and their consultants attended. Refer to response to RFI no. 1, Appendix 2 for a full accounting of the information evenings that were held by the applicant councils and by others.</p>
	12.22	The Public Engagement content of the Poddle FAS website had zero content on 6th January 2020. When checked on 5th June 2020, it had been post-populated with public information days stemming from December 3rd 2018 onwards.	The public engagement page was updated in June to summarise the public consultations carried out to date as well as notifying the closing date for submissions to ABP on 11th June 2020. All notifications of these public information events as well as updates on activities to do with the Scheme such as surveys, COVID notifications etc were contained in the news feed section of the website dating as far back as December 2018 and is easily accessible for anyone navigating the website. Notwithstanding the above all public events were also notified on SDCC website, social media as well as through leaflet drops (See Appendix 2 and its associated appendices).
	12.23	The benefits of nature were tangible during the COVID-19 pandemic with fresh leaf growth on trees providing hope during an uncertain period of our lives. Several scientific studies have shown that trees and green spaces naturally promote good mental health. There is also a relationship between tree cover and lower levels of crime, regardless of socioeconomic factors (Troy et al., 2012). It is within this context that I frame my objection on social and visual grounds.	See Chapter 6 of the EIAR for detail of the social impacts of the Scheme. See also Chapter 4 of the EIAR and RFI no. 6 in the main response document for options that were considered as part of the proposals for the Scheme. The Scheme proposals do not involve culling of local parks and green spaces. It is a fact that access to and use of the local parks and green spaces will be restricted during construction at the works areas. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. The modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the re-aligned channel at Whitehall, and the embankment in Tymon Park, will alter these parks and spaces and the way they are used and enjoyed by the public, but they will not result in the loss of these spaces. Careful consideration as to how these spaces are used has been given in the design of the Scheme, and a balance had to be struck given the great demands for use of parks and green spaces for formal and informal recreation and amenity, and to provide the necessary flood protection.
	12.24	As with most urban areas, there are anti-social issues in our community, which is why planning decisions need to be made at the community level and made for the 'greater good' utilising 'Sustainable Development' principals. A recent tree mapping survey within DCC (mappinggreendublin.com) highlighted the connection between affluent communities and higher tree cover. This survey also highlighted that tree cover was particularly low in parts of southwest Dublin, mentioning parts of Crumlin and Inchicore, in particular.	<p>The proposals at Ravensdale are necessary to protect the surrounding area from the real risk of flooding. The wall heights are the lowest possible that are required to provide flood protection, and have been located to minimise impact on the existing park.</p> <p>The proposals for the Scheme include now include for extensive replacement tree planting and planting of mini woodlands in areas where they can be accommodated, and where they will make the most difference in improving natural flood management in the catchment. This proposal alone cannot resolve the issue of low tree cover in the Dublin City region, but the revised proposals for replacement tree planting including the mini woodlands go above what is required by the tree strategies and policies of each applicant council.</p>
	12.25	The project design for our parks removes green infrastructure and replaces them with grey infrastructure. It detracts from the natural beauty of the river and will deprive locals of access to nature - as well as other provisions provided by trees such as clean air.	The Scheme proposals do not involve culling of local parks and green spaces. It is a fact that access to and use of the local parks and green spaces will be restricted during construction at the works areas. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. The modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the re-

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			aligned channel at Whitehall, and the embankment in Tymon Park will alter these parks and spaces and the way they are used and enjoyed by the public, but they will not result in the loss of these spaces. Careful consideration as to how these spaces are used has been given in the design of the Scheme
	12.26	The visual impact of the hard defences will be greatest from the Poddle Park side of St Martins Drive Park (Dublin 12), with native landscaping screening the hard defences from the St Martins Drive communities (Dublin 6w).	The landscape changes and visual effects brought about by the Scheme are addressed in Chapter 10 Landscape and Visual of the EIAR.
	12.27	<p>EIAR Volume 2 - Main Report Section 4.7.4 Flood protection walls at St. Martin's Drive</p> <p>Two different options were considered for flood protection walls at St. Martin's. The first option was to provide the flood defence wall along the existing footpath as far as the cul-de-sac, instead of along the riverbank for the entire length as required to provide flood protection. This option would have required the wall to run 1.1 m high along the riverbank at the southern cul de sac before turning away from the river and following the edge of the green space along the footpath. The section of flood wall stepped back from the river would be approximately 0.5m in height, as opposed to a height of 1.1m in the second option of constructing the wall along the entire length of the riverbank. This option would have resulted in the loss of fewer trees, especially from the bank side, however, local residents expressed a concern about antisocial behaviour at this location and did not wish to see any improvements to the green area to change its use from a passive space to an active space. It was considered that a wall 0.5m in height would constitute such a change, cutting off the green space from the houses adjacent, and in spite of the loss of bank side trees and vegetation, the preferred option, and the one that is proposed, is to construct the flood protection wall close to the bank.</p> <p>There is flawed logic in selecting Option 2 (1.1 m wall along the riverbank that removes trees) over Option 1 (primarily a lower 0.5m wall in existing grey space on a cul-de-sac) as Option 2 is the option most likely to increase the risks of anti-social behaviour in this location. It is also worrying that the interests of the 'few' determined the fate of a valued public amenity. With the exception of dumping, I have never witnessed anti-social behaviour occurring amongst the trees along the River Poddle with these activities always tending occur in grey man-made spaces.</p>	As stated in RFI no. 6 option 2 replanting will provide natural screen for the defence wall and is unlikely to encourage unwanted congregation of people over option 1 where the wall it brought out into the border of the green space.

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<b>Orlette Mc Grath Massey</b>	13.1	<p>I wish to submit an observation in support of the above joint planning application and enclose a €50 cheque in respect of this observation. I am a resident of the Harold's Cross area whose property was flooded on the night of the 24th October 2011. The resultant flood waters of the River Poddle caused immense damage to many properties and loss of life in the lovely Harold's Cross area where I have lived with my family since 2001. Unless you have been flooded, you have no real comprehension of how your life can be decimated and thrown into chaos by flooding. My family and I had to move out of our home for 9 months because firstly it was uninhabitable, secondly the lengthy insurance dealings and thirdly the actual repair works themselves. To cap it all off, we (and like many other residents of Harold's Cross) no longer have any flood insurance cover. If such flooding occurs again, I do not know how we will cope. This cannot be allowed to happen again to me and my family and to the numerous residents of Harold's Cross who were flooded as well. This proposed flood alleviation scheme is a once in a lifetime opportunity to maximise the prevention of such a repeat flooding nightmare. To have the "Trinity" of DCC, SDCC &amp; OPW all on board and the government finance in place is beyond my wildest expectations! Whilst I have absolutely no engineering experience, the OPW seem to have a good track record with previous flood defence schemes (i.e. River Suir in Clonmel, Rivers Tolka and Dodder in Dublin). I believe that there are some concerns by residents of Ravensdale Park, St Martin's Park and Poddle Park regarding the flood alleviation proposals close to where they live. However, the OPW would not jointly propose this flood alleviation scheme along the River Poddle unless the required proposed measures are fully justified and warranted. Myself and my family are victims of the flooding from 2011 who simply do not want to go through such a repeat nightmare scenario again. All we want is the best possible infrastructure in place along the River Poddle for when the next flood rains occur again. Therefore, I am "guilty" of kindly requesting that An Bord Pleanála grant full planning permission for this proposed flood alleviation scheme in its full entirety. Please do not let the Harold's Cross area suffer such flooding devastation and loss of life again!!</p>	<p>The response reflects the broad support that has been received for the development of this Scheme from the consultations that began on this back in 2018. The project team were told at such events of the trauma and hardship experienced by residents and businesses who suffered in 2011, some of whom were out of their homes for over 6 months and some who nearly drowned. The proposed Scheme is a detailed response to the need to provide adequate protection to these and other properties at genuine risk from serious flooding.</p>
<b>Our Lady's Hospice and Care Services</b>	14.1	<p>To whom it may concern, this is a letter in support of the River Poddle flood alleviation scheme, Planning reference number.306725, Our lady's Hospice and Care Services, fully support these works on the basis that they will assist with the flood defences along the River Poddle and will reduce the risk of flooding in the Harold's Cross area</p>	<p>The response reflects the broad support that has been received for the development of this Scheme from the consultations that began on this back in 2018. The project team were told at such events of the trauma and hardship experienced by residents and businesses who suffered in 2011, some of whom were out of their homes for over 6 months and some who nearly drowned. The proposed Scheme is a detailed response to the need to provide adequate protection to these and other properties at genuine risk from serious flooding.</p>
<b>Patrick Costello and Others</b>	15.1	<p>To Whom It May Concern,</p> <p>We are writing to object to the above planning application, for reasons which we will outline below:</p> <ol style="list-style-type: none"> <li>1. Environmental Impact</li> <li>2. Wildlife Impact</li> <li>3. Social Impact</li> <li>4. Hydrological Considerations</li> <li>5. General Concerns</li> </ol> <p>We understand the need to address the serious flooding that has happened along the course of this river; however we are concerned that this project is not a proportionate response and will itself cause significant harm.</p> <p>We have tried to show in parts a better way forward that can achieve flood protection without the negative impact. We will outline some general policy issues in relation to the environmental impact of the proposed works that apply to the project as a whole, before considering how they impact some specific locations.</p>	<p>Response is provided to each of the points below.</p>

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	15.2	As outlined in the Dublin City Biodiversity Plan 2015 - 2020, Dublin City's street trees provide important nesting, roosting, feeding, and commuting opportunities for many wildlife species, such as birds and bats, and are an important component of the City's Green Infrastructure Network.	<p>The proposals do not affect any of Dublin City's street trees. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. The modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the re-aligned channel at Whitehall, and the embankment in Tymon Park will alter these parks and spaces and the way they are used and enjoyed by the public, but they will not result in loss of these spaces.</p> <p>See also responses RFI no. 8 and RFI no. 9 in the main response document for further information on net biodiversity gain and ecological enhancement measures.</p>
	15.3	Additionally, Dublin City Council's Dublin City Tree Strategy 2016 - 2020 refers to trees as making a significant contribution to people's health and quality of life. They clean the air, mask noise, and promote a general sense of wellbeing. The cumulative impact of tree loss across the project as whole will greatly impact the environment and air quality in the city. The proposed felling of so many trees is therefore deemed to be against existing biodiversity policies and should be rejected.	The removal of trees will have a slight short-term negative effect on these habitats, but when the trees have fully established (estimated to be approx. 10 years) the impacts will be neutral in the medium term.
	15.4	Based on its flood maps, the South Dublin County Council Climate Change Action Plan 2019 identified that the River Poddle would benefit from solutions involving green infrastructure, integrated wetlands and tree planting. This is echoed in the Dublin City Development Plan 2016 - 2022, which also calls for the use of Sustainable Water Drainage and Sustainable Urban Drainage Systems to mimic natural drainage through the use of permeable paving, swales, green roofs, rain water harvesting, detention basins, ponds and wetlands. It offers the opportunity to combine water management with green space, which can increase amenity and biodiversity - an opportunity which has not been fully grasped in the proposed works.	SuDS, flood water retention and NFM methods have been employed where possible in the Scheme at Tymon, Whitehall, Ravensdale. The use of permeable paving, green roofs, etc. are long term sustainable drainage mechanisms that need to be encouraged at a private and development level but do not alleviate the immediate fluvial flood risk from the River Poddle to properties as identified in this Scheme. A broader conversation on urban drainage is important but people and property need to be protected in the sustainable manner presented in this Scheme.
	15.5	It is also important to note that the Arterial Drainage Act 1945 is an outdated Act which completely contradicts E.U. law which states that we need to rejuvenate our rivers, not use them for drains. We cannot allow complete ecosystem degradation by allowing the original channel of rivers to be channelised beyond recognition. The river Poddle is listed as a Green Infrastructure Asset, and it is important that Dublin is recognised as a place of biodiversity.	There is confusion in this statement as these works are not being undertaken as part of the OPW 1945 Arterial Drainage Act but under the Part X planning process as presented by SDCC and DCC, and were developed from the National CFRAM programme to identify flood risk. This process began in 2012. There is no channelisation in this Scheme - rather there is NFM in the use of upper catchment storage in Tymon Park, river naturalisation and restoration at Whitehall and greenspace suds storage at Ravensdale. The urban nature of the river particularly in the Dublin city area limits further natural approaches but hard defences are only present where there are not alternatives to protect properties. It should be noted that the extent of hard defences for the Poddle was initially 3km over the catchment but through NFM and detailed hydraulic analysis this has been reduced to approximately 800m over a 6km length of river.
	15.6	<p>Of particular concern, we note:</p> <p>Tymon Park</p> <p>As 'major' tree-felling will occur in Tymon park, this is obviously the area of greatest concern, and while there is a degree of habitat enhancement contained within the plans with the creation of a wetland which should come to fruition within five years and provide a valuable addition to the overall biodiversity of the park, we note in section 7.4.3 of the Planner's report that while 23 specimens/ 1,100 m2 of woodland will be lost, this will be replaced with 92 specimen/ 1,100 m2 • The project outlines plans to replant felled trees at a ratio of 2: 1; however if this represents a spatially reduced area of woodland, we believe the ratio in Tymon Park should be at least 3:1.</p>	<p>See RFI no. 7 on construction stage impacts, RFI no. 8 on net biodiversity gain and RFI no. 9 on ecological enhancement measures.</p> <p>In Tymon Park, north and south of the M50, a total of 126 no. trees and 1,100m<sup>2</sup> of woodlands are required to be removed to accommodate the Scheme. The original proposals for the Scheme were for 92 no. replacement trees, 1,075m<sup>2</sup> of woodland planting, and 218m<sup>2</sup> of marginal planting at Tymon Park and Lake.</p> <p>It is noted that the requirement for replacement tree planting at a ratio of 2:1 has been met across the Scheme within each Council area. It is not required, nor is it possible or desirable in all cases to plant replacement trees within the various works areas.</p> <p>As summarised in the summary on response to RFI no. 9, each applicant Council has committed to additional replacement tree planting and landscape enhancements that bring the ratio to 2.8:1. In addition, in Tymon Park, and in the upper Poddle catchment in Bancroft Park approximately 14,000 trees will be planted in mini woodlands along the riparian corridor and in pockets in Tymon Park. This method of planting results in rapid</p>

