



**Iascach Intíre Éireann
Inland Fisheries Ireland**

15th September 2022

SD22A0333 Construction of 2 adjoined single storey data centres with associated office and service areas with an overall gross floor area of 15,274sq.m

Location: Site within the townland of Ballymakailly, West of Newcastle Road (R120), Lucan, Co. Dublin

Applicant: EdgeConneX Ireland Limited

Dear Sir/Madam,

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

The proposed development has hydraulic connectivity to the Griffeen River, via the proposed surface water management system

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.

IFI have concerns that the proposed development in combination with other developments in the area, which are using the Griffeen River and its Tributaries as the final discharge point for treated and attenuated surface water may lead to a further deterioration in water quality.

- 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 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.



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- 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 EIAR, to reduce the risk to surface water contamination are adopted into the final CEMP.
- Appropriately sized bunded areas should be provided for all areas where fuels or oils are to be stored.
- Installation of any new surface water outfall points should be behind bunded structures to prevent any loss of sediment or construction pollutants to the water.
- IFI recommended that a suitably experienced, and qualified person is employed to implement all agreed environmental mitigation measures.

IFI have noted a lack of appropriate maintenance on interceptors, attenuation tanks on several developments in the operational phases and would encourage that a robust post construction maintenance agreement/condition is put in place for the maintenance of this same infrastructure.

SuDS measures such as interceptors and attenuation tanks are only effective in protecting the aquatic environment into which they discharge if they are maintained and serviced at appropriate intervals.

Regards,

Matthew Carroll

Fisheries Environmental Officer

Inland Fisheries Ireland - Dublin

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