

Lauren Griffin

From: Lauren Griffin
Sent: Tuesday, 15 July 2025 09:53
To: Pj.Griffin@rps.tetrattech.com
Subject: RE: Case Number ABP-322329-25 Ballina Flood Relief Scheme

A Chara,

The Commission acknowledges receipt of your email; the contents are noted.

Kind regards,

Lauren

From: Griffin, PJ <Pj.Griffin@rps.tetrattech.com>
Sent: Monday, 14 July 2025 16:23
To: LAPS <laps@pleanala.ie>
Cc: 'Michael O Grady' <mjogrady@mayococo.ie>; Mulryan, Karen <Karen.Mulryan@rps.tetrattech.com>; victor.fairbrother <victor.fairbrother@opw.ie>; Edmund Bridge <edmund.bridge@opw.ie>
Subject: Case Number ABP-322329-25 Ballina Flood Relief Scheme

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Please find attached response from RPS on behalf of Mayo County Council to the observations received on the Ballina Flood Relief Scheme planning submission.

Please confirm receipt of response.

Regards,
PJ

PJ Griffin

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Our Ref: MGW0290L10012

Your Ref: ABP-322329-25

Date: 14 July 2025

An Coimisiún Pleanála

Dear Lauren,

RPS (a Tetrattech Company) as an agent for the above noted planning application, submit the following comments on behalf of Mayo County Council in response to the invitation issued by An Coimisiún Pleanála (ACP) in their letter dated 17 June 2025 to make a submission on the observations received in relation to the Strategic Infrastructure Development Application (ABP-322329-25) for the Ballina Flood Relief Scheme (FRS). The letter requests that a response be received no later than on the 14 July 2025. The client and project team have considered the matters raised in the observations received from statutory consultees and third parties, namely:

1. An Taisce,
2. Moyvale Residents Committee,
3. Uisce Éireann,
4. Transport Infrastructure Ireland (TII).

A detailed response in respect of the request is enclosed with this letter. The accompanying document constitutes a full and robust response to the matters raised and the information provided here will directly assist ACP in their ongoing consideration of the planning application.

Having regard to the key points set out in this response, it is respectfully requested that ACP consider the relevant EU, National, Regional and Local planning context that applies to the Proposed Scheme as well as the necessity for the Proposed Scheme and grants permission for the flood relief measures which are the subject of this application.

Yours sincerely,
for RPS Tetrattech



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An Taisce:

An Taisce's main observations are summarised as follows:

1. Note the "near threatened" and protected status of sea lamprey and request ACP to consider closely the instream works proposed.
2. Recommend the project be assessed against Article 4 of the Water Framework Directive to determine whether the project may cause a deterioration of the status of a surface or groundwater body or jeopardise the attainment of good surface or groundwater status or of good ecological potential and good surface or ground water chemical status.
3. Highlight the designation of River Moy as Salmonid River and presence of salmon in the Zone of Influence of the scheme, and therefore highlighting that the robustness of mitigation measures in the EIAR for salmon are considered
4. Importance of Consultation with Inland Fisheries Ireland (IFI) and National Parks and Wildlife Service (NPWS) as set out in Mayo County Development Plan Objectives in relation to Flood Relief Measures.
5. Query the necessity to remove some trees within riparian habitat upstream of Rathkip/Shanaghy Bridge.
6. Recommend environmentally friendly lighting with a limiting colour temperature to less than 2,700 Kelvins.
7. Concerns regarding the removal of otter habitat to facilitate the proposal and request ACP to review the proposed remediation conditions.

