

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Department: Parks & Landscape Services / Public Realm

Date: 19/04/2021

Sarah Watson

Planning Department

Development:

Construction of two single storey data centres with associated office and service areas; and three gas powered generation plant buildings with an overall gross floor area of 24,624sq.m that will comprise of the following: Demolition of abandoned single storey dwelling, remaining agricultural shed and derelict former farm building; Construction of 2 single storey data centres (12,797sq.m), both with associated plant at roof level, with 24 standby diesel generators with associated flues (each 25m high) that will be attached to a single storey goods receiving area/store and a single storey office area (2,404sq.m) located to the west of the data centres as well as associated water tower and sprinkler tank and other services; Amendments to the internal access road and omission of access to loading bay permitted under SDCC planning Ref. SD19A/0042/ABP Ref. PL06S.305948 that include the relocation of permitted, and new, internal security gates; and new internal access roads to serve the proposed development that will provide access to 39 new car parking spaces (including 4 electric and 2 disabled spaces) and sheltered bicycle parking to serve the new data centres; The development will also include the phased development of 3 two storey gas powered generation plants (9,286sq.m) within three individual buildings and ancillary development to provide power to facilitate the development of the overall site to be located within the south-west part of the overall site. Gas plant 1 (3,045sq.m) will contain 20 generator units (18+2) with associated flues (each 25m high) will facilitate, once operational the decommissioning of the temporary Gas Powered Generation Plant within its open compound as granted under SDCC Planning Ref. SD19A/0042/ABP Ref. PL06S.305948.

Gas plant 2 (3,045sq.m) will contain 20 generator units (18+2) with associated flues (each 25m high). and, Gas plant 3 (3,196sq.m) will contain 21 generator units (19+2) with associated flues (each 25m high). These plants will be built to provide power to each data centre, if and, when required. The gas plants will be required as back up power generation once the permitted power connection via the permitted substation is achieved; New attenuation pond to the north of the site; Green walls are proposed on the southern elevation of each power plant, as well as to the northern elevation of the generator compound of the data centres, and enclosing the water tower/pump room compound, and a new hedgerow is proposed linking east and west of the site; Proposed above ground gas installation compound to contain single storey kiosk (93sq.m) and boiler room (44sq.m). The development will also include ancillary site works, connections to existing infrastructural services as well as fencing and signage. The development will include minor modifications to the permitted landscaping to the west of the site as granted under SDCC planning Ref. SD19A/0042/ABP Ref. PL06S.305948. The site will remain enclosed by landscaping to all boundaries. The development will be accessed off the R120 via the permitted access granted under SDCC planning Ref. SD19A/0042/ABP Ref. PL06S.305948. An EPA-Industrial Emissions (IE) licence will be applied for to facilitate the operation of the gas powered generation plant. An Environment Impact Assessment Report (EIAR) has been submitted with this application. All on a site of 22.1hectares.

Location: **Site within the townland of Ballymakailly, West of Newcastle Road (R120), Lucan, Co. Dublin**

Applicant: **EdgeConnex Ireland Ltd.**

Reg. Ref: **SD21A/0042**

Comments:

In relation to the above proposed development, this section has reviewed the application and has the following comments.

1. Existing Trees

- The applicant has submitted an arborist report and tree constraints plan prepared by The Tree File Consulting Arborist. However, the tree constraints plan is insufficient as it doesn't display the proposed development, tree protection area or landscape plan overlay of the proposed development. No tree protection plan has been submitted to SDCC, it's unclear what's proposed to be removed and retained.
- The landscape plan prepared by Kevin Fitzpatrick Landscape Architects, drawing no101 outlines that many of the hedgerows are proposed for retention. However, further details should be submitted to SDCC to clearly define the percentage of loss.

G2 Objective 1:

- To reduce fragmentation of the Green Infrastructure network and strengthen ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network.

G2 Objective 2:

- To protect and enhance the biodiversity value and ecological function of the Green Infrastructure network.

G2 Objective 9:

- To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County

G2 Objective 13:

- To seek to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species

G6 Objective 1:

- To protect and enhance existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design process.

HCL15 Objective 3:

- To protect existing trees, hedgerows, and woodlands which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in accordance with Living with Trees: South Dublin County Council's Tree Management Policy 2015-2020.

