



Response to Item 7 of
Request for Further
Information by South Dublin
County Council

FOR

Proposed Warehouse Development

AT

Brownsbarn, Citywest Campus, Dublin 24.

February 2022

ON BEHALF OF

Exeter Ireland IV B Limited

Prepared by

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DOCUMENT CONTROL SHEET

Client	Exeter Ireland IV B Limited.
Project Title	Proposed Warehouse Development at Brownsbarn, Citywest Campus, Dublin 24.
Document Title	Response to Item 7 of Request for Further Information by South Dublin County Council.

Rev.	Status	Author(s)	Reviewed by	Approved by	Issue Date
00	Internal Draft	Liam Gaffney <i>Senior Ecologist</i>	Jim Dowdall <i>Director</i>	-	-
01	Issue	Liam Gaffney <i>Senior Ecologist</i>	Jim Dowdall <i>Director</i>	Jim Dowdall <i>Director</i>	02/11/2021

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TABLE OF CONTENTS

REPORT LIMITATIONS	II
TABLE OF CONTENTS	IV
LIST OF TABLES	IV
LIST OF FIGURES	IV
1 INTRODUCTION	1
2 BREEDING BIRDS	1
3 HABITATS	2
4 BATS	3
5 CONCLUSIONS	6
6 REFERENCES	7

LIST OF TABLES

Table 1. Results of the preliminary roost assessment of relevant bridges along the River Camac, located within the vicinity of the Brownsbarn Site (Enviroguide, 2020c). 4

Table 2. Results of the preliminary roost assessment of relevant treelines along the River Camac, located within the vicinity of the Brownsbarn Site (Enviroguide, 2020c). 5

LIST OF FIGURES

Figure 1. Enlarged section of habitat map containing the Brownsbarn Site adapted from Enviroguide (2020b) and associated habitat key (As per Fossitt, 2000). 3

Figure 2. Map adapted from Camac FRS Bat Report (Enviroguide, 2020c) showing the Brownsbarn Site in Pink, and nearby surveyed bridges and treelines. 4

1 INTRODUCTION

This document has been prepared at the request of Thornton O' Connor Planning Consultants to help address Item 7 of a Request for Further Information (RFI) made by South Dublin County Council, with regard to a proposed Warehouse Development (The Proposed Development) at Brownsbarn, Citywest Campus, Dublin 24, on 17th of August 2021.

Item 7 of this RFI states:

"7. 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 BREEDING BIRDS

With regard to the usage of the Site by breeding bird species, Enviroguide Consulting carried out breeding bird surveys within and adjacent to the Site during the summer of 2020, as part of survey works commissioned by Dublin City Council (DCC) (Enviroguide, 2020a). Enviroguide was instructed by DCC to undertake riparian breeding bird surveys of the River Camac and its tributaries and provide an assessment of the usage of this river system and its associated habitats by breeding birds.

While it should be noted that these surveys were primarily focused on the riparian corridor itself and the species utilising vegetation along its banks, primarily species dependent on these riverine habitats, all species within the general area were recorded. The following is the list of species recorded in the Baldonnel Area, which is the area that includes the Site:

- Blue Tit *Cyanistes caeruleus*
- Chaffinch *Fringilla coelebs*
- Wren *Troglodytes troglodytes*
- Robin *Erithacus rebecula*
- Willow Warbler *Phylloscopus trochilus*
- Chiffchaff *Phylloscopus collybita*
- Blackcap *Sylvia atricapilla*
- Swallow *Hirundo rustica*
- Buzzard *Buteo buteo*
- Linnet
- Stonechat

Several Red-listed¹ Grey Wagtail *Motacilla cinerea* juveniles and adults, recorded in both June and July surveys with these birds observed utilising the Corbally Stream as it joins the Camac just north-east of the Vehicle Distribution Centre.