With regards to points raised in the An Taisce submission, it is first stated that the requested information is comprehensively addressed within Chapter 9 Aquatic Biodiversity, the Natura Impact Statement (NIS), and in greater detail in Appendix 9-6 Ridge Pool Survey, Appendix 9.8 Hydraulic Cross Section Data and Appendix 12-1 Water Framework Directive Compliance Report. The following information is relevant:

1. Sea Lamprey and Instream Works

River Moy - Ridge Pool:

Appendix 9-6 Ridge Pool Survey clearly sets out the proposed instream works areas in relation to sea lamprey spawning and nursery habitat. There are two discrete areas where instream works are proposed in the Ridge Pool: (1) A temporary access ramp on the true left (LHS, i.e., left side looking downstream) at the river margin along the front of IFI office, around to the 'groyne' area upstream of the warehouse, and (2) Temporary cofferdams of maximum width 5m into channel along the true right hand side (RHS - Ridgepool Road side) to repair masonry Quay walls.

These temporary works areas do not impinge on sea lamprey spawning habitat. This is set out in Appendix 9.6 of the EIAR. To support the conclusions of Appendix 9.6, a further instream survey of the River Moy was undertaken during May 2025 when the river was closed to angling because of high water temperature. This was an ideal time to observe the river for signs of sea lamprey spawning as river levels were very low and May to July is sea lamprey spawning season.

Note that it is not usually possible to access the Ridge Pool so extensively in sea lamprey spawning period (May-July) because it is the peak angling booking season on the pool. With the agreement of IFI, therefore, the high water temperatures which closed the Moy Fishery in May 2025, were used to freely access Ridge Pool and search for sea lamprey redds and further define the spawning habitat suitability over what was already earmarked in Appendix 9.6 of the EIAR.

This survey, which was a follow up to a detailed survey undertaken in September 2023 as reported in Appendix 9.6 of the EIAR (i.e., outside of sea lamprey spawning season) further defined the area of potential sea lamprey spawning habitat in the Ridge Pool and confirmed that the proposed temporary instream works footprint does not impact on that habitat. In addition, the areas already identified in surveys of September 2023 (see Appendix 9.6 of EIAR) as lamprey nursery areas were reconfirmed by the May 2025 survey with

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juvenile lampreys (ammocoetes) captured at the areas marked in Figure 1, below. The additional site visit in May 2025 clearly identified the only area of suitable substrate and habitat where lamprey could be spawning in Ridge Pool (Figure 2). The reference point of the gravel riffle is: ITM 524543, 818658. A 'probable' sea lamprey redd was observed in this area (23 May 2025), identified by a patch of large gravels mounded up on the downstream side of a 1.5m oval depression. No lampreys were observed over the area, but given water temperature was >18 degrees at that time, spawning had likely occurred.

The gravel riffle area is just downstream of a clear break in the flow where the channel transitions from mainly bedrock/boulder to a deposition area where the suitable gravels are deposited. It is, in fact, a very limited area that forms a possible "sweet spot" for sea lamprey spawning at this location (Figure 2, below) where suitable gravel and cobble substrates deposit and the flow/depth character (at both high and low tide) is suitable for spawning. This is the only habitat that could adequately incubate sea lamprey eggs without substrate wash out (high flow at low tide) or suffocation (slack flow and detritus deposition at high tide). Upstream the channel is too swift, and bedrock dominated, and downstream a scour pool forms and is too deep with unsuitable substrate and slack flow at high tide.

The May 2025 survey therefore reconfirmed and provided an additional layer of certainty and definition over what had already been found in September 2023 (reported in Appendix 9.6 of the EIAR) with the benefit of occurring within sea lamprey spawning season. The area of potential sea lamprey spawning habitat in the Ridge Pool during spawning season is confined to that one gravel riffle as shown in Figures 1, 2 and 3, below. There is no spawning habitat on the RHS (Ridgepool Road).

Figure 3, below, is taken from Appendix 9.6 of the EIAR, showing that the proposed temporary access ramp is at widest 7.5m out from the river margin at the corner of the disused warehouse. The edge of the sea lamprey spawning riffle is a further 7.5m out from the edge of the proposed instream works boundary. The temporary access ramp thus does not impact on the existing sea lamprey spawning habitat of Ridge Pool. It is confined to the marginal edge of the channel which regularly dries out at low tide and on low flows, only impacting on ephemeral habitat which in no way could support sea lamprey spawning or nursery in the proposed location. There was no suitable sea lamprey spawning habitat along the RHS of the river at all, hence temporary instream cofferdams to repair the Ridgepool Road Quay Walls has no impact on sea lamprey spawning habitat.