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			growth which will bring benefits of natural flood management in the upper catchment where it can be of greatest benefit to flood protection.
	15.7	Ravensdale While there has been significant adaptation of the plans to ensure fewer trees are lost at Ravensdale, we note the intention to fell six trees and replant one. While the stated objective of the project is to replace lost trees at a ratio of 2:1, section 7.4.3 of the Planner's report states: Replacement planting may not occur in the affected locations due to space constraints but will be planted as closely as possible in nearby green spaces to benefit the local communities.	Further consideration of construction methods at detailed design stage, and meetings with Council officials in SDCC and DCC, additional areas were surveyed by the Arborist, Keith Mitchell of CSR. An updated Tree Survey and Arboriculture Impact Assessment is submitted as Appendix 4 and includes updated Tree Removal and Protection Drawings. As outlined in Table 8-1 of the main response document. A total of 20 trees are to be lost in Ravensdale Park according to the updated tree survey report.
	15.8	We do not agree with the assessment that space constraints would limit the replanting opportunities in Ravensdale to just one replacement tree, and would prefer to see like-for-like replanting as a bare minimum, with 2:1 replanting acceptable in other areas, but 3:1 preferable where this can be accommodated.	Due to the heavily urbanised nature of the DCC areas there are limited opportunities for replacement tree planting directly within the works areas for Ravensdale Park and St Martin's Drive. While replacement trees are being suggested for the parks and green spaces affected by the proposed Scheme, the parks in question are not of a sufficient scale to accommodate the proposed 2:1 ratio for replacements in a proper sustainable manner. There are green spaces within 2 km of the affected parks that could benefit hugely from tree planting and other measures for ameliorating against biodiversity loss. See RFI no. 9 for further details.
	15.9	We note also the amenity value of this park to local residents and the fact that the works will result in full closure of the park and 'significant landscape alteration', and propose that the small green area at the end of Poddle Close could be developed as an amenity in the interim and with the longer term goal of enhancing the area and progressing a Green Infrastructure Network in this area.	The Scheme proposals do not involve culling of local parks and green spaces. It is a fact that access to and use of the local parks and green spaces will be restricted during construction at the works areas. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. The modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the realigned channel at Whitehall, and the embankment in Tymon Park will alter these parks and spaces and the way they are used and enjoyed by the public, but they will not result in the loss of these spaces. Careful consideration as to how these spaces are used has been given in the design of the Scheme.
	15.10	The proposed construction of a flood defence wall at the right bank of the river at the end of St. Martin's Drive, Kimmage would lead to the removal of bankside vegetation and the felling of an estimate 20 no. trees and three tree groups. This would have a devastating impact on a park that is recognised as having a level of high biodiversity. This plan is also unlikely to offer any enhanced protection. The stated aim of the Poddle FAS works is to alleviate fluvial flooding (hold water back from going over the banks); however, residents have reported that flooding in this area in previous years entered properties from the back gardens due to blocked culverts causing flooding on the Kimmage road, and report that there is no recalled incident of the river breaking its banks at this point, at least since the 1970s.	Refer to RFI no. 6. Flooding mechanisms in 2011 were as stated here, however, it is very incorrect to say that the defence proposed here does not offer protection. This Scheme is designed to protect against a 1% AEP or 100year event. The event in 2011 was not of this magnitude. The hydraulic modelling undertaken identified the flood risk at St Martins as shown on CFRAM mapping ( <a href="http://www.floodinfo.ie">www.floodinfo.ie</a> ) and updated hydraulic report flood risk mapping and as explained in RFI no. 6 even with other flood protection measures there is a clear flood risk where the river bursts the right bank at St Martin's Drive. Flood defences at this location are an absolute requirement to prevent houses along the drive from flooding.
	15.11	The severity of the works at this point, the destruction of valuable habitat, and the use of hard defences must be examined in the context of both Tymon Park and Ravensdale having a combined estimated storage capacity of 66,800 m <sup>3</sup> and in terms of the variance in the natural river bank at this point. While the plans propose that the wall will run adjacent to number 28 St. Martin's Drive and extend as far as number 15, a visual assessment of the natural river bank shows a rapid increase in the height of the natural bank along this stretch. In light of the hydrological considerations outlined below, we believe that some or all of this habitat could be maintained with an alternative or more sympathetic approach.	As above and as outlined in RFI 2 and RFI 6, the flood storage at Tymon Park and Ravensdale does not alleviate the risk of flooding at St Martin's Drive. 2 options were considered here and the preferred option, while removing more vegetation and trees had the least impact on green space, allowed for a replacement planting regime along the defence wall as well as riparian planting within the river bank adjacent to the defence wall. the length of defence wall is such that it only runs until there is sufficient capacity in the existing river bank to retain the flood waters.
	15.12	The abovementioned Dublin City Council plans also call for enhanced opportunities for biodiversity conservation through green infrastructure, and the promotion of ecosystem services in appropriate locations throughout the City. Planning application would tear up bank-side riparian habitat, for it to be replaced with a concrete wall. The main tree here is <i>Salix alba</i> , an insect-pollinated tree that provides early food for bees. It has a fissured bark that is ideal for other invertebrates, and the tall layered structure of the tree is also	The replanting proposed as agreed with DCC Parks is native species and in addition there are riparian replanting proposals proposed for St Martin's Drive consisting of rock roll against the wall then coir roll which encourages riparian growth. Details of these proposals are contained in RFI no. 6

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		an important bird habitat. The proposal would also remove trees that are planted in groups, mimicking a woodland setting - this would be irreplaceable.	
	15.13	The Environmental Impact Assessment Report confirms the considerable tree removal at St. Martin's Drive as having moderate to significant adverse visual effects in the short term, and the development will also have permanent impacts on species-rich dry meadow, broadleaved woodland and treeline habitats, all of which are of local value. Our parks and green spaces are already rapidly shrinking. It is imperative that we invest in them and their potential for richer biodiversity, not diminish them and allow for a further loss of what is already rare green space in an urban setting.	See RFI no. 6. Examination of the "do nothing" option demonstrates the need to provide flood protection measures at St. Martin's Drive is indisputable ( <b>Figure 7-1</b> ). A flood defence is needed to prevent the river bursting its banks on the right-hand side where the existing bank level is lower than the bank at the left-hand side. Further consideration of construction methods at detailed design stage, and meetings with Council officials in SDCC and DCC, additional areas were surveyed by the Arborist, Keith Mitchell of CSR. An updated Tree Survey and Arboriculture Impact Assessment is submitted as Appendix 4 and includes updated Tree Removal and Protection Drawings. As outlined in Table 8-1 of the main response document, a total of 38 trees are to be lost in St. Martin's Drive, 7 less than the original count according to the updated tree survey report.
	15.14	While we appreciate the difficulty of incorporating nature-based solutions as a whole in an urban catchment area, we believe there is an opportunity here for nature-based solutions, such as the inclusion of trees and hedgerows which would ultimately have multiple benefits beyond flood defence, such as habitats for wildlife. This could be complimented by lower impact hard defences that do not require tree loss, such as a low wall along the edge of the park to allow the park itself to be a contained flood area, closer to natural flood defences. This is the logic of the proposed works in Ravensdale Park where the number of trees lost has been significantly reduced from earlier designs. It is unclear why this same logic has not been applied to this stretch; as outlined in the hydrological considerations below, a low (0.5m) wall along the footpath of St Martin's Drive would not only allow conservation of the trees and vegetation, as well as the river bank itself (which is often the home of much biodiversity), and access by residents to the river bank, but hydrologically, this alternative would also offer an advantage in helping to attenuate the flood flows in the river downstream rather than accelerating them through the section.	The option described here was considered but was ruled out in favour of the preferred option as it had a greater visual impact, affected the use of greenspace and was more likely to encourage congregation of people. It should be noted that the option rejected still requires tree and vegetation removal along the southern section for approximately 60m as well as the removal of some of the trees in the greenspace whose roots would be affected by the wall foundations. Details of this are contained in RFI 6
	15.15	Furthermore, the exact stretch of river for which this high wall is proposed is already a dumping blackspot, with residents regularly reporting vans offloading at Poddle Park and dumping over an area of low wall. Proposed measures for this area must take into account a possible reduction of access to this spot for removing illegally dumped waste, and the knock on effect this could have if it blocks the flow.	Illegal dumping is a blight on all communities and as shown in 2011 can lead to increased flooding - however, as stated in EIAR and above - the inclusion of trash screens at key culvert locations together with unified maintenance programme from SDCC/DCC limits the risk of blockage from dumping. within the flood defence design - inclusion of 60% blockage at these sensitive culverts has allowed for robust defence.  The fence at Poddle Park was to be heightened 5 years ago to alleviate dumping but this was stopped due to the objection from a local resident in Poddle Park
	15.16	It is furthermore noted in section 7.3.5 of the Planner's report, Impacts on Biodiversity: Mammals and birds are most vulnerable to impacts during the spring and summer months when nesting and rearing young. Impacts will be avoided by scheduling site clearance works outside the nesting/ breeding season, or by carrying out pre-clearance surveys; however in section 7.3.6, Mitigation and Enhancement measures, it states: It is strongly recommended that any tree or shrub removal is carried out between September and February (inclusive). If this is not possible, the project Ecologist will survey relevant vegetation in advance in order to determine the presence of any of protected fauna. If any are encountered, the vegetation clearance will be delayed until they have moved away from the area.  As several nesting sites were observed at St Martin's Drive in March 2020 we maintain that it is essential that the clearing of large tracts of habitat containing nesting sites is carried out outside of the nesting period and pursuant to the Wildlife Act of 1976 (as amended): it is an offence to kill or injure a protected bird or mammal or to disturb their breeding/ resting places.	Potential impacts on tree-nesting birds have already been assessed in the EIAR. The mitigation strategy will be updated based on a request from the National Parks and Wildlife Service (Submission #23) that "any clearance of vegetation from the banks of the Poddle or adjacent areas as part of this Scheme should only take place outside the main bird nesting season, i.e. in the period from September to February inclusive". In response, references to pre-clearance surveys during the nesting season will be omitted from Section 7.6.6 of the EIAR.

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	15.17	Finally, even taking into account the ambitious replanting and landscaping plans, citing visual amenity and habitat reestablishment, it must be considered that the unique habitat and ecosystem which has developed around this stretch of natural river bank cannot be re-established or replicated on a green, and we note that section 7.3.1 of the Planner's report, Impacts on Habitat, examines the long term benefits to the habitat at Tymon Park and the timeline for reestablishment of habitat at Whitehall Park, but does not mention the habitat loss at St. Martin's Drive.	The landscape mitigation proposals for the Scheme at St. Martin's Drive is contained in EIAR Volume 3, St. Martin's Drive Landscape Mitigation Plan and planning Drg. No. RPFS-NOD-XX-XX-DR-C-08167. These proposals were prepared in consultation with Dublin City Council Public Realm Section and will reduce the effects of habitat loss and tree removal required to accommodate the flood defence walls in this location. In addition, the applicant Councils have commissioned CBEC to undertake a feasibility study for channel naturalisation along the channel at St. Martin's Drive.  See RFI no. 6 for details of landscaping measures to be implemented in St Martin's Drive.
	15.18	Whitehall Park/ Wainsfort Manor Crescent  With a projected loss of 15 no. trees and four tree groupings, there is again significant impact along this stretch of the river that will tear out irreplaceable riparian habitat when other, less impactful solutions have not been considered. There are large areas of green space here along the side of the river, hard flood defences placed at the edge of the green areas instead of removing trees and placing defences at the river bank itself would protect the habitat while also providing flood protection. As stated above, this is the logic of the proposed works in Ravens dale Park where the number of trees lost has been significantly reduced from earlier designs. It is unclear why this same logic has not been applied to this stretch.	As stated in the EIAR there will be a temporary impact on the habitat and Wainsfort Manor Crescent area, this is to access the river to reinforce the block boundary walls on the left bank which are structurally not capable of withstanding flood flow. There is a requirement to remove some trees to access the river to complete these works but this has been kept to a minimum by construction methods chosen. The reinstatement as agreed with SDCC Parks will see full riverbank restoration and additional planting of native trees to protect and enhance the amenity and biodiversity of this area.
	15.19	Furthermore, while the overall stated aim of the project is to replace felled trees 2:1, there is no plan to replace the trees lost at Wainsfort Crescent, with a proposal instead to plant trees in a nearby green, or at Tymon Park, which would have little to no immediate value to the community at Wainsworth. Section 7.4.1 of the Planner's report judges the impact on the landscape at this section often with significant tree loss and no plans to replant, it seems the impact, both visually and environmentally, will be quite high.	After further review of the construction methods, the number of proposed trees to be felled in Wainsfort Manor Crescent has fallen from 36 to 20. See RFI no. 7 and Appendix 4 for further details. SDCC have also committed to planting 20. no. replacement trees in Wainsfort Manor Crescent as per RFI no. 9 and associated drawings.
	15.20	The proposed plans for St. Martin's Drive would seriously inhibit the accommodation of wildlife at this site. The field surveys identified the presence of mammal species such as bats, hedgehogs, and stoats, and both common terrestrial birds and specialised bird species associated with aquatic habitats. Nesting is also taking place in trees set to be felled. A tree tagged 790 that is due to be felled was already noted as having a small nest being built in it, and as previously mentioned, several nests were identified at this location in March 2020.	Potential impacts on tree-nesting birds have already been assessed in Chapter 7 of the EIAR. The mitigation strategy will be updated based on a request from the National Parks and Wildlife Service (Submission #23) that " <i>any clearance of vegetation from the banks of the Poddle or adjacent areas as part of this Scheme should only take place outside the main bird nesting season, i.e. in the period from September to February inclusive</i> ". In response, references to pre-clearance surveys during the nesting season will be omitted from Section 7.6.6 of the EIAR.
	15.21	Amongst the many birds that will be at risk if tree felling goes ahead as planned at St. Martin's Drive, some of the birds are listed as having high conservation concern nationally, such as: the herring gull, black headed gull, and grey wagtail. Those of medium conservation priority include: the sparrow hawk, swallow, common gull, starlings, robin, goldcrest, greenfinch, and house sparrow. St. Martin's Drive park is also home to other birds which will be at risk, such as the kingfisher, grey heron, little egret, long tailed tit, mallards, swifts, and kestrels. The EU Birds and Habitats Directive calls for species protection provisions to target all naturally occurring wild bird species in the EU. In this regards, they require Member States to prohibit "deliberate disturbance, e.g. during breeding, rearing, hibernation and migration", the "deterioration or destruction of breeding sites or resting places," and finally, "deliberate destruction of nests or eggs, or the picking, collecting, cutting, uprooting or destruction of protected plants in the wild." The impact on wildlife and loss of biodiversity listed in the report would be devastating. While St. Martins Drive section has one of the greatest impacts, the same applies to the other stretches of the proposed works, and would call into question if the project is in line with the EU Birds and Habitats Directives.	As outlined in Section 7.4.2.6 of the EIAR, a range of common garden and urban bird species were observed during surveys of the Scheme, including tits, finches, corvids, pigeons, robin, wren, etc. With the exception of the Tymon Park, most of the woodland / treeline habitats along the Poddle FAS are small and fragmented, and are not large enough to provide a permanent territory for individual birds. Therefore, it is expected that most birds will move between fragments of suitable habitat along the river corridor, as well as in nearby gardens and green spaces. For this reason, it is not necessary to list individual species in each habitat fragment, because this is likely to change on a regular basis. For the purposes of the impact assessment it was assumed that most or all common garden / urban bird species are present in each of the proposed working areas at different times of the year. Furthermore, the mitigation strategy for these species will be the same throughout the Scheme; that vegetation clearance will take place outside the bird nesting season. This is a standard method that is regularly applied for construction projects throughout Ireland, and thus is considered to be best practice, e.g. in the National Roads Authority (now Transport Infrastructure Ireland) guidelines on Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes.

