

**Date:** 18<sup>th</sup> November 2022

Register Reference: SDZ22A/0014

**Development:** Development on 2 sites separated by the permitted

Celbridge Link Road with a total area of 6.36 Ha

**Applicant:** Quintain Developments Ireland Limited

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

The proposed development is within the River Liffey catchment, which is a recognised salmonid system.

The river Liffey is under significant ecological pressure from several sources such as urbanisation, power generation and water abstraction.

The river supports populations of migratory Salmon and Sea Trout.

Other species include the protected European eel, Freshwater Crayfish

(Austropotamobius pallipes) and Lamprey (Lampetra sp.) species, listed under Annex II of the FU Habitats Directive.

Surface water during both the construction and operational phase of the proposed development will ultimately discharge into the Backweston/Tobermaclugg Stream before finally discharging into the River Liffey via an existing culvert under the N4

SuDS measures, such as interceptors and attenuation tanks are only effective in protecting the aquatic environment providing that they are maintained and serviced at appropriate intervals.

IFI are becoming aware of the lack of appropriate maintenance on interceptors, attenuation tanks and other agreed SuDS measures during the operational phases of developments and would encourage that a planning Condition is put in place for the maintenance of any agreed drainage infrastructure, that will not be taken in charge by the LA or I.W. post construction

It is recommended that all the proposed protection and mitigation measure recommended in the various reports, to protect surface water and groundwater sources during both the construction and operational phases of the development, should be adopted in their entirety.

IFI would also encourage that the application of nature-based solutions be incorporated as part of the drainage attenuation design, where appropriate and feasible, for surface water management.



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 <a href="mailto:should-be-considered">should-be-considered</a> when designing drainage systems. <a href="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/</a>

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.

IFI have published the following guidelines which should be referred to at the design stage of a project to ensure protection of the aquatic environment.

GUIDELINES ON PROTECTION OF FISHERIES DURING CONSTRUCTION WORKS IN AND ADJACENT TO WATERS

https://www.fisheriesireland.ie/sites/default/files/migrated/docman/2016/Guidelines%20Report%202016.pdf

## Regards,

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