



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

**Date: 13/04/2022**

**Planning Reference:** SD21A/0241 Profile Park, Clondalkin, Dublin 22

**Applicant:** Vantage Data Centers Dub 11 Ltd.

**Demolition of the abandoned single storey dwelling and associated outbuilding (206sqm); construction of 2 two storey data centers with plant at roof level of each facility and associated ancillary development.**

IFI welcomes the response contained in the "Significant Additional Information" document in relation to the revised master planning layout for the site which enables the applicant to retain the stream in its current alignment and the maintenance of a 10m wide riparian strip (measures from the top of the bank on either side) along the entire length of the existing stream.

If there is any potential for deleterious matter to enter the Baldonnel Stream during the construction phase through the surface water sewer system or by any other means this should be acknowledged and mitigated against in a site-specific Construction Environmental Management Plan (CEMP).

- Should development proceed, best practice should be implemented at all times in relation to any activities that may impact on surface water or riparian habitats. Any discharges to surface streams present on or near the site must not impact negatively on the system. Comprehensive surface water management measures must be implemented at the construction and operational stage to prevent any pollution of local surface waters.
- The site-specific Construction Environmental Management Plan (CEMP) should identify potential impacts and mitigating measures on the aquatic environment, it should provide a mechanism for ensuring compliance with environmental legislation and statutory consents. The CEMP should detail and ensure Best Construction Practices including measures to prevent and control the introduction of pollutants and deleterious matter to surface water either directly or indirectly through the storm water drainage network and measures to minimise the generation of sediment and silt.
- Ground preparation and associated construction works, including large-scale topographic alteration, the creation of roads, buildings and footpaths, have significant potential to cause the release of sediments and various pollutants into



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surrounding watercourses. Pollution of the adjacent freshwaters (Baldonnel Stream) from poor on-site construction practices could have a significantly negative impact on the fauna and flora of this surface water system. A comprehensive and integrated approach for achieving stream protection during construction and operation (in line with international best practice) should be implemented. Construction works must be planned in a manner which prevents extensive tracts of soils from being exposed at any time and arrangements must be made for the control and management of any contaminated water resulting from construction.

- It is essential that the receiving foul and storm water infrastructure has adequate capacity to accept predicted volumes from this development during construction and post construction phases with no negative repercussions for the quality of any receiving waters.
- The Department of Housing, local Government and Heritage have recently published the following interim guidance document on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design Best Practice Interim Guidance Document which should be considered when designing drainage systems.  
<https://www.gov.ie/en/publication/10d7c-nature-based-solutions-to-the-management-of-rainwater-and-surface-water-runoff-in-urban-areas-best-practice-interim-guidance-document/>
- IFI have recently published the following guidelines which should be referred to and can be accessed on our website [www.fisheriesireland.ie](http://www.fisheriesireland.ie) Revised “**Planning for watercourses in the urban environment**” and “**IFI Guidelines on Protection of Fisheries During Construction Works in or Adjacent to Waters 2016**” which can provide guidance on site specific measures to enhance, protect, rehabilitate, or establish riparian and aquatic habitats.
- All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.

Yours sincerely,

Matthew Carroll  
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