



Iascach Intíre Éireann
Inland Fisheries Ireland

Date: 29th April 2022

Re: SDH 313322- 443 no. residential units. Priorsland, within the townlands of Carrickmines Great and Brennanstown, Dublin 18.

Dear Sir/Madam,

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

The Carrickmines river runs to the north of the proposed development, from west to east. The Ticknick stream runs along the eastern border of the site, from south to north. It then joins the Carrickmines river at a point adjacent to the north east corner of the development site

The Ticknick Stream is associated with the surface waterbody 'Carrickmines Stream_010' (WFD code IE_EA_10C040350). The most recent WFD Status score (2013-2018) classifies this waterbody as 'Moderate' and 'At Risk of not achieving good status'.

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.

Ireland has a legal obligation in accordance with The [EU Water Framework Directive \(2000/60/EC\)](#) which requires all Member States to protect and improve water quality in all waters so that we achieve good ecological status by 2015 or, at the latest, by 2027. It was given legal effect in Ireland by the [European Communities \(Water Policy\) Regulations 2003 \(S.I. No. 722 of 2003\)](#).

Good ecological status must be maintained within the Ticknick, Carrigmines River systems 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.

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, Carrigmines, 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 struggle to comply with their legal obligations as set out in the EU Water Framework Directive in these catchments.



Iascach Intíre Éireann
Inland Fisheries Ireland

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.

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/>

- Measures should be taken, in accordance with best practice guideline from Inland Fisheries Ireland (2016) to prevent pollution entering the Carrigmines/Ticknick streams. These measures should include storing fuels and dangerous substances in a bunded area at all times. Any proposed Instream works will be undertaken between July and September. Installation of new surface water outfall points will be done behind bunded structures to prevent any loss of sediment or construction pollutants to the water.
- 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 pipe-work, 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.
- Should the Local Authority consider granting a temporary Section 4 discharge license to discharge treated site run-off into the Ticknick or Carrigmines streams during the construction phase of the development, IFI recommends that discharge limits particularly for suspended solids be conditioned at conservative values. The license should be enforceable and monitored should be undertaken at regular intervals.
- Should a License be issued to discharge to the Ticknick or Carrigmines stream, it is recommended that there should be a minimum of two sample locations within the



Iascach Intíre Éireann
Inland Fisheries Ireland

site boundaries **1-** at the point of discharge from within the site boundaries and **2-** at the point of discharge from any treatment facility, apparatus or containment Structures used for the purpose of containment and treatment of run off generated on the site during the construction phase. It is also recommended that there should also be sample locations U/S & D/S of the discharge point into receiving waters

- All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.
- IFI recommends a minimum of a 10m vegetated, undisturbed riparian buffer zone is maintained between any water course and construction works. This riparian buffer should be protected during the construction phase using adequately designed and functioning mitigation measures, which should be outlined and agreed in a site-specific CEMP. It is further recommended that the existing vegetation adjacent to any river or within the recommended 10m riparian buffer zone be maintained in its natural state unless it can be demonstrated that it is having a negative impact on the adjacent aquatic environment or contains invasive plant species.
- 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 any time and arrangements must be made for the control and management of any contaminated water resulting from construction.
- 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.



Iascach Intíre Éireann
Inland Fisheries Ireland

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

Iascach Intíre Éireann
Inland Fisheries Ireland

Telephone: +353 (0) 1 8842651

Email: matthew.carroll@fisheriesireland.ie

Address: 3044 Lake Drive, City West, Dublin 24, IRELAND.



Iascach Intíre Éireann
Inland Fisheries Ireland