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	15.22	Covid-19 has provided a greater insight into the social impact of the proposed works. The limitations on movement meant that people, in many cases discovered, or became more reliant on local amenities such as the green spaces along this river and the river itself. At St. Martin's Drive and at Wainsfort, local residents are concerned about the loss of what have become valuable amenities. While the need for this kind of space must be balanced against the need for flood defences, it is our contention that alternatives have not been properly considered.	As above, the Scheme proposals do not involve culling of local parks and green spaces. It is a fact that access to and use of the local parks and green spaces will be restricted during construction at the works areas. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. The modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the re-aligned channel at Whitehall, and the embankment in Tymon Park will alter these parks and spaces and the way they are used and enjoyed by the public, but they will not result in the loss of these spaces. Careful consideration as to how these spaces are used has been given in the design of the Scheme.
	15.23	The Environmental Impact Assessment Report confirms that views into and out of Ravensdale park will be restricted in some areas as a result of walls being built. Whilst the construction of a high wall around the Park would further limit views and potentially create issues such as unsocial behaviour, this remains a significant concern for local residents.	The proposals at Ravensdale are necessary to protect the surrounding area from risk of flooding. Where possible the wall heights have been reduced and located to minimise impact on the existing park. Details of Ravensdale Park Defence are contained in EIAR Volume 2, Section 4 and in Appendix 3 in response RFI no. 2
	15.24	As readily acknowledged in the EIAR and in the CFRAM report on the Poddle, the catchment is intensely urbanised and under the EU Water Framework Directive is regarded as 'heavily modified'. With no known natural tributaries and a small catchment area of approximately 16 km <sup>2</sup> , the flood response is largely characterised by direct runoff and contributing storm sewer drainage with a significant proportion of paved or impermeable areas. As such, there is considerable uncertainty in predicting or modelling the response to intense rainfall events of high return periods (EIAR sect 8.5.3). There are no flow gauges on the Poddle, just three key water level monitoring points upon which the modelling was based.	It is fully understood that the Poddle catchment is highly urbanised and ungauged. the process for determining catchment response and flood risk began in CFRAM study in 2012 and was refined during this Scheme. while there are no historic flow gauges, the model has been verified against observed water levels during 2011, level recorders installed since 2012 at Gandon Close, Kimmage Manor and Lakelands weir as well as a flow and rainfall survey carried out along the length of the River in 2018. The surface water network that contributes to the catchment and where it outfalls to the catchment is contained within the hydraulic model and the hydrologic storm profiles to generate the run-off are determined from the analysis of the long record historical rainfall data at Casement Aerodrome less than 6km from source of the Poddle as well short record rainfall gauges within the catchment. the hydrological analysis produced rainfall storm profiles for storms of various return periods which were then inputted into the physical hydraulic model which contained the surface water network and river channel to determine the worst case storm duration and extent of flooding as a result of these storm events.
	15.25	Trinity College (Civil Engineering) in collaboration with Dublin City Council, conducted an intensive urban runoff monitoring on the Priory Road (adjacent to Mount Argus) storm drainage in the Poddle catchment over 2 years, and during the time of the intense rainfall event in 2011. The focus was on the means of encouraging detention of urban runoff (sustainable urban drainage) and reducing the impact on flood flows in the Poddle. Although the measured rainfall in the event of 2011 was confirmed as being over 90mm at Mount Argus with apparently small impact on the river at that point, the results were seemingly not used in the modelling for the EIAR. Nevertheless, while the updated CFRAM modelling undertaken by Black and Veatch consultants had an eye on the historical events, the outcome confirmed the importance of the proposed solution of providing upstream storage at Tymon Park to control the flooding downstream.	The requirement for upstream storage at Tymon is well noted. The surface water works at Priory Road and the 24" outfall into Mount Argus have been included in the Scheme model. as above a robust and detailed hydrological and hydraulic study of the catchment have been undertaken as part of this Scheme.
	15.26	However, the same strategy of providing, as much as possible, natural storage to attenuate the extreme flooding events, seems to be lacking downstream on the Poddle, particularly in the vicinity of St Martin's Drive, which itself is part of the natural flood plain (between Poddle Park and St Martin's Drive). The proposal, instead, is to eschew the floodplain and build a constraining wall along the eastern river bank itself, some 1.1m high, which itself will destroy the natural river bank and necessitate the destruction of a large number of trees and riparian vegetation. This proposal appears to have originated in the Poddle Options Report (RPS Engineering Consultants Drawing no. 09PE DEF Option 1 003) and has been adopted by the present applicants as indicated in the EIAR.	The original CFRAM proposals consisted of 3km of hard defences which have now been reduced to approximately 800m across the 6km length of River. The existing lakes at Tymon have allowed for increase of flood storage here as have the low-lying nature of Ravensdale Park - see RFI no.2 and Appendix 3. The green space at St Martins is not conducive to natural flood plain with Poddle Park Road to the left significantly higher than the right bank and no natural flood plain available on the left at St Martin's Drive where out of bank flow enters the road and runs north towards existing properties which need to be protected.

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	15.27	<p>One of the stated objectives of the flood alleviation scheme (EIAR p.2-10) is to 'maintain biodiversity' and indeed, the remedy for the proposed destruction of the vegetation is (EIAR section 4.4) is to "replace trees that will be lost as a result of the construction of a 1.1 m high flood wall along the river here". If the construction of this river bank wall were eliminated, much of these objectives for sustainable biodiversity would be realised. An alternative approach is to utilise the existing floodplain as much as possible which can be achieved ( as mentioned in the EIAR) by building a wall along the footpath of St Martins Drive, which would be much lower (0.5m) and would allow conservation of the trees and vegetation as well as the river bank itself which is often the home of much biodiversity.</p> <p>Hydrologically, this alternative would also offer an advantage in helping to attenuate the flood flows in the river downstream rather than accelerating them through the section. While this modification would be a much better contribution to the natural solutions to flooding on the Poddle, and apparently recognised by the applicants the decision to go with the river bank wall was influenced by objections from local residents, which are discussed in section 4.</p>	<p>RFI no. 6 details the direct need for flood protection measures at St Martin's Drive and clearly demonstrates the vulnerability in not carrying out protection works. Neither of the options considered can prevent works along the river bank and removal of some existing trees however, it should be noted that the proposed works extend for only 120m along the St Martin's Drive area and the remainder of the existing channel will not be affected. Added to this the proposed replanting plan as well and riverbank restoration planting on the inside of the proposed defence wall.</p>
	15.28	<p>There has been significant lack of consultation in relation to this project. Many residents spoken to recently were unaware that works were being planned, or of any of the details. This is not just as a result of the Covid pandemic but that has certainly exacerbated the situation, particularly as the last public consultation event occurred on March 12th, when schools were closed.</p> <p>Residents not directly on the course of the Poddle, but who would still be affected by this development and by the loss of a valued local amenity did not receive required information.</p>	<p>All information was made publicly available on the Poddle FAS website. Letters were also shared with Tymon Park user groups and sports clubs informing them of the Scheme (Appendix 3-2 of the EIAR). Appendix 2 of the RFI response also contains evidence for all aspects of the public consultation process.</p> <p>The scheme was launched on October 2018 by the Minister for State for the OPW with updates on the progress and details of the scheme for elected members in DCC provided in October 2018, September 2019 and December 2019.</p> <p>In relation to COVID-19 it should be noted that the announcement of school closures occurred at lunchtime of 12<sup>th</sup> March 2020 as the public consultation session at DCC Area offices, Crumlin were ending and the decision to continue with the evening session at Harold's Cross National School was upheld and supported by the School itself and there was 27 no. attendees who were present between the two locations, including a signatory of this submission; Green Party Councillor Carolyn Moore.</p>
	15.29	<p>As outlined previously, we also have concerns about the level and locations of replanting. Most of the trees that would be lost are part of unique riparian habitat. While replanting, even at the stated rate of 2:1, is welcome, it will not and cannot not replace that As such, where replanting is to take place, a significantly higher number of new trees should be replanted.</p>	<p>Refer to RFI no. 9 and associated drawings for details on locations, species and quantities of trees to be replanted. In RFI no. 9 of the main response document the DCC and SDCC have provided the commitments for tree replanting in their respective areas. DCC provide commitments for 165 trees to be replanted in green spaces within 2 km of the affected parks that could benefit hugely from tree planting and other measures for ameliorating against biodiversity loss. SDCC had proposed that 350 trees be replanted across Tymon Park, Wainsfort and Whitehall Park. In addition to these 350 trees they have proposed the planting of mini woodland areas in Tymon Park and Bancroft Park. These woodlands will facilitate the planting of approximately 14,000 trees and shrubs. This will further enhance the NFM properties of the river.</p>
	15.30	<p>Finally, we note the intention to maintain all walls in a flood-proof state and to keep culvert screens and channels clear of debris, and we suggest that CCTV monitoring and a rigorous schedule of maintenance and cleaning to both tackle and deal with the issue of illegal dumping will be needed to achieve this. As previously mentioned, where flooding has previously occurred at properties on St. Martin's Drive, this was not the result of the Poddle bursting its banks at this point, but a blocked culvert causing the Lower Kimmage Road to flood.</p>	<p>Illegal dumping is a blight on all communities and as shown in 2011 can lead to increased flooding - however, as stated in EIAR and above - the inclusion of trash screens at key culvert locations together with unified maintenance programme from SDCC/DCC limits the risk of blockage from dumping. within the flood defence design - inclusion of 60% blockage at these sensitive culverts has allowed for robust defence.</p>

Name	Observation no.	Observation/Issue	Response
<b>Peter Sweetnam</b>	16.1	<p>The re-alignment of the river at Whitehall Park will involve in-stream works, including the creation of a new section of channel diversion of the river to the new channel and the infilling of the existing channel Temporary crossings of the River Poddle will be required to facilitate works in some locations; notably Tymon North and Tymon Park. In these cases, all in stream works will comply with current best practice, Commission notice "Managing Natura 2000 sites The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" Brussels, 21.11.2018 C(2018) 7621 final stats at;</p> <p>3.6.6 Considering suitable mitigation measures to avoid or reduce the impacts</p> <p>For the competent authority to be able to decide if the mitigation measures are sufficient to remove any potential adverse effects of the plan or project on the site (and do not inadvertently cause other adverse effects on the species and habitat types in question). each mitigation measure must be described in detail, with an explanation based on scientific evidence of how it will eliminate or reduce the adverse impacts which have been identified. Information should also be provided of how, when and by whom they will be implemented, and what arrangements will be put in place to monitor their effectiveness and take corrective measures if necessary. The need for definitive data at the time of authorization is also raised in case C-142/16, paragraphs 37-45.</p> <p>The mitigation measures in this Natura Impact Statement clearly do not comply with the above, therefore in the opinion of the European Commission they do not comply with EU Law.</p>	A revised NIS has been submitted along with the RFI response.

Name	Observation no.	Observation/Issue	Response
<b>Recorder's Residents Association</b>	17.1	<p>This Residents Association is greatly pleased to see the Poddle Flood Alleviation Scheme finally go to An Bord Pleanala for evaluation We have waited many years since this major upgrade was first financed in 2012, anxiously watching every rain forecast. We represent 3 56 homes in our area many of whom have suffered direct flooding from the Poddle on numerous occasions down the years since we began to campaign in 1993. Others have endured the knock-on effect of the river overflowing because, as in line with most flood events, the water from the river enters the sewage system and even those not directly affected by the river, suffer consequences even more abhorrent. Many of us now go without flood insurance cover or pay an extra premium for this cover.I have lived for 75 years in this area of Dublin, some residents even longer. We, have seen huge developments take place, much of it on disused quarries such as Wheelan Park, Dangan Park, St. Damien's School, Perrystown Community Centre. These old quarries, all over this area provided water storage. These have now been built on, or simply filled in and used as playing fields. Flood plains, such as Brookfield, was aptly named as it was under water for much of the winter time, and observed on our walk to school. This is now Brookfield Estate. The playing field on Kimmage Manor was also frequently under water. Willington Lane (now called Wellington) had a 'flooding field' along the bank of the Poddle. This is now Glendown Estate. Above Willington House, where the fields stretched out to the Tallaght Road which also flooded in winter, there now exists, courtesy of SDCC, a lovely ornamental pond just inside the entrance to Tymon Park.All surface water, from these estates and many others drain into the Poddle River. All developments from Cookstown to Tymon Park also drain into it, as does a section of the M50 via the Tymon Stream, which merges with the Poddle. There is an interesting reference to Tymon Lane in the "The Neighbourhood of Dublin" by Weston St. John Joyce, published in 1912 " ... it would be well to go by Tymon Lane, a pretty secluded by-road .... This is a very ancient road, running along the ridge of the sand-hills so as to avoid the marshes which formerly surrounded Tymon Castle" This area. now houses Castle Lawns Estate.It is no wonder then that the tiny stream of my childhood turns into a raging torrent after a relatively short space of time depending on the intensity of rainfall. Please see the attached photos. It should be noted that these floodings are not always at the times generally quoted/publicised as - "unusual rainfall events" - they can come quickly as a result of a severe thunderstorm, or localized rainfall: The depth of the flooding is rarely dramatic! But the devastating effects of under house flooding lasts for many months. Years of studying the behaviour of the river has shown that the Whitehall Road area is hit far more frequently by-flooding, as described above, than any other part of its route. We know this to be a fact, as we have liaised with many Residents Associations all along the route of the river. In fairness, South Dublin County Council have, by creating three ponds in Tymon Park, endeavoured down the years, to alleviate the flooding to this area. Two were instated following the development at Kimmage Manor. At that time it was our opinion that a stronger flood defence was needed. By 2011, it finally became abundantly clear to all concerned, that these greater measures were, indeed, needed. Much interaction took place between South Dublin County Council; Dublin City Council, the Office of Public Works and the Residents and their Associations following this event. Everyone, without any exception, had deep concerns regarding the River Poddle. Five years ago plans were drawn up, agreed and ready to go but there was a faux-pas, and the process re-started. A huge amount of discussion and debate has taken place between the Project Manager for SDCC, Mr. David Grant, the consultants Nicholas O'Dwyer, and the 1993 victims/survivors.In the period 1993 to 2011, logged dates show that the Poddle burst its banks along the Whitehall Road stretch 7 times, sometimes 2 and 3 times in one year. There had also been 18 High Alerts up to 2017. We have lived, from day to day with a huge dependency on the element of luck we may have with the weather. This is a situation which cannot be allowed to exist. Apart from the initial cost and repair, the damage caused leaves a legacy of dampness, its all-pervading smell and, the fear of the inevitability that it will happen again; fear also for those who have claimed on their insurance policy and will not be insured again. I can personally vouch for the foregoing, having been refused further insurance cover and, having floors replaced while being temporarily housed in a hotel. Management of an Urban River is difficult in the</p>	<p>The response reflects the broad support that has been received for the development of this Scheme from the consultations that began on this back in 2018. The project team were told at such events of the trauma and hardship experienced by residents and businesses who suffered in 2011 - some of whom were out of their homes for over 6 months and some who nearly drowned. The proposed Scheme is a detailed response to the need to provide adequate protection to these and other properties at genuine risk from serious flooding.</p>

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		<p>extreme, with much culverting along the route of the Poddle. We now feel that this proposed management plan could give the best outcome, namely;</p> <ul style="list-style-type: none"> <li>• We will have a greater chance of flood waters being held back at Tymon Park.</li> <li>• Two wetlands will be created which will provide meanders and bring back more of the flora and fauna, and the bird life that was so dramatically lost as a result of the Kimmage Manor development.</li> <li>• Much of 'our' stretch of the river will not be greatly altered and we welcome some defences being strengthened.</li> </ul> <p>The recent KCR/Ravensdale issue has raised much debate, and the claims that remedial work there will destroy one small habitat is erroneous. Also, claims that the blockage of grids in this area is the problem, is uninformed and clouds the real and far more serious issues. It is at this location that flood waters make their way into the converging sewer system (Whitehall/Fortfield/Wainsfort/Lavarna) and it is the two-fold 'attack' (river and sewers) on properties both above and below this point, that causes the biggest problems that devastate huge local areas. We also feel, that in order to provide protection for all, both upstream and downstream, this current part of the plan is vital.</p> <p>In summary, with the strengthening/enlargement of capacity of Tymon Ponds, and the establishment of two wetlands, we feel re-assured that the flood waters of the Ravensdale Scenario will be a thing of the past, as enough will have been done upstream to prevent, this ever happening again and this park will still be a pleasant place for all to enjoy.</p> <p>The submission has a number letters from local residents attached who voice their support for the proposed scheme as well as a number of pictures of the Poddle River during past flood events.</p>	
<b>Residents of Wainsfort Drive</b>	18.1	<p>I write in connection with the above submission to develop flood alleviation into the Poddle River on behalf of specified residents on Wainsfort Drive, Terenure, D6w. We note the proposed works as follows: (a) Construction of flood defence embankments in Tymon Park (west and east of M50) Tallaght (b) Demolition of the existing flow control structure and footbridge and construction of a flood storage defence spillway with passive flow control structure and replacement footbridge at Tymon Lake in Tymon Park ( east of MSD), Tallaght. (c) Construction of an integrated constructed wetland in Tymon Park (East of the MSO) Tallaght (d) Channel realignment and embankments, and flood defence walls on both banks of the river adjacent to the Lakelands overflow at an open space located in Whitehall Park, east of Templeville Road, Templeogue. (e) Construction of a flood defence wall on the left bank of the river at the rear of properties on Whitehall Road, Terenure and Glendale Park, Walkinstown. (f) Demolition of existing walls and construction of new flood defence walls on the right bank of the river at the rear of the properties on Fortfield road south of KCR Kimmage cross roads, Terenure (g) Construction of flood defence walls and demolition and replacement of footbridge at Ravensdale Park, Kimmage (h) Construction of a flood defence wall on the right bank of the river at the end of St Martins Drive Kimmage (i) Construction of a flood defence wall on the right bank of the river at Mount Argus Close Harolds Cross and (j) Rehabilitating or replacing manholes in the public roads in the junction of Ravensdale Park and Poddle Park Kimmage and in the vicinity of Saint Teresa's gardens and Donore Road and at the rear of the national stadium south circular road, and merchants quay (k) Proposed ancillary works and associated development includes drainage channel clearance and</p>	<p>The response reflects the broad support that has been received for the development of this Scheme from the consultations that began on this back in 2018. The project team were told at such events of the trauma and hardship experienced by residents and businesses who suffered in 2011 - some of whom were out of their homes for over 6 months and some who nearly drowned. The proposed Scheme is a detailed response to the need to provide adequate protection to these and other properties at genuine risk from serious flooding.</p>

