



**Iascach Intíre Éireann**  
**Inland Fisheries Ireland**

**29/08/2022**

**RE: DART+ West**

The DART expansion corridor will transect many important river systems in the Greater Dublin area.

- The Royal canal supports significant populations of coarse fish not to mention a range of other freshwater aquatic species, plus all associated floral and faunal components in adjacent habitats.
- The River Rye Water supports a resident population of Brown trout, a migratory population of Sea trout and importantly a healthy population of the Atlantic salmon. The Lyreen River, is an important salmonid tributary of the River Ryewater.
- The Tolka River supports Atlantic salmon, Lamprey (Habitats Directive Annex II species) and Brown trout populations in addition to other fish species.
- The Liffey system is exceptional in supporting Atlantic salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive) in addition to resident Brown trout (both *Salmo trutta*) populations. The Liffey River also supports populations of the Freshwater Crayfish (*Austropotamobius pallipes*) and Lamprey (*Lampetra* sp.) species listed under Annex II of the EU Habitats Directive.
- Migratory Atlantic salmon, Sea trout, and Lamprey (juvenile fish on their seaward run and adult fish returning from the sea to spawn) have to pass through the Liffey Estuary /Dublin Harbour to reach the sea or return to their spawning grounds. Large numbers of eels also migrate through this area. Estuaries / transitional waters include a variety of different habitats. Their importance to fisheries relate to the fact that migratory fish must pass through these zones on their passage to / from the sea, while such transitional waters also act as important spawning / nursery areas for a wide variety of different marine fish species.
- A comprehensive and integrated approach for achieving estuary and river protection during construction and operation should be implemented through environmental construction management planning. The disturbance of riparian habitats should be minimised. An undisturbed buffer zone between development areas and river banks should be maximised.



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- Spencer Dock station will be constructed below ground. This will require large ground works near the River Liffey. A comprehensive Construction Environmental Management Plan (CEMP) must be compiled to ensure the protection of the Liffey estuary. Particular attention should be given to the treatment and disposal of groundwater encountered during the excavation works.
- A comprehensive Construction Environmental Management Plan (CEMP) must be compiled for the Coolmine, Porterstown and Clonsilla crossings, which could potentially could negatively impact the canals. Waterways Ireland should be consulted in relation to any works that could potentially impact on the canal.
- A detailed design and agreed method statements is essential for watercourse crossings where instream works are proposed. It is vital that these works are scheduled between July 1st and September 30<sup>th</sup>.
- The planned 400m realignment of the of Ballycaghan Stream will be subject to agreed detailed design and method statement with IFI.
- Any utility diversions that cross watercourses should be done by directional drilling in order to protect the riverine habitat. The timing constraints do not apply to directional drilling which may take place at any time of year subject to agreement with IFI on a method statement and location of crossing points.
- Drainage works should ensure adequate attenuation measures are in place and silt and petrol interceptors, constructed wetlands and swales should be employed where appropriate to reduce pollutants from the railway and compounds entering watercourses.
- There can be no direct pumping of contaminated water from the works to a watercourse at any time. Any dewatering of ground water during excavation works must be pumped into an attenuation area before being discharged offsite.
- Surface water outfalls to any watercourse must have detail design and subsequent method statements submitted to IFI for approval.
- Precautions must be taken to ensure there is no entry of solids, during the connection of any pipework to the surface water system.





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- It is recommended that the "Guidelines on protection of fisheries during construction works in and adjacent to waters" (2016) be consulted particularly in the vicinity of surface water features.

- IFI have recently published the following guidelines which should also be referred to during construction. They can be accessed on our website [www.fisheriesireland.ie](http://www.fisheriesireland.ie) :

Revised **"Planning for watercourses in the urban environment"** which can provide guidance on site specific measures to enhance, protect, rehabilitate or establish riparian and aquatic habitats.

- It is respectfully highlighted that appropriate environmental protection measures are the responsibility of the developer and contractor involved, and all works are subject to the provision of the Local Government (Water Pollution) Act 1977 (as amended) and the Fisheries (Consolidation) Act 1959 (as amended). Ongoing aquatic ecological monitoring both during construction and operational phases should be implemented.

I trust you will take our observations on board.

Kind regards,

Roisin O' Callaghan

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