Iascach Intíre Éireann
Inland Fisheries Ireland

19/04/2022

SHD3ABP-313129-22: Demolition of the former Chadwicks Builders Merchant development and construction of a mixed residential and commercial development o the same site.

Dear Sir/Madam,

IFI have reviewed the application and associated documentation and make the following observations:

The proposed development is within the River Camac catchment which is a recognised salmonid system, under significant ecological pressure predominately due to urbanisation. Although considerable sections of main channel are culverted, sections that remain on the surface invariably support self-sustaining populations of Brown trout (Salmo trutta). The river also supports populations of migratory Sea trout (Salmo trutta) in the lower reaches. Other species include the protected European eel , Freshwater Crayfish (Austropotamobius pallipes) and Lamprey (Lampetra sp.) species, listed under Annex II of the EU Habitats Directive.

In the **AA Screening Report**, Section 3.5 Assessment of Likely Significant Effects, it is stated that "*The potential for surface water generated at the Site of the Proposed Development to reach European Sites within Dublin Bay and cause significant effects, during both the Construction and Operational Phase, is negligible due to:*

• *The distance and consequent potential for dilution in the River Camac, River Liffey and Dublin Bay. Surface water discharges would have to travel almost 13km within the surface water network and along the River Camac and River Liffey before discharging into Dublin Bay.*

• *The potential for dilution in the surface water network during heavy rainfall events.*

IFI would view the Camac River and the South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA and North Bull Island SPA as being inter dependent on one another to maintain a healthy and sustainable environment throughout.

The concept or idea of the Camac River acting as a type of buffering mechanism, or part of any mitigation measures to protect the SAC or SPA would not be considered by IFI. There should be nothing other than clean water entering the surface water sewer system and any mitigation measures to protect the aquatic environment should be solely designed and implemented within the proposed development to ensure there is no negative impact within any of the receiving environments.

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

The **EIAR** identifies that that there is potential impacts to the receiving environment through increased sediment loading in run-off and Potential Contamination of Local Water Courses and outlines measures to mitigate against such possibilities and states that "monitoring commitments detailed within the EIAR have been included in a separate compendium and are presented in Chapter 17.0 included in Volume II of the EIAR. Further to those outlined in the EIAR, a Construction Management Plan (CMP) will be agreed with the Planning Authority, prior to the commencement of construction activities on the site, and will incorporate provision for the primary construction mitigation measures"

The CEMP should adopt all recommended measures contained within Chapter 17.0 included in Volume II of the EIAR along with those outlined within the CEMP.
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 surrounding watercourses. Pollution of the adjacent freshwaters (Camac/Poddle Rivers) 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.

- Should development proceed, best practice should be always implemented in relation to any activities that may impact on surface water (stream and river). Any indirect 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.

- All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.

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- 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. Ringsend WWTP is currently working at or beyond its design capacity and won't be fully upgraded until 2023. It is essential that local infrastructural capacity is available to cope with increased surface and foul water generated by the proposed development in order to protect the ecological integrity of any receiving aquatic environment.

- 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/

I trust you will consider our observations when assessing this application.

Regards,

Matthew Carroll

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