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Takeda Ireland Ltd.
c/o DPS Engineering & Construction Ltd,
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Compliance with Conditions,
Planning Department,
County Hall,
Belgard Square North,
Tallaght,
Co. Dublin

19th December 2022

Re: Planning Conditions to Final Grant of Permission (17th October 2022)
Planning File Reference: SD22A/0303

To whom it concerns,

Further to the correspondence letters issued from South Dublin County Council.

- 07th September 2022- Decision Notification Grant
- 17th October 2022 - Final Grant of Permission

Takeda Ireland Ltd has prepared responses for the Conditions issued to fulfil compliance with the Notification of Grant of Permission (correspondence 07th September 2022). Takeda Ireland Ltd is fully committed to constructing the Proposed Development as per these Conditions received.

Takeda Ireland Ltd intends to commence enabling works mid-end January 2023 and will require agreement as requested on our proposals for the following Conditions 3, 4, 6, 8, 9 and 10 in advance of mid-end January 2023.

Please find enclosed with this letter responses to conditions 3, 6 & 8.

Responses are presented within the main body of this letter with supporting information (documents and drawings) provided where appropriate in Attachments 1, 2, 3, 4 & 5.



DPS Engineering & Construction Ltd.

Directors: F. Keogh, E. Kent, B. Donohoe, C. Farrelly, A.P. O'Dwyer, S. Cooke, G. Hamill, K. Fenton, J. Flynn

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Attachment No.	Document /Drawing provided	Associated Condition
1	Letter from Inland Fisheries	Condition 3
2	220513 - Arboricultural Compliance document	Condition 6
3	220513-P-11 (Tree Removals & Protection Plan)	Condition 6
4	220513-P-13 (Tree & Hedgerow Management Plan)	Condition 6
5	A21DB035-CV-002 Existing Water Supplies Infrastructure drawing	Condition 8

Condition 3

Prior to the commencement of development on the site, the applicant shall submit details of flood management and mitigation measures on the site for the written agreement of the planning authority for the operational phase of the development. These details shall set out how the applicant will ensure the development hereby approved will not obstruct important flow paths and how the storage of any hazardous substances (if applicable) connected with this development will be managed, as well as how an incident of inundation can be managed and recovery delivered quickly in an environmentally-robust manner having regard to sensitive water-based receptors. The submitted details shall demonstrate how consultation(s) with Inland Fisheries Ireland informed the preparation of these details.

REASON: In the interests of managing and mitigating flood risk and good water quality

RESPONSE:

The area of site vulnerable to flooding in a 1% AEP event is shown in the image below (excerpt from original Flood Risk Assessment – stage 3 submitted as part of the approved planning application SD22A/0303). The proposed site (VOC Abatement System Compound and Utilities Workshop) is indicated by the red box on the image below.

To mitigate the risk of contamination to the surface water system the VOC abatement system utilities area is fully bunded. The top of the bund is set 950mm above the 1% AEP MRFS flood

level. The Urea IBC containers units are bunded and positioned within the bunded compound (creating a double bund).

As the top of the bund is set 950mm above the 1% AEP MRFS flood level there is no risk of inundation of flood water into this area. In the event of a spill or leak within this area the sump drain can be diverted and pumped to a container for disposal rather than continuing to the process water drainage. The method of collection and management of any leak or spill in this area is carried out as per the EPA environmental licencing requirements for the site and Takeda's EHS team guidance.

To reduce the impact on the existing site surface water system, minimal areas drain to the surface water while all others adopt a SUD's approach:

- The new access road is finished in a permeable asphalt.
- The roof of the Utilities Workshop drains to a soak pit.
- All other areas of the development are planted with native trees, hedgerows, plants and grasses (as described in the planning report).
- The only areas of the development draining to surface water are the vehicular area of the VOC Abatement System Compound and the pedestrian footpath.



IMAGE - Flood depth on Takeda site for 1% AEP MRFS event (excerpt from FRA stage 3 as submitted with the planning application).

RED BOX: Indicates extent of VOC abatement system plinth and Utilities workshop. Total area 940m sq.

PURPLE BOX: Site including the new access road. Total area 2240m sq.

In the event of a 1% or .05% AEP flood, the location of the development will not impede but has the potential to marginally narrow the overland flow path travelling north (through the site towards culvert 1 of the Griffeen river). This occurs between the western site boundary planted berm and the VOC Abatement system compound. The current modelled level of water passing over this area is 0-20cm (1% AEP Flood event, from FRA stage 3 document submitted as part of the planning application).

As the VOC Abatement System is fully bunded (the bund is set 950mm above the 1% AEP MRFS flood level, ground level of bund set 600mm above the flood level), there is no risk of contamination to the flood water from the proposed development.

As part of this review, we held a meeting with Inland Fisheries to discuss the proposed development (drawings, planning report, EIA report and Flood Risk Assessment Stage 3). See excerpt below and attached letter.

"I am satisfied that due diligence has been completed by the applicant in recognising the potential impacts on the adjoining surface water system and that appropriate mitigation measures have been identified to protect the aquatic environment at both the construction and operational phase of the proposed development".

Please refer to attachment 1 for the Letter from Inland Fisheries.

Condition 6

The applicant is requested to submit the following additional information for the written agreement of the Planning Authority.

(a) A tree/hedgerow management plan showing the amount of trees and hedgerow being removed and the amount of compensatory/replacement trees and hedgerow being planted as part of the proposals. The latter should be at least equal to that being removed. This should be conducted by a qualified arborist.

(b) Arboricultural Method Statement including clear and practically achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.

REASON: In the interests of green infrastructure and tree protection.

RESPONSE:

An arborist survey took place at site in May 2022 to investigate the existing trees and hedgerows. This survey was submitted as part of the approved planning application.

A follow up report was created by the arborist in November 2022.

The following provides a high-level summary of the arborist's recommendations on tree retention, protection & replanting.

- a. Condition 6(a) requires a tree/hedgerow management plan showing the proposed removals and replacement planting, ensuring that the new planting is at least equal to what is being removed.

The Tree & Hedgerow Management Plan in Appendix B provides this information. It highlights the proposed tree/hedge removals and the proposed tree/hedge replacement planting as per the Landscape Layout which was prepared by DPS.

In total, 380 m² of trees and shrubs are proposed to be removed, while 385 m² of hedging and 16 trees are proposed to be planted. This concludes that the replacement planting is marginally greater than the proposed removals.

- b. Condition 6(b) requests an Arboricultural Method Statement and Tree Protection Plan to ensure retained trees are safeguarded during the proposed construction works. The Tree Removals & Protection Plan illustrates the location of the Tree Protection Zones which will be safeguarded by protective fencing. The specification of the fencing type required is shown on the plan and is in accordance with BS5837:2012.

The Arboricultural Method Statement provides detailed information on the management and protection of the trees for the main contractor during construction.

Refer to Attachment 2,3 & 4 for the arboriculturist method statement, protection & management plans and tree schedule.

Condition 8

The applicant is requested to submit a water supply infrastructure drawing of the subject site.

REASON: To ensure proper drainage

RESPONSE:

Please see attachment 5 for the water supply infrastructure drawing for the site. Please also refer to the planning report, section 6 for detail of SUD's on the site.

Yours sincerely,

For and on behalf of DPS Group.



—
Aoife Kelly,

Lead Process Architect.