As set out in Chapter 9 Section 9.4.4.1 of the EIAR, temporary works in the Ridgepool do impinge on marginal and limited sea lamprey nursery habitat in one location in the RHS of the Ridgepool immediately upstream of the Upper Bridge. Robust mitigation for this impact is set out clearly in Section 9.5.1.3 (Mitigation) of Chapter 9 of the EIAR.

The patch of nursery habitat on the LHS in front of Ballina Manor is not impacted by the proposed instream works and will be cordoned off on the landward side and marked as an "exclusion zone" during works in the Ridge Pool as clearly set out in Section 9.5.1.3 (Mitigation – Ridge Pool, River Moy) of Chapter 9 of the EIAR.

As highlighted by An Taisce, robust mitigations for any possible impact on sea lamprey spawning and nursery habitat in the Ridge Pool are clearly set out in Section 9.5.1.3 (Mitigation) of Chapter 9 of the EIAR.

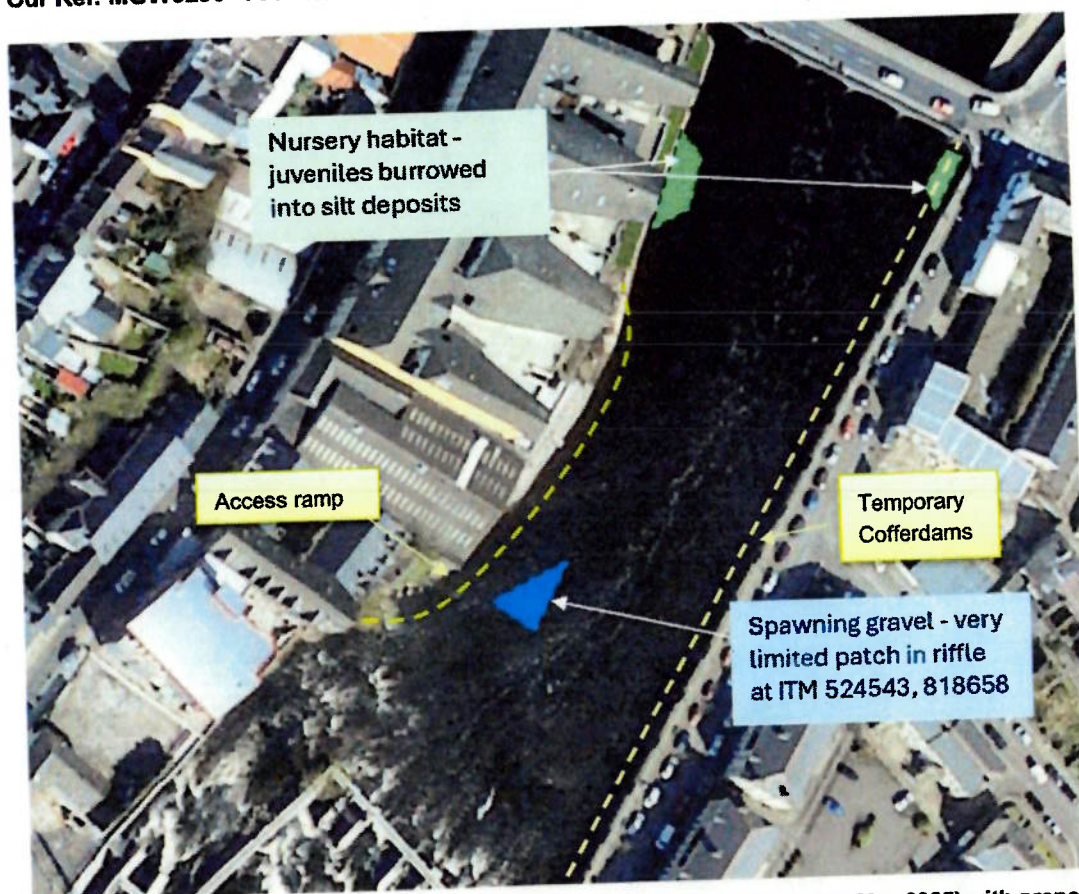


Figure 1: Areas of sea lamprey spawning and nursery in Ridgepool (defined in May 2025) with proposed temporary instream works areas indicated



