



**Iascach Intíre Éireann
Inland Fisheries Ireland**

Date: 8th June 2022

Register Reference: SDZ22A/0007 In the townlands of Gollierstown & Aderrig, Adamstown, Lucan, Co. Dublin

Development: Comprising Phase 1 of the Adamstown Boulevard Development Area and consists of 38,768.21sq.m. of residential development to be constructed in a mix of housing and apartment units, with 423 residential units proposed in total

Applicant: Adamstown Station & Boulevard Ltd.

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

The proposed development is within the River Liffey catchment which is a recognised salmonid system, under significant ecological pressure due to urbanisation, power generation and water abstraction. The river supports populations of migratory Salmon and Sea Trout. 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.

All proposed surface water sewers will ultimately drain towards the Tobermaclugg Stream which is mostly culverted through the Lucan Golf Course before discharging to the River Liffey via an existing culvert under the N4

It is essential that site specific, appropriate, and flexible mitigation measures are incorporated into a Construction Environmental Management Plan (CEMP) and that appropriately designed, sized, and maintained drainage measures are incorporated in the final approved design to protect the aquatic environment, post construction.

- 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 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 entering any drainage



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network within or beyond the site boundaries and subsequently entering an adjoining water course.

- All construction should be in accordance with a Construction Environmental Management Plan which ensures that good construction practices are adopted throughout the construction period and contains mitigation measures to deal with potential adverse impacts identified in advance of the scheme.
- 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.
- Pipe laying activity poses a high risk of suspended solid contamination of surface waters, if pumping is required from excavations such as thrust and reception pits or land trenches along the route then, water must be treated by either infiltration over land, discharge to a suitably sized and sited settlement pond or other appropriate treatment infrastructure before discharge to any existing drainage network or watercourse. There can be no direct pumping of contaminated water from the works to a watercourse at any time.
- Precautions must be taken to ensure there is no entry of solids, during the connection of pipework, or at any stage to the existing surface water system. The environmentally sensitive design and implementation of surface water discharge structures would be required to ensure protection of ecological integrity at point of discharge.
- All discharges must follow the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010, or any discharge Licences issued by the Local authorities.
- 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.
- It is recommended that there is a designated, suitably experienced person assigned during the construction phase, to monitor and ensure all agreed environmental mitigation measures are implemented and functioning correctly. The contact details of this appointed person should be provided to all relevant agencies, including IFI.



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- 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

Fisheries Environmental Officer

Inland Fisheries Ireland - Dublin

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Telephone: +353 (0) 1 8842651

EMail: matthew.carroll@fisheriesireland.ie

Address: 3044 Lake Drive, City West, Dublin 24, IRELAND.



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