



**Iascach Intíre Éireann
Inland Fisheries Ireland**

16th August 2022

Planning Reference - SD22A/0303

Project Proposal - Construction of a Volatile Organic Compound (VOC) Abatement system comprising of a thermal oxidiser (TO), associated plant equipment and scrubbers positioned on a bunded concrete plinth with a maximum single stack height of 12m along with two access platforms at 2.5m high and 5.0m high used for maintenance

Applicant: Takeda Ireland Limited

Dear Sir/Madam,

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

The proposed development is adjacent to Griffeen River and will have direct hydraulic connectivity to the River, via the drainage network.

This connectivity in the absence of appropriate mitigation measures during both the construction and operational phase of the development poses a risk to the receiving aquatic environment.

The current WFD status for the Griffeen River is Moderate which must be returned to Good status by 2027.

Ireland has a legal obligation in accordance with The [EU Water Framework Directive \(2000/60/EC\)](#) requires all Member States to protect and improve water quality in all waters so that we achieve good ecological status by 2015 or, at the latest, by 2027. It was given legal effect in Ireland by the [European Communities \(Water Policy\) Regulations 2003 \(S.I. No. 722 of 2003\)](#).

IFI have concerns that the proposed development in combination with other developments within the catchment, which are using the Griffeen River and its Tributaries as the final discharge point for treated and attenuated surface water generated pre and post construction phases.

- 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 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



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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.
- All construction should be in line with a detailed site-specific Construction Management Plan (CEMP). The CEMP should 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 measures to minimise the generation of sediment and silt. The developer must take precautions to ensure there is no entry of solids, during the connection of pipework, or at any stage to the existing surface water system. IFI recommends that all the mitigation measures outlined in the EIA, to reduce the risk to surface water contamination are adopted into the final CEMP.
- Any new flood mitigation measures, that involve direct access or changes in or to the Griffeen River channel, such as the installation or alterations to existing culverts, widening of the existing channel, etc, shall only be undertaken, subject to prior consultation and agreement with IFI.
- IFI recommended that there is a designated, suitably experienced, and qualified person assigned during the construction phase, to monitor and ensure all conditioned and agreed environmental mitigation measures are implemented and functioning correctly. The contact details of this appointed person are to be provided to all relevant agencies, including IFI.



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Regards,

Matthew Carroll

Fisheries Environmental Officer

Inland Fisheries Ireland - Dublin

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