



THORNTON O'CONNOR
TOWN PLANNING

Response to a Request for Further Information

**In respect of SDCC Reg. Ref.: SD21A/0162 which
relates to a Warehouse Development at**

Brownsbarn, Citywest Campus, Dublin 24

Submitted on Behalf of

Exeter Ireland Property IV B Limited

February 2022

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THORNTON O'CONNOR
TOWN PLANNING

Principal Planning Officer
Planning Department
South Dublin County Council
County Hall
Tallaght
Dublin 24

Friday, 4th February 2022

Dear Sir/Madam,

RESPONSE TO REQUEST FOR FURTHER INFORMATION

South Dublin County Council Register Reference SD21A/0162

1.0 INTRODUCTION

1.1 Response to *Request for Further Information* by Dublin County Council

This letter is submitted by Thornton O'Connor Town Planning¹ on behalf of Exeter Ireland Property IV B Limited² in response to a *Request for Further Information* issued by South Dublin County Council, dated 13th August 2021, in respect of an application for permission for development to provide 2 No. warehouses at a site at Brownsbarn, Citywest Campus, Dublin 24.

This response to the *Request for Further Information* has been prepared by Thornton O'Connor Town Planning in association with Kavanagh Burke Consulting Engineers³, JBA Consulting⁴, Stephen Reid Consulting Traffic and Transportation⁵, Axiseng Consulting Engineers⁶, Irish Archaeological Consultancy⁷ and Historic Building Consultants⁸.

1.2 Key Design Changes Proposed

The scheme as lodged with the Planning Authority has been subject to modifications to address matters raised in the *Request for Further Information*. The modifications are shown on the plans and particulars submitted with this response to the *Request for Further Information* with the key changes summarised below for ease of information:

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14

² No. 88 Harcourt Street, Dublin 2.

³ Calmount Park, Unit F3 Block F, Ballymount, Co. Dublin, D12 PX28

⁴ Unit 8, Block 660, Greenogue Business Plaza, Greenogue Business Park, Rathcoole, Dublin, D24 YN81

⁵ Estuary House, New St, Malahide, Co. Dublin, K36 KH32

⁶ 47 Mount Street Upper, Dublin, D02 AC95

⁷ Unit G1, Kilcoole Rd, Network Enterprise Park, Co. Wicklow

⁸ Old Bawn, Old Connaught, Bray, Co. Dublin

Key Design Changes:

Layout/ Architecturally related:

- The floor area of the proposed warehouse unit No. 1 has been reduced from 8,156 sq m to 7,742 sq m to provide an increased landscape area from an average of 10m to between 19.06m and 23.95m wide along the western boundary.
- The alignment of the proposed warehouse no. 2 has been rotated through 90 degrees in order to provide a greater separation distance to the proximate Protected Structure and the majority of the parking areas have been relocated from the previously proposed southern side of the building to the western side in order to allow the substantive parking areas to be screened by the mass of the building.
- The floor area of the proposed warehouse no. 2 has increased from 5,990 sq m to 6,163 sq m. The area of landscaping to the south has been augmented with a significant increase in planting. The landscape zone along the western boundary has increased from an average of 10m proposed at Planning Application stage to between 15.56m and 19.04m in width as part of this *Response to Request for Further Information*.
- The ground level of Unit 2 has been reduced by 500mm which thus reduces the parapet level by 500mm, which will reduce the impact of the height of the structure relative to the adjacent Protected Structure.
- Increase of 3 No. car parking spaces from 109 No. to 112 No. car parking spaces.
- General adjustments were made at HGV yards regarding new buildings positions.

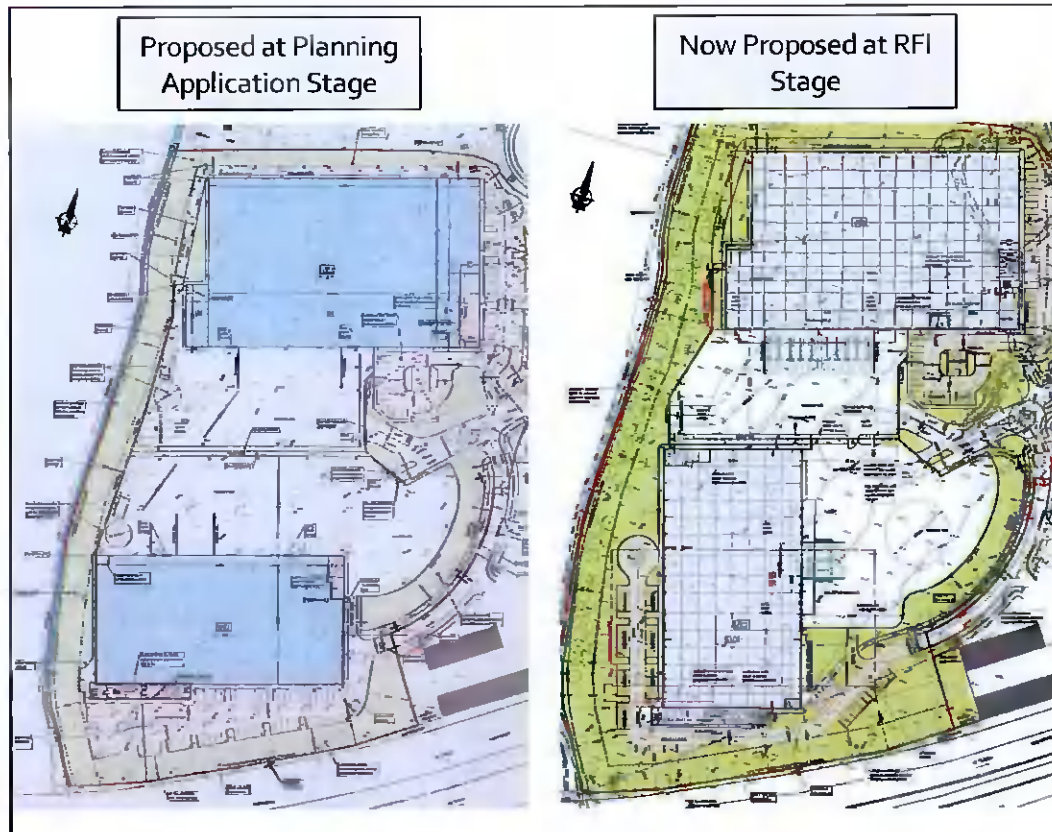


Figure 1.1: Site Plan Proposed at Planning Application Stage (Left) and Site Plan Now Proposed at RFI Stage (Right)

