



Iascach Intíre Éireann
Inland Fisheries Ireland

Date: 10th May 2022

SHD 313278: 335 no. residential units. White Heather Industrial Estate, South Circular Road & 307/307a South Circular Road & 12a St James's Terrace, Dublin 8

Dear Sir/Madam,

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

IFI note, that the developer proposes to discharge both surface and foul water during the construction and operational phase of the proposed development to a newly constructed drainage network within the site, which will discharge to an existing combined surface/foul network.

This would be an acceptable proposal, subject to receipt of appropriate discharge licences and approvals from the relevant authorities in conjunction with a detailed site-specific CEMP to protect the receiving environment which is Dublin Bay.

- All construction should be in line with a project specific Construction Environmental 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 groundwater and measures to minimise the generation of sediment and silt.
- The developer must take adequate precautions to ensure there is no entry of solids, during the connection of pipework, to the existing surface water system.
- It is essential that the receiving foul and storm water infrastructure has adequate capacity to accept predicted volumes from this development during construction and post construction phases with no negative repercussions for the quality of any receiving waters. Ringsend WWTP is currently working at or beyond its design capacity and won't be fully upgraded until 2023.
- Construction works as envisaged have significant potential to cause the release of sediments into surrounding watercourses. Any overburden material stored on site, must have mitigation measures in place to prevent any deleterious material entering the surface water network.



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- 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 should be considered when designing drainage systems.
<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/>
- All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.

Regards

Matthew Carroll

Fisheries Environmental Officer

Inland Fisheries Ireland - Dublin

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