Name	Observation no.	Observation/Issue	Response
		<p>removal of trees where required for the works; rehabilitating or installing culvert screens in locations as required ; installing flap valves in all culverts draining to the river, bio diversity enhancements including installation of floating nesting platforms in Tymon lake in Tymon park, Tallaght; and landscape mitigation and restoration at Tymon park , Tallaght, Whitehall Park, Templeogue, and Ravensdale Park, and St Martins Drive Kimmage, including public realm improvements, biodiversity enhancements and tree planting and landscaping.(I) Temporary works include establishing a main construction compound in Tymon Park, with access off limekiln road, Tallaght, which will be in operation for the entire duration of the works and temporary works, set down areas at Wainsfort Manor Crescent, Terenure and Ravensdale Park and St Martins Drive Kimmage which will be in use for the duration of the works to be carried out in these locations. Other temporary works include stockpiling of excavated earth in designated areas of Tymon park, Tallaght, temporary channel crossings in Tymon Park, (west and east of the M50), Tallaght and channels diversions at Tymon Park Tallaght and Whitehall park, Templeogue to enable works along the river to be carried out. We have read the content of the <a href="http://www.poddlefas.ie">www.poddlefas.ie</a> website following it updating with all therelevant information I documentation namely: Part 1 Planning Application Documents Cover Letter to application Section 1. Planning Application Form&amp; Schedule of planning drawings Section 2. Landowner Consent Section 3. EIA Portal notification Section 4. Letters to Statutory Bodies .</p> <p>Section 5. Newspaper Notices Section 6. Site Notices, signed site notice, site notice locations listSection 7. Planning Report Part 2 Planning Drawings RPFS-NOD-01-XX-DR-C-08000 Planning Book Part 3 Environmental Impact Assessment Report Volume 1. Non-Technical Summary Non-Technical Summary Volume 2. Environmental Impact Assessment Report Cover and Contents Main Report Part I - General (Chapters 1-5) Main Report Part II -Assessment of Environmental Effects and Proposed MitigationMeasures (Chapters 6-17) Main Report Part III - References and Abbreviations (Chapters 18 and 19) Volume 3. Figures &amp; Photomontages Cover and Contents Landscape Mitigation Plans Benefitting Areas Maps Integrated Constructed Wetland Drawings Tree Survey &amp; Arboriculture Impact Assessment Drawings 1% AEP Flood Depth Maps Photomontages Traffic &amp; Transport Maps Volume 4. Appendices Cover and Contents EIAR Part I Appendices Appendix 3-1 EIA Scoping Responses Appendix 3-2 Letters to Residents and Tymon Park Users Appendix 5-1 Outline CEMP Appendix 5-2 Tree Survey &amp; Arboriculture Impact Assessment</p> <p>Appendix 5-3 Integrated Constructed Wetland Report EIAR Part II Appendices Chapter 7 Biodiversity Chapter 11 Archaeology, Architectural, and Cultural Heritage Chapter 12 Noise &amp; Vibration Part 4 Natura Impact Statement Natura Impact Statement</p> <p>We have also attended a number of consultation sessions with state engineers present as well as the consulting engineers.While the loss of some trees is regrettable we nonetheless are in fulsome support of the proposals that have been submitted to you. We believe-this will secure our homes from flooding into the future .We believe we will be able to secure flood insurance for our homes when this work is complete.We believe there is no significant ongoing impact on the environment meriting reconsideration of this planning application We believe this greatly and positively impacts health and safety implications for our more senior members who would not be able to protect their homes or themselves in the event of a repeat flood to that of 2011We believe this development will remove a constant source of anguish and stress from our members in Wainsfort . We urge you to approve this significant plan and we look forward to its delivery and the security such an alleviation scheme will bring.</p>	
<b>Roisin Mc Aleer and Laure Duez</b>	19.1	<p>We object to Poddle FAS on 3 grounds - chiefly because the planning process lacked:</p> <ul style="list-style-type: none"> <li>A. Proper public engagement, in accordance with statutory laws.</li> <li>B. A full EIAR (that also takes into account concurrent planning proposals), in accordance with Irish and EU Law.</li> </ul>	Response is provided to each of the points below.

Name	Observation no.	Observation/Issue	Response
		C. Cognisance of social and environmental impact on community, in accordance with The Sustainable Development Goals, CFRAM objectives. DCC and SDCC Development Plans, SDCC Tree Management Policy and DCC Tree Strategy.	
	19.2	A 1. Claims made in the plans in relation to public participation are spurious. The first time I heard of Poddle FAS was when the proposed plans were presented to local councillors on 9th September 2019 on a DCC South East Area Committee webcast. I live less than 200 meters away from the Poddle and despite my active involvement in both my community and local politics, I never heard of the plans until I stumbled upon them accidentally on DCC webcast 9.9.19: <a href="https://dublincity.public-i.tv/core/portal/webcast/interactive/455060">https://dublincity.public-i.tv/core/portal/webcast/interactive/455060</a>	Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project launch and since the project launch for this phase in October 2018. In addition to regular updates to elected members of both SDCC and DCC since 2018, information about public information events were communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See Appendix 2 and its associated appendices for further details on these consultation events. Bangor Road residents received notification of public information days <i>via</i> leaflet drops in January and March 2020. These public information days were held on January 16th and 20th as well as on March 10th and 12th.
	19.3	A 2. Lack of public information regarding Poddle FAS is of grave concern. Poddle FAS website is not fit for purpose. The retrospective updating of information in recent days and weeks highlights the last minute efforts to correct this serious short-coming in the planning process. I flagged this with Project Manager, David Grant several times since October 2019, the solution he offered, to contact him directly is worrying. Unfortunately this is not an open way to engage communities and individuals who do not have a direct line to David Grant. The contact portal was/is defunct on Poddle FAS website, thus communication of Poddle FAS has not been far-reaching or anywhere near inclusive.	As above. Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project launch and since the project launch for this phase in October 2018. In addition to regular updates to elected members of both SDCC and DCC since 2018, information about public information events were communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See Appendix 2 and its associated appendices for further details on these consultation events. Bangor Road residents received notification of public information days <i>via</i> leaflet drops in January and March 2020. These public information days were held on January 16th and 20th as well as on March 10th and 12th.
	19.4	A 3. All stake-holders have not been engaged in the process with parity. Some residents have been engaged since 2011, others more recent. My community, in Dublin 12 only became aware when I brought it to their attention in October 2019. There are over 12,000 people living in Crumlin. For example, Bangor Road is meters from the Poddle. Bangor Road residents have not been engaged in the process, despite being obvious 'stakeholders' and affected people. Many still have no idea it is happening and are unaware of the environmental impact on a large scale. The 'reach' of information has been selective. I have yet to meet one person in my locality who knew about Poddle FAS prior to October 2019. I believe 1000s still do not know about it. 'Early public participation' therefore for effective public participation' did not take place with equity - thus breaking a fundamental right to include all stakeholders equally as set out in the Aarhus Convention.	As above. Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project launch and since the project launch for this phase in October 2018. In addition to regular updates to elected members of both SDCC and DCC since 2018, information about public information events were communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See Appendix 2 and its associated appendices for further details on these consultation events. Bangor Road residents received notification of public information days <i>via</i> leaflet drops in January and March 2020. These public information days were held on January 16th and 20th as well as on March 10th and 12th.
	19.5	A 4. There is no reference to those who oppose or voiced concerns and objections to the plans in the planning documents. Where is evidence of concerns to date? How have they been recorded, collated and integrated in the plans? Where can copies of public feedback be accessed?	Records of concerns raised to the Poddle FAS portal can be seen in Table 3 of Appendix 2.  Concerns raised by the public have been integrated throughout the design phase of the Poddle FAS especially when examining the different proposed options at various locations.
	19.6	A 5. A friend and I had to organise public meetings and invite council representatives to open public meetings to share information, to seek clarity and to ask questions about the plans - further illustration that the 'consultation' process has been exclusionary. Closed meetings were arranged privately thus creating exclusive participation-not inclusive or equal.	This event was agreed with David Grant at the meeting with the submitters held in November 2019.  As stated above, numerous public consultation days have been held over the course of the Eastern CFRAM project launch and since the project launch for this phase in October 2018. In addition to regular updates to elected members of both SDCC and DCC since 2018, information about public information events were communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See Appendix 2 and its associated appendices for further details on these consultation events. See Appendix 2, Section 2.3.1 and 2.3.2.

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	19.7	<p>A6.Exclusive access to planning documents is in breach of the public's right to equal access to information and compromises transparency. One-to-one meetings with project manager, David Grant are not only professionally inappropriate but also deny full, open, transparent public participation and open representation. One-to-one meetings have also given rise to different information being passed around to different stakeholders thus giving rise to ambiguous, and often ambivalent information. e.g. I was told by David Grant in October 2019 that tree tagging at Ravensdale and St. Martin's was nothing to do with Poddle FAS and he had no knowledge of same. In November, he retracted this statement and said some of the trees 'might' have been tagged by SDCC appointed arborist, but he wasn't sure. In December, he said trees had been tagged months ago. Further, public written feedback was not invited by SDCC/DCC from public attendees of information days. I requested that this facility be setup for a December information day at Mount Argos Community Centre. Has written feedback from this meeting and all 'public consultation' / information days including 2018 been recorded? Despite my best efforts to find an answer to this question, I have not received confirmation of any notes, feedback etc that document the public's feedback at public 'consultation days'. Where are minutes of meetings conducted in private between David Grant and other residents / stakeholders? The 'consultation' process lacks inclusivity, transparency and integrity. For this reason, the plans must be paused until proper and meaningful public consultation can be guaranteed.</p>	<p>David Grant met with the submitters in November 2019.</p> <p>As outlined in the consultations report (Appendix 2) in Section 2.3.1 these meetings were not private and were held as part of the information gathering process. Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project launch and since the project launch in 2018. Information about public information events were communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See Appendix 2 and its associated appendices for further details on these consultation events and how they were advertised.</p>
	19.8	<p>A 7. Misinformation - a local councillor cited the felling of 6 trees at Ravensdale in DCC South East Committee meeting (9.12.19) - she quotes a report which she says was given to her by David Grant: This is an example of the spreading of misinformation which leads to confusion, mistrust and lack of transparency. See webcast <a href="https://dublincity.public-i.tv/core/portal/webcastinteractive/455060">https://dublincity.public-i.tv/core/portal/webcastinteractive/455060</a>. Why wasn't the 'misquote' corrected in council chamber by DCC/SDCC or David Grant? The number of trees reported to be felled for the Poddle FAS has been misquoted as 6, 12, 18, 20, 28 and 29 over the course of recent months. I asked David Grant and other a representative from O'Dwyer's what the approximate total tree loss would be. I was told that they estimated 30 trees max in total for the entire project. The figure of 228 trees in the final proposed plans were a shock to many who had asked the same question, but who were never given a figure over 30. In March, David Grant confirmed in public that 29 would be felled at St. Martin's - however according to Appendix 5-2 under Volume 4 of Poddle FAS plans, 45 trees will be felled at St. Martin's. Furthermore, a number of trees on Poddle FAS map are not tagged. A number of trees at Wainsfort and Fortfield are mixed up. The tree survey is unreliable due to a number of errors regarding tagging. In this instance, public information is not trustworthy and undermines the integrity of the entire project.</p>	<p>Details of the final number of trees to be felled as part of the project can be observed in RFI No 7 of the main response document and in Appendix 4.</p> <p>In some cases, it was found that some tags had either fallen off trees or had been removed by persons not relating to the Poddle FAS. These trees (T455 and T456 at Wainsfort Manor Crescent) have been re tagged where necessary (See updated tree survey drawings as part of Appendix 4).</p> <p>The updated tree survey report has also addressed the issues raised in relation to a mix up at Wainsfort Manor Crescent and Fortfield Road (see Section 2.2 of Appendix 4).</p>
	19.9	<p>A 9. Last minute 'consultation' days were called for by communities who had not been included from the get-go and were poorly scheduled by DCC/SDCC at Christmas - during working hours, thus exclusionary. The final 'consultation' day occurred on Day 1 of Lockdown - on school grounds -when schools had been officially closed -thus only a handful of people showed up, excluding many who had questions and concerns. This is another reason why the plans must be paused so that public consultation can be meaningful and carried out with integrity.</p>	<p>Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project launch and since the project launch in 2018. Information about public information events were communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See Appendix 2 and its associated appendices for further details on these consultation events.</p>
	19.10	<p>A 10.The term 'consultation' is misleading as there was no formal consultation other than one-to-one brief 'chats' with 3 representatives who proffered conflicting information regarding tree loss, defence wall heights, defence wall locations and the purpose of the wall at St. Martin's and Ravensdale. Questions from the public were not made in public. Answers to the public were not made in public, and are not, to date in the public domain. Official records documenting private meetings with individuals and residents' associations need to be made available to all in the interest of transparency. Has the CEO of SDCC or DCC made a report on any submissions received to date?</p>	<p>Records of meetings between SDCC's resident engineer are presented in Appendix 2. The general topic of questions from the public are also provided in the consultations report (Appendix 2).</p>

Name	Observation no.	Observation/Issue	Response
	19.11	A 11. Covid-19 restrictions mean that all stakeholders have not had equal access to engage in the submissions process. Library closures and lack of access to online plans have inhibited 100s, perhaps 1000s from engaging in the process. Isolating and cocooning guidelines and social distancing continue to inhibit full and inclusive public involvement in this process, thus more time is needed to ensure meaningful public engagement can happen.	This is not within the applicant's control.
	19.12	A 12. DCC/SDCC site notices were not completely erected or maintained, most notably at Templeville, Wainsfort, Tymon Park and Fortfield and have not been updated at a number of spots - eg. Templeville Road - Wainsfort notice was not a full notice and it was not updated with new information regarding extended deadlines for submissions during Covid-19	It should be noted that due to the extent of works as part of the scheme starting in Tymon north and finishing in St Teresa's gardens some 7km away all reasonable efforts were made to maintain the 14 No. New site notices were erected at all locations on two occasions: on 28th April 2020 to notify the public of the extension to the 28th of May, and again on the 11th May 2020 to show the extension to 11th June 2020, along with newspaper notices and leaflet drops when extension to deadline was notified by ABP. All other notices and information were continuously updated on the project website.
	19.13	A 13. Submission fees prohibit all stakeholders from having a voice in this process. Given that large number of Crumlin residents rely on social welfare and live in social housing - how then can the majority of those most affected by Poddle FAS on low incomes afford submission fees? The process discriminates against those who cannot afford to pay to be involved.	This is not within the applicant's control.
	19.14	B.EAIR: B 1 The realignment of the river at Whitehall will involve in-stream works. Mitigation measures have not been described in detail in the plans. The need for definitive data is imperative and has not been furnished in these plans, thus they do not comply with EU Law. The creation of a new section of channel, diversion of the river to the new channel, and the infilling of the existing channel is of concern. Temporary crossings of the River Poddle will be required to facilitate works in some locations, notably Tymon North and Tymon Park. In these cases, all in-stream works should comply with current best practice, as laid out in Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" Brussels, 21.11.2018 C(2018) 7621 The mitigation measures in Poddle FAS Natura Impact Statement clearly do not comply with the above, therefore in the opinion of the European Commission they do not comply with E.U. Law. (see enclosed supporting submission from Peter Sweetman).	See Revised NIS for further information on mitigation measures.
	19.15	B 2 We have deep concerns regarding the "Wainsfort" section of the proposed scheme. First, no photomontage was proposed for that section despite the planned removal of 36 trees and "the construction of flood walls". Therefore we are offered no support to help us visualise the impact of such disruptive works. How can we make informed decisions with no visual support? (how come other sections of the scheme have benefited from photomontages and not the "Wainsfort" one?). Now, looking at the tree survey, we have noticed a number of errors and inconsistencies which have led us to legitimately question the quality of the entire tree survey at least for that section: the T977 picture in the tree survey does not correspond to the T977 tree which is in fact a "Fagus sylvatica 'Purpurea'" easily identifiable with its red leaves; the TG10 (tree group number 10) appears in the tree pictures for that section (the "Wainsfort" section) whereas it does not appear on the tree survey mapping for that section (it is located on the "Fortfield Road" section); or, put it another way, there are two different TG10 pictures, one in the "Wainsfort" section and one in the "Fortfield" section (among other questions such error raises, does it mean that 14 additional trees will be removed that haven't been taken into account in the local and total number of trees to be removed? Does it mean that we are now going towards a number of 242 trees in total to be removed?); Finally, after a site visit and although we were not in a position to check all trees involved in the scheme, we confirm that not all trees planned for removal were properly tagged, namely here T970 and T971 didn't have any tag as of 08/06/2020 (trees have been filmed and videos can be provided on request). Therefore the tree survey carried out for the "Wainsfort"	After further review of the construction methods, the number of proposed trees to be felled in Wainsfort Manor Crescent has fallen from 36 to 20. See RFI no. 7 and Appendix 4 for further details. SDCC have also committed to planting 20. no. replacement trees in Wainsfort Manor Crescent as per RFI no. 9 and associated drawings. In some cases it was found that some tags had either fallen off trees or had been removed by persons not relating to the Poddle FAS. These trees (T455 and T456 at Wainsfort Manor Crescent) have been re tagged where necessary (See updated tree survey drawings as part of Appendix 4). The updated tree survey report has also addressed the issues raised in relation to a mix up at Wainsfort Manor Crescent and Fortfield Road (see Section 2.2 of Appendix 4).