Source: Kavanagh Burke Consulting Engineers, 2022

Landscaping:

- Increase tree planting by 14%, all existing tree along the western boundary to be retained.
- Increased riparian zone from 10m to between 15.1m and 25m, more native tree planting has been added along the western boundary.
- Green roof has been added to the office element of Unit 2.
- All tree planting at carpark will be tree pit to incorporated SuDS.
- All carpark and tender fire access are permeable paving (grasscrete).
- Seating area at warehouse no. 2 with verdant swathes of trees and shrub planting.
- Adaptation to incorporate updated ESB boxes.
- Amended position of trees away from the N7.
- Introduced native wildflower meadow.

- The amended position of the trees and native wildflower meadow will contribute to the increase in the views towards the Protected Structure.



Figure 1.2.: Landscape Masterplan Proposed at Planning Application Stage (Left) and Landscape Masterplan Now Proposed at RFI Stage (Right) Showing Increased Landscape Zones and Planting to Western and Southern Boundaries.

Source: JBA Consulting, 2022

1.3 Documents Enclosed

Some 6 No. copies of the documents listed below are enclosed with this response to *Request for Further Information*.

1.3.1 Response prepared by Thornton O'Connor Town Planning

- This Planning Response Letter prepared by Thornton O'Connor Town Planning, dated Friday, 4th February 2022.

1.3.2 Documents Prepared by Kavanagh Burke Consulting Engineers

- Drainage Design report, dated February 2022
- Fire Tender Access Document
- The following drawings have also been prepared by Kavanagh Burke Consulting Engineers:

Kavanagh Burke Consulting Engineers		
Drawing No.	Drawing Title	Scale
D1678 D3 PL10	Site Plan	1:500

D1678 GA-A-1-01 PL3	Ground Floor Plan	1:200
D1678 GA-A-1-02 PL3	First Floor Plan	1:200
D1678 GA-A-1-03 PL3	Second Floor Plan	1:200
D1678 GA-A-1-04 PL3	Unit 1 Ancillary Office & Warehouse Toilet Block Floor Plans	1:100
D1678 GA-A-1-05 PL3	Unit 1 Architectural Elevations	1:200
D1678 GA-A-1-06 PL3	Unit 1 Architectural Section 1-1	1:100
D1678 GA-A-07 PL5	Architectural Contiguous Elevations	1:200
D1678 GA-A-2-01 PL8	Unit 2 Ground Floor Plan	1:200
D1678 GA-A-2-02 PL8	Unit 2 First Floor Plan	1:200
D1678 GA-A-2-03 PL8	Unit 2 Second Floor Plan	1:200
D1678 GA-A-2-04 PL8	Unit 2 Ancillary Office & Warehouse Toilet Block Floor Plans	1:100
D1678 GA-A-2-05 PL8	Unit 2 Architectural Elevations	1:200
D1678 GA-A-2-06 PL8	Unit 2 Architectural Section 2-2	1:100
D1678 D3-2 PL1	Boundary Plan	1:500
D1678 D4 PL4	Drainage and Watermain Layout	1:500
D1678 D5 PL2	Drainage Details	Not to Scale

1.3.3 Documents Prepared by JBA Consulting

- Brownsbarn Site Ecological Impact Assessment, dated January 2022
- The following drawings have also been prepared:

JBA Consulting		
Drawing No.	Drawing Title	Scale
ENO-JBAI-XX-XX-DR-L-0002-A3-Co6	Landscape Masterplan	As shown
ENO-JBAI-XX-XX-DR-L-0003-A3-Co6	Landscape Section	As shown
ENO-JBAI-XX-XX-DR-L-0004-A3-Co6	Landscape Section	As shown
ENO-JBAI-XX-XX-DR-L-0005-A3-Co6	Planting Plan	Not to scale
ENO-JBAI-XX-XX-DR-L-0006-A3-Co3	Landscape Section	As shown

1.3.4 Document Prepared by Enviroguide Consulting

- Response to Item 7 of Request for Further Information by South Dublin County Council prepared by Enviroguide Consulting, dated February 2022

1.3.5 Drawings Prepared by Axiseng Consulting Engineers

- Part L Compliance Report prepared by Axiseng Consulting Engineers
- The following drawing has also been prepared by Axiseng Consulting Engineers

Axiseng Consulting Engineers		
Drawing No.	Drawing Title	Scale

1.3.6 Documents Prepared by IAC Archaeology

- Document entitled 'Archaeological Assessment' prepared by IAC Archaeology dated January 2022

1.3.7 Documents Prepared by Digital Dimensions

- Verified View Montages by Digital Dimensions

1.3.8 Documents Prepared by Stephen Reid Consulting Traffic and Transportation

- An Outline Workplace Travel Plan Unit 1, Brownsbarn, Citywest Campus, Dublin 24
- An Outline Workplace Travel Plan Unit 2, Brownsbarn, Citywest Campus, Dublin 24

1.3.9 Documents Prepared by Historic Building Consultants

- Document entitled 'Site at Brownsbarn, Citywest, Citywest Campus, Dublin 24' dated January 2022

1.3.10 Documents Included from Irish Water

- Irish Water pre-connection enquiry dated November 2021.

