



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

**6<sup>th</sup> July 2022**

**SHD 313777:** 100 no. apartments and retail outlets. Lands at No.2 Firhouse Road and the former 'Mortons, The Firhouse Inn, Firhouse Road, Dublin 24.

Dear Sir/Madam,

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

The closest surface water feature to the proposed development is the Dodder River, located c. 180 m to the north of the site. The River Dodder continues to flow north east for a further ~9.4 km before discharging into the Liffey Estuary lower transitional waterbody which in turn discharges into Dublin Bay coastal.

Stormwater from the proposed development site shall discharge to the existing 300 mm surface water sewer located on the Mount Carmel Park road, and which is being diverted from its current location which runs diagonally across the rear of the site. The stormwater will ultimately outfall to the River Dodder.

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 one of the supporting reports for the planning application, it is stated that:

*“Given the nature of the proposed residential and commercial development site, there will not be perceptible effect on the River Dodder taking into account the extent of loading of contaminant, distance between the source and the river and significant dilution in the surface water sewer will ensure any released hydrocarbons (or other contaminants) are at background levels (i.e., with no likely impact above 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). Therefore, there will no effect on the ability for the River Dodder to attain a ‘Good’ status in the future”.*



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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.

Given that there will be direct connectivity from the site, via the storm water network to the river dodder catchment, there is the potential for discharges into the Dodder during the construction and post construction phases of the development.

Considering this risk, 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.

The current CEMP requires strengthening in these areas and it is suggested that appropriate measures are formulated in consideration of standard best international practices and should incorporate the following measures:

- Existing storm drain inlets which could receive stormwater from construction activities should be protected throughout the construction phase. Inlet protection should be provided and installed in advance of works commencing on site
- Run-off from the working site area, or any areas of exposed soil must be channelled and intercepted at regular intervals for discharge to silt traps or lagoons. Surface water run-off should be treated using appropriate measures such as silt trays/settlement ponds and temporary interceptors and traps.
- Any pumping of concrete should be monitored to ensure no accidental discharges.
- Mixer washings should not be discharged on-site. All excess concrete should be removed from site and all washout of concrete chutes should be captured in appropriate receptacle and removed from site for appropriate disposal.
- If cast in place concrete is required, all work must be carried out in the dry and isolated from any existing onsite drainage networks.
- 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.



- A contingency plan should be in place in the event of an extreme rain event to deal with potential breakouts of silt laden washout that may enter the storm network.
- Re-fuelling of plant and machinery during the construction phase should be carried out in accordance with standard best practice. Re-Fuelling should only be carried out in a designated area, on an impermeable surface with appropriate containment in place.
- Maintenance of plant and machinery such as oil changes should also take place in a designated secure area. Drip trays and spill kits must be available during any scheduled or unscheduled maintenance of plant and machinery.
- Any fuels, oils, or lubricants to be stored on site must be in an appropriately sized bunded area.
- 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.
- 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.
- 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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Regards,

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