Surveys carried out by JBA as part of the EclA (JBA, 2021) for this application recorded relatively common countryside species i.e., Blackbird *Turdus merula*, Wren *Troglodytes troglodytes*, Blue Tit *Cyanistes caeruleus*, Wood Pigeon *Columba palumbus*, Robin *Erithacus rubecula* and Sparrowhawk *Accipiter nisus*. These species are to be expected in a Site such as this containing rank grassland and wooded/scrub habitats. It is noted that the JBA bird survey was conducted in February and as such some bird species may not have been present yet due to the time of year. It is likely that Grey Wagtail would also be present along the river bank lining the western Site boundary, as this species was noted in several locations along the Corbally and Camac waterbodies during Enviroguide's surveys.

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. In addition, the proposed landscape design (JBA drawing ENO-JBAI-XX-XX-DR-L-0002, dated 10/06/2021) includes supplementary native hedgerow and tree planting along the boundaries, and within the eastern portion of the Site, which will contribute to the maintenance of nesting/roosting/foraging habitat at the Site for the local passerine population.

3 HABITATS

Enviroguide Consulting was commissioned by DCC in 2020 to undertake a baseline habitats and flora study over the summer of 2020, to include a detailed Fossitt habitat survey of semi-natural habitats of the Camac River catchment within a defined red line survey boundary (Enviroguide, 2020b). The purpose of this report was to give an overview of the semi-natural habitats within the study area to aid and inform the design of the River Camac Flood Alleviation Scheme, and subsequently the Ecological Impact Assessment process for components of said scheme. These habitat assessments were carried out in June 2020 and July 2020.

This assessment of the habitats along the Corbally/Brownsbarn Stream section described 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."

The Enviroguide (2020b) habitat descriptions for the Site (Figure 1) are largely in line with those of JBA, 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, largely

¹ As per *Birds of Conservation Concern in Ireland 4: 2020–2026* (Gilbert, Stanbury & Lewis, 2021)

conforming to JBA's 2021 description of the western Site boundary with the Corbally/Brownsbarn Stream.

