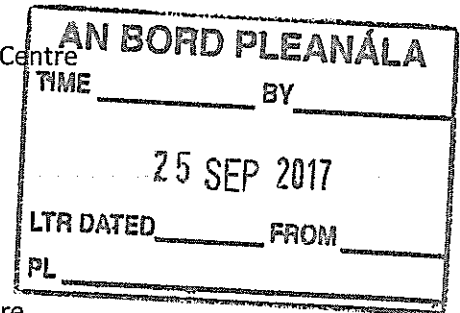


Kieran Somers

From: SIDS
Sent: Tuesday 26 September 2017 10:55
To: Kieran Somers
Subject: FW: Ref JA0040 South Dublin County Council Dublin Mountain Visitor Centre

From: Bord
Sent: Monday 25 September 2017 13:11
To: SIDS <sids@pleanala.ie>
Subject: FW: Ref JA0040 South Dublin County Council Dublin Mountain Visitor Centre

From: Gretta Hannigan [<mailto:Gretta.Hannigan@fisheriesireland.ie>]
Sent: Monday 25 September 2017 12:44
To: Bord <bord@pleanala.ie>
Subject: Ref JA0040 South Dublin County Council Dublin Mountain Visitor Centre



The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

South Dublin County Council Application under Section 175(3) of the Planning and Development Act 2000 (as amended) for Approval of Proposed "Dublin Mountains Visitor Centre" Development

Dear Sir,

Inland Fisheries Ireland have examined the above application by South Dublin County Council for provision of proposed "Dublin Mountains Visitor Centre" Development.

The proposed development is located in the catchment of the Owendoher River a tributary of the Dodder. The Owendoher is the most important nursery and recruitment tributary in the Dodder system. The Dodder system is exceptional among most urban river systems in the area in supporting Atlantic salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive, Lamprey species (*Lampetra* sp.) and Sea trout in addition to resident Brown trout (both *Salmo trutta*) populations. The presence of these fish populations highlights the sensitivity of the Owendoher R. and the Dodder catchment in general. Thus, it is vital to note that salmonid waters constraints apply to any development in this area.

Fishery habitat is regarded as particularly good for all salmonid life stages throughout the Owendoher/Dodder system. The Owendoher River represents a valuable resource both in terms of local natural heritage (biological diversity value) and particularly from a native fisheries perspective. This system constitutes a local natural heritage feature warranting careful protection and conservation.

Ground preparation and associated construction works, including large-scale topographic alteration, the creation of roads, car parks, pipe-laying and buildings (as proposed), 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. All works must be completed in line with a Construction Management Plan (CMP) and a Construction Erosion and Sediment Control Plan which ensures that good construction practices are adopted throughout the construction period and contains mitigation measures to deal with potential adverse impacts identified in advance of the scheme. The CMP should provide a mechanism for ensuring compliance with environmental legislation and statutory consents. All enabling works including topsoil stripping, access road installation, and temporary site office construction must be detailed in a Construction Management Plan. In the preparation of the CMP particular account must be taken in relation to bio security. To prevent the spread of hazardous invasive species and pathogens, high pressure steam cleaning of all items of plant and equipment to be used at and adjacent to waters must be undertaken prior to use. All PPE must be disinfected prior to use.

Any permission must include an Invasive Species management Plan.

Detail is required on the creation and upgrading of trails. What is the typical path width and depth? Will construction involve excavation, what materials will be used, are there drainage considerations, are there maintenance considerations? If the construction involves excavation will this result in surplus material and if so how will this be managed?

Best available technology (BAT) mitigation measures should be a condition of any permission to ensure protection of the surface water and ground water system during both construction and operational programmes. The implementation of a SUDS system which restricts discharge to predevelopment rates (as advocated in the Greater Dublin Strategic Drainage Study) on the site is welcomed. The maintenance of any attenuation structures (e.g. de-silting operations) must not result in the release of contaminated water to the surface water network. Again and in all cases, it is essential that only clean and uncontaminated surface water should be discharged from the site to the local surface water network. Precautions must be taken to ensure there is no entry of solids to the Glendoo/Owendoher Catchment during the connection of pipework to the existing surface water system. Petrol/oil interception should be in place on primary surface water discharges to protect receiving freshwaters in terms of water quality. If permission is granted we suggest a condition to require the owner/management company to enter into an annual maintenance contract in respect of the efficient operation of the interceptors. The environmentally-sensitive design and implementation of surface water discharge structures would be required to ensure protection of ecological integrity at the point of discharge.

Filling of old field boundaries must be avoided. Surface water drains and ditches should be retained with adequate buffer zones in order to protect surface water drainage systems.

Concrete / cement and other construction materials are highly toxic to aquatic life. Use of these elements should be strictly controlled and monitored. Implementation of comprehensive and strict site housekeeping measures to isolate concrete from ground and surface waters is essential. Again, all concrete works must be completed in the dry. Groundwater vulnerability is rated as high to extreme for this site therefore the use of concrete for foundations and hardstanding areas must be in line with best practice and not result in groundwater contamination. All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.

It is essential that the receiving foul water infrastructure has adequate capacity to accept predicted volumes from this development with no negative repercussions for quality of treatment, final effluent quality and the quality of receiving waters. The likely impact of the foul discharge from the proposed development on the Ringsend Wastewater Treatment Plant must be assessed.

Forestry management in particular clear felling and afforestation should be at minimum be in line with The Environmental Requirements for Afforestation 2016, The Code Of Forest Practice and the Forestry Harvesting and Environmental Guidelines. Effective mitigation is required through the creation of a minimum 10m buffer zone along associated watercourse and through the construction of sedimentation traps at appropriate locations in advance of the works with appropriate maintenance throughout the scheme.

It is IFI policy is to maintain watercourses in their open natural state in order to prevent habitat loss and preserve biological diversity. Any river or stream manipulation works (bridging, culverting or otherwise) must first be submitted to IFI for consultation and approval. IFI recommends the retention of a natural riparian vegetation zone (10m minimum) free from development each side of watercourses, all planting should consist of native species. Any habitat enhancement measures associated with watercourses must be agreed with Inland Fisheries Ireland.

*The applicant should consult our revised guideline document "Guidelines on protection of fisheries during construction works in and adjacent to waters" (2016) available at <http://.fisheriesireland.ie/fisheriesmanagement-1/624-guidelines-on-protection-of-fisheries-during-construction-works-in-and-adjacent-to-waters> when undertaking any works on this site, particularly in the vicinity of surface water features.

Please advise us of your decision on this application.

Yours sincerely,

Gretta Hannigan

Gretta Hannigan
Senior Fisheries Environmental Officer

Inland Fisheries Ireland- Dublin

Iascach Intíre Éireann
Inland Fisheries Ireland

Tel +353 (0)1 8842693

Email gretta.hannigan@fisheriesireland.ie

Web www.fisheriesireland.ie

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

AN BORD PLEANÁLA	
TIME _____	BY _____
25 SEP 2017	
LTR DATED _____	FROM _____
PL _____	

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed are solely those of the author and do not necessarily represent those of Inland Fisheries Ireland. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this email in error.

