



Submission

Submitter:	Mr Donnachadh Byrne
Organisation Name:	Inland Fisheries Ireland
Submission Title:	IFI Ref: W0310-01
Submission Reference No.:	S010141
Submission Received:	05 November 2021

Application

Applicant:	Noel Lawler Sand & Gravel Limited
Reg. No.:	W0310-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Environmental Licensing Programme
Office of Environmental Sustainability
EPA Headquarters
PO Box 3000
Johnstown Castle Estate
County Wexford

05 November 2021

**Submission re. proposed quarry restoration at Portersize,
Ballitore, County Kildare, by Noel Lawler
Ref: W0310-01**

Dear Sir/Madam

The site of this proposed development borders a tributary of the Greese River which is in turn a tributary of the River Barrow. A recent inspection of this stream highlighted that it is a salmonid watercourse.

The main channel of the Barrow River is a candidate Special Area for Conservation (SAC) under the European Habitats Directive but because of the Barrow navigation, there is limited salmon spawning or nursery habitat in the Barrow main channel and almost all salmon production occurs in tributaries such as the Greese. The Greese is one of the more important salmon spawning tributaries of the Barrow and the salmon populations of the Greese River are an integral component of the Barrow River SAC.

IFI have recently submitted proposal for the extension of SAC designation for the Greese and Bothkoge Rivers, given the importance of salmon recruitment within these waters.

The following are our concerns:

1. IFI notes that the applicant proposes the restoration of 3 smaller pond to provide an area of aquatic habitat. The provision of ponds in close proximity to watercourses is of concern to IFI as we have concerns that such ponds may be used by individuals to stock non-native and/or invasive species which then may be introduced to the adjoining watercourse. For example, the non-native fish species roach was illegally introduced to a number of large ponds associated with sand-pits along the middle reaches of the River Slaney and IFI believe it is from these ponds that this species was introduced to the Slaney River system.
2. With regard to the provision of these three ponds IFI request clarification that there will be no hydrological connectivity between these ponds and the adjoining watercourse.
3. We also request that the ponds be designed so that they are very shallow throughout with no potential for the introduction of fish.

4. IFI request that the proposed ponds be designed and planted so that they are dominated by emergent aquatic vegetation/plants and that large areas are intermittently wet.
5. One of the potential impacts of projects such as this, is the discharge of silt-laden waters to fisheries streams from sites at which earth moving and excavation works are ongoing. Silt can clog salmonid spawning beds, and juvenile salmonids 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.
6. Systems should be put in place to ensure that there shall be no discharge of suspended solids or other deleterious matter to watercourses during any phase of works at this site.
7. The design and sizing of the surface water drainage system must ensure that no suspended solids enter the neighbouring watercourse, even during periods of prolonged heavy rainfall.
8. All surface waters from the site and access roads should be channelled through adequately sized petrol/oil interceptors prior and be subject to attenuation prior to discharge to surface waters.
9. If silt settlement ponds are proposed for this facility. It is important that they are oversized to cope with all eventualities.
10. Refuelling of machinery must be carried out in bunded areas.
11. Fuels, oils, greases and hydraulic fluids must be stored in bunded compounds.
12. All waste oil, empty oil containers and other hazardous wastes are disposed of in conjunction with the requirements of the Waste Management Act 1996.
13. The activities proposed for this site are likely to result in significant lorry traffic to and from the site, with potential for the generation of significant suspended solids pollution in the associated road run-off. It is imperative that the potential for suspended solids pollution from road run-off associated with vehicles entering and leaving this site is addressed.
14. We ask if the applicant proposes to provide a wheel wash to prevent soils/clays being deposited on the public road. Our experience is that wheel-washes, if not designed/managed properly can represent a significant source of suspended solids pollution to surface waters. The maintenance of this wheel-wash should be addressed & wash water from any wheel wash must be directed to a suitable treatment facility.

Yours faithfully

Donnachadh Byrne
Senior Fisheries Environmental Officer

Please note that any further correspondence regarding this matter should be addressed to Mr. Donnachadh Byrne, Senior Fisheries Environmental Officer, Inland Fisheries Ireland, 3044 Lake Drive, Citywest Business Campus, Dublin 24