



**Iascach Intíre Éireann
Inland Fisheries Ireland**

11th August 2023

SD22A/0457 Permission is sought for a cemetery including: 8, 047 No. traditional burial plots; Columbarium walls; 1 single storey reception building (214.7m² Gross Floor Area (GFA)) comprising a reception, 1 office, 1 reception store, WC, kitchenette with photovoltaic (PV) solar panels at roof level; and the provision of an ancillary maintenance shed, bin and battery storage structures;

Location: Land at Citywest Hotel and Convention Centre, Saggart, Co. Dublin

Applicant: Cape Wrath Hotel Unlimited

Dear Sir/Madam,

IFI have reviewed the planning application and associated documentation and make the following observations for your consideration.

The proposed development is within the Camac River catchment which will be the receiving waterbody for the surface water runoff generated from within the site at both the construction and operational phases of the development.

The Camac River is a recognised salmonid system, which is under significant ecological pressure primarily resulting from the significant development taking place within the catchment. Although considerable sections of main channel are culverted, sections that remain on the surface invariably support self-sustaining populations of Brown trout (*Salmo trutta*). The river also supports populations of migratory Sea trout in the lower reaches. 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 Camac will be the conduit for the conveyance of any deleterious material that may enter the river at any point during the development to connected Natura sites, so it is essential that all appropriate mitigation measures are implemented to ensure the protection of both the river Camac and connected Natura sites.



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In response to a further information request from the planning authority "*The applicant is requested to demonstrate consultation with Inland Fisheries Ireland on surface water quality issues and incorporate any recommendations of IFI, given the nature of the proposed use*". You are referred to CS Consulting's additional information document, where they state that they have had discussions with IFI and have taken their views regarding the provision of a box culvert to bridge the existing watercourse and have submitted a revised drawing CTW-CSC-ZZ-XX-DR-C-0102 incorporating a box culvert as opposed to a 900mm culvert pipe as instructed by the LA.

IFI expressed their preference for maintaining an open channel where possible and that if a box culvert was the only option, then it was requested that the floor of the culvert should be embedded below the existing stream level at both the up & downstream side of the culvert openings and that no impediment to the passage of fish should be created.

It is unclear from the submitted drawings or correspondence whether this request has been accommodated.

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 within the river Camac system.

A comprehensive and integrated approach for achieving stream protection during construction phase should be implemented.

It is recommended that there is a detailed site-specific Construction Environmental Management Plan (CEMP) for the project. 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.

All discharges from construction sites either directly or indirectly, via the surface water storm network at all phases of the development must comply with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.



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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>

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