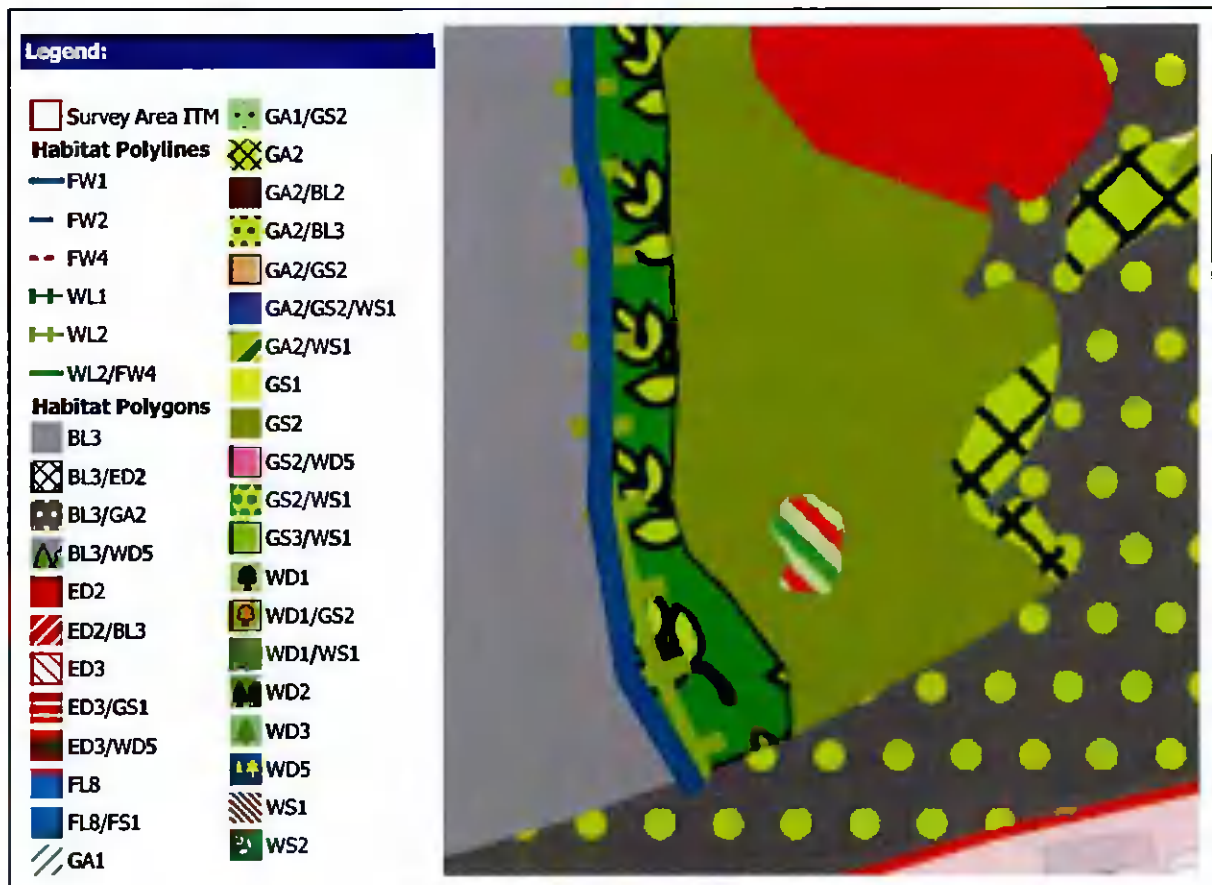


Figure 1. Enlarged section of habitat map containing the Brownsbarn Site adapted from Enviroguide (2020b) and associated habitat key (As per Fossitt, 2000).

4 BATS

In 2020 Enviroguide Consulting was commissioned by Dublin City Council (DCC) to undertake a Preliminary Roost Assessment of a number of bridges and treelines selected by DCC, located along the Camac River, as part of flood alleviation studies of the Camac River catchment (Enviroguide, 2020c). The scope of these assessments was to look for evidence of bats and potential roost features that bat may utilise within the selected bridges and treelines to inform future works along the Camac. These bat assessments were carried out in June 2020 and July 2020.

No bridges or treelines within the Brownsbarn Site (the site of the Proposed Development in this case), or directly adjacent to the Site were selected by DCC as part of Enviroguide's survey brief, however, the features that were surveyed as part of the assessment are listed below and provide some wider context to roost potential in the vicinity of the Site:

- Bridge 1 (B1)
- Treeline 3 (TL3)
- Treeline 4 (BL4)

These surveyed features and their proximity to the Site of the Proposed Development are shown below in Figure 2. Although obscured by B1 marker, Treeline 3 was assessed as *Negligible-Low-Moderate* roost potential (See Table 2).

