



**Iascach Intíre Éireann
Inland Fisheries Ireland**

08/04/2022

SHD 313059: 178 no. residential units (72 no. houses, 106 no. apartments) at Lands at Kilmashogue House and Coill Avon House, Whitechurch Road, Rathfarnham, Dublin 16.

Dear Sir/Madam,

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

- The proposed development is within the River Dodder Catchment, which is an important salmonid system. There is direct connectivity between the site and the Whitechurch Stream (also referred to as the Kilmashogue) which flows from south to north along the eastern boundary and is culverted under the existing site entrance and eventually into the river Dodder. Currently surface water from the site percolates to soil or runs directly off hard surfaces to the Whitechurch Stream, however on completion of the development, Storm water will ultimately discharge to the Whitechurch Stream via new outfall pipes, which can pose a threat to aquatic life within the stream if not designed and managed correctly.
- The Whitechurch stream functions as a nursery for the Dodder channel trout population. Any future development in the area should not cause any degradation of fishery habitat.
- The River Dodder is exceptional among most urban rivers in the area in having resident salmon and sea trout populations, underlying the sensitivity of this particular watercourse and the Dodder catchment in general. The river is regarded as a very important fishery. Only clean, uncontaminated surface waters must be permitted to discharge to the surface water network so that the ecological integrity of the system is protected.
- The *Outline Construction Management plans section 4.0 ENVIRONMENTAL MANAGEMENT, sub section 4.7 Sediment and Water Pollution Control Plan* outlines a number of measures to prevent and control the management of contaminated run-off from the site during the construction phase of the proposal, one of which is to “to create an exclusion zone, as far as reasonably practicable, by the erection of a visible 1.0m high barrier along watercourses”. The setback distance for this exclusion zone from the Whitechurch stream is not specified. IFI would recommend that a minimum of 5 m of undisturbed ground be maintained between any construction works and the stream and that the as well as being clearly visible and signed there should be a robust silt curtain or similar barrier installed along the stream to prevent loss of sediment to water, and that this



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will remain in place for the duration of the construction phase in conjunction with other silt control measures outlined.

- Measures should be taken, in accordance with best practice guideline from Inland Fisheries Ireland (2016) to prevent pollution entering the Whitechurch Stream. These should include storing fuels and dangerous substances in a bunded area at all times. The construction of the bridge will use pre-cast concrete if possible and will be installed following best practice guidelines from Inland Fisheries Ireland. Instream works will be undertaken between July and September. The installation of new surface water outfall points will be done behind bunded structures to prevent any loss of sediment or construction pollutants to the water.
- All construction should be in line with a project specific Construction Environmental Management Plan (CEMP). The CEMP should identify potential impacts and mitigating measures, 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 and groundwater and measures to minimise the generation of sediment and silt.
- 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.
- Should the Local Authority consider granting a temporary Section 4 discharge license to discharge treated site run-off into the Whitechurch stream during the construction phase of the development, IFI recommends that strict and enforceable conditions be attached to any license.
- Should a License be issued to discharge to the Whitechurch stream, it is recommended that there should be a minimum of two sample locations within the site boundaries **1-** at the point of discharge from within the site boundaries and **2-** at the point of discharge from any treatment facility, apparatus or containment structures for the purpose of containment and treatment of run off generated on the site during the construction phase. It is also recommended that there should also be sample locations at the point of discharge into the Whitechurch stream and U/S & D/S of same discharge point.



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- All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.
- 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 take our observations on board when assessing this application.

Regards,

Matthew Carroll

Matthew Carroll

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Inland Fisheries Ireland - Dublin

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