Figure 2: Image of Ridgepool May 2025 showing patch of sea lamprey spawning gravels. (Note the proposed temporary access ramp area on the far bank is dewatered)

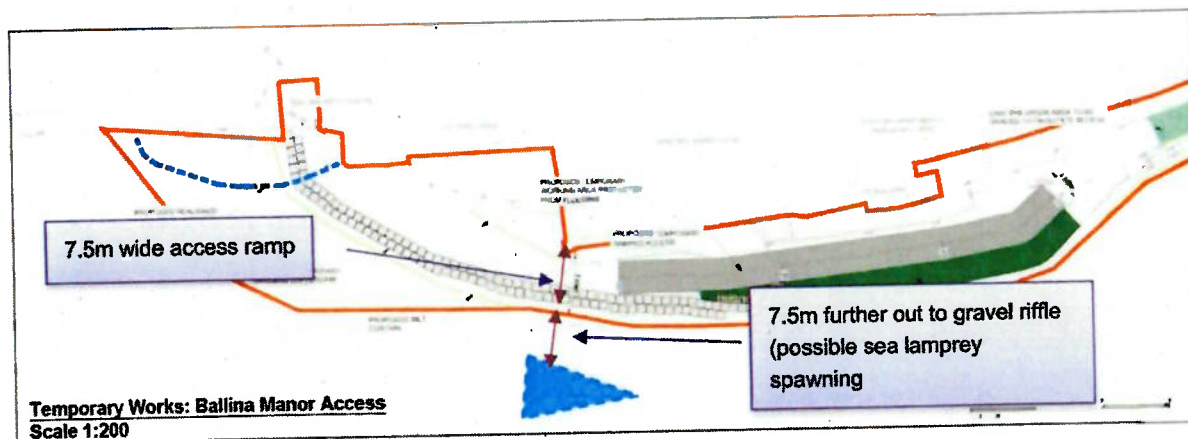


Figure 3: Temporary works area in relation to sea lamprey spawning habitat in Ridgepool

River Moy – Moy Estuary: Downstream Lower Bridge (N59):

As set out in Chapter 9 Section 9.4.4.1 of the EIAR, temporary instream works also occur on both banks of the River Moy downstream of the Lower Bridge (N59) where footings for flood defense walls will need to be anchored. There is marginal and limited habitat for juvenile lamprey at this location as set out in Section 9.3.3.2 of Chapter 9 of the EIAR. As highlighted by An Taisce, robust mitigation for this impact is clearly set out in Section 9.5.1.4 of Chapter 9 of the EIAR.

2. Water Framework Directive Compliance

The Proposed Scheme is comprehensively assessed against Article 4 of the Water Framework Directive for each affected surface and groundwater body within Appendix 12-1 Water Framework Directive Compliance Report. Appendix 12-1 Water Framework Directive Compliance Report and Appendix 9.8 Hydraulic Cross Section Data comprehensively addresses hydromorphological effects on waterbody status in relation to the Biological Quality Elements that define status. This includes impacts on fisheries spawning and nursery habitat at relevant watercourses. Brusna (Glenree), Tullyegan and River Moy are the only fisheries channels (noting that the latter is tidal and does not support salmonid spawning). The Water Framework Directive Compliance Report is supported by analysis of the hydraulic modelling (Appendix 9.8) with regards to fisheries habitats.

An Taisce suggests the proposed scheme could lead to siltation of watercourses and therefore preclude good status of water bodies being achieved. This was examined in detail using the hydraulic model results (Appendix 9.8) and the impact on status was presented clearly in the WFD Assessment (Appendix 12-1). Please refer to the WFD Assessment in conjunction with hydraulic analysis in Appendix 9.8.

