



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

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

**SHD 313760:** 310 no. Build to Rent apartments. Lands at Belgard Square East, Belgard Road and Blessington Road. Tallaght, Dublin 24.

Dear Sir/Madam,

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

The nearest surface water receptor are the Tymon River and the Jobstown Stream, which are located c. 370 m to the northeast and c. 410 m to the south of the site respectively. The Tymon River crosses the Tymon Park and becomes the Poddle River downstream c. 2.7 km northeast of the site. The Poddle River eventually discharges into the River Liffey in Dublin Centre c. 9 km to the northeast of the site. The Jobstown Stream is a tributary of the Dodder River to which joins it at the Dodder Valley Park c. 2 km to the southeast of the proposed development site. The Dodder River ultimately discharges into the River Liffey at Ringsend c. 11 km to the northeast of the site.

There is a hydrological linkage for construction and operation run-off via the existing stormwater network into the Dodder river system (c. 1.7 km to the southeast of the site). This connectivity poses a high risk to aquatic life within the river, especially during the construction phase from the accidental release of deleterious materials from the site into the stormwater network and subsequent discharge into the Dodder catchment. It is essential that adequate measures are in place during both the construction and operational 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 during 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.

It is noted that in a number of the supporting reports for the planning application, it is stated that in the event of a discharge of deleterious materials into the river system, that the river will act as a means of protecting receiving Natura sites by diluting the discharge to background levels (see example below).



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*“Should any silt-laden stormwater from construction or hydrocarbon-contaminated water from a construction vehicle leak/tank leak manage to enter into the surface water sewer, the suspended solids will naturally settle within the sewer; however, in the event of a worst case hydrocarbon leak of 1,000 litres this would be diluted to background levels (water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019) by the time the stormwater reaches the nearest Natura 2000 Sites (South Dublin Bay, c. 11 km downgradient).*”

IFI does not believe that any watercourse should be considered as a possible means of mitigation or attenuation for possible discharges from construction sites and it should not be inferred that they can act in this capacity. All discharges from construction sites either directly or indirectly, via the surface water storm network at all phases of the development must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.

- 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.
- All the recommendations contained in the *Outline Construction Environmental Management Plan- 6.4 Operational Controls- 6.4.2 control of emissions to surface water drainage* should be adopted into the final CEMP for the site.
- 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.
- 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.
- 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 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.



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- 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/>

Regards,

Matthew Carroll

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