



**Iascach Intíre Éireann
Inland Fisheries Ireland**

Date: 7th March 2023

Register Reference: SDZ23A/0004

Development: 385 dwelling units (139 houses, 70 Build-to-Rent duplex / apartments, 72 duplex / apartments and 104 apartments), ranging between two to six storeys in height

Applicant: Clear Real Estate Holdings Limited

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

The proposed development is within the wider River Liffey catchment which is a recognised salmonid system which is under significant ecological pressure from various sources, such as power generation, water abstraction and development. 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 EU Habitats Directive.

The Griffeen River which is an important tributary of the R. Liffey runs 35m to the East/South East of the site and is hydrologically connected to the R. Liffey North of the site. The proximity of the site to the River Griffeen and the hydrological connection to the R. Liffey poses a significant risk to water quality during both the construction and operational phases of the development if there is not suitable mitigation and control measures implemented at all phases of the development.

It is recommended that all of the site specific mitigation measures to protect the aquatic environment that are referenced in supporting reports including the (CEMP) and Construction Surface Water Management Plan are conditioned as part of any final approval.

There should be minimum disturbance to South-Eastern boundary adjacent to the Griffeen River in accordance with the Clonburris Planning Scheme SDZ

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)



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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 entering any drainage network within or beyond the site boundaries and subsequently entering an adjoining water course.

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 at the operational phase of developments and would encourage that a planning condition requiring the maintenance of any agreed drainage infrastructure, that will not be taken in charge by the LA or I.W. post construction is included as part of any permission.

It is recommended that suitably qualified, experienced person is employed during the construction phase, to monitor and ensure all agreed environmental mitigation measures are implemented and functioning correctly. The contact details of this appointed person should be provided to all relevant agencies, including IFI.

Matthew Carroll

Fisheries Environmental Officer

Inland Fisheries Ireland - Dublin

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