2. Landscape Plan

- No trees have been proposed in the car parking area. Car parking trees should be provided every 5/6 car parking spaces to reduce the hard impact of the proposed development.
- A new SuDS feature is proposed in the North East of the proposed development. No details have been provided in relation to the expected times it will be full/empty, soils etc. No level details have been submitted in relation to the SuDS feature. This feature does not appear to be part of a SuDS treatment train with intervening SuDS infrastructure such as green roofs, swales, bioretention areas, SuDS tree pits to treat, attenuate and convey runoff to the attenuation pond.
- Proposed trees near hard surfaces should have suitable tree pits that have SuDS features. The applicant should submit cross section drawings to SDCC for approval.
- It has been proposed that the wildflowers will be planted into topsoil. However it's unclear if the topsoil is suitable to the proposed wildflower seed mix. The applicant should consult with the wildflower providers and submit details to SDCC.
- The applicant should submit cross section details of the tree pits in the soft landscape. The applicant should ensure that there is subsoil/sand under the root ball to ensure that the no compaction occurs due to the weight of the root balls and that water can percolate through.

- The applicant should include rejuvenating infill planting along the existing hedgerow in the planting schedule within the landscape report. Additional native Irish infill planting should be proposed at 2/m².
- At preplanning stage the green walls were proposed on the southern elevation of each Power plant, as well as to the northern elevation of the generator compound of the data centres, and enclosing the water tower/pump room compound. However green wall proposals or details have not been provided.

Recommended Conditions:

In relation to the above proposed development, this section has reviewed the application and recommends the following condition to be included as part of any grant of permission;

- 1.** The previous conditions relevant to SD19A/0042/ABP Ref. PL06S.305948 shall apply.

3.2. Trees

Prior to the commencement of the development the applicant shall submit and agree a comprehensive Tree Report with SDCC Public Realm Section. This shall comprised of a detailed Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, **Tree Protection Plan and Arboricultural Method Statement**, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction – recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:

- Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. within falling distance thereof) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site
- Tree Survey Schedule: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.
- Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).
- Design Iteration- Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team [especially arborist, consulting architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate
- Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.
- Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and

protected and those to be removed; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs) of all trees and hedgerows to be clearly shown on this drawing.

- Arboricultural Method Statement: 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.
- Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.
- Pre Development Photo's: Prior to the commencement of works the applicant shall submit pictures of the existing trees/hedgerows before works commence with the tree protective fencing. This should include a location map of where each picture was taken from.
- Arborist's name, arboricultural qualifications and contact details.
- Date that the survey was carried out (surveys > 12 months are unacceptable).
- Based on the results of the tree protection plan and arboricultural impact assessment a tree bond may be required to be agreed with South Dublin County Council with respect to retention of existing trees and hedgerows.

4.3. Three Year Post Completion Tree Survey

Prior to the commencement of development the applicant shall submit written agreement that a tree survey will be conducted post 3 years completion of site works. A suitable tree survey shall be submitted and agreed with SDCC Public Realm Section before **any** bond is released by SDCC. This shall be agreed with the Public Realm Section post 3 years completion. This is to ensure the protection of trees/hedgerow on and immediately adjacent to the site to make good any damage caused during the construction/post-construction period. The bond lodgment shall be coupled with *an Arboricultural Agreement*, with the applicant, empowering the planning authority to apply such security, or part thereof, to the satisfactory protection of the tree immediately adjoining the site, or the appropriate and reasonable replacement of the trees/hedgerows that dies, removed or become seriously damaged or diseased within a period of three years from the substantial completion of the development. Any replacement planting shall use large semi-mature tree size(s) and species or similar as may be stipulated by the planning authority.

The survey shall comprised of a detailed Tree Survey, Tree Survey Schedule, and Tree Constraints Plan, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction – recommendations. The report shall be carried out by an independent, qualified Arborist and be submitted to SDCC in hard copies and Digital format (Compact Disc) and shall include all of the following:

- Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. within falling distance thereof) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site

- Tree Survey Schedule: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.
- Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.
- Summary Table: Summary of all trees and hedgerow on site. This shall include existing, proposed and any trees that have died or been removed from the original landscape plan and arborists tree protection plan.
- Arborist's name, arboricultural qualifications and contact details.
- Date that the survey was carried out (3 years post completion of development)

Reason: to ensure the protection, safety, prudent retention and long-term viability of trees to be retained immediately adjacent to the site.

5.4. Retention of Qualified Arborist/Tree Works

Prior to the commencement of any permitted development, the developer shall engage the services of a qualified arborist as an arboricultural consultant, for the entire period of construction activity. The applicant shall inform the planning authority in writing of the appointment and name of the consultant, prior to commencement of development. The consultant shall visit the site at a minimum on a monthly basis, to ensure the implementation of all of the recommendations in the tree reports and plans.