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		section does not align with any minimum professional standard expected from a professional tree survey.	
	19.16	In our opinion, Poddle FAS tree survey is not fit for purpose. This opinion is further strengthened in an independent arborist report of Ravensdale Park (CMK Horticulture and Arboriculture Ltd.) which highlights many flaws in Poddle FAS tree mapping of Ravensdale.	See Keith Mitchell / CSR's response to the CMK independent arborist report in Table 2 attached.
	19.17	<p>When the sum of tree loss in Poddle FAS is totalled, the extremity of the scheme shines a light on how shamelessly it contradicts DCC Climate Change Action Plan, SDCC Tree Management Policy and DCC Tree Strategy. The promotion of nature based solutions to climate problems by both local authorities is also in direct contradiction to many proposals in Poddle FAS - most pointedly where hard defences will be erected for flood mitigation at St. Martin's, Ravensdale and Wainsfort. Therefore, literature produced by both councils appearing to promote an awareness of and efforts to tackle climate and biodiversity issues amounts to propaganda and false advertising.</p> <p>Take for example one main road which runs parallel to the Poddle: Fortfield Road to Clanbrassil Street. There are NO street trees from Fortfield Road in Terenure to Clanbrassil Street in the city centre - a stretch of 1.5km. A recent UCD survey, referenced by SDCC, highlighted: ZERO- 5% tree coverage in the Crumlin/Kimmage vicinity. The European average for city tree coverage stands at 15%. While SDCC Tree Management Policy and Dublin City Tree Strategy both acknowledge the deficit in tree canopy in comparison to our European counterparts, plans to fell 228 trees are at complete odds with their own goals and statements. The proposed loss of more tree coverage in already deprived areas contravenes DCC's own goals to improve this and further illustrates that tree poverty is inextricably linked to social poverty. This begs the question, why an alternative solution to Poddle FAS did not start with increasing tree cover in the Poddle river catchment area, given that trees absorb excess water? A more sustainable, natural and cost-effective way is to create extensive tree coverage along catchment areas. New trees will not mitigate flooding or create the same climate and bio-diverse benefits as mature trees, which absorb more flooding or create the same climate and bio-diverse benefits as mature trees, which absorb more water, CO2 encourage nesting and create shelter during hot periods. The current deprivation of trees in this area may even help explain why flooding is problematic.</p>	Refer to RFI no. 2, RFI no. 6 and RFI. no. 9 of the main response document for details on how nature based solutions have been implemented into the designs of the Scheme. DCC and SDCC have provided the commitments for tree replanting in their respective areas. DCC provide commitments for 165 trees to be replanted in green spaces within 2 km of the affected parks that could benefit hugely from tree planting and other measures for ameliorating against biodiversity loss. SDCC had proposed that 350 trees be replanted across Tymon Park, Wainsfort and Whitehall Park. In addition to these 350 trees they have proposed the planting of mini woodland areas in Tymon Park and Bancroft Park. These woodlands will facilitate the planting of approximately 14,000 trees and shrubs. This will further enhance the NFM properties of the river.
	19.18	B 3 Poddle FAS wildlife survey is not fit for purpose + the omission of red-listed birds such as The Grey Wagtail and The Kingfisher at Wainsfort and St. Martin's, amongst other wildlife omissions undermines its credibility. I have seen both species a number of times at St. Martin's, Ravensdale and Wainsfort this spring 2020 alone. Recordings of bats at St. Martin's proves how important this corridor is for a wide variety of bats, not just most common ones as recorded in Poddle FAS survey. The riverine corridors serve as a habitat for a large number of birds, otters, ducks, swans, frogs etc. The EIAR also fails to record the many natural occurring pollinators along the river, most especially at St. Martin's and Wainsfort.	Grey wagtail, kingfisher, grey heron and little egret were all named individually under sub-heading ' <i>Other bird species</i> ' in Section 7.4.2.6 of the EIAR, and the suitability of the habitat was discussed. Similarly, swans and ducks were discussed under the subheadings ' <i>Breeding waterfowl</i> ' and ' <i>Other over-wintering waterfowl</i> '. On this basis, we contest the claim that these species were omitted from the EIAR.
	19.19	B 4 Poddle FAS EAIR does not take into account environmental impact assessment of other proposed and concurrent planning project. For example, Bus Connects planning is currently in progress. Its development will impact Ravensdale Park and other sites along the Poddle	BusConnects proposals here refer to proposals released by BusConnects in March 2020 after the submission of the Poddle FAS in February 2020 which were significantly altered from proposals in circulation prior to this where there were no planned BusConnects works contained within Ravensdale Park.

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	19.20	<p>B 5. Another question arises -why did ABP give planning permission to developments at Leo Laborities, Ravensdale Apartments, Marlet developments at Mount Argos and Harolds Cross? If these areas are considered to be at risk of flooding, why then continue to build on what are, essentially flood plains? Marlet apartments with underground carparks built lower than the river makes no sense and if anything, proves how the river is being put under more severe pressure, thus increasing the risk of flooding and risk to property and life. Is Poddle FAS a means for which developers gain(ed) planning permission, or is it to protect properties that were flooded in 2011? Building on flood plains or where flooding historically happens, is misguided, reckless and put lives at risk. How many new builds have been built in the Poddle catchment area since 2011? How was planning permission secured given the high risk of flooding projected by SDCC/DCC/OPW? What will be the final costs and price to be paid for unsustainable urban expansion in the river catchment?</p>	<p>The Scheme has identified the flood risk to properties within the Poddle catchment and the works required to prevent flooding to individual properties. the applicant cannot comment on decisions made by Local Authorities and ABP on historical or existing developments other than the understanding that these meet or have met the planning guidelines required for such developments.</p>
	19.21	<p>C. Social Impact C 1. Risk to social infrastructure and other trees not identified on the plans is very high due to the extensive excavations required for the proposed flood defence measures including the erection of walls and other extensive excavations required for the proposed scheme. Consequently, there will be an overall loss of several social park/green amenities due to the extensive flood walls. The river is a vital part of the identity of Dublin and to cut it off in an extremely insensitive way using alien materials will degrade the wildlife corridor and its unique green fabric of this locality in the south side of the city. In particular the walls at St. Martin's and Wainsfort will separate whole communities from their connection to the river and will further cement social and class divisions across the community. For example, social deprivation in areas like Crumlin will be even more pronounced as the community will be affected by the proposed loss of 2 nearby parks at St. Martin's and Ravensdale. Given Covid-19 experiences, all communities, perhaps vulnerable communities more so, need green space now more than ever. Access to green spaces will be diminished if walls are built and trees removed along the Poddle catchment area of Kimmage and Terenure especially.</p>	<p>The Scheme proposals do not involve culling of local parks and green spaces. It is a fact that access to and use of the local parks and green spaces will be restricted during construction at the works areas. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. The modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the re-aligned channel at Whitehall, and the embankment in Tymon Park will alter these parks and spaces and the way they are used and enjoyed by the public, but they will not result in the loss of these spaces. Careful consideration as to how these spaces are used has been given in the design of the Scheme</p>
	19.22	<p>C 2. It is known that where there are more trees, anti-social behaviour decreases, and where there are walls, antisocial behaviour increases. The area at St. Martin's - Poddle Park is particularly prone to illegal dumping and antisocial behaviour. This is more likely to increase if walls are built where anti-social behaviour will be more covert and go unnoticed behind walls and enclosures. The wall at St. Martin's in particular was selected without giving any serious consideration to viable alternatives and in engineering terms it does not appear to act as a flood defence wall - but instead appears to be a wall dividing 2 neighbourhoods. The wall down the centre of Ravensdale does not make sense. It is referred to as flood wall. A wall that tapers to 70cm is not a flood wall in any engineering terms. It is still not clear what purpose the centre wall at Ravensdale will serve, other than to split the park in half. Will one half be used as a flood basin or wetland? Will the other be used for Bus Connects? No-one on the Poddle FAS 'consultation' team could explain this wall to me. Thus, it needs to be called into serious question as to whether or not it serves any purpose for flood mitigation?</p>	<p>The proposals at Ravensdale are necessary to protect the surrounding area from risk of flooding. Where possible the wall heights have been reduced and located to minimise impact on the existing park.</p>
	19.23	<p>C 3. Dumping has been cited by David Grant as a major cause for concern in relation to previous flooding of the Poddle (see webcast DCC - <a href="https://dublincity.public.i.tv/core/portal/webcast_interactive/439577">https://dublincity.public.i.tv/core/portal/webcast_interactive/439577</a>). Unsolicited dumping continues despite a consensus that it is a serious risk to the river both in terms of pollution and flooding. I have requested DCC records for the council's rubbish removal from Poddle river at Poddle Park, St. Martin's and Ravensdale - none has been forthcoming, and as a volunteer who removes rubbish weekly from the river, I have no reason to believe that a serious or concerted effort is being made by SDCC or DCC to safeguard our river, its wildlife and aquatic life from fly-tipping. The threat of flooding due to blocked culverts and drains remains and will continue to remain a threat to our river, unless a policy is put in place and enforced, to protect our river from dumping. A more cost effective and sustainable</p>	<p>Illegal dumping is a blight on all communities and as shown in 2011 can lead to increased flooding - however, as stated in EIAR and above - the inclusion of trash screens at key culvert locations together with unified maintenance programme from SDCC/DCC limits the risk of blockage from dumping. within the flood defence design - inclusion of 60% blockage at these sensitive culverts has allowed for robust defence.</p>

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		measure for flood alleviation and river restoration is to start with local authorities removing litter and rubbish from the river. While the last point, it is possibly the most important issue that ABP must consider. Despite spending millions on Flood defences, if dumping continues, and culverts are blocked, no flood wall, no matter how high it is built, will stop the river bursting its banks if the river is clogged with illegally dumped waste.	
	19.24	C 4 If Poddle FAS goes ahead, what guarantee will SDCC/DCC/OPW give communities in the Poddle's catchment area that property and lives will be protected from floods? There is no guarantee that householders will be able to acquire flood protection home insurance, even if a flood alleviation scheme is in place.	DCC have provided letters of comfort to residents seeking house insurance on similar Schemes - however, there are no obligations on commercial insurance companies to provide insurance to members of the public. however, the policy of providing guarantees for insurance is outside of the scope of this Scheme.  A Memorandum of Agreement is in place with the OPW and Insurance Ireland since June 2014. While the provision of insurance cover, the level of premiums charged and the policy terms applied are a matter for individual insurers, the Memorandum requires that insurers take full account of information provided by the OPW on completed flood defence schemes.
	19.25	The submission has the CMK Report attached as well as the submission made by Peter Sweetman.	A revised NIS has been submitted along with the RFI response.  See Keith Mitchell / CSR's response to the CMK independent arborist report in Table 2 attached.
<b>Tara Deacy</b>	20.1	Introduction: I have been a resident of the Kimmage area for almost 12 years. As a local resident and as a recently elected City Councillor representing this area, I was concerned that I had not been made aware of the substantial changes that were being proposed for our very valuable and well used local park and waterway. I acknowledge that some work had been done by DCC in terms of highlighting this prior to September 2019 but it was only then through a presentation at a Local Area Committee meeting that I was made aware of this proposed scheme.  While I fully acknowledge the need and urgency in terms of flooding defences for our community I do wish to highlight and ensure the community voice is not lost in this process. In light of this I compose this submission on behalf on the Residents Association of Clonard Road, myself as a local resident and a number of individuals who have expressed their concern and wish to ensure flooding is addressed in a way that allows us to hold onto the little green space we have in the area. In October 2019 I held a public meeting outlining the process involved, approximately 60 residents were in attendance. I also alongside South Dublin County Council helped arrange a number of information sessions in a local community centre of which were well attended also.  There were a number of concerns being raised by a large number of individuals.	Further to the details provided in Chapter 3 and Section 4.7.4 of the EIAR, Appendix 2 and provide details of consultations and how feedback from the public was incorporated into the Scheme.
	20.2	1) Street Trees and Sustainable Drainage Systems Firstly, the cutting down of the existing trees, and the solution focused proposal of using Sustainable Urban Drainage Systems. Street trees and sustainable urban drainage systems (SUDS) are vitally important in flood alleviation as they decrease the rate and volume of surface water runoff generated by the surrounding hard landscape. Thanks to a locally based Clean Up Group a vast amount of research has been carried out on this area and they have identified there are little or no street trees at present in the area. The streets are highly concreted with: 1. 0 street trees from Fortfield Road to Clanbrassil Street 2. 0 street trees on Ravens dale Park (Road). 3. 0 street trees on Ravens dale Drive. 4. 0 street trees on Poddle Park Road. 5. 0 street trees on Poddle Close.	Refer to RFI no. 2, RFI no. 6 and RFI. no. 9 of the main response document for details on how nature based solutions have been implemented into the designs of the Scheme. DCC and SDCC have provided the commitments for tree replanting in their respective areas. DCC provide commitments for 165 trees to be replanted in green spaces within 2 km of the affected parks that could benefit hugely from tree planting and other measures for ameliorating against biodiversity loss. SDCC had proposed that 350 trees be replanted across Tymon Park, Wainsfort and Whitehall Park. In addition to these 350 trees they have proposed the planting of mini woodland areas in Tymon Park and Bancroft Park. These woodlands will facilitate the planting of approximately 14,000 trees and shrubs. This will further enhance the NFM properties of the river.

