



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

**10<sup>th</sup> June 2022**

**SHD3ABP-313590-22:** demolition of existing substation and removal of existing advertisement structure on site and the construction of a residential development of 197 apartments.

**Applicant:** Greenhills Living Limited

Dear Sir/Madam,

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

The proposed development site is located within the Poddle river system, which places it within the wider catchment of the River Liffey.

The River Poddle flows approximately 80m to the south. The direction of flow is towards the east, where Poddle ultimately joins the River Liffey in Dublin City centre.

The River Poddle is assessed as 'poor status' under the Water Framework Directive reporting period 2015-2018 throughout its length.

The transitional waters of the Liffey Estuary Upper is 'good status' at the point where it meets the Poddle while the Liffey Estuary Lower and the marine area of Dublin Bay are also 'good status' which must be maintained.

There is a direct hydrological pathway to the River Poddle, via the surface sewer and indirectly to the River Liffey via the above from the proposed development.

It is essential that adequate measures are in place during both the construction and post construction phases of the development to protect the aquatic environment.

Surface runoff of deleterious material entrained including suspended sediment, fuels and materials being used on-site during the construction or post construction phase of a development could potentially impact the receiving water quality.

IFI are becoming more aware of the lack of appropriate maintenance on interceptors, attenuation tanks 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.

- The developer must take adequate precautions to ensure there is no entry of solids, during the connection of pipework, to the existing surface water system.
- 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.

- All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.
- All construction should be in line with a project specific Construction Environmental Management Plan (CEMP). The CEMP should be robust and 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.
- Pipe laying activities, general ground works and pipe connections poses a high risk of suspended solids and other deleterious matter entering surface waters, especially where there is existing connections on-site to the surface water drainage network, which is hydraulically connected to water courses. If pumping is required from excavations such as thrust and reception pits or land trenches along the route then water must be treated before discharge to any existing drainage network. There can be no direct pumping of contaminated water from the works to a watercourse at any time.
- Storage of any excavated soil from the construction activities should be sited well away from and any drainage system and measures should be taken to prevent any ingress of same into the drainage network within or beyond the site boundaries.
- Should development proceed, best practice should be implemented at all times in relation to any activities that may impact on surface water (stream and river) or receiving waters.
- 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/>



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I trust you will take our observations into consideration when assessing this application.

Regards,

Matthew Carroll

Fisheries Environmental Officer

Inland Fisheries Ireland - Dublin

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