Iascach Intíre Éireann
Inland Fisheries Ireland

17/07/2019

REF: An Bord Pleanála Reference : PL06F.304624
Broadmeadow way

To whom it may concern,

- Coastal waters and estuaries serve as the natural linkage for species such as salmon and sea trout migrating between freshwater and ocean environments, providing the necessary habitat for their transition. Both migratory and resident fish groups utilise coastal habitat in the vicinity of the proposed development at some time during their life cycle. Thus it is essential to consider fisheries impacts of the development at all times, particularly impacts on those species of conservation importance.

- IFI refer to the River Pill as the Turvey. The Turvey system is exceptional among most urban river systems in the area in supporting Sea trout in addition to resident Brown trout (both Salmo trutta) populations. The presence of these fish populations highlights the sensitivity of local watercourses and the Turvey catchment in general. Thus, it is vital to note that salmonid waters constraints apply to any development in this area.

- The Broadmeadow system also supports a small population of Atlantic salmon in its lower reaches and a resident Brown trout population

- High levels of suspended solids settling on the sea shore and seabed can alter habitats resulting in potential loss of feeding nursery and spawning grounds for fish. All measures necessary should be taken to ensure protection of local aquatic ecological integrity, in the first place by complete impact avoidance and as a secondary approach through mitigation by reduction and remedy.

- All works should be completed in line with a Construction Management Plan (CMP) 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.

- Design drawings and detailed method statements must be agreed with IFI in relation to the bridge crossings of the Malahide estuary and the two crossings of the River Pill/Turvey.

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- Any construction or enabling works required has the potential to discharge silt-laden waters to the canal. Silt can clog fish spawning beds, and juvenile fish are particularly sensitive to siltation of gill structures. Similarly, plant and macro-invertebrate communities can literally be blanketed over, and this can lead to loss or degradation of valuable habitat. It is important to incorporate best practices to minimise discharges of silt/suspended solids to waters.

- Any stockpiling of topsoil must be considered and planned such that risk of pollution from these activities is minimised. Drainage from the topsoil storage area should not enter the canal.

- Any refueling area should be sited away from the canal and mitigations in place to prevent hydrocarbons entering the canal.

- There can be no direct pumping of contaminated water from the works to a watercourse at any time, any dewatering must be treated by either infiltration over land, discharge to a Local Authority sewer or to a suitably sized and sited settlement pond.

- All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.

I trust you will take our observations on board when assessing this application.

Regards,

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