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		Has there been consideration given to Urban Drainage Systems for this project, similar to that in Crumlin village? Can this be looked at now? Has there been any consideration given to increasing the number of street trees in the area? Can this also be addressed at this point.	
	20.3	2) Trees and Green Space The cutting down of our already scarce number of trees both on both sites in this proposal is causing huge concerns for residents. The existing trees support an abundance of bird & insect life & help reduce pollution in the air caused by traffic etc. They are an integral part of the park and have been for many years. Any plans to reduce them must be considered very carefully. Will there be mature trees put in their place, what type of trees? The number of trees being targeted have caused huge distress for local people with many querying whether there is an alternative to this. I ask that this be re-examined	In RFI no. 9 of the main response document the DCC and SDCC have provided the commitments for tree replanting in their respective areas. DCC provide commitments for 165 trees to be replanted in green spaces within 2 km of the affected parks that could benefit hugely from tree planting and other measures for ameliorating against biodiversity loss. SDCC had proposed that 350 trees be replanted across Tymon Park, Wainsfort and Whitehall Park. In addition to these 350 trees they have proposed the planting of mini woodland areas in Tymon Park and Bancroft Park. These woodlands will facilitate the planting of approximately 14,000 trees and shrubs. This will further enhance the NFM properties of the river.
	20.4	The existing area has already an abundance of roads, buildings, walls & pillars. The Kimmage community have for years been fighting to hold onto the small amount of green space we have. Ravensdale Park has been a very important resource for us over the years and in particular during the Covid pandemic. The park is occupied every single day and this space is crucial not only for resident's wellbeing but also our wildlife. Can any consideration be given to a decreased amount of green space being taken up by this plan?	The Scheme proposals do not involve culling of local parks and green spaces. It is a fact that access to and use of the local parks and green spaces will be restricted during construction at the works areas. The modification of the parks and green spaces proposed in the Scheme is necessary to provide flood protection for people and property in the localities. The modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the re-aligned channel at Whitehall, and the embankment in Tymon Park will alter these parks and spaces and the way they are used and enjoyed by the public, but they will not result in the loss of these spaces. Careful consideration as to how these spaces are used has been given in the design of the Scheme
	20.5	3) Internal & Exterior Wall The proposed 6 foot internal wall at the junction of Ravensdale & Poddle Park will section off the green space & encourage unsociable behaviour & activity	The extent and height of flood defences at Ravensdale Park are required to protect the surrounding properties and those further downstream from flooding.
	20.6	For many years this area was a 'hot spot' for anti-social behaviours, alcohol use and drug taking. It has taken the community many years to stop this type of unwanted behaviour and there are huge concerns that this type of wall encourages this to resume. Many residents have requested that this wall be lowered and at a minimum a grass verge which would be child friendly be put there. This would be an ideal opportunity for DCC and SDCC to promote some biodiversity in the centre of the park and give some ownership to the young people of the area to be involved in this. I have seen concrete structures on the plans which both aesthetically and socially will be problematic. In its current form I envisage every Local Area Committee meeting to be taken up with the anti-social behaviour discussions that it will inevitably bring. It will put additional pressures on our already over stretched Local Garda and will make the park a no-go area for local residents. If Covid has taught us anything it is how vitally important this small park is for us as a community.	The height of flood defences proposed cannot be lowered without compromising their purpose. DCC Parks and Realm have proposed a replanting plan as outlined in RFI 9 which will include for biodiversity planting in Ravensdale Park and surrounding areas in Crumlin/Kimmage.
	20.7	The Exterior Wall at the entrance of the park: The design of this wall (seen on plans) does not in anyway fit into the environs of the local area and would be better placed in areas like the IFSC. The Kimmage area is an old, well established community with houses dating back to the early 1900s. The wall needs to reflect this and needs to be finished in a way that is not going to be graffitied or damaged. There are good examples of traditional stone that would be more appropriate and must be considered. It has also been suggested by residents that trees	The proposal for wall finishes in the park are stone clad on the western side and fair finished concrete to the north and through the park. Comments on the fair finish concrete were noted in the statutory Public Consultations and from discussions with DCC Parks and Realm it was agreed that stone cladding would be used for the whole section of the works. Random Rubble stone clad finishing is less prone to graffiti than fair faced concrete.

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		and other sustainable plant life be placed strategically to lessen the impact of such a wall.	
	20.8	<p>4)Bus Connects Project</p> <p>The Ravensdale park area will be adjacent to a significant junction for the Bus Connects corridor. The F corridor (F3, F2 and F3 routes) will diverge/ intersect/combine with the S4 and Route 24. There will be a significant pedestrian footfall arising at this junction.</p> <p>We are at present none the wiser as a community in terms of what this may look with no surface infrastructure deriving from the Bus Connects project published.</p> <p>I ask that these two new projects be looked at together and that some collaboration be achieved between the NTA and DCC as a matter of urgency.</p>	BusConnects proposals here refer to proposals released by BusConnects in March 2020 after the submission of the Poddle FAS in February 2020 which were significantly altered from proposals in circulation prior to this where there were no BusConnects works contained within Ravensdale Park.
	20.9	<p>Conclusion</p> <p>Finally, as I have stated in the introduction, I and my neighbours are supportive of Flood Alleviation measures being implemented. In this current proposal substantial change and tweaking is essential for this to be a workable and community friendly project. I believe that if our community feels heard and part of this process they will fully support measures, tokenistic engagement is not useful and disempowers residents. Taking on the suggestions of the community should be an integral part of this process and will undoubtedly make the project a more positive and sustainable piece for all parties involved</p>	<p>Records of concerns raised to the Poddle FAS portal can be seen in Table 3 of Appendix 2.</p> <p>Concerns raised by the public have been integrated throughout the design phase of the Poddle FAS especially when examining the different proposed options at various locations. From the official launch of the scheme in October 2018 information on the scheme has been readily provided through organised public events as well as through local elected member briefings in both SDCC and DCC areas.</p>
<b>Vincent Cahill</b>	21.1	<p>I am a long term resident in Harold's Cross. My house and my life were destroyed by the catastrophic flood event in October 2011. At that time we were promised by Dublin City Council that flood attenuation at Tymon Park would be delivered by Summer of 2012. Eight years later . we are still waiting for that solution to be delivered. Based on historic trends. we are living with the risk of another catastrophic flood event at any stage over the next few years.</p> <p>I have examined the detailed FAS proposals at the recent information and public consultation days. I think that the proposed scheme is excellent well thought through and sympathetic to the impacted areas that the river Poddle flows through. I understand that there may be some concerns / objections about loss of trees in some areas but that the proposal is to replace lost trees on a two for one basis. Regardless, loss of trees can never be prioritised over loss of life. And, as we all know loss of life has occurred over during the tragic events of 2011. All of us resident in Greenmount Avenue, Harold's Cross and neighbouring impacted areas live in fear of another pluvial flood event and are on high alert every time that heavy rain is forecast.</p> <p>Most residents / owners in this area lost their flood insurance following significant claims / losses in 2011 and this has led to many sleepless nights whenever we have heavy rain, so much so that even planned trips away have to be cancelled if heavy rain is forecast as we may be needed at home to man our own property flood defences.</p> <p>As well as our own concerns, the flood risk is having an adverse impact on the efficient use of existing housing stock. Harold's Cross is a mature community, and there are many households who are at the stage in life when they'd like to downsize, freeing up family homes for other people. The lack of flood insurance means that new families cannot obtain mortgages for these homes. and the existing householders cannot sell at a price that would buy them even a much smaller property. The result is young families in overcrowded accommodation whilst many family homes remain underused.</p>	The response reflects the broad support that has been received for the development of this Scheme from the consultations that began on this back in 2018. The project team were told at such events of the trauma and hardship experienced by residents and businesses who suffered in 2011 - some of whom were out of their homes for over 6 months and some who nearly drowned. The proposed Scheme is a detailed response to the need to provide adequate protection to these and other properties at genuine risk from serious flooding.

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		The proposed Poddle F.A.S. is critical to ensure our safety here downstream and we hope and trust that An Bord Pleanála can now approve the scheme – without further ado.	
<b>Violet Dempsey</b>	22.1	I object to the River Poddle Flood Alleviation Scheme on 2 Grounds: 1. Meaningful public engagement-a contravention of the Aarhus Convention. 2. Public information meeting 16th January 2020 Mount Argus Community	See below.
	22.2	As stated in the Convention on access to information, public participation in decision making and access to justice in environmental matters executed at Aarhus, Denmark, on 25 June 1998, it states in article 6 section 4. "Each part shall provide for early public participation when all options are open and effective public participation can take place."	Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project launch and since the project launch in 2018. Information about public information events were communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. See Appendix 2 and its associated appendices for further details on these consultation events.

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	22.3	<p>I strongly feel that genuine public and community participation has not been sufficient from the start of the pre plans for the River Poddle Flood Alleviation Scheme. I am a resident of Poddle Park I live adjacent to St. Martins Park. The first time I heard about the plans to remove trees as part of the Poddle FAS was one week before Christmas 2019. It was through a private citizen putting up a notice containing information about DCC and SDCC plans to at that stage to remove 20 trees from St Martin's Park. I then went to the Poddle FAS website and observed the lack of information regarding these plans. I then saw that there was a public meeting held on the 19th of January 2020 in Mount Argus community centre from 2pm to 6pm. I would not been able to attend this meeting because it was held during working hours. I questioned the time of this meeting because I felt it wasn't inclusive,-members of the community who work full time could not attend. I also asked DCC if the next public information meeting would be held at the same time, unfortunately that was the case and the meeting was proposed to be held on the 16 of January at the same time. I would like to point out that I feel that DCC, SDCC and David Grant at this stage of their public engagement did not plan for full community or public engagement; it's not public engagement if these meeting are not held at a time wherein everyone has an opportunity to attend. I also felt strongly that there was a lack of proper advertising for this proposed public information meeting. I did not see a poster or receive a leaflet through my door. I took it upon myself to check with my neighbors, no one from Poddle Park, Poddle Green, Poddle Close or Banger Rd knew about the Poddle FAS or the public information meetings. A lot of my neighbours are elderly and are not on social media. All members of the community have a right to know what is happening in their local parks, green spaces, rivers and trees which have provided a well needed amenity to our local environment and community for the past 30+ years.</p> <p>I contacted David Grant, project manager with an email on Friday 27th December 2019 with my complaint please find email attached with his reply. I would like to draw your attention to the last paragraph of his reply. "We are currently reviewing the works in St Martin's Park and I will send you on a copy of the proposed works drawing when the review is complete, but as I have suggested if you would like to meet to discuss the proposed scheme please contact me on this mail or at 086-0211451.</p> <p>I have an issue with the invitation to meet and for a project manager of such a large scale project having one to one meetings and dialogues. This is not in my professional opinion open public engagement. There is no record of what would be discussed at these said meetings, no room for full disclosure and transparency. My neighbours got similar invitations and all before the final reports were made available on their website or site notices were applied and other public information meetings.</p> <p>It also came to my attention that there had been meetings with residency groups and members of St Martin's Park please find reference in the EIAR Main report, part 1 page 5. I question these pockets of meetings held within the community as they were not open to all and no minutes have been made publicly available.</p> <p>I contacted my local TD Joan Collins and requested that the public information meeting be held at a time where people who work full time could attend. Please refer to David Grant's emails attached. The pre-planning meeting was changed to 4pm to 8pm on Jan 16th. I also asked David Grant to do a leaflet drop and advertise these public meetings. There were leaflets distributed within the community but I feel not adequately done, as a lot of members of the community did not receive them, another failing I believe on the part of DCC and SDCC. There were five A4 posters on display in the community I also feel this was not adequate as they were not easily noticeable (examples, posters down low in a shop window and on a pub notice board), missing the effectiveness of displaying notices in key venues such as the actual venue of the meeting and the local citizen advice centre at Sundrive rd.</p>	<p>Consultation relating to this project dates back to 2012 as part of the Eastern CFRAM study. Numerous public consultation days have been held over the course of the Eastern CFRAM project launch and since the project launch in 2018. Information about public information events were communicated to the public <i>via</i> leaflet drops, social media posts, emails and on the Poddle FAS website. Leaflet drops were made to residents of Poddle Park on January 10th and 11th 2020 informing them of the consultation days that took place on the 16th and 20th of January. Leaflets were also dropped in the letterboxes of the residents of Poddle Park in the lead up to the in January and March 2020. See Appendix 2 and its associated appendices for further details on these consultation events and how they were advertised.</p> <p>As outlined in the consultations report (Appendix 2) in Section 2.3.1 meetings held with local residents were not private and were held as part of the information gathering process.</p> <p>Evidence of all the efforts made to communicate with the public are provided in Chapter 3 of the EIAR as well as in Appendix 2 (and its associated appendices) of the RFI response.</p> <p>The statutory consultation meeting that was held on the 10th of March 2020 occurred before any "lockdown" measures were introduced by the Government. David Grant (SDCC Project Manager) sent out an email to all email addresses on the Poddle FAS database advising them of the HSE guidelines with respect to COVID-19 prior to the events. On the 12th of March 2020, the Government made the decision to close schools from 6pm that day. Given the short notice of the Government announcement (lunchtime 12<sup>th</sup> March) as the first public session at DCC area Offices Crumlin was drawing to a close, it was agreed to proceed with the remaining evening consultation meeting as planned and with full agreement of Harold's Cross National School. The consultation events held on March 12th 2020 at the two locations recorded 27 people as attending over the course of the day. See Appendix 2 for more details.</p> <p>The planning drawings, documents and photomontages provided are to the planning requirement scale and detail. Members of the project team were available to explain any details during the public meetings.</p>

Name	Observation no.	Observation/Issue	Response
		<p>The last public information meeting was held on the 12th of March 2020 4.30pm to 8.00pm held in Harold's Cross National School. The Taoiseach announced a lock down of this school on the 12th of March from 6pm. I cannot see how there would have been scope to have a full public meeting when this restriction from our government came into place. There would be little community engagement as people would not go to a school to attend a public meeting during these circumstances. I feel this last meeting should and needs to be rescheduled for full community engagement to transpire.</p> <p>Due to Covid-19 restrictions I feel that the public have not had equal access to engage in the submissions process. Library closures and lack of access to online plans have inhibited potential engagement in the process. Self-Isolating guidelines and social distancing continue to inhibit full and inclusive public involvement in this process.</p> <p>In my personal experience and observations, I attended the said meeting, I did not see any signs outside the community centre advertising the public meeting. The pre plans were available for viewing but I have a strong objection to the photographs used to show the proposed plans, they were of poor quality and not to scale so I found them very misleading. I requested that at the next public meeting if there could be more efficient and accurate imagery used, this did not happen.</p> <p>I asked could there be a 3d model. to provide a more approachable demonstration of the proposed plans. I asked David Grant and I was told they had not got a budget for that. I object to this on the grounds of the scale of this project in full. I found the maps and other imagery hard to follow and comprehend. I heard other members of the public saying the same thing. I am not an engineer so I feel the plans should be delivered in a fashion that makes it more assessable to the general public.</p> <p>I was told by Nicholas O'Dwyer that 20 trees were proposed to be cut down in St Martin's Park across the road from where I live. In the full public report that came out after the public meeting there will be in fact 45 trees removed. I found the information I was given at the meeting was misleading and now question the rest of the information that was given at the meeting. There was an opportunity for feedback and members wrote their questions and opinions on paper, this information gathered is not on public display. I question where this information is and why is it not in the public domain. I would like to see a public meeting where there is a full breakdown of the proposed plans, timelines; accurate imagery and a proper concise questions and answers session, where information is documented sufficiently, I feel only then can there be genuine public engagement on this matter. I am not against plans to prevent flooding but I feel from the start there has not been a coherent plan put in place for satisfactory community engagement as stated in Aarhus. I feel the Poddle FAS has failed to demonstrate adequate level of engagement and this project and community deserves better.</p>	
<b>Development Applications Unit</b>	23.1	<p>It is noted that the proposed flood relief scheme is located in an area of high archaeological potential. The proposed development is located adjacent to numerous of zones of archaeological established around a number of recorded monuments including tower houses, mills and weirs and the Dublin City watercourse (DU018- 043004, DU022-003, DU018- 043002, DU022-007, DU022-007, DU022-078, DU018- 047001 and DU018-020) which are subject to statutory protection in the Record of Monuments and Places, established under section 12 of the National Monuments (Amendment) Act 1994. It is also noted that the development is large in scale. Given the location of the proposed development and the nature of the works it is possible that underwater and terrestrial archaeology may be impacted by the proposed works. It is therefore recommended that the following be included as conditions in the granting of any planning permission:</p> <p>1. It is recommended that Archaeological Monitoring, as described below, be carried out of all proposed ground disturbance and river disturbance works to take place as part of</p>	The applicant Councils accept the Department's recommended conditions for archaeological monitoring, pre-development testing, and the wade and metal detection survey. These are in line with the recommended mitigation measures set out in EIAR Chapter 11.

