



Iascach Intíre Éireann  
Inland Fisheries Ireland

**Date: 12<sup>th</sup> May 2022**

**Re: SDH 313281**- 534 no. Build to Rent apartments. "Barrington Tower",  
Brennanstown Road, Dublin 18.

Dear Sir/Madam,

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

The Carrickmines Stream is not located within the site boundary. However, it is downhill of the proposed works just outside the site outline and would be susceptible to surface water runoff in the absence of mitigation.

The Carrickmines stream will also be the final discharge point for attenuated water post construction phase of the proposed development, which will further increase pressures on the system if all the proposed mitigation measures such as hydrocarbon interceptors, attenuation tanks are not properly maintained and serviced at the required intervals.

IFI have noted a lack of appropriate maintenance on interceptors, attenuation tanks on some developments in the operational phases and would encourage that the appointed management company be required to enter a service maintenance contract with an authorised specialised company with responsibility for the maintenance of this same infrastructure.

Surface runoff of deleterious material entrained including suspended sediment, fuels and materials being used on-site during the construction works could potentially impact the receiving water quality in the Carrickmines Stream.

IFI have concerns that as a result of the proposed development in combination with other developments within the catchment, which are using the river and stream systems (Ticknick, Carrickmines, Shangannagh) as the final discharge point for treated and attenuated surface water generated pre and post construction, that there will be a high probability that Ireland will not be able to comply with their legal obligations as set out in the EU Water Framework Directive in these catchments.

The most recent surface water quality data for the Carrickmines Stream (2020) indicate that it is 'Unpolluted, with the most recent Q values, indicated a welcome improvement to good ecological conditions in June 2020, however **excessive siltation of the substratum** was observed.

Good ecological status must be maintained within the Carrickmines River with appropriate and specific mitigation measures being implemented on all construction sites within the catchment to ensure that there are no uncontrolled discharges of deleterious materials directly or indirectly into surface waters that may result in a deterioration in water quality.



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IFI are opposed to any culverting or re-routing of any surface water course, temporary or otherwise, pre or post construction phases, except for in extreme or emergency situations. We would also encourage that the application of nature-based solutions be incorporated as part of the drainage attenuation design for surface water management as opposed to the usual default to hard engineering solutions, such as underground attenuation tanks.

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 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. Precautions must be taken to ensure there is no entry of solids, during the connection of pipework, or at any stage 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. It is essential that local infrastructural capacity is available to cope with increased surface and foul water generated by the proposed development in order to protect the ecological integrity of any receiving aquatic environment.
- All discharges from the site must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.
- 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
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any time and arrangements must be made for the control and management of any contaminated water resulting from construction.

- Any proposed works directly adjacent to or within the stream can only be completed between the months of July and September in any given year and not without prior consultation and notification to IFI.
- It is recommended that there is a designated, suitably experienced, and qualified person is assigned during the construction phase, to monitor and ensure all conditioned and 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.

I trust you will take our observations on board when assessing the proposed Greenway Route.

Regards,

Matthew Carroll

Fisheries Environmental Officer  
Inland Fisheries Ireland - Dublin

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