Appendix 9-8 Hydraulic Cross Section Data presents hydraulic modelling data in relation to fisheries habitats which is used to underpin the WFD Assessment, fisheries habitat impact assessment in EIAR Chapter 9: Aquatic Biodiversity. This comprehensively demonstrates (as set out in the WFD Assessment text) that there are minor, if any effects on fisheries habitats in any of the watercourses that actually have fish sensitivity. Brusna (Glenree), Tullyegan and River Moy are the only channels that have fisheries sensitivity as identified comprehensively in Chapter 9: Section 9.3 of the EIAR, noting that: (1) the River Moy is tidal, does not support salmonid spawning in the Proposed Scheme footprint and is only a migration route for salmonids, (2) Brusna / Glenree is a good salmonid stream with high energy / spate flow that does not facilitate silt deposition in either the pre- or post- scheme scenarios, and (2) Tullyegan is a highly modified, drained, channelised low quality trout stream. Potentially positive effects on trout (and possibly brook lamprey spawning habitat) are likely in the Tullyegan as the post-works velocities will help flush out fine sediment, likely improving the suitability of spawning habitat for trout and brook lamprey in this currently drained and channelised watercourse.

This clearly shows siltation will not be an effect of the proposed scheme. In almost all cases there are very slight increases in channel velocities predicted which will slightly improve instream habitats in terms of flushing out fine sediment and improving status as defined by invertebrates (Q-value).

3. Quignamanger Stream and Salmonid

The Quignamanger is not a sensitive salmonid stream. This is clearly set out in Chapter 9, Section 9.3.3.2 which states: *The Quignamanger Stream has low fisheries significance owing to extensive existing culverting that begins at the Moy confluence. Only approximately 50 m of the lower channel is likely accessible to any salmonids.* During field studies, it was observed that a small number of outward migrating smolts may be temporarily attracted into the lower reach of the stream, but the watercourse has no salmonid spawning habitat because of its extensive, existing culverting. Hence the Proposed Scheme has been designed to ensure fish can still temporarily enter the lower reaches by (i) improving the existing Quay Road culvert, (ii) adding in a step-pool fish ladder type arrangement as part of the proposed regrade of the lower channel, and (iii) daylighting of the channel downstream of Quay Road culvert, i.e., all equating to improvement for fish access despite the limited availability of habitat in the lower reaches of this minor watercourse.

4. Consultation with IFI and NPWS

An Taisce's submission requests ACP draw attention to objectives set out in the Mayo County Development Plan, emphasising the importance of INO24 :

"INO 24 To consult, where necessary, within Inland Fisheries Ireland, the National Parks and Wildlife Service and other relevant agencies in the provision of flood alleviation measures with the County".- This is particularly important given that instream works are considered unavoidable for certain stretches of the project footprint.'

There is a comprehensive record of consultation with stakeholders and the public as detailed in Chapter 3 Consultation. Furthermore, detailed consultation was undertaken with both IFI and NPWS throughout the EIAR/ NIS preparation phase. Refer to Chapter 3 Consultation, Chapter 9: Aquatic Biodiversity (Section 9.2.7) and Chapter 10: Terrestrial Biodiversity for details. IFI were regularly contacted both formally and informally to facilitate instream surveys at the Ridge Pool. IFI were also consulted in relation to their proposals for fisheries enhancements and angling access arrangements at Ridge Pool and Cathedral Beat. Both statutory bodies are well informed of the Proposed Scheme.

5. Retention of Riparian Corridors

It is noted in the EIAR and NIS that the removal of riparian woodland and vegetation can have significant effects without the implementation of appropriate mitigation measures. The flood relief measures have been designed to be as far back from the riparian habitat as practicable. The majority of riparian tree removal required for the Proposed Scheme will be of ash which have ash die back and some trees marked for removal are small immature trees which currently do not provide a considerable biodiversity benefit.