2.0 RESPONSE TO FURTHER INFORMATION REQUEST

The Planning Authority set out the following:

2.1 Item No. 1: Details Regarding the Future Intended Warehouse Use

Item No. 1 states:

'The application describes the units as warehouse units, however, it is unclear what type of goods are to be stored and distributed from the site. The applicant is requested to submit details regarding the future intended warehouse use. In particular what goods are to be stored onsite. This information would assist in the screening for Appropriate Assessment.'

2.1.1 The Applicant's Response to Item No. 1

Owing to the speculative nature of the development, it is not possible to provide the definitive nature of the goods to be stored on site as tenants for both units are yet to be secured. This is the regular approach with regard to the development of warehouse buildings.

2.2 Item No. 2: Potential Impact of the Proposed Development on the Neighbouring Protected Structure

Item No. 2 states:

'The Planning Authority has concerns in regard to the potential impact of the proposed development on the neighbouring Protected Structure RPS No. 261 Royal Garter Stables. This includes the retention of the views of the Protected Structure when approaching it from the south-west. In front of Unit 2 would be surface car parking, which has the potential to disrupt views and could negatively detract from the setting of this Structure. The applicant is requested to review the area to the front of Unit 2 in regard to impact on the views of the Protected Structure. While the height and proximity of Unit 2 to the Protected Structure might be acceptable the applicant should ensure that the unit is sensitively designed so as not to detract from the Structure. The applicant should confirm what measures have been undertaken to ensure this. If any modifications are required these should be identified and a revised proposal submitted. The applicant should liaise with SDCC's Architectural Conservation Officer on this item.'

2.2.1 Response to Item 2:

Rob Goodbody of Historic Building Consultants liaised on behalf of our Client (Exeter Ireland Property IV C Limited) with the South Dublin County Council Conservation Officer on the 29th November 2021. After engaging with the South Dublin County Council Conservation Officer, it was deemed necessary to revise the proposal, as set out in the enclosed report by Rob Goodbody:

'The alignment of the proposed warehouse has been rotated through 90 degrees and the parking areas have been moved from the area between the building and the main road.'

The benefits of such changes, from an architectural heritage perspective, have been extracted from Rob Goodbody's report and are included below:

'The original layout maintained a line of sight from the south-western corner of the application site to the north-western corner of the protected structure. The revised layout also protects that line of sight, while moving the building away from the protected structure.'

Another revision to the proposal is as follows:

'The warehouse that is close to the protected structure is Unit 2 and as part of the changes to the proposal the ground level of this building has been reduced by 500mm, resulting in the parapet level being reduced from 116.2m to a level of 115.7m.'

Please find enclosed Rob Goodbody's report enclosed with this *Response to Request for Further Information*.

2.3 Item No. 3: Request to Extend Landscaped Buffer

Item No. 3 states:

'A 10 m 'buffer' has been proposed along the western boundary, to the east of the stream along this boundary. This is described as a no build zone, and it is proposed to retain the existing vegetation within this. The Planning Authority notes this boundary is significantly vegetated, even beyond 10 m from the stream. Based on the site analysis, and the reports from the Public Realm and Heritage sections, it is considered that in this case 10 m is insufficient to maintain and protect this green corridor. The applicant is requested to review and extend this buffer significantly eastwards having regard to the protection of the existing vegetation along this boundary and of protected species (based on additional site surveys). The proposed lighting plan should be revised with regard to this buffer and the results of the ecological surveys and relocated away from the western ecological area.'

2.3.1 Response to Item No. 3

Please see attached '**Site Plan**' drawing (Drawing No.: D1678 D3 PL10) where an increased landscaped buffer has been provided for.

For Unit 1: The landscape area has been increased from an average of 10m to between 19.06m and 23.95m along the western boundary.

For Unit 2: The building has been repositioned and now provides an enlarged landscape zone to the west increasing from an average of 10m proposed at Planning Application stage to between 15.56m and 19.04m in width as part of this *Response to Request for Further Information*.

The '**Landscape Masterplan**' proposed at Planning Application Stage and '**Landscape Masterplan**' now proposed have been included below for reference in order to demonstrate the additional planting along the southern and western boundaries.

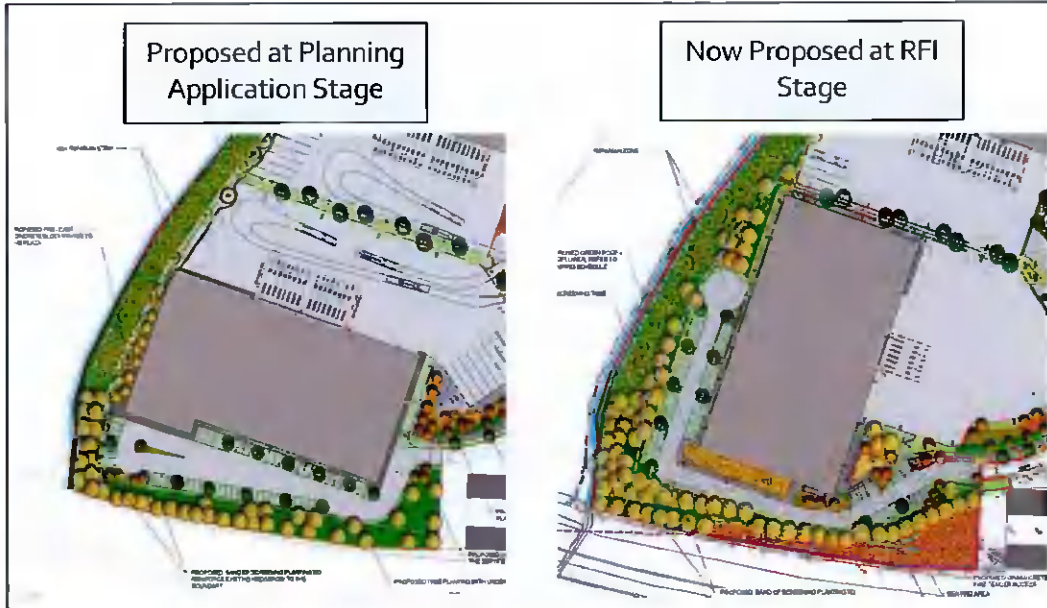


Figure 2.1: Landscape Masterplan Proposed at Planning Application Stage (Left) and Landscape Masterplan Now Proposed at RFI Stage (Right) Showing Increased Screening Along Southern Boundary

Source: JBA Consulting, 2022

The proposed Lighting Plan has also been revised having regard to the increased landscape buffer and results of ecological surveys. The proposed Lighting Plan (Drawing No. EBB-AXE-ZZ-00-DR-E-60101) prepared by Axiseng Consulting Engineers has been enclosed with this *Response to Request for Further Information*.

