



Iascach Intíre Éireann  
Inland Fisheries Ireland

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

**SHD 313338:** 207 no. Build to Rent apartments. Junction of Ravens Rock Road and Carmanhall Road, Sandyford, Dublin 18.

**Applicant:** Sandyford Environmental Construction Ltd

Dear Sir/Madam,

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

The proposed development is in the Carysfort Maretimo Stream catchment, so surface water drainage will ultimately discharge to Brewery Stream/Carysfort Maretimo Stream and then the Irish Sea in Dublin Bay coastal water which hosts the South Dublin Bay Special Area of Conservation (SAC), South Dublin Bay and River Tolka Estuary Special Protection Area (SPA) and proposed National Heritage Area (pNHA) habitats.

Surface runoff of deleterious material entrained including suspended sediment, fuels and materials being used on-site during the construction or post construction phase of a development could potentially impact the receiving water quality.

IFI are becoming more aware of the lack of appropriate maintenance on interceptors, attenuation tanks on some developments in the operational phases and would encourage that the appointed site management/maintenance company, post construction phase be required to enter a service maintenance contract with an authorised specialised company with responsibility for the maintenance of this same infrastructure.

- Should Appropriate discharge licenses be required from Dún Laoghaire-Rathdown County Council in respect of discharges from dewatering or other construction operations on-site, it is recommended that the discharge limits, particularly for Suspended Solids should be set at conservative levels with at least one of the sampling/monitoring locations being at the direct point of discharge from the site boundaries.
- 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.
- All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.



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- All construction should be in line with a project specific Construction Environmental Management Plan (CEMP). The CEMP should be robust and 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.
- Should development proceed, best practice should be implemented at all times in relation to any activities that may impact on surface water (stream and river) or receiving waters.
- 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/>

I trust you will take our observations into consideration when assessing this application.

Regards,

Matthew Carroll

Fisheries Environmental Officer

Inland Fisheries Ireland - Dublin

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