



**Eastern Regional Fisheries Board**  
Bord Iascaigh Réigiúnach an Oirthir



**Fisheries Ireland**  
Our Natural Heritage

**Environmental  
Protection Agency**

01 OCT 2007

Marie Harris  
Programme Officer  
Office of Climate, Licensing and Resource Use  
EPA HQ, PO Box 3000, Johnstown Castle Estate,  
Co. Wexford.

Your Reference – W0129-02  
Our Reference – BB/DD/270

September 26<sup>th</sup>, 2007

**Re: Waste Licence Application from Murphy Environmental, The Naul,  
Co. Dublin.**

Dear Ms. Harris,

Please find the Board's comments outlined below regarding the above waste licence application:

- The Corduff River system (including surface water streams in the Hollywood Great area) is salmonid. This system supports significant local populations of both resident Brown trout and migratory Sea trout (both *Salmo trutta*). Preventing any polluting matter from entering this important river system must be a key component of any planning application in this area.
- As with any development, all measures necessary should be taken to ensure comprehensive protection of local aquatic ecological integrity, in the first place by complete impact avoidance and only as a secondary approach through mitigation by reduction and remedy. Only clean, uncontaminated surface waters must be permitted to discharge to the surface water network in the area so that the ecological integrity of the system is protected.
- Ground preparation and associated construction works, including large-scale topographic alteration, importation of waste materials and the creation of roads 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

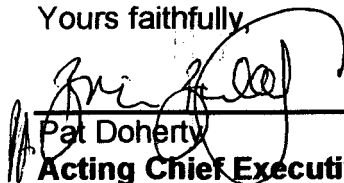
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and operation (in line with international best practice) should be implemented.

- Best available technology (BAT) mitigation measures should be implemented to ensure protection of the surface water and ground water system during both construction and operational programmes. The implementation of a SUDS system (as advocated in the Greater Dublin Strategic Drainage Study) on the site is highly desirable both in the short and long term. The maintenance of any attenuation structures (e.g. desilting 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. In relation to additional information on Condition 3.13, 'P7.0.C: Procedure for Emptying Silt Settlement Ponds', it must be highlighted that all discharges from the system being maintained should stop until such a time as maintenance is complete and the discharge has cleared of suspended solids.
- The discharge of clean surface waters to the Corduff River system and any construction works associated with the proposed development must in no way impact on the passage of salmonids thereby contravening Section 173 of the Fisheries (Consolidation) Act 1959, as amended.
- It is recommended that the "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites" (<http://www.fishingireland.net/environment/fullconstructionanddevelopment.htm>) be consulted when undertaking any works on this site, particularly in the vicinity of surface water features.
- 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).

Yours faithfully,

  
Pat Doherty  
Acting Chief Executive Officer