2.4 Item No. 4: Workplace Travel Plan

Item No. 4 states:

'Table 11.25 of the South Dublin County Development Plan 2016-2022 outlines the thresholds for the submission of a Workplace Travel Plan. Due to the size of the proposed units both being over 2,500 sqm, a Workplace Travel Plan Statement is required for each unit.'

2.4.1 Response to Item No. 4

Please see enclosed *Outline Workplace Travel Plan Unit 1, Brownsbarn, Citywest Campus, Dublin 24* and *Outline Workplace Travel Plan Unit 2, Brownsbarn, Citywest Campus, Dublin 24* prepared by Stephen Reid Consulting Traffic and Transportation Limited.

2.5 Item No. 5: Additional SuDS Features, Landscaping and Emergency Vehicle Access

Item No. 5 states:

'The Planning Authority requests the following in regard to surface water:
a) It is noted that no above ground, natural SuDS measures are proposed. Given the site's existing environment, the applicant is requested to review the proposal and incorporate above

ground, natural surface water drainage measures into the design. The applicant shall show further proposed SuDS features for the development such as Green roofs, SuDS tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. The revised plans should incorporate:

I. More trees to break up the car park hard standing areas in the North East. A tree every 5 parallel and 2 perpendicular car park spaces is required ensuring 5m separation from lighting columns. All car park trees and trees adjacent to hard standing should incorporate SuDS tree pits.

II. A landscape section through the northern boundary.

b) The Planning Authority has concerns in regard to the use of the proposed material open texture macadam for the fire tender access and car parking areas when a more greened material would be more appropriate. This might include the use of grasscrete or similar. The applicant is requested to submit revised proposals for 'greened' pathway solutions and submit revised cross sections clearly showing any revised materials and associated drainage.

c) It is also noted that access for an emergency fire vehicle is not provided fully around Unit 2 (not on the western side). The applicant should clarify whether fire vehicle access is fully provided for both units. If this is required, the applicant is requested to submit revised proposals to relocate and/or reduce Unit 2 away from the western boundary.'

2.5.1 Response to Item No. 5 (a)

Further proposed SuDS features have been set out in the enclosed 'Landscape Masterplan' drawing (Drawing No. ENO-JBAI-XX-XX-DR-L-0002) enclosed with this *Request for Further Information Response*. In summary, a range of measures have been incorporated into the development as follows:

- A green roof to the office building element of Unit 2 has been added as a SuDS measure.
- Parking bays and the fire tender access have been surfaced with grasscrete to allow for 'at source' water disposal and to increase the amount of green areas (permeable paving is proposed for the disabled car parking spaces and internal road space as grasscrete is not suitable for these areas).
- Irrigation tree pits to be installed across the site car park as per the landscape architect layout to intercept any residual runoff from open texture macadam.
- Other SuDS measures proposed include trapped road gullies, restricted discharge silt trap and petrol interceptor, water butts and permeable paving.

Please refer to the 'Drainage Design Report' prepared by Kavanagh Burke Consulting Engineers which sets out the attenuation capacity provided by the SuDS features for both units

2.5.2 Response to Item No. 5 (I)

All car park trees and trees adjacent to hard standing incorporate SuDS tree pits, as shown on the 'Landscape Masterplan' drawing (Drawing No. ENO-JBAI-XX-XX-DR-L-0002). A tree pit detail drawing has been provided below for reference which is contained within the enclosed 'Landscape Masterplan' drawing prepared by JBA Consulting, which states:

'A tree pit detail has been added into the carpark design which adjacent to hard standing surfaces, this will allow incorporated SuDS.'