Native woodland and shrub/vegetation planting is proposed across the Scheme to offset the required tree removal to facilitate the necessary flood defence infrastructure. Refer to Chapter 19 Section 19.4 for details and Appendix 19-1 Mitigation Planting which details all the proposed riverbank planting and native woodland planting to support biodiversity, including riparian biodiversity across the Scheme.

6. Lighting

As detailed in Chapter 5 Project Description, existing lighting will be replaced where disturbed along the River Moy and all other areas of work. There are currently no proposals to change the nature of the lighting except for making a change to LED lighting where lights have not already been upgraded. Where upgrades are required, lighting with a limiting colour temperature to less than 2,700 Kelvins can be implemented.

In public realm areas where further lighting may be added, a limiting colour temperature to less than 2,700 Kelvins can be implemented.

7. Otter

There will be no permanent loss of otter habitat anywhere across the Proposed Scheme. Due to its close proximity to the proposed works, one holt along the Brusna will be excluded from use by otter for the duration of the works adjacent to it for the safety of the otter that use it. This holt will once again be free for use by otter when the works are completed. The use of the two couches along Clare Street will be temporarily affected as works are progressing but this area will also then be free for use by otter once works are finished. Couches are also temporary and ephemeral structures as otter can move between couching areas across their territory. Additionally the way works have been designed along Clare Street also (i.e. working on a length/section that can be completed in 1 week) also leaves other areas along this approx. 300m stretch of bank for otter to use.

Two artificial holts will be provided along the Brusna for use by otter while the current holt is not available for use. Furthermore, the landscaping plans along this section of the Brusna will provide more cover for otter (and the current holt) than is currently present. Flood relief measures have been designed to be as far back from the river as possible to preserve the riparian habitat and facilitate otter movement throughout the landscape.

Moyvale Residents Association

Water Safety Concerns pertaining to the existing and proposed increase to an exposed stream.

1. Water Safety Concerns pertaining to accessibility to exposed stream.
2. Current Design Proposals: Inclusion of "angled banks" and "vertical walls" over beach like gradient at stream banks.
3. Direct Access pathway to N59: inclusion of culvert would block right of way
4. Impact of existing Vehicular Traffic on Moyvale Estate – Noise & Pedestrian Safety concerns with the removal of trees in the area
5. Alternative suggested open stream sections along Behy Road
6. Potential loss of existing Trees and Biodiversity
7. Moyvale Residents to be valued as Shareholders

1 & 2. Water Safety Concerns

The current watercourse and the surrounding green area (to Moyvale Housing Estate) constitutes a primarily undesigned public realm space, with a partially open/partially culverted stream running along the southern side of the open/green space area. *(The stream does not run through the main playing area, as stated in the Residents' submission to An Bord Pleanála).*

It is accepted that waterbodies present a risk to all age groups. However, the risk of retaining an open watercourse adjacent to a residential development (housing estate) must be balanced against the environmental, ecological and public realm gains derived from this approach. Children (including young children) can benefit from the experience of growing up (including playing) in the vicinity of a well-designed and maintained public space that incorporates a natural watercourse – out of sight and out of mind does not equate to zero risk..

3. Current Design Proposals

The hydraulic modelling undertaken from the scheme indicates that the culverted section of the Bunree through the Moyvale estate causes a constriction to flood flows, and therefore its removal is necessary to reduce this flood risk. Whilst it could be replaced with a larger culvert the removal of the culvert in this area leads to a potential biodiversity gain by de-culverting a section of the watercourse.

It is also noted that the current proposals do not represent the final design/treatment for this area.

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Subject to obtaining planning consent from An Bord Pleanála, Mayo County Council will embark on Stage 3 – detailed design. This will allow for detailing of the surface treatments to be applied to the proposed 'open' stream section, including the design of a mix of gradients, shrub/tree planting and discreet temporary fencing – pending the maturing of planted areas. Further consultation will be undertaken with the residents as part of the detailed design to address their safety concerns.

4. Direct Access pathway to N59

There will be no loss of direct access to the N59, from the Green area.

The existing Pedestrian route from the Green area to the N59 can be maintained by including a short culverted section (subject to planning) over the open stream. This in turn can be incorporated into an improved Public Realm space/Green area.

