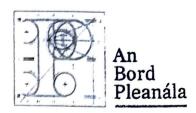
Our Case Number: ABP-319306-24



Ailish Keane Inland Fisheries Ireland IFI Corlesmore Woteraughty Corlesmore Co. Cavan H12VY09

Date: 1st May 2024

Re: Proposed development of Cavan Town Sports Campus

in the townlands of Kilnavara, Lurganboy (Loughtee Upper By), Creighan and Rosscolgan in Cavan

Town.

Dear Sir / Madam.

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

If you have any queries in relation to the matter, please do not hesitate to contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

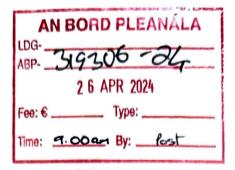
Yours faithfully.

Elmear Reilly **Executive Officer**

Direct Line: 01-8737184

JA03

An Bord Pleanála, 64 Marlborough Street, Dublin 1, DO1 V902,





Applicant:

Cavan County Council

Development:

Cavan Regional Sports Campus

Our Ref. Cav/P/AK/24

Dear Sir / Madam,

I refer to the above application for planning permission for the development of a Cavan Regional Sports Campus on lands Southwest of Cavan Town, west of Royal school and Breffni Park, Kilnavar, Lurganboy, Creighan, Rosscolgon, Cavan.

Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st of July 2010. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) the principal function of IFI is the protection, management, and conservation of the inland fisheries resource.

The proposed development is within proximity to The Cavan Town River which contains excellent salmonid habitat. It also contains Lamprey and suitable habitat for Lamprey which are a protected species under The EU Habitats Directive. The site is physically bordered by the Cavan River with a bridge proposed over it as part of the development. The Cavan River has a hydrological link to the Lough Oughter SAC and SPA (approx. 7km upstream from the proposed development site). Meaning that any potential runoff, hydrocarbon spills/leaks, silt or debris from site entering the river is extremely high.

Regard should be given the extent of hard / paved surfaces in the area. Storm-water runoff from hard surfaces can contain potential pollutants (e.g., oil, litter, and debris), which find their way into adjacent waterbodies. Only clean, uncontaminated surface waters should be discharged from the site. Oil / grease interceptor traps and / or silt traps installed to intercept any potential pollutants must be regularly maintained. There should be no mixing of storm and foul waters. Hard surfaces can also result in increased surface runoff, which can lead to potential flooding in downstream areas; this can have significant adverse effects on fish, fish habitat and fisheries. Where appropriate, water attenuation systems should be put in place to buffer such discharges.

Measures should be put in place to minimise potential damage during construction. This includes minimising the potential damage from sediment run-off, spillages, and discharges (e.g., cement, paints, oils), and avoiding damage to riparian vegetation. IFI provide a guide for protection of watercourses during construction works on their website viz. Requirements for the protection of Fisheries Habitat during Construction and Development Works at River Sites (http://www.fisheriesireland.ie/Download-document/90-Requirements-for-the-Protection-of-Fisheries-Habitat-during-Construction-and-Development-Works-at-Ri.html).

IFI request that all watercourses (including streams and ditches) within or adjacent to this property should be protected in terms of water quality, topography and habitat. There must be no discharge

of suspended solids or any other deleterious matter to watercourses. Hedges and ditches containing native trees/ hedgerow vegetation are also important habitat for the adult form of many aquatic insects — an important food for fishes — and where these occur, they should be retained where possible. Any re-planting should involve the use of native species to maintain biodiversity, and, in the vicinity of watercourses, bank stabilisation.

The introduction of alien invasive species, either inadvertently through spoil on machinery or deliberately, through planting, must also be avoided. To prevent the introduction of Alien Invasive Species (AIS) IFI would recommend that hot-power-washing of machinery before its introduction to the site. IFI would also recommend that any machinery or plant in contact with AIS or involved with their removal should also be treated with 1% aqueous virkon solution and left to dry before its use on another site.

The following measures are critical for preserving water quality and aquatic habitats:

- Where fuels, oils, greases and hydraulic fluids etc. are stored onsite, this should be done well
 away from the watercourse, in a bunded, lined and lockable storage area.
- Refuelling of machinery, etc., should be carried out in bunded areas.
- Any servicing or maintenance of vehicles to be carried out in bunded areas.
- Washing etc. of vehicles and machinery should be done away from the watercourse.
- Drip-trays to be used for generators, pumps etc.
- Stockpile areas for sands and gravel and other materials should be kept to minimum size, well away from any watercourses.
- Runoff from machine service, concrete mixing areas and stockpiles must not enter the watercourse.
- Spill kits to be provided on site during the entire duration of the works and staff trained in their correct use.
- Silt curtains should be used where there is a risk of suspended solids entering the watercourse.

In conclusion, we stress the importance of the Cavan Town River and associated tributaries as sensitive salmonid habitat and urge extreme care and diligence in preventing adverse impacts during construction and operation of the above scheme if planning is approved.

We trust that you will take these observations on board.

Yours sincerely,

Ailish Keane

Senior Fisheries Environmental Officer