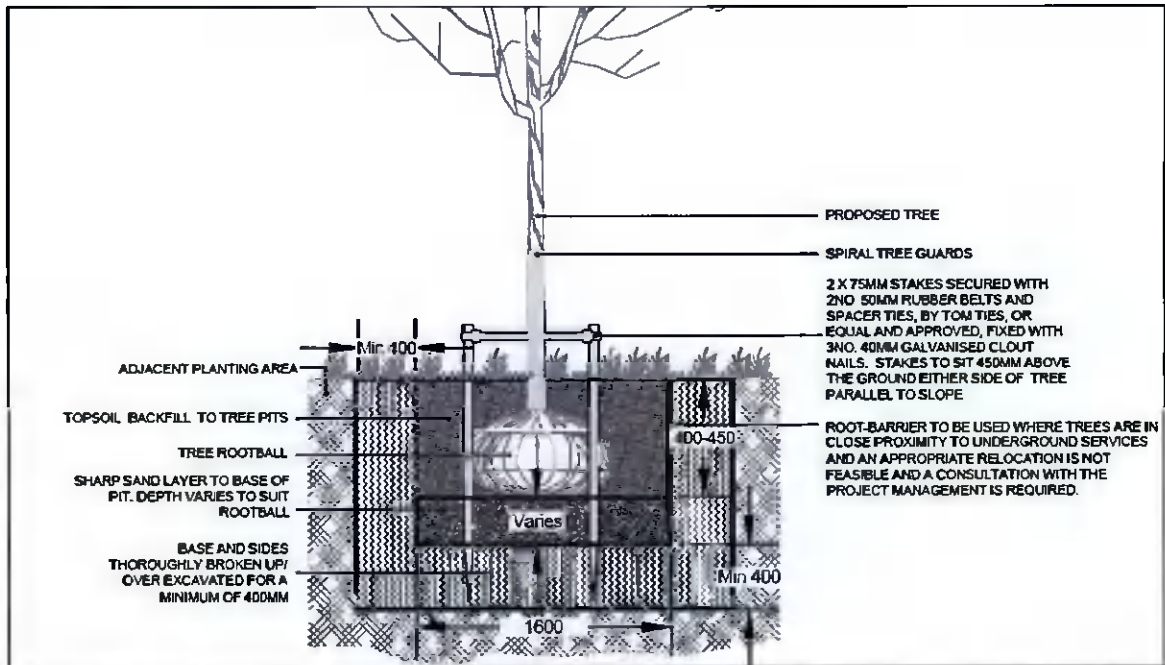


Figure 2.2: Tree Pit Detail Drawing

Source: JBA Consulting, 2022

With regard to breaking up the car park hard standing areas, in the vast majority of instances a tree, greened or planted area has now been provided every 5 No. parallel car park spaces with 5m separation from lighting columns also provided, as shown below.

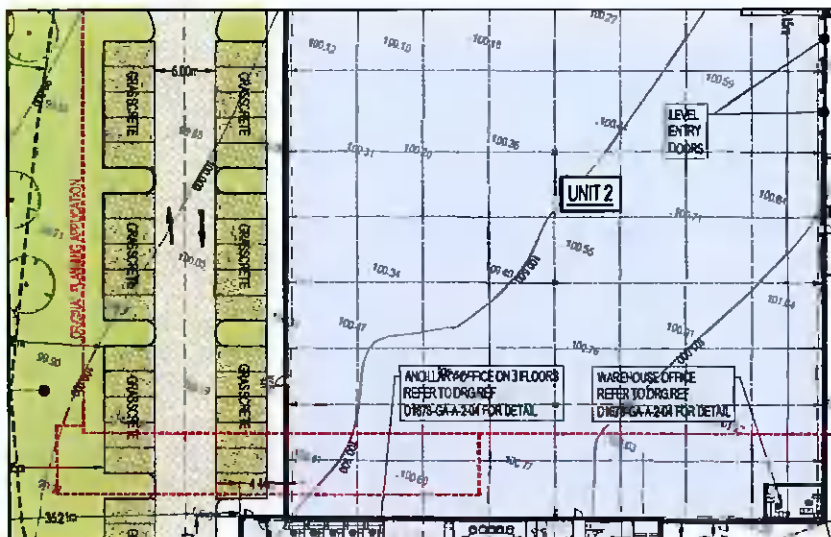


Figure 2.3: Trees/ Greened or Planted Area Every 5 No. Car Parking Spaces to the West of Unit 2

Source: Kavanagh Burke Consulting Engineers, 2022

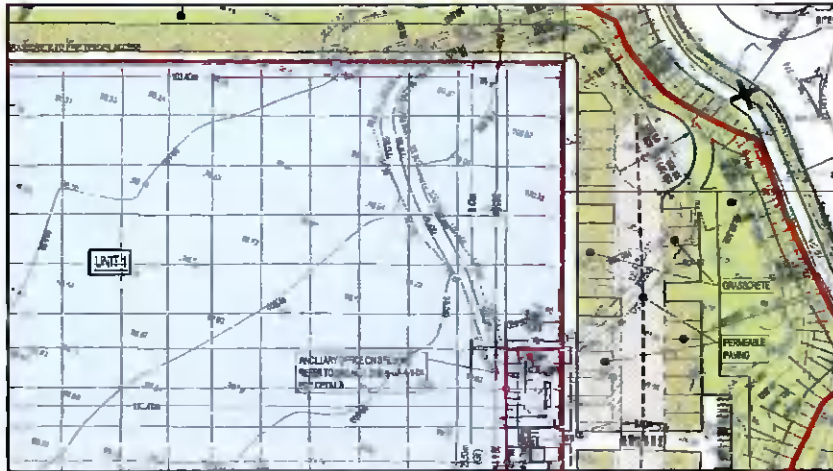


Figure 2.4:
Trees/ Greened or Planted Area Every 5 No. Car Parking Spaces to the East of Unit 1

Source:
Kavanagh Burke Consulting Engineers, 2022

2.5.3 Response to Item No. 5 (II)

Please see enclosed landscape section through the northern boundary contained within the 'Landscape Section' (Drawing No.: ENO-JBAI-XX-XX-DR-L-0006), prepared by JBA Consulting. The 'Section E-E' drawing contained within the 'Landscape Section' drawing has been included below for reference:



Figure 2.5: Section E-E Contained within the 'Landscape Section' (Drawing No.: ENO-JBAI-XX-XX-DR-L-0006)

Source: JBA Consulting, 2022

2.5.4 Response to Item No. 5 (b)

The design team have sought to reduce open texture macadam for the fire tender access and car parking areas. As part of this *Request for Further Information Response*, grasscrete has been provided in car parking areas and fire tender access and permeable paving is proposed for the disabled car parking spaces and internal road space. Please refer to the

enclosed 'Site Plan' drawing (Drawing No.: D1678 D3 PL10) prepared by Kavanagh Burke Consulting Engineers.