Name	Observation no.	Observation/Issue	Response
		<p>this development. The Archaeological monitoring should be licenced under the National Monuments Act 1930-2004.</p> <p>2. Pre-development Testing, as described below and as recommended in the EIAR, shall be carried out at Cutlers Mill and Cutlers Weir in advance to works commencing at the site. The Pre-development Testing should be licenced under the National Monuments Act 1930-2004.</p> <p>3. A Wade and Metal Detection survey, as described below should be carried out in all areas where the Poddle riverbed shall be disturbed by the works. This should be licenced under the National Monuments Act 1930-2004.</p> <p>4. It is recommended that the applicant is required to engage the services of a suitably qualified Project Archaeologist to oversee the archaeological components of the Flood Relief Scheme and to ensure compliance with cultural heritage legislation.</p> <p>It should be borne in mind, that if significant archaeological remains are found, further archaeological mitigation may be required.</p> <p>Archaeological Monitoring shall consist of the following:</p> <p>1. In order to ensure the preservation of potential archaeological sites and features the applicant is required to engage the services of a suitably qualified archaeologist to monitor all disturbance works associated with the development. The archaeological monitoring shall be licensed under the National Monuments Acts 1930-2004.</p> <p>2. A detailed method statement shall accompany the licence application and shall include details on the proposed works, duration of works; archaeological monitoring team proposed and a find's retrieval strategy.</p> <p>3. Should archaeological material be found during the course of monitoring, the archaeologist shall have the work in that area suspended, pending a decision as to how best to resolve the archaeology. The applicant shall be prepared to be advised by the Department of Culture, Heritage and the Gaeltacht with regard to any necessary mitigating action (e.g. avoidance, preservation in situ or excavation). The applicant shall facilitate the archaeologist in recording any material found.</p> <p>4. The Department of Culture, Heritage and the Gaeltacht shall be furnished with a report describing the results of the monitoring.</p> <p>Pre-development testing should consist of the following:</p> <p>1. The applicant is required to engage the services of a suitably qualified archaeologist (licensed under the National Monuments Acts 1930-2004) to carry out predevelopment testing at Cutlers Mill and Cutlers Weir as recommended in the EIAR. No sub-surface work should be undertaken in the absence of the archaeologist without his/her express consent.</p> <p>2. The archaeologist is required to notify this Department in writing at least four weeks prior to the commencement of site preparations. This will allow the archaeologist sufficient time to obtain a licence to carry out the work.</p> <p>3. The archaeologist should carry out any relevant documentary research and may excavate test trenches at locations chosen by the archaeologist, having consulted the proposed development plans.</p>	

Name	Observation no.	Observation/Issue	Response
		<p>4. Having completed the work, the archaeologist should submit a written report to the Planning Authority and to this Department.</p> <p>5. Where archaeological material is shown to be present, avoidance, preservation in situ, preservation by record or (excavation) and/or monitoring may be required. The Department of Culture, Heritage and the Gaeltacht will advise the Planning Authority with regard to these matters.</p> <p>6. No site preparation or construction work should be carried out until after the archaeologist's report has been submitted and permission to proceed has been received in writing from the Department of Culture, Heritage and the Gaeltacht.</p> <p>The Wade and Metal Detection Survey shall be compiled as follows:</p> <p>1. The applicant is required to engage the services of a suitably qualified archaeologist to carry out Wade and Metal Detection survey in all areas where the Poddle riverbed shall be disturbed by the works. This should be licenced under the National Monuments Act 1930-2004.</p> <p>2. The metal detection survey should be carried out under licence granted under section 2 of the National Monuments Act 1987.</p> <p>3. Having completed the work, the archaeologist shall submit a written report to this Department for review.</p> <p>4. Where archaeological material/features are shown to be present, preservation in situ, avoidance, preservation by record (archaeological excavation) or archaeological monitoring may be required.</p> <p>The applicant shall be prepared to be advised by the Department of Culture, Heritage and the Gaeltacht in this regard.</p> <p>It should be borne in mind, that if significant archaeological remains are found, further archaeological mitigation might be required. Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.</p> <p>Having examined the documentation submitted in support of the present application, the NPWS of this Department very much welcomes the approach which has been adopted by the applicants in evaluating and mitigating the impacts of the proposed River Poddle Flood Alleviation Scheme on the flora and fauna occurring along the sections of the Poddle which will be affected by it, as well as avoiding any impacts on the Natura 2000 Sites present downstream in Dublin Bay. Given the constraints involved in constructing a flood alleviation scheme on a largely urban water course, the applicants appear to have incorporated measures in the proposed scheme in as far as was feasible to preserve the existing flora and fauna occurring on the Poddle. To compensate for some inevitable loss of trees and semi-natural vegetation, much tree planting is proposed as well as measures to allow the re-establishment of species rich meadow areas. The habitat enhancement measures proposed are also very worthwhile, including the construction of nesting platforms and artificial sand banks to encourage nesting by sand martins and kingfishers on Tymon Lake.</p> <p>This Department considers that such provision of refuges and breeding places for bird species should in addition be extended to otters. Though, as reported in the Environmental Impact Assessment Report, otter surveys in 2018 and 2019 found no evidence of the presence of otters on the Poddle, as also stated in this document there have been occasional reports of otter sightings in Tymon Park in recent years, particularly</p>	

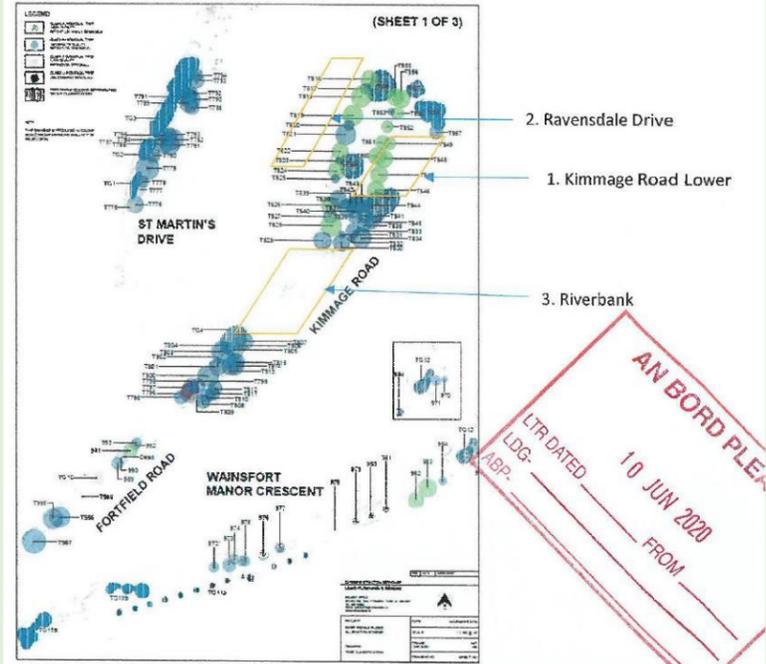
Name	Observation no.	Observation/Issue	Response
		<p>circa 2016. In the future improved water quality on the Poddle may lead to the re-establishment of sufficient fish stocks to allow a permanent presence again by otters on this stream. To facilitate otter re-colonisation artificial otter halts should be provided on or near the ponds in Tymon Park on either side of the M50, and if possible, further downstream as well. Such halts would provide resting and breeding places for these animals secure from human or canine interference. Similar holts installed elsewhere in Dublin have been readily occupied by otters, for instance by the Aviva Stadium on the Dodder.</p> <p>Considerable numbers of trees and shrubs are to be removed to facilitate the flood alleviation works. These are likely to harbour nesting birds during the bird breeding season.</p> <p>In the light of the above the Department of Culture, Heritage and the Gaeltacht recommends the following conditions should be attached to any permission granted by An Bord for the proposed flood alleviation scheme:</p> <ol style="list-style-type: none"> <li>1. That artificial otter halts are to be provided on or near the ponds in the two parts of Tymon Park on either side of the M50, the design of these holts to be agreed with the South Dublin County Dublin Heritage Officer and the National Parks and Wildlife Service; halts also be installed downstream in the vicinity of Whitehall Park and/or Poddle Park depending on space and design constraints. Reason: To conserve the otter, a species afforded a regime of special protection under the Habitats Directive (92/43/EEC).</li> <li>2. That any clearance of vegetation from the banks of the Poddle or adjacent areas as part of this scheme should only take place outside the main bird nesting season i.e. in the period from September to February inclusive. Reason: To avoid the destruction of nests, eggs, and nestlings of protected bird species.</li> </ol>	
<b>An Taisce</b>	24.1	<p>While An Taisce acknowledge the flood risk of this area, and the serious threat posed to homes and lives, we submit that flood relief schemes can, and should, be carried out in a way which is as ecologically sensitive as possible. Climate change is leading to increased flood events which necessitate such flood relief schemes, but we are in the midst of a climate and biodiversity emergency and the mitigation for the former should not undermine the protection of the latter.</p>	<p>See response to RFI No 9 of the main response document for details on how ecological enhancements will be incorporated into the Scheme.</p>
	24.2	<p>The value of amenity grasslands for Geese is outlined in section 3.4 of the NIS: "Brent Geese also fly inland to feed on amenity grasslands in parks and sports fields around Dublin city. These areas are not included within the SPAs, but are important supporting habitat features for this species. " And we would highlight the importance of these areas, given that in the past planning permission has been refused by An Bord Pleanála on the grounds that the development would potentially impact on the inland feeding grounds of Brent Geese (St. Anne's Park), a qualifying interest of nearby SPAs.</p> <p>An Taisce would highlight that there is conflicting evidence provided in the planning documentation in regard to Brent Geese. In the NIS no threat is identified to Brent Geese (which is a qualifying interest of two nearby SPAs, Bull Island SPA and South Dublin Bay and Tolka Estuary SPA) by the works, and Table 3.1 indicates that the NPWS did not respond to a consultation (although it is unclear to us what this consultation was, or when it was carried out). However, we would observe that in Table 3.1 of the EIAR, it is indicated that the DCHG, which has departmental responsibility of the NPWS, had the following response during the EIA scoping exercise in early 2019: "Brent Geese were present again this winter. This is relevant also to the Appropriate Assessment since Brent Geese are qualifying interests for both Bull Island SPA and South Dublin Bay and Tolka Estuary SPA."</p> <p>An Taisce submit that it is clear that the potential impact of the works on Brent Geese</p>	<p>Response provided in RFI no. 18. A revised Natura Impact Statement is also provided with the RFI response.</p>

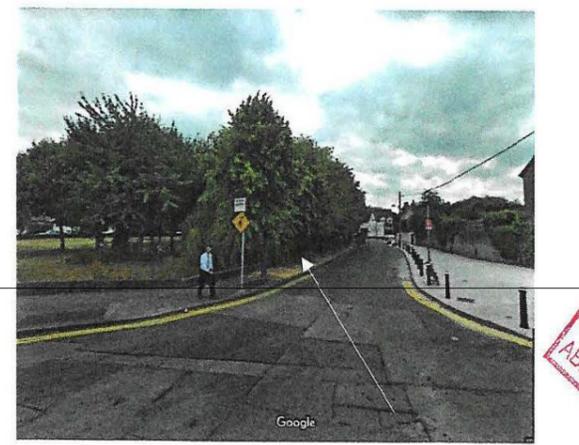
Name	Observation no.	Observation/Issue	Response
		<p>should have been specifically assessed in the NIS. It is considered that in failing to even identify the potential impact on Brent Geese, one which the applicant was made aware of by the DCHG during the EIA scoping process, the NIS fails to provide the necessary level of detailed assessment upon which the Relevant Authority can rely in order to carry out a full Appropriate Assessment. The requirements under article 6(3) of the Habitats Directive were made clear by OEU ruling for C-404/091 which held that: [a]n assessment made under Article 6(3) of the Habitats Directive cannot be regarded as appropriate if it contains gaps and lacks complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt</p> <p>While the EIAR makes further reference to the Brent Geese and bird surveys which were carried out, an NIS is a standalone legal document, one which we submit is currently failing to assess potential impacts on Brent Geese at all. It is our considered opinion that the NIS cannot provide the relevant authority with the necessary precise and definitive findings which are required for the purposes of an Appropriate Assessment, and that to rely on this document for the purposes of an Appropriate Assessment would be a compliance failure of Article 6(3) of the Habitats Directive.</p> <p>Without prejudice to our comments on the failure of the NIS to assess the potential impact on Brent Geese, the EIAR contains what we perceive to be conflicting data on Brent Geese. The EIAR presents a range of anecdotal evidence to suggest that Tymon Park is no longer used by Brent Geese. For example in Chapter 7 of the EIAR it outlines that: "Based on anecdotal evidence, Brent Geese have not used Tymon Park in recent years as a result of constant disturbance by dogs. In addition, a dog park was built next to the area that was used by Brent Geese in the fields at the north end of Tymon Park East. Construction activity was noted during the survey period."</p> <p>And in Table 3.2 of Chapter 7 it quotes a number of anecdotal responses to an unidentified consultation. However, An Taisce would observe that these should not be relied upon, given their anecdotal nature. We acknowledge that bird surveys were carried out over several months in early 2018, during which no Brent Geese were observed to use the park. However, in Chapter 7 of the EIAR it is acknowledged that: "A flock of Brent geese was observed by the SDCC Heritage Officer on the 4th of February 2019 (pers. comm.) on playing fields in the north-west of the park. The playing fields were subsequently surveyed by NM Ecology Ltd. in early March 2019 to search for goose droppings or other signs of activity, but no evidence was found"</p> <p>In addition, during the EIA scoping exercise in early 2019, the DCHG indicated that geese were present in the park that winter. An Taisce assume this submission was from the NPWS, who must be viewed as the ultimate authority in this case given their role as the designated governmental body for the protection of flora and fauna. As such, while anecdotal evidence and a limited number of bird surveys would indicate that the park is no longer used by Brent Geese, both the DCHG and the SDCC Heritage Officer present evidence to the contrary. This discrepancy is not addressed in the EIAR, and An Taisce would highlight that an unresolved question remains regarding the use of the park by Brent Geese.</p>	
	24.3	<p>Section 4.7.4 of the EIAR indicates that two options were proposed for this area, Option 1 was a 0.5 m high retaining wall stepped back from the river along the footpath which would greatly reduce the number of trees needing to be felled, and Option 2 was a 1.1m high wall along the river bank which would result in extensive tree removal and impacts on the river riparian zone (river bank). The EIAR reports that the residents of St. Martin's Drive rejected Option 1 in favour of Option 2, due to fears in regard to anti-social behaviour, as outlined in section 4.7.4 of the EIAR: "local residents expressed a concern about anti-social behaviour at this location and did not wish to see any improvements to the green area to change its use from a passive space to an active space. " An Taisce would question the transparency of this decision, and would query what percentage of</p>	<p>A response to this has been provided in RFI no. 6.</p>

Name	Observation no.	Observation/Issue	Response
		<p>the local inhabitants requested this. While we acknowledge that local concerns are very relevant, we are equally aware that there are a significant number of local inhabitants who are strongly opposed to this tree removal proposal, and the proposed option does not reflect their concerns. The tree removal will impact on a far greater number of inhabitants than those living directly adjacent to the proposed area of tree removal, as evidenced by the establishment of the 'Save the Poddle Wildlife Sanctuary' community group. Given the combined biodiversity and climate emergency declared by the Irish Government in May 2019, it would appear to us that the opinion of the directly adjacent residents should not be the absolute decider of a plan. Their views must obviously be accounted for, but not exclusive of other concerns, such as those of natural heritage, particularly when the risk of anti-social behaviour is hypothetical, and not firmly established. The River Poddle is a public space, providing an amenity for a broad range of people and biodiversity, and any planning decisions for the river must be cognisant of the needs of the wider public, not just a limited sub-set. In addition, we would question if the design of the 0.5 m high flood wall along the footpath (Option 1, rejected by local residents) could be adjusted to assuage those concerns, with the use of a transparent or a removable barrier, or another similar measure, the like of which are frequently employed in flood relief schemes along river banks in urban areas in order to protect the visual amenity of an area while providing flood relief. The consideration of alternative designs is a requirement under the EIA Directive Annex IV(2)): "A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for this choice selecting the chosen option, taking into account including a comparison of the environmental effects" An Taisce would question if alternative designs for the flood wall for Option 1 at St. Martin's Drive have been thoroughly considered, with a view to protecting the established trees and riparian zone while preventing the development of a potentially anti-social space. While we welcome the proposal to replace any felled trees, mature trees have far higher biodiversity and carbon sequestration value than new trees, and should be given high level protection, where possible. The first option would also prevent the permanent alteration of the riparian zone of the river, and would allow for a limited amount of intermittent flooding which would somewhat mimic the natural floodplain system, in as much as that is possible within such an urban catchment, while providing protection for the established biodiversity. We would welcome a more in-depth analysis of the design options in this particularly sensitive area, and would suggest that the outright rejection of the first option due to the concerns of an unenumerated number of local residents should be revisited to endeavour to find a solution suitable for simultaneously protecting biodiversity and assuaging local concerns.</p>	