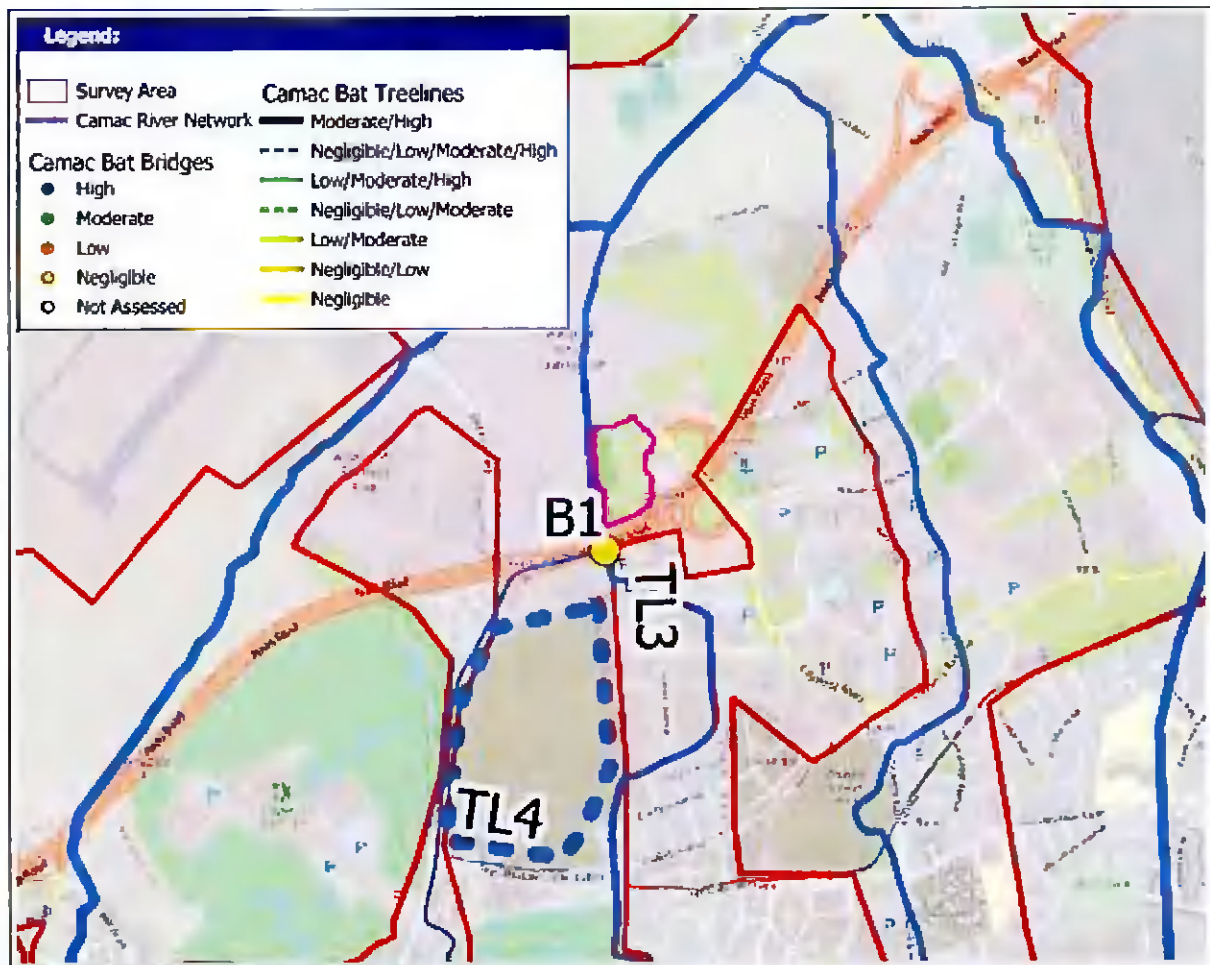




Figure 2. Map adapted from Camac FRS Bat Report (Enviroguide, 2020c) showing the Brownsbarn Site in Pink, and nearby surveyed bridges and treelines.

The tables below describe these features in further detail.

Table 1. Results of the preliminary roost assessment of relevant bridges along the River Camac, located within the vicinity of the Brownsbarn Site (Enviroguide, 2020c).

Item ID	Date Surveyed	Suitability	Notes	Image
B1	26/06/2020	Negligible	Smooth, concrete bridge easily submerged. No crevices. Accessible.	

Table 2. Results of the preliminary roost assessment of relevant treelines along the River Camac, located within the vicinity of the Brownsbarn Site (Enviroguide, 2020c).

Item ID	Main Tree Species	% treeline with bat potential	Suitability	Field Notes	Image
TL3	<i>Fraxinus excelsior</i> , <i>Corylus avellana</i> , <i>Salix sp.</i>	50%	Negligible Low Moderate	Approximately 50% of treeline with bat potential. Ash with bat potential and other 50% is willow and hazel with none.	
TL4	<i>Fraxinus excelsior</i> , <i>Fagus sp.</i> , <i>Ulmus glabra</i> , <i>Cupressus × leylandii</i> , <i>Quercus sp.</i> <i>Acer pseudoplatanus</i> , <i>Salix sp.</i>	50%	Negligible Low Moderate High	Large area. Garters Lane (High/Moderate), Bianconi Avenue (Negligible/Low), Fortunestown Lane (Negligible). Eastern side of polygon (High/Moderate).	