Please also refer to the enclosed Landscape 'Section C-C' drawing contained within the 'Landscape Section' (Drawing No. ENO-JBAI-XX-XX-DR-L-0004) which shows revised cross sections showing revised materials and associated drainage, as shown below:

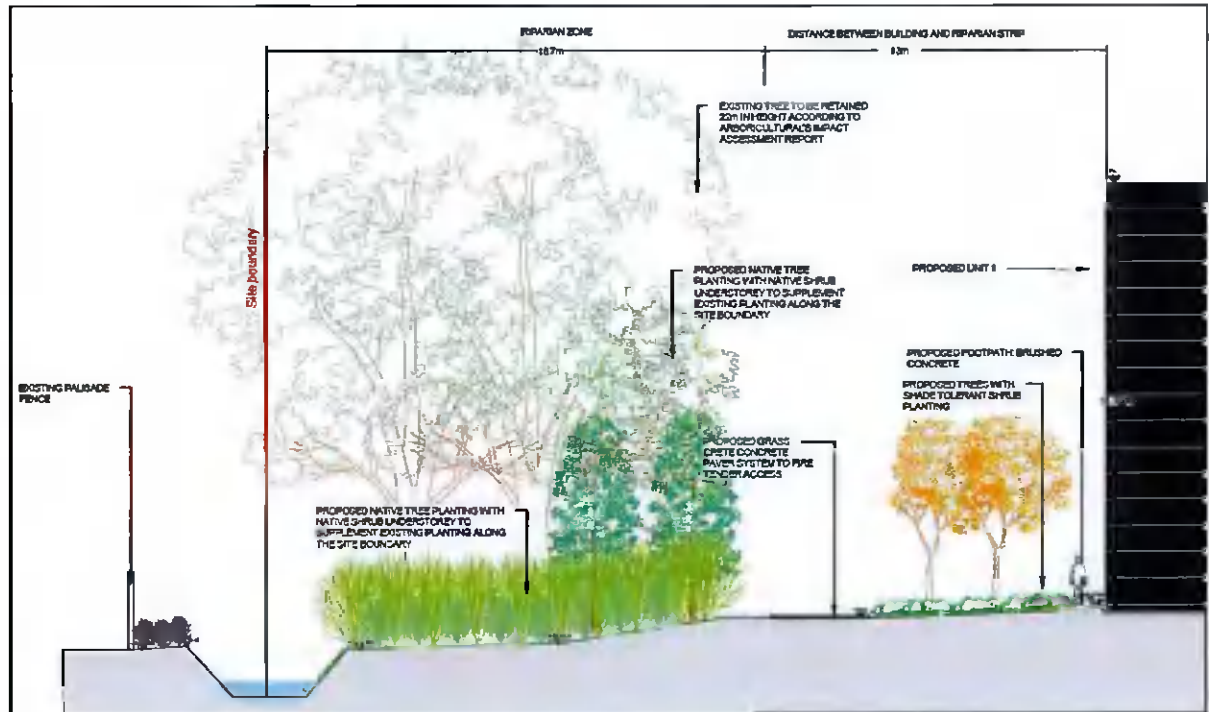


Figure 2.6: Section C-C Contained within the 'Landscape Section' (Drawing No. ENO-JBAI-XX-XX-DR-L-0004)

Source: JBA Consulting, 2022

2.5.5 Response to Item No. 5 (c)

Please see attached 'Fire Tender' document enclosed with the *Request for Further Information Response* prepared by Kavanagh Burke Consulting Engineers which details the fire tender access, and concludes:

'75% building perimeter is applicable for fire tender access. We calculate we have provided 82% of building perimeter fire tender circulation based on the building footprint dimensions noted above. Therefore, the site plan as presented is in compliance with the Building Regulations Part B Fire Safety Table 5.1 – Vehicle Access to Buildings.'

Thus, fire vehicle access has been fully provided for.

2.6 Item No. 6: Irish Water Pre-Connection Enquiry

Item No. 6 states:

'The applicant is required to engage with Irish Water through the submission of a Pre-Connection Enquiry (PCE) in order to determine the feasibility of connection to the public water

supply and waste water infrastructure. The Confirmation of Feasibility (COF) must be submitted to the planning department as the response to this further information request. Pre-connection enquiries can be made at <https://www.water.ie/connections/get-connected/>.

2.6.1 Response to Item No. 6

Please see enclosed pre-connection response from Irish Water which states:

'Based upon the details you have provided with your pre-connection enquiry and on our desk top analysis of the capacity currently available in the Irish Water network(s) as assessed by Irish Water, we wish to advise you that your proposed connection to the Irish Water network(s) can be facilitated at this moment in time.'

2.7 Item No. 7: Detailed Ecology and Bat Assessment

Item No. 7 states:

'a) A more detailed assessment of the ecology present on the proposed development site and commuting through the site is requested. This more detailed survey is to be undertaken during the appropriate season for the assessment of habitats, breeding birds, Freshwater Crayfish, and bats.

b) The applicant is requested to submit a bat roost survey and a bat activity survey for bat usage for the entire site and immediately adjoining sites during summer period when bats are active.

c) The applicant is requested to provide a site-specific assessment of the potential impact on these species arising from the proposed development. This is to be undertaken by a qualified and experienced bat expert at the appropriate time of the year for the survey of species.'

2.7.1 Response to Item No. 7 (a)

Please refer to Section 2.0 (breeding birds) of the Enviroguide Consulting report which includes a list of species recorded in the Baldonnel Area, which is the area that includes the subject site. Enviroguide Consulting state:

'It is our opinion that with the retention of much of the wooded habitats at the Site proposed through the incorporation of a 10m riparian buffer into the design; much of the potential nesting habitat at the site will be retained, with grassland and scrub being the main habitats lost to development,' and that supplementary proposed planting 'will contribute to the maintenance of nesting/roosting/foraging habitat at the site for the local passerine population.'

Please refer to Section 3.0 (habitats) of the Enviroguide Consulting report for habitat assessments which were carried out in June 2020 and July 2020. This assessment of the habitats along the Corbally/Brownsbarn Stream section describes the area of land containing the site of the proposed development i.e., south of the Camac but north of the N7, as largely greenfield in nature:

'At present this land parcel is dominated by GS2 habitats. Mature Ash trees are located along the banks of the Camac in this area. Bank vegetation included Meadowsweet, Butterbur, Thistles, Nettles, Willowherb and Common reed in places.'

