Iascach Intíre Éireann
Inland Fisheries Ireland

Date: 14th June 2022

Plannning Reference: SD21A/167 Profile Park, Clondalkin, Dublin 22

Construction of a gas fired power plant with an electrical output of up to 125MW with associated balance of plant, equipment and buildings including; an Engine Hall building with a height of 18.9m, comprising 6 gas engines and ancillary infrastructure; an Electrical Annex Building with a height of 18.7m; a Workshop building with a height of 5. 1m; a Tank Farm building with a height of 5.68m; a Security hut with a height of 3.27m; an Exhaust Stack with a height of 31.8m; a Gas AGI including a kiosk with height of 3.3m; Radiator Coolers with a height of 8.46m; 2 electrical transformers with a height of 4.98m; Tanks including 2 x Diesel Oil Storage Tanks (volume of 2500m3 combined); SCR Urea Tank (26m3); Lube Oil Storage Tank (26m3); Lube Oil Maintenance Tank (26m3); Pilot Oil Tank (26m3); Fire Water Storage Tank (1000m3); Effluent Collecting Tank (26m3); Underground Surface Water Attenuation Tank (490m3); 2 new access onto the existing private road network with Profile Park; 12 parking spaces, footpaths, landscaping; fencing and all other associated site development plant and equipment and other works including surface water and foul wastewater drainage.

Applicant: Shane Minehane, Greener Ideas Limited

The Baldonnell Stream is located along the northern boundary of the proposed development site. The stream flows in a north-westerly direction before discharging into the Grifeen River (EPA_Code: 09G01) approximately 2km downstream. The Grifeen River is a tributary of the River Liffey (EPA_Code: 09L01) which flows into Dublin Bay.
Due to the close proximity of the stream, there is potential for sediment laden runoff and/or construction pollution into the watercourse which may result in water quality impacts within, and further downstream into the rivers Grifeen and Liffey.

Where there is 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).
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.

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It is proposed that all surface water will be discharged to the Baldonnel Steam, post construction phase.
IFI are becoming more aware and concerned of the lack of appropriate maintenance on interceptors, attenuation tanks and the general drainage infrastructure on some developments in the operational phases and would encourage that the appointed site management/maintenance company, post construction phase be required to enter a service maintenance contract with an authorised specialised company with responsibility for the maintenance of this same infrastructure.

- 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.

- 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.

- 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 (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.

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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/

- IFI have recently published the following guidelines which should be referred to and can be accessed on our website 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.

Regards,

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