5. Impact of existing Vehicular Traffic on Moyvaley Estate – Noise & Pedestrian Safety

Whilst these matters are generated from infrastructure under the remit of TII, the EIAR prepared for Ballina Flood Relief Scheme addresses all Environmental Impacts arising specifically from the construction and operation of Ballina Flood Relief Scheme.

Notwithstanding this, the development of a flood scheme for Ballina does provide opportunities for the collective development and improvement of Public Realm, at the respective infrastructure interfaces. The Active Travel project for Ballina (currently being progressed) is likely the most relevant avenue to address issues of pedestrian safety along the N59 and adjoining roads/thoroughfares.

6. Alternative suggested open stream sections along Behy Road

Following extensive assessment and flood modelling of the Bunree watercourse (Stage 1 - Options Development), it has been determined that retaining the section of watercourse which extends from the Behy Road Industrial Estate (Davys Tool Hire) to the N59 culvert crossing, as an open watercourse, is not viable – this option would not afford the 1-in-100 year Standard of Protection to the at-risk properties along Behy Road. Hydraulically, only the section of the Bunree watercourse northwest of the N59 can operate as an open watercourse, whilst still providing the 1-in-100-year Standard of Protection.

7. Potential loss of existing Trees and Biodiversity

Some trees will require removal to facilitate the removal of the existing culvert. This tree removal would also be required if the culvert was being replaced with a larger culvert. Where existing native tree and shrub species can be retained, this will be identified in the Detailed Design stage and undertaken during the Construction stage.

The Detailed Design stage will also undertake to enhance the existing biodiversity, through improvements to the planted landscape as outlined in Chapter 16 of the EIAR.

8. Moyvaley Residents to be valued as Shareholders

In meeting the Moyvaley Residents Association (on site) during the planning process, Mayo County Council is demonstrating its commitment to listening to the concerns expressed, to providing information on the project and to working with the residents of Moyvaley, in an effort to achieve a solution that's acceptable to all.

Should planning consent be obtained to progress Ballina Flood Relief Scheme, Mayo County Council is committed to meeting and working further with the residents of Moyvaley through the Detailed Design stage of this project.

Uisce Éireann

Uisce Éireann (UE) state in their observation they have reviewed the plans and particulars of the Proposed Scheme and note there are no new connections proposed to UE's infrastructure as part of the Scheme, there are no UE abstraction points within the section of Moy where the Scheme is located and there is no implication for a water source protection impacts arising from the Proposed Scheme. UE note that

underground UÉ infrastructure and the proposed UÉ lough Talt Water Supply Upgrade Project have been considered in the Proposed Scheme constraints study and cumulative impacts, and that early and detailed engagement with UÉ in relation to the Proposed Scheme was undertaken to discuss potential interactions and suitable mitigation. UÉ states it "has reviewed and is satisfied with the proposed scheme impact mitigation plan". Further engagement will be undertaken with Uisce Eireann as necessary as the project progresses.

Transport Infrastructure Ireland

1. Scour Assessment and appropriate Mitigation Measures, where relevant
2. Proposals for structural repairs to retaining walls which support national roads to be agreed with MCC and TII Bridge Management Section
3. Requirement for Technical Acceptance in accordance with TII Publications DN-STR-03001 for box culvert under the N59
4. Requirement for Technical Acceptance in accordance with TII Publications DN-STR-03001 should flood walls tie into existing bridge structures.

1. Scour Assessment

We have undertaken a scour assessment on TII Structure ID MO N26 001.00 (N26 bridge on the Tullyegan) in accordance with both the old standard (UK BD97/12) and the latest standard (UK CS 469) for both the existing and defended conditions using the 0.5% AEP flows and velocities. The following assumptions were made.

