

## **A8 Response to IFI (Inland Fisheries Ireland) Letter of July 17<sup>th</sup> 2019 to An Bord Pleanála concerning the proposed Broadmeadow Way (PL06F.304624)**

**IFI Par #1** *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.*

Response: The importance of fish (both salmonid and non-salmonid) within the study area is acknowledged and addressed in the EIAR Vol 2 (Sections 8.2.5, 8.2.14, and 8.2.25). Specific avoidance and mitigation measures are set out in Sections 8.2.46 to 8.2.59 of Chapter 8 in the EIAR, and in the Construction Environmental Management Plan (CEMP) provided in Section 3.13 of Vol 2 of the EIAR.

**IFI Par#2** *IFI refer to the River Pill as The Turvey system. 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 highlight the sensitivity of local watercourses and the Turvey catchment in general. Thus it is vital to note that salmonid water constraints apply to any development in the area.*

Response: The presence of trout and seatrout as well as other marine and estuarine fish species in the lower reaches of the Pill River (Turvey River) is addressed in the EIAR (Vol 2 Section 8.2.14). The detailed mitigation measures and CEMP provisions are specifically designed to ensure that all fish in the watercourses adjoining and traversed by the Broadmeadow Way will not be adversely impacted as a result of its construction or operation. No instream works are intended for the Turvey River. However, in the event that any instream works are required, there will be consultation with IFI in advance to any instream works being undertaken.

**IFI Par#3** *The Broadmeadow system also supports a small population of Atlantic salmon in its lower reaches and a resident Brown trout population.*

Response: The presence of salmon and seatrout in the Ward River and Seatrout in the Broadmeadow River as well as a wide range of freshwater, estuarine and marine species in the Broadmeadow Estuary is highlighted in the EIAR (Vol 2, Section 8.2.5). As outlined in Section 8.2.60, Vol 2 of the EIAR, once mitigation measures are implemented, there will be no significant adverse impact to aquatic habitats or species along the route of the proposed greenway.

These will not be adversely impacted by the construction or operation of the Broadmeadow Way.

**IFI Par#4** *High levels of suspended solids settling on the seashore 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.*

Response: A list of the potential sources of suspended solids from the project is provided in the EIAR (Vol 2 Sections 8.2.35 – 8.2.39 and a comprehensive list of avoidance and mitigation measures to

prevent suspended solids entering watercourses is presented in Sections 8.2.47 to 8.2.57 of Chapter 8 and Section 3.13 CEMP of Vol 2 of the EIAR.

**IFI Par#5** *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 of insuring compliance with environmental legislation and statutory consents.*

Response: A detailed CEMP (Construction Environmental Management Plan) is provided in the EIAR Vol 2 Chapter 3, Section 3.13. This deals with every aspect of potential pollution from the project as they could affect watercourses. These will be updated as required to take account of any legislative or consent conditions at the contracting stage and, as necessary, during the construction phase.

**IFI Par#6** *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.*

Response: A comprehensive list of design drawings for every structure required for the greenway is provided in the application documentation (EIAR Vol 4B). Fingal County Council will liaise with IFI in relation to the bridge crossings and the methodologies as set out in the CEMP.

**IFI Par#7** *Any construction or enabling works required has the potential to discharge silt-laden waters to the estuary. Silt can clog fish spawning beds and juvenile fish are particularly sensitive to siltation of gill structures. Similarly, plant and macroinvertebrate 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.*

Response: While acknowledging the sensitivity of fish and fish habitats to damage by suspended solids and sedimentation, as noted in the EIAR (Sections 8.2.14 and 8.2.25) there is no salmonid spawning habitat in lower section of the Pill/Turvey River potentially impacted by the proposed project. Nor will any of the Broadmeadow River or Ward River salmonid habitats be impacted by the proposed greenway, as they are located upstream from the crossing. These points notwithstanding, the EIAR contains a comprehensive list of measures designed to prevent the escape of suspended solids to watercourses as referred to in response #4 above. These measures will provide protection for all fish species and fish habitats at and downstream of the construction works.

**IFI Par#8** *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 estuary.*

Response: Stockpiling of soils and prevention of solids entering watercourses are addressed in Sections 8.2.50 to 8.2.54 of Chapter 8 of the EIAR, and in Section 3.13.14 (CEMP-7 Management of Excavation and Soil) in Chapter 3, Vol 2 of the EIAR.

**IFI Par#9** *Any refuelling area should be sited away from the estuary and mitigations in place to prevent hydrocarbons entering the estuary.*

Response: Refuelling, fuel delivery and fuel storage are addressed in Sections 7.6.13 to 7.6.15, 8.1.28, 8.1.29, 8.2.58, and 8.2.59 in Vol 2 of the EIAR and specifically under items CEMP-2, CEMP-4, CEMP-5 and CEMP-12 in Sections 3.13.8, 3.13.10, 3.13.11, 3.13.20 of the CEMP (Section 3.13 of Vol 2 of the EIAR)

**IFI Par#10** *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 sites settlement pond.*

Response: There will be no direct pumping of contaminated water from the works to a watercourse at any time. Treatment of run-off from the construction site is dealt with in Mitigation Measures Sections 8.1.29, 8.1.35, and 8.2.51 of Vol 2 of the EIAR and in Section 3.13.11 of the CEMP (CEMP-5 – Protection of Water Resources, (A) – Silt) in Vol 2 of the EIAR.

**IFI Par#11** *All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.*

Response: The CEMP and mitigation measures detailed in Volume 2 of the EIAR when fully implemented will ensure that all discharges will be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010. Specific measures are set out in the CEMP at CEMP-3, CEMP-4, CEMP-5, CEMP-7, CEMP 12 and CEMP-13 and at Sections 8.2.47 to 8.2.59 of Chapter 8 of Vol 2 of the EIAR.