To ensure the protection of trees to be retained within the site, the applicant shall implement all the recommendations pertaining to tree retention, tree protection and tree works, as detailed in the Arboricultural Method Statement and Tree Protection Plan in the submitted tree report. All tree felling, surgery and remedial works shall be completed upon completion of the works. All works on retained trees shall comply with proper arboricultural techniques conforming to BS 3998: 2010 Tree Work – Recommendations. The clearance of any vegetation including trees and scrub shall be carried out outside the bird-breeding season (1 March – 31 August inclusive) or as stipulated under the Wildlife Acts 1976 and 2000.

The arborist shall carry out a post construction tree survey and assessment on the condition of the retained trees. A completion certificate is to be signed off by the arborist when all permitted development works are completed and in line with the recommendations of the tree report. The certificate shall be submitted to SDCC **Public Realm Section** for written agreement upon completion of the works.

Reason: To ensure and give practical effect to the retention, protection and sustainability of trees during and after construction of the permitted development.

6-5. Landscape Design Proposals and Rationale

The site shall be landscaped (and earthworks carried out) in accordance with the detailed comprehensive scheme of landscaping which accompanied the application submitted, unless otherwise agreed in writing with the Public Realm Section prior to commencement of development. Further agreement of landscape plans/specification details with the Public Realm Section shall include the following:

- i. The applicant shall submit cross section details of the tree pits and growing mediums, the applicant shall clearly outline how SuDS features within the tree pits will function.
- ii. A tree management plan for the future shall be submitted to SDCC and implemented by the applicant. This shall be conducted by a qualified arborists.
- iii. The applicant shall test the soil nutrition's in proposed wildflower areas to ensure selected seed for the wildflower area will be adequate for the existing soil nutrition's and shall be in line with the national pollinator plan. This shall be submitted and agreed with SDCC Public Realm Section.
- iv. The applicant shall demonstrate the rate hedgerow restocking per m² in the revised planting plan. Hedgerow restocking should be at 2/m². Where new hedgerow is being planted it shall be at 3/m².
- v. Car parking trees should be provided every 5/6 car parking spaces to reduce the hard urban impact of the proposed development. Trees should have SuDS features incorporated into the tree pits.
- vi. Further details shall be submitted in relation to the SuDS attenuation basin, pond and wetland feature. This should include, proposed levels (ensure there is a slope from the development site into the feature), capacity of storage, planting plans, maintenance, etc. In addition, SuDS features that convey and treat runoff in advance of the attenuation basin should be proposed.
- vii. Further details in relation to the cross section details of the tree pits in the soft landscape shall be submitted to SDCC Public Realm Section. The applicant should ensure that there is adequate subsoil/sand under the root ball to ensure that there is no compaction occurs due to the weight of the root balls and that water can percolate through.
- viii. Details of any green wall proposals as presented at the pre planning meeting.

Reason: the interests of biodiversity, amenity, compliance with Development Plan Policy, the provision, establishment and maintenance of a reasonable standard of landscape and the proper planning and sustainable development of the area.

7-6. Retention of the Landscape Architect:

Prior to the commencement of any permitted development - the developer shall appoint and retain the services of a qualified Landscape Architect (or qualified Landscape Designer) as a Landscape Consultant, throughout the life of the construction works and shall notify the planning authority of that appointment in writing prior to commencement. A Practical Completion Certificate is to be

signed off by the Landscape Architect when all landscape works are fully completed to the satisfaction of SDCC Public Realm Section and in accordance with the permitted landscape proposals. If attenuation tree pits are proposed their installation shall be supervised by the project landscape architect.

Reason: To ensure full and verifiable implementation of the approved landscape design

7. EIAR Mitigation Measures

- a) The mitigation measures and commitments identified in the EIAR and other plans and particulars submitted with the planning application, shall be implemented in full by the developer, except as otherwise may be required in order to comply with other conditions.
- b) Prior to commencement of development, the developer shall submit a schedule of mitigation measures identified in the EIAR to the planning authority for its written agreement.

Reason: In the interest of clarity and protection of the environment and operational phases of the proposed development.

8. Ecology/Appointment of Ecologist

The developer shall appoint and retain the services of a qualified ecological consultant for the duration of the development. The consultant shall ensure that the relevant mitigation measures recommended in the EIAR prepared by Marston Planning Consultancy are implemented in full.

Fionnuala Collins
Assistant Parks Superintendent

Endorsed By: Laurence Colleran
Senior Executive Parks Superintendent