As described in the above tables, the bridge upstream of the Site (B1) provided negligible bat roost potential due to its modern construction and lack of roost features; while Treelines 3 & 4 located in the lands just south of the Site were assessed as having roost potential ranging from negligible to high.

With regards suitability at the Site itself for roosting bats, the Ecological Impact Assessment Report (EclA) prepared by JBA Consulting (2021) concluded based on a preliminary bat roost survey carried out in February 2021 that no evidence of any potential bat roosting features were found amongst the mature trees present within and directly adjacent to the Site of the Proposed Development.

As described in previous sections, the Site itself is predominantly covered by dry meadow GS2 habitat with linear areas of transitional scrub and immature woodland habitats present along the western boundary with the Corbally/Brownsbarn stream. Enviroguide's habitat assessments (Enviroguide, 2020b) concur with this description of the habitats at the Site. These habitat types may provide suitable commuting and foraging habitat to local bats as they move along the linear vegetation that follow the stream and the various field boundaries in the area. It is not considered likely based on the types of habitats currently present, and on JBA's preliminary assessment of the trees along the stream, that significant roosting opportunities

are present at the Site in its current condition. Bat activity surveys carried out at the appropriate time of year would be needed to confirm levels of bat activity at the Site, however, due to the relative lack of linear vegetation within the lands and the dominant rank grassland ground cover, it is likely that bat activity would be focused along the linear woodland/scrub habitats and stream that make up the western boundary of the Site.

As discussed previously, the Proposed Development design has incorporated the retention of a 10m riparian woodland buffer along the stream with additional native tree and hedge planting along the various site boundaries. It is thus likely that the impacts to local bat populations will take the form of (a) to a lesser extent, a loss of some sections of foraging habitat (i.e., Scrub, rank grassland and immature woodland), and not a loss of roosting habitat; and (b) through the permanent increased lighting of portions of the Site. As mitigation for the above impacts JBS have designed, in agreement with the lighting and landscaping consultants, for dark bat friendly corridors to be incorporated into the Site design, in the north and west of the Site. General bat considerate lighting measures are also proposed in the form of motion sensor lighting along pedestrian walkways and reduced lighting in the yards during hours of inactivity. These lighting measures, along with the supplementary planting of existing boundary vegetation, would largely maintain and possibly improve the existing bat foraging/commuting routes along the margins of the Site, maintaining habitat connectivity with the riparian woodland and surrounding lands, and as such significant impacts to local bat populations would not be deemed likely.

5 CONCLUSIONS

Birds: There were no species of concern recorded on or adjacent to the site during Enviroguide Consulting's bird surveys carried out in June and July 2020. There will be no significant impact on breeding birds as a result of the proposed development.

Habitats: The habitat mapping of the site carried out in June and July 2020 concurred with the habitat mapping carried out by JBA. The habitats that will be lost as a result of the proposed development are not significant.

Bats: The bat roost survey carried out by JBA has assessed the potential for roost suitability and has determined that there was no evidence of bat roost suitability. This is broadly consistent with Enviroguide Consulting's findings in the local area. An activity survey is recommended prior to construction which will confirm the siting of the proposed bat friendly lighting. Overall the proposed development will not have a significant impact on bats once the mitigation measures are employed.

6 REFERENCES

Enviroguide (2020a). Camac Breeding Bird Survey Report for River Camac Flood Alleviation Scheme. Report prepared for AECOM on behalf of Dublin City Council. 2020.

Enviroguide (2020b). Camac Habitats and Flora Survey Report for River Camac Flood Alleviation Scheme. Report prepared for AECOM on behalf of Dublin City Council. 2020.

Enviroguide (2020c). Bat Report for River Camac Flood Alleviation Scheme. Report prepared for AECOM on behalf of Dublin City Council. 2020.

JBA Consulting (2021). Brownsbarn Site, Citywest, Co. Dublin, Ecological Impact Assessment. 9 June 2021. Project number: 2020s1431.