JBA Consulting also carried out an assessment in their 'Ecological Impact Assessment' report; please refer to Table 4-5 and Figure 4-3 which includes a table of habitats and a habitat map.

The Enviroguide habitat descriptions for the site are in line with those of JBA Consulting, and describe a site covered in GS2 meadow habitat, with small sections of scrub, and an area of disturbed ground in the northern portion of the site. Immature woodland WS2 and a mature treeline WL2 are described by Enviroguide in the west of the Site.

With regards suitability at the site itself for roosting bats, the 'Ecological Impact Assessment' report prepared by JBA Consulting concluded:

'The preliminary bat roost survey (10/02/2021) carried out on-site found no evidence of any potential bat roosting features amongst the mature trees present within and directly adjacent to the proposed development site.'

A White-clawed crayfish survey was conducted within the Camac tributary present on-site. This survey was carried out by Ecologist William Mulville, a holder of a White-clawed Crayfish Full licence, with permission to conduct Basic manual stone turning / hand net surveys (diurnal and nocturnal surveys). The surveyors recorded no White-clawed Crayfish individuals within the stretch of the tributary which runs along the border of the site.

'The stream habitat provided little appropriate refuge habitat, i.e., the stream was lacking in suitably loose small and large boulders; as well as having unsuitable banks for crayfish burrows. However, the surveyors did record an Otter spraint which consisted of entirely White-clawed Crayfish remains (Figure 4-10 overleaf). This proves that while White-clawed Crayfish are not present within this stretch of the Camac tributary along the border of the site, they are present in the local Camac system, most likely downstream in the main channel of the River Camac.'

2.7.2 Response to Item No. 7 (b)

A Preliminary Bat Roost Survey was carried out by JBA Consulting which uncovered the following results:

'The preliminary bat roost survey (10/02/2021) carried out on-site found no evidence of any potential bat roosting features amongst the mature trees present within and directly adjacent to the proposed development site.'

Some 2 No. bat activity surveys were carried out by JBA Consulting as follow:

'The transect survey on 15th September 2021 commenced at 19:45 (sunset) and was 2 hours in length. The weather during the survey was cloudy and approximately 14-17°C.'

Firstly, the results of the Transect Bat Activity Survey have been included below:

Species	Surveyors		Recordings Total
	Surveyor 1	Surveyor 2	
Soprano Pipistrelle	1 recording (56kHz) - Commuting along western boundary	1 recording (56kHz) - Foraging over western immature woodland	2
Leisler's Bat	2 recordings (23kHz) - Commuting along northern and southern boundaries	3 recordings (21-22kHz) - Commuting along southern and eastern boundaries	5

Table 2.7: Transect Bat Recordings

Source: JBA Consulting, 2022

Secondly, the Static Bat Activity Survey was carried out as follows:

'A static bat detector was placed along the north-western boundary, facing south-east in towards the site. This location was selected as the best possible location to ensure that any bats passing through the site would be detected if calling.'

The results of the Static Bat Activity Survey have been included below:

'The static bat detector recorded a total of three bat species, Leisler's Bat, Common Pipistrelle and Soprano Pipistrelle, and 475 passing bat calls. Generally, the presence of bats on the site varies notably, but given the seasonally late timing of the surveys (migrations to hibernation roost areas in progress) and the less suitable weather conditions, this degree of bat activity fluctuation is to be expected. Most bat activity was recorded on the third night of the recording, 17th September, with a peak in activity on-site for Leisler's Bat; while the fourth night, 18th September, was the only night to record all three bat species within the site.'

The JBA report notes that *'the seven bat species that are potentially using the site are likely only utilising it for commuting and opportunistic foraging. The proposed development is not anticipated to have an adverse impact on population numbers of the bat species identified as using the site, as there will be no reduction in potential roosting locations due to the proposed development.'*

2.7.3 Response to Item No. 7 (c)

Please refer to Table 8-1 in Section 8.0 of the enclosed 'Ecological Impact Assessment' report prepared by JBA Consulting which contains a summary of impacts, mitigations, and significance of residual impacts on habitats, breeding birds, freshwater crayfish, and bats. Bat activity surveys (transect and static deployment) were carried out by JBA Ecologists Malin Lundberg and Mark Desmond on the 15th September 2021, which concludes:

'In conclusion, the temporary impacts on the local habitats and species will be offset by the proposed long-term, operational mitigation measures, including dark corridors and bat boxes for local bat species; enhancement measures of additional planting to safeguard the function of the existing wildlife corridor; and sections of wildflower meadows to improve existing habitats for all species. These measures will have an overall neutral-negligible residual impact that will become positive - neutral over time.'

2.8 Item No. 8: Requirement for Archaeological Assessment

Item No. 8 states:

'The applicant is requested to prepare and submit an archaeological assessment of the site. While the site is not within or near an area of archaeological potential, it is located in close proximity to a Protected Structure and is a green field site which has remained untouched for many years, where the original stone walls and water course remains in situ.'

2.8.1 Response to Item No. 8

A document entitled *Archaeological Assessment at Brownsbarn, Citywest Campus, Dublin 24*, prepared by Matt Brooks of IAC Archaeology has been enclosed with this *Response to Request for Further Information*, and concludes that the site has been subject to disturbance, with spoil dumped in the area and drainage works having been carried out. The site is considered to possess a low-moderate archaeological potential.

2.9 Item No. 9: Proposed Signage and Associated Lighting

Item No. 9 states:

'No details in regard to the proposed signage have been submitted although it is listed in the statutory description of the development. The applicant is requested to confirm if signage is being applied for as part of this permission. If not, the applicant should be satisfied that any future signage, and proposed lighting thereof, has the relevant planning permission. Any signage, and associated lighting, should ensure it is cognisance of the neighbouring Protected Structure and ecology found on the site.'

