



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

**19/04/2022**

**SHD 313145: 655 no. residential units (257 no. houses and 398 no. apartments). In the townland of Boherboy, Saggart Road, Co. Dublin**

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

- The development is adjacent to the Corbally Stream which merges into the Camac River. This is a recognised salmonid system, under significant ecological pressure as a result of its largely urban situation. Although considerable sections of main channel are culverted, lengths of this river that remain on the surface invariably support self-sustaining populations of brown trout (*Salmo trutta*). The river also support populations of the Freshwater Crayfish (*Austropotamobius pallipes*) and Lamprey (*Lampetra* sp.) species, listed under Annex II of the EU Habitats Directive.
- Various reports supporting this application describe onsite streams as semi-dry ditches. One example describes the Cooldown Stream as: *"The Cooldown Stream is usually a dry ditch which divides the site and it is believed that is a man-made stream. It is an inactive stream which activates only when a heavy rainfall occurs."* IFI carried out a site inspection of the Cooldown stream which flows through the middle of the site and two species of fish were noted; Three spined stickleback and Minnow. Thus, it is vital to protect all these onsite streams during construction and operational phase.
- If permission is granted, all works will be completed in line with the Construction Management Plan (CMP) which ensures that good construction practices are adopted throughout the works period and contains mitigation measures to deal with potential adverse impacts identified in advance of the scheme.
- Before works commence, it is advised to ensure that all construction personnel and contractors are made familiar with and adhere to the mitigation measures in any construction phase surface water management plan, construction management and environmental plans.
- Surface water management (SUDS approach) should not in any way result in a deterioration of water quality or habitat in natural river / stream channels or any receiving waterbody.
- There can be no direct pumping of contaminated water from the works to a watercourse at any time; any dewatering must be treated by either infiltration over



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- land or to a suitably sized and sited settlement pond. A discharge licence may be required from South Dublin County Council.
- Any top soil or demolition material which is to be stored on site must have mitigations in place to prevent any deleterious material entering the river. Drainage from the topsoil storage area may need to be directed to a settlement area for treatment.
- Concrete / cement and other construction materials are highly toxic to aquatic life. Use of these elements should be strictly controlled and monitored. Implementation of comprehensive and strict site housekeeping measures to isolate concrete from local surface waters is essential.
- Precautions must be taken to ensure there is no entry of solids, during the connection or stripping of old pipework to the surface water system.
- Mitigation measures such as silt traps, silt fences and oil interceptors should be regularly maintained during the construction and operational phase. If permission is granted we suggest a condition to require the owner to enter into an annual maintenance contract in respect of the efficient operation of the petrol/oil interceptor.
- It's IFI policy is to maintain watercourses in their open natural state in order to prevent habitat loss, preserve biological diversity and aid in pollution detection. The planned stream crossings and surface water outfalls onsite should be subject to an agreed method statement with IFI.
- Online monitoring and telemetry must provide failsafe and alarm-enabled mechanisms on the new planned foul pumping station discharges in order to protect receiving waters with regular inspection and maintenance schedules.
- It is noted that 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.
- 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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I trust you will take our observations on board.

Kind regards,

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