- Approach velocities of 1.01m/s in the existing condition and 1.24m/s in the defended condition as extracted from the hydraulic model. RPS used InfoWorks ICM (version 2021.5) to undertake the numerical modelling of the Moy River and its tributaries. InfoWorks ICM is an integrated hydrological and hydraulic modelling package developed by Innovyze and includes full solution modelling of open channels, floodplains, embankments and hydraulic structures.
- Depth of the foundation was assumed based on the construction method of the substructure (depth of foundation assumed to be 1m).
- For masonry structures, the depth of the scour is based on the average size of bed material, and the velocity through the structure. The bed material size was assumed to be 100mm. A sensitivity check using a range of 50-150mm bed material, showed no impact on the risk rating or scour depth.

The scour assessment indicated the following results.

Scenario	Priority Risk Rating as per UK BD97/12	Scour Risk Rating as per UK CS469	Scour Risk Score as per UK CS469	Theoretical Scour Depth
Q200 – Existing Velocity	4	Medium	60	1.90m
Q200 – Defended Velocity	4	Medium	60	1.98m

As can be seen the scour assessment indicates that there is slight increase of 80 mm in theoretical scour depth in the defended versus the existing condition which is an increase of 4%. The priority risk rating (as per UK BD97/12) and scour risk rating and scour risk score (as per UK CS469) remain the same in both cases. Whilst the most recent inspection report for the bridge provided by TII indicates some undermining of the bridge structure (approx. 200mm) the scour assessment undertaken would indicate little risk of increased scour risk following the completion of the flood defence works.

For the other bridge locations velocities in the existing and defended conditions were extracted from the hydraulic model for the 0.5% (Q200) flows as outlined in the following table.

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TII Structure ID	Location	Existing Velocity (m/s)	Defended Velocity (m/s)	Difference (m/s)
MO-N59-001.70	Ballina Upper Bridge on the River Moy	1.818	1.810	-0.009
MO-N59-002.00	Ballina Lower Bridge on the River Moy	2.074	2.065	-0.009
MO-N59-001.00	Brusna River Bridge	1.535	1.484	-0.051

As can be seen there is very slight reduction in velocities between the existing and defended scenarios. As there are no changes to any of the other inputs to the scour assessment calculations it can therefore be concluded that there is no increase in scour risk at these locations from the proposed works.

2. Structural Repairs

It is agreed that proposals for structural repairs to existing walls which support national roads shall be agreed with Mayo County Council and TII Bridge Management Section prior to the commencement of any development on-site and works shall be undertaken in accordance with the detailed agreed therein.

3. Technical Acceptance for box culvert under N59

A Technical Acceptance (TA) application will be made to TII in accordance with TII Publications DN-STR-03001 (Technical Acceptance of Roads Structures on Motorways and Other National Roads) for the proposed 2.0x1.25m box culvert proposed under the N59 national road, prior to any proposed works in the road. Following receipt of TA, any and all works will be undertaken in accordance with the details contained with the acceptance document.

4. Technical Acceptance where flood walls tie into existing bridges

It is not proposed that the flood walls are connected structurally to the existing bridges but rather abut the bridge structures. We will consult with TII Bridge Management Section as part of the detailed design for the scheme and agree a suitable connection arrangement. If required a Technical Acceptance (TA) application will be made to TII in accordance with TII Publications DN-STR-03001 (Technical Acceptance of Roads Structures on Motorways and Other National Roads) prior to any proposed works flood wall works near bridge structures. Following receipt of TA (if required), any and all works will be undertaken in accordance with the details contained with the acceptance document.

Conclusion

The proposed Ballina FRS conforms to the Proper Planning and Sustainable Development of Ballina and its Environs, in accordance with the governing plans and policies, including but not limited to; Ballina Local Area Plan 2024-2030, Mayo County Development Plan 2022-2028, National Development Plan/National Planning Framework.

The likely effects on the environment are comprehensively addressed in the supporting EIAR and NIS prepared for this Proposed Scheme and submitted to ACP as part of the planning process.

In light of the points outlined in this response, it is respectfully requested that ACP take into account the applicable EU, National, Regional, and Local planning frameworks relevant to the Proposed Scheme, as well as the necessity of the Proposed Scheme, and approve the permission for the flood relief measures covered by this application.