2.9.1 Response to Item No. 9

No signage is proposed as part of the subject application. Should signage be required, a subsequent Planning Application will be lodged at a later date.

2.10 Item No. 10: Details of Fence Type

Item No. 10 states:

'The applicant is requested to provide details of Fence Type A and B and of fencing types along all boundaries. A boundary plan is required clearly stating what fencing/boundary wall treatments are to be provided. The applicant should note that interference with the existing stone wall would not be acceptable to the Planning Authority.'

2.10.1 Response to Item No. 10

A drawing entitled '*Boundary Plan*' has been prepared by Kavanagh Burke Consulting Engineers and is enclosed with this *Request for Further Information Response* (Drawing No.: D1678 D3-2 PL1).

Details of Fence Type A and Fence Type B have been extracted from the 'Boundary Plan' Drawing (Drawing No.: D1678 D3-2 PL1) and are included below for reference. It is important to note the existing stone wall will not be interfered with and is listed as Fence Type B in the below Figure 2.9.

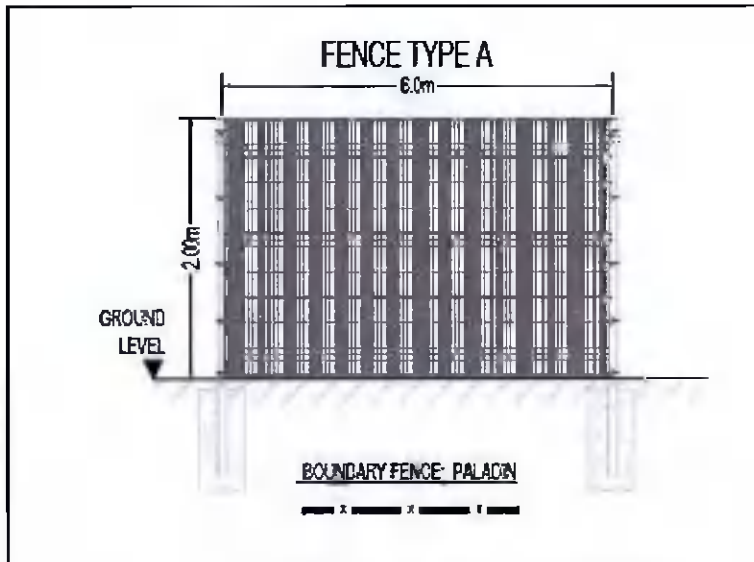


Figure 2.8:
Fence Type A – Paladin Fence

Source:
Kavanagh Burke Consulting Engineers, 2022

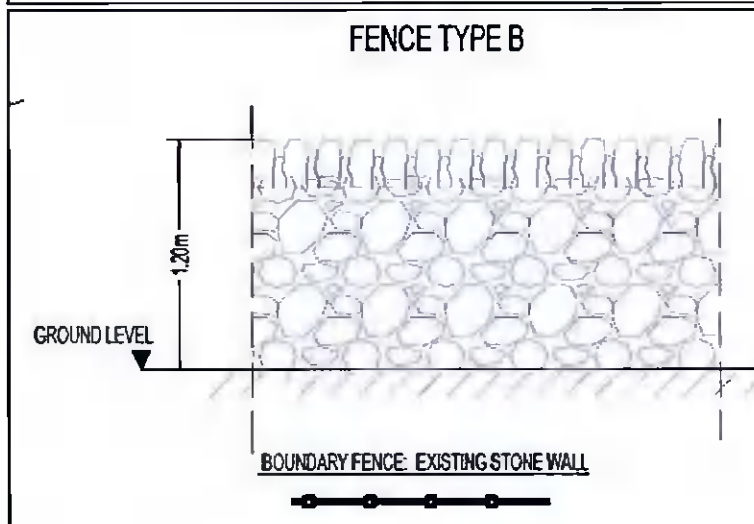


Figure 2.9:
Fence Type B – Existing Stone Wall

Source:
Kavanagh Burke Consulting Engineers, 2022

2.11 Item No. 11: Additional and Revised Photomontages

Item No. 11 states:

'The applicant is requested to submit additional photomontages (and revised photomontages due to potential changes to the proposal) to capture the full visual impact of the proposed development. These should include from the N82 bridge, from the neighbouring Protected Structure and a view straight into the site from Naas Road (N7) and the site as seen from a south-west and north-east view from the N7. All photomontages should also show the growth in the proposed vegetation over time by providing proposed photomontages for Years 1, 5 and 10. The applicant should assess if screening along the southern boundary is sufficient and propose appropriate measures if not/augment proposed screening with further measures.'

2.11.1 Response to Item No. 11

An updated set of Verified View Montages prepared by Digital Dimensions are enclosed with this *Response to Request for Further Information* where the proposed extensive vegetation has been shown over time in the photomontages for Years 1, 5 and 10. Views of the Protected Structure have been retained. An example view is provided below depicting a proposed photomontage for Year 5 taken from a key point of visibility at the N82 bridge. We submit that the image clearly demonstrates that the warehouse can be easily assimilated into the receiving context. A version of this view is also enclosed at Year 10 at which point the mature landscaping further reduces any impact of the development.



Figure 2.10: CGI Image for Year 5 taken from the N82 Bridge

Source: Digital Dimensions, 2022



3.0 CONCLUSION

We trust that this submission fully addresses the *Request for Further Information* in respect of the subject warehouse development on lands zoned for enterprise and employment development at a site at Brownsbarn, Citywest Campus, Dublin 24.

Please revert to us if we can be of further assistance or clarification.

We look forward to receiving an acknowledgement and subsequent Decision in respect of the above.

Yours sincerely,

A handwritten signature in black ink that reads "Sadhbh O'Connor".

Sadhbh O'Connor
Director
Thornton O'Connor Town Planning

Encl.

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