Name	Observation no.	Observation/Issue	Response
<b>Mary Dunne</b>	25.1	<p>I would like to make a submission in support of the Poddle Flood Alleviation Scheme submitted to An Bord Pleanála on 21 February 2020.</p> <p>My house on Osprey Drive was flooded 3 times since 1978. Since the flooding in 2011, I have been unable to get house insurance with flood cover, my property has been devalued, and I suffer psychological stress every time it rains heavily.</p> <p>The River Poddle rises in Cookstown, Tallaght and flows through Tymon Park and then follows a circuitous route through Templeogue, Kimmage, Harold's Cross, and Temple Bar.</p> <p>Due to the constrained nature of the river as it exists today, the Poddle is particularly susceptible to blockages from accumulating debris and fly-tipping at the various structures along its course. This has caused the river to flood urban areas and recorded instances have occurred in 1986, 1993, 2000, and 2008 and most recently in 2011. Very significant flooding occurred in October 2011 when up to 90mm of rain was reported to have fallen within a six hour period on the evening of the 24th.</p> <p>According to Met Eireann, the equivalent of one month's rain fell in 24 hours in October 2011 and 65mm of rain fell within four hours from 3pm. This only happens about once every 80 years according to meteorological records. The speed with which the water levels rose increased the risk of flash flooding and claimed the life of Celia de Jesus, the nurse who died when her basement flat flooded in Parnell Road, Harold's Cross as the River Poddle burst its banks.</p> <p>The proposed scheme will increase the flood protection on the River Poddle and so will protect properties at risk, including my own from the 1 in 100 year river flood, taking into account the anticipated increase in flows attributable to climate change.</p> <p>The cost of damages by the River Poddle is 22,793,840 euro (Eastern CFRAM Study Poddle Options Report IBE0600Rp0030, page 32).</p>	<p>The response reflects the broad support that has been received for the development of this Scheme from the consultations that began on this back in 2018. The project team were told at such events of the trauma and hardship experienced by residents and businesses who suffered in 2011, some of whom were out of their homes for over 6 months and some who nearly drowned. The proposed Scheme is a detailed response to the need to provide adequate protection to these and other properties at genuine risk from serious flooding.</p>

Table 2. Response to independent Arborist's Report

Observation No.	Observation / Issue	Response
<p><b>1</b></p>	<p>The report (Tree Survey and Arboricultural Impact Assessment) and drawing (Tree Classification drawing, 1915-T-101) provided by Cunnane Stratton Reynolds, are inadequate as they do not include a number of trees on the eastern boundary of the site with Kimmage Road Lower (area 1, image 1) nor any of the trees on the western boundary within the grass verge within Ravensdale Drive (area 2, image 1). Both groups of trees are shown to be within the site boundary on drawings provided by Nicholas O'Dwyer (RPFS-NOD-O1 -XX -DR-C - 01-08160 Rev P01) There is also no information provided for a group of trees directly adjacent to the site boundary (area 3, image 1)</p>  <p>Image 1. Cunnane Stratton Reynolds drawing 1915-T-101 Trees within the park on the boundary with Kimmage Road Lower, the centre of the park and on Ravensdale Drive are not included within the tree survey (yellow boxes and blue arrows indicating approximate locations).</p>	<p>These trees were not included in the original tree survey as in our judgement their modest size and relative distance from the proposed works made it clear to us that they would not be impacted upon. However, for the avoidance of doubt an additional survey has been undertaken to pick up all trees within the area, the results of which vindicate our initial judgement that they will not be impacted upon.</p> <p>The street trees located outside the park on Ravensdale Drive were not included in the original tree survey as the proposed construction techniques to the adjacent channel do not involve any excavation or demolition to the existing channel wall on that side of the stream, thus ensuring the RPA of these trees will remain undisturbed. However, again for the avoidance of doubt, these trees have now been included in the survey and their assessment vindicates the initial judgement that they will not be impacted upon.</p>
<p><b>2</b></p>	<p>The arboricultural impact report (Tree Survey and Arboricultural Impact Assessment) and drawing Tree Removal &amp; Protection 1915-T-103 provided by Cunnane Stratton Reynolds, the details of which are also shown on the Nicholas O'Dwyer drawing RPFS-NOD-01-XX-DR-C-01- 08160 Rev P01 do not address the direct impact of the proposed works in a number of locations and as a result do not provide an accurate description of the impact of these works on trees. These shortcomings are outlined below and include Ravensdale Drive, the Western boundary of Ravensdale park and the construction access route within the park. Comment is also made on the omission of information on trees along the riverbank immediately adjacent to the site boundary.</p>	<p>Addressed under other observations</p>

<p><b>3</b></p>	<p>The provision of a retaining wall and works to the river bank will have a significant impact on trees on the western boundary of Ravensdale park and potentially on trees within the grass verge on Ravensdale Drive (image 2). The trees within Ravensdale Drive are within the site boundary (Nicholas O'Dwyer drawing RPFs-NOD-01-XX-DR-C-01-08160 Rev P01) but no included within Cunnane Stratton Reynolds drawing 19150-T-101 or the schedule of trees within the Tree Survey and Arboricultural Assessment report</p>  <p><b>Image 2.</b> Trees on Ravensdale Drive (arrowed) not included within Tree Survey report and drawings. Note close proximity of tree group 6 trees to left of image.</p>	<p>The street trees located outside the park on Ravensdale Drive, were not included in the original tree survey as the proposed construction techniques to the adjacent channel do not involve any excavation or demolition to the existing channel wall on that side of the stream, thus ensuring the RPA of these trees will remain undisturbed. However, again for the avoidance of doubt, these trees have now been included in the survey and their assessment vindicates the initial judgement that they will not be impacted upon.</p> <p>A number of trees are proposed for removal to facilitate works access to the channel along the western boundary of Ravensdale Park. These have been selected based on their lower classification/value (T817 / T820 / T823 / T825 / T839 / T840 / T841 and three trees from TG6) with the higher classification/value Weeping Willow trees prioritised for retention. (It is anticipated that some limited removal of minor lower level foliage of the Weeping Willow trees will be the only likely intervention required).</p>
<p><b>4</b></p>	<p>It is estimated that ten additional trees (Nos 1816 -1825) of mixed age and species on the edge of the river on the western edge of Ravensdale park will need to be removed to facilitate the works in this area. Tree group TG6 is also very vulnerable to impact from these works as large machinery access will be required</p>	<p>A number of trees are proposed for removal to facilitate works access to the channel along the western boundary of Ravensdale Park, these have been selected based on their lower classification/value (T817 / T820 / T823 / T825 / T839 / T840 / T841 and three trees from TG6) with the higher classification/value Weeping Willow trees prioritised for retention. (It is anticipated that some limited removal of minor lower level foliage of the Weeping Willow trees will be the only likely intervention required).</p>
<p><b>5</b></p>	<p>A total of ten early mature lime trees on Ravensdale Drive are very vulnerable to construction related activities. The comment within section 3,4 of the Tree Survey and Arboricultural Impact Assessment that trees within Ravensdale Drive be protected by bamboo matting wrapped around trunks is considered inappropriate as the trees will most likely be directly impacted upon by the proposed works and, in the unlikely event that the trees are retained, bamboo would provide totally inadequate protection against machinery impacts</p>	<p>The only works access required to this area will be pedestrian access - <i>i.e.</i> operatives carrying out non-mechanical works / handworks or observation works only. Given the nature of the access requirement and proposed works in combination with circa 5m spacing between trees - it is considered that temporary ground protection boards and bamboo matting wrapped around trunks will be a sufficient protection for the existing Lime trees.</p>
<p><b>6</b></p>	<p>The direct impact of providing a retaining wall and works to the river bank on trees on the western boundary of Ravensdale park adjacent to the KCR Builders Providers will necessitate the removal of approximately five additional trees (T826-T829 &amp; T838) to facilitate works in this area.</p>	<p>Three trees will require to be removed - T826 / T827/ T838.</p>
<p><b>7</b></p>	<p>It is estimated that the impact of the internal 'featured fair faced concrete retaining wall' will require six additional trees (T841, T843, T842, T846, T847, 848) and part of one additional tree group (TG9) to be removed. Comments within section 3.4 of the Tree Survey and Arboricultural Impact Assessment (Cunnane Stratton Reynolds) that excavations be undertaken by hand/ airspade are considered an unrealistic and unachievable approach to the retention and management of trees in this area given the proximity of the proposed wall to trees and the other construction activities necessary in this area <i>i.e.</i> access for plant and machinery.</p>	<p>These trees can be retained given the limited area of disturbance proposed, considered in conjunction with the relative youth of the trees and the resilient nature of their particular species type. Only T844 will have to be removed, (it is our opinion that too many trees within close proximity of one another in this area preventing proper development and over shading issues - additional removal of trees would be a beneficial measure in terms of proper tree management for those selected for retention).</p> <p>The use of hand digging and or airspade around tree roots is a tried and tested methodology, and though slower and more labour intensive than orthodox methods they are eminently possible if the retention of the trees is considered a priority.</p>

<b>8</b>	It is estimated that approximately nine additional trees (T836, T837, T838, T839, T842, T843, T849, T844, T845) and one tree group (TG9) will need to be removed to facilitate the construction of the proposed construction access routes and to facilitate the movement of plant and machinery in these areas. Comment within section 3.4 of the Tree Survey and Arboricultural Impact Assessment (Cunnane Stratton Reynolds) that excavations be undertaken by hand/ airspade are considered an unrealistic and unachievable approach to the retention and management of trees in this area considering the proximity of trees, and the large size of construction machinery accessing this area.	We are advised that the engineers are confident that they can limit the area of works to that shown within the proposed tree protection fence, in which case it is our opinion that these trees can be retained given the limited area of disturbance proposed, considered in conjunction with the relative youth of the trees and the resilient nature of their particular species type. (There are however too many trees within close proximity of one another in this area preventing proper development and over shading - so additional removal of trees could be made with some positive long-term impact on those remaining).
<b>9</b>	The size of the site compound is considered inadequate to house plant, machinery and site facilities. The potential impact on trees of the compound is considered to be greater than that shown.	We are advised that the engineers consider the size of the indicated compound to be sufficient for their needs. The tree survey drawings clearly confirm there is no potential conflict with any RPA's in this area.
<b>10</b>	A section of the park (area 3 image 1) has not been included within Cunnane Stratton Reynolds drawing 19150-T-101, the Tree Survey and Arboricultural Impact Assessment or within Nicholas O'Dwyer drawing RPFS-NOD-01-XX-DR-C-01-08160 Rev P01 This appears to be an unnecessary omission as trees directly adjacent to Kimmage Road West have been included. It also runs contrary to the recommendations made within 8S5837 (2012) which states that all trees within and directly adjacent to the site be assessed and examined.	These trees were not included in the tree survey as in our judgement their modest size and relative distance from the proposed works made it clear to us that they would not be impacted upon, however for the avoidance of doubt an additional survey has been undertaken to pick up all trees within the area, which has confirmed our initial judgement that they will not be impacted upon.
<b>11</b>	Tree surveys, arboricultural impact reports and associated drawings should always provide the public and planning authorities with a full and comprehensive analysis of the existing trees on any given site and the impact that any proposed trees. This has not occurred in this instance. The Tree Survey and Arboricultural Assessment report and drawing provided by Cunnane Stratton Reynolds are inadequate as baseline data and the true impact of the proposed development has not been adequately addressed by Cunnane Stratton Reynolds or Nicholas O'Dwyer.	These trees were not included in the tree survey as in our judgement their modest size and relative distance from the proposed works made it clear to us that they would not be impacted upon, however for the avoidance of doubt an additional survey has been undertaken to pick up all trees within the area, which has confirmed our initial judgement that they will not be impacted upon.
<b>12</b>	The comment on the impact on riparian vegetation made by Cunnane Stratton Reynolds (section 3.5) within the Tree Survey and Arboricultural Impact Assessment report that 'a considerable number of riverbank trees are required to be removed to facilitate the construction process ..... ' within Ravensdale park is considered a poor approach to addressing the impact on trees. It should be noted that these riverbank trees are additional to those trees tagged and included within the Tree Survey and Arboricultural Impact Assessment report. This approach is considered inadequate within a small community park such Ravensdale park where access to all trees for inclusion with a Tree Survey Report is not difficult. This comment opens up the prospect of all existing trees adjacent to the river being removed. Whilst this may be the inevitable consequence of the current proposals it is an inappropriate response to addressing the impact in this instance.	The additional loss of trees highlighted under section 3.5 refers primarily to Fortfield Road and a very small area of Ravensdale Park/Kimmage Road around where the stream enters a tunnel to pass under the road travelling towards Fortfield Road. The tree loss refers to young scrub vegetation which fall below the 150mm diameter threshold to warrant being tagged and individually included in the survey as per BS5837 guidance. These areas are composed mostly of fast growing readily self-seeding species such ash, sycamore and willow which would be considered of low value due to their immaturity and ease of replacement.
<b>13</b>	Without data for all the trees within and directly adjacent to the site a true picture of the existing tree stock and the potential impact of the proposed development cannot be determined. The associated reports and drawings provided by Cunnane Stratton Reynolds and Nicholas O'Dwyer do not reflect the true extent of the existing trees within and adjacent to the site.	Data for all trees of a girth greater than 150mm within the likely zone of influence of the works are included in the original tree survey. Trees that were not included in the original tree survey were omitted because in our judgement their modest size and relative distance from the proposed works made it clear to us that they would not be impacted upon, however for the avoidance of doubt an additional survey has been undertaken to pick up all trees within the area, which has confirmed our initial judgement that they will not be impacted upon.
<b>14</b>	The industry standard for undertaking tree surveys and arboricultural impact assessments is BS5837 Trees in relation to design, demolition and construction - Recommendations (2012). Section 4.4.1.1 states that all trees within and directly adjacent to the site be assessed and examined. This examination which should include the impact of any proposed development standard has not been adhered to in this instance at Ravensdale Drive, the Eastern and Western boundaries of Ravensdale park and areas adjacent to the site boundary. Therefore, the assertion here is that the baseline information and the subsequent impact of the proposed development is fundamentally flawed.	Data for all trees of a girth greater than 150mm within the likely zone of influence of the works are included in the original tree survey. Trees that were not included in the original tree survey were omitted because in our judgement their modest size and relative distance from the proposed works made it clear to us that they would not be impacted upon, however for the avoidance of doubt an additional survey has been undertaken to pick up all trees within the area, which has confirmed our initial judgement that they will not be impacted upon.

<p><b>15</b></p>	<p>Image 3 provides what is considered to be a more accurate indication of the true nature of the area of the park and its tree population which will be directly impacted upon by site works (red hatch area) and the area just outside of the boundary (blue outline) which appears to be described as the area where a 'considerable number of riverbank trees are required to be removed to facilitate the construction process ..... ' (section 3.5 Cunnane Stratton Reynolds Tree Survey and Arboricultural Assessment report)</p>  <p><b>Image 3.</b> Estimated area of tree removal (red hatch) and unclear area of impact (blue outline).</p>	<p>This estimate is incorrect - the area of proposed works is as per the tree survey and associated drawings. It is also not the area referenced under section 3.5, (which is in fact the small area around the mouth of the tunnel travelling under the public road to Fortfield Road).</p>
<p><b>16</b></p>	<p>The proposals provided by Cunnane Stratton Reynolds and Nicholas O'Dwyer are inaccurate and misleading. Drawing RPFS-NOD-01-XX-DR-C-01-08160 Rev P01 (Nicholas O'Dwyer) identified seven trees for removal based on the design.</p>	<p>The tree proposed for removal are all clearly illustrated on the 'Tree Removal &amp; Protection' Drawings and in addition listed by tag number under section 3.3 of the tree survey report.</p>
<p><b>17</b></p>	<p>This report identified an additional thirty trees and two tree groups within Ravensdale Park which will be directly impacted upon by the proposed works and ten trees within Ravensdale Drive which are vulnerable. This is an additional forty trees and two tree groups. here is also an unknown number of trees along the river to be removed.</p>	<p>This alternative survey is misinformed for the all the reasons set out in responses above.</p>
<p><b>18</b></p>	<p>It has been established here that the impact of the proposed development will significantly alter the structure and appearance of Ravensdale Park. If that is the case then all relevant consultants drawings and reports should reflect this fact accurately. Anything less is below the standards that should be expected by the public and their representatives. In this instance these standards have not been adhered to and the reports and drawings related to existing trees and the impact of the proposed works are fundamentally flawed.</p>	<p>This is not the case - the statement is misinformed for the all the reasons set out in responses above.</p>