



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

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

**SD22A0157:** The proposed development consists of a change of dwelling type and increase in number from 17 permitted houses to 26 proposed houses

**Applicant:** Capami Ltd

Dear Sir/Madam,

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

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 and attenuation tanks on some developments in the operational phases and would encourage that a condition of planning should be considered where 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.



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

- 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, then the water must be treated before discharge to any existing drainage network. There can be no direct pumping of contaminated water from the works to existing drainage networks or watercourses 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.
- It is noted that there are two substantially sized underground Surface Water Attenuation Tanks proposed within the site boundaries. One of these tanks on the Western boundary, where it is stated on drawing entitled "*Proposed Foul & Surface Water Drainage Layout Sheet 1 of 2*" and that "*Proposed outfall to existing ditch. Contractor to confirm before construction commences*" It is unclear as to what is to be confirmed and whether there is direct connectivity between the ditch and any adjoining surface water courses.
- The site may also be suitable for the incorporation of Nature-based Solutions for the Management of Rainwater which could possibly be considered as opposed to hard engineered below ground solutions for the management of surface water. 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/>

Matthew Carroll

Fisheries Environmental Officer

Inland Fisheries Ireland - Dublin

**Iascach Intíre Éireann**

**Inland Fisheries Ireland**

**Telephone:** +353 (0) 1 8842651

**EMail:** [matthew.carroll@fisheriesireland.ie](mailto:matthew.carroll@fisheriesireland.ie)

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



**Iascach Iníre Éireann**  
**Inland Fisheries Ireland**



**Iascach Iníre Éireann**  
**Inland Fisheries Ireland**

