

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Department: Parks & Landscape Services / Public Realm

Date: 21/09/2021

SARAH WATSON

Area Planner

Planning Department

Development: 10 year permission for development consisting of removal of an existing unused waste water treatment facility on site and the erection of two data centre buildings, gas powered energy generation compound, and all other associated ancillary buildings and works; the two data centre buildings, DUB 15 and DUB 16, will comprise a total floor area of c. 33,577sq.m over two storeys; the first 2 storey data centre building (DUB15), located to the southwest of the site, will comprise 16,865sq.m data storage use, ancillary office use and associated electrical and mechanical plant rooms, loading bays, maintenance and storage space; a second 2 storey data centre building (DUB16), located to the southeast of the site, will comprise 16,712sq.m data storage areas, ancillary office use and associated electrical and mechanical plant rooms, loading bays, maintenance and storage space; both data centre buildings will reach a height of 20m; emergency generators and associated emission flues and plant are proposed in compounds adjacent to each data centre building; gas powered energy generation is proposed to the north east corner of the site to provide electricity for the proposed development; the application proposes to re-route and widen an existing watercourse constructed following an earlier planning permission; it is proposed to reroute this watercourse along the eastern and southern boundary of the site; landscaping is proposed to the south of the site to screen the buildings; fencing and security gates are proposed around the site; new access roads within the site are proposed along with 71 car parking spaces and 26 cycle spaces, bin stores, site lighting, and all associated works

including underground foul and storm water drainage attenuation and utility cables and all other ancillary works; a Natura Impact Statement will be submitted to the planning authority with the application.

Location: Profile Park, Ballybane, Clondalkin, Dublin 22

Applicant: Digital Netherlands, VIII B.V.

Reg. Ref: SD21A/217

Recommendation: **ADDITIONAL INFORMATION**

Site Area: 6.181 ha

Zoning

Objective EE - To provide for enterprise and employment related uses; and

Objective RU - To protect and improve rural amenity and to provide for the development of agriculture.

Main Concerns:

1. Impacts of the proposed development on existing trees, hedgerows and local biodiversity: The proposed stream may cut through the rootzone of the hedgerow and trees along the eastern boundary. This hedgerow has not been included in the tree and hedgerow survey. The tree and hedgerow survey does not extend to the full extent of the red line boundary.
2. Impact on Green Infrastructure: The landscape proposals do not show the extent of the existing hedgerow along the eastern boundary with the golf course site/Kilcarbery development. Green infrastructure links have been broken and there are no proposals for green infrastructure along the western boundary.
3. Insufficient SUDs proposals: not compliant with the County Development Plan 2016-2022. Proposed SuDS are limited to permeable paving and swales. SDCC do not approve of underground tanks unless the full potential of the site to manage surface water using soft natural features has been assessed. The landscaped area to the south, zoned rural, would be an ideal location for SuDS features. The proposed swales should be included and detailed in the landscape proposals.
4. Visual Impact: The southern boundary lacks a berm. Although mentioned in the landscape design report, the landscape plans and sections do not show berms. There is a lack of hedgerow and tree planting along the western boundary. At preplanning the applicant was asked to consider living walls and green roofs.

Relevant Sections, Policies and Objectives of the SDCC Development Plan 2016-2022:

GREEN INFRASTRUCTURE (G) Policy 2 Green Infrastructure Network

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 3: To restrict development that would fragment or prejudice the Green Infrastructure network.

G2 Objective 4: To repair habitat fragmentation and provide for regeneration of flora and fauna where weaknesses are identified in the network.

G2 Objective 5: To integrate Green Infrastructure as an essential component of all new developments.

G2 Objective 6: To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries, and increase hedgerow coverage using locally native species.

G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within design proposals and supporting their integration into the Green Infrastructure network.

G2 Objective 10: To promote a network of paths and cycle tracks to enhance accessibility to the Green Infrastructure network, while ensuring that the design and operation of the routes responds to the ecological needs of each site.

G2 Objective 11: To incorporate appropriate elements of Green Infrastructure e.g. new tree planting, grass verges, planters etc. into existing areas of hard infrastructure wherever possible, thereby integrating these areas of existing urban environment into the overall Green Infrastructure network.

G2 Objective 12: To seek to control and manage non-native invasive species and to develop strategies with relevant stakeholders to assist in the control of these species throughout 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.

GREEN INFRASTRUCTURE (G) Policy 3 Watercourses Network

G3 Objective 1: To promote the natural, historical and amenity value of the County's watercourses and address the long-term management and protection of these corridors in the South Dublin Green Infrastructure Strategy.

G3 Objective 2: To maintain a biodiversity protection zone of not less than 10 metres from the top of the bank of all watercourses in the County, with the full extent of the protection zone to be determined on a case-by-case basis by the Planning Authority, based on site specific characteristics and sensitivities. Strategic Green Routes and Trails identified in the South Dublin Tourism Strategy, 2015; the Greater Dublin Area Strategic Cycle Network; and other government plans or programmes will be open for consideration within the biodiversity protection zone, subject to appropriate safeguards and assessments, as these routes increase the accessibility of the Green Infrastructure network.

G3 Objective 3: To ensure the protection, improvement or restoration of riverine floodplains and to promote strategic measures to accommodate flooding at appropriate locations, to protect ground and surface water quality and build resilience to climate change.

G3 Objective 5: To restrict the encroachment of development on watercourses, and provide for protection measures to watercourses and their banks, including but not limited to: the prevention of pollution of the watercourse, the protection of the river bank from erosion, the retention and/or provision of wildlife corridors and the protection from light spill in sensitive locations, including during construction of permitted development.

GREEN INFRASTRUCTURE (G) Policy 4 Public Open Space and Landscape Setting

G4 Objective 2: To connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity and people and to strengthen the overall Green Infrastructure network.

G4 Objective 4: To minimise the environmental impact of external lighting at sensitive locations within the Green Infrastructure network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.

G4 Objective 7: To avoid the cumulative fragmentation and loss of ecologically sensitive areas of the Green Infrastructure network to artificial surfaces...

GREEN INFRASTRUCTURE (G) Policy 5 Sustainable Urban Drainage Systems

G5 Objective 1: To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems.

G5 Objective 2: To promote the provision of Green Roofs and/or Living Walls in developments where expansive roofs are proposed such as industrial, retail and civic developments.

INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE) Policy 2 Surface Water & Groundwater

IE2 Objective 3: To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Urban Drainage Systems (SUDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.

IE2 Objective 5: To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS) and ***avoid the use of underground attenuation and storage tanks.***

IE2 Objective 9: To protect water bodies and watercourses, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains, within the County from inappropriate development. This will include protection buffers in riverine and wetland areas as appropriate (see also Policy G3 Objective 2 – Biodiversity Protection Zone).

HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 15 Non-Designated Areas

HCL15 Objective 1: To ensure that development does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992.

HCL15 Objective 2: To ensure that, where evidence of species that are protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992 exists, appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.

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.

Living with Trees – Tree Management Policy 2015 – 2020

South Dublin County Council's Tree Management Policy 'Living with Trees' 2015-2020 contains information within Chapter 7 Trees and Development that relates to the retention, protection and planting of trees on development sites. Relevant points within this section include:

- The Council will use its powers to ensure that where it is conducive with the objectives of the County Development Plan, and other planning objectives there is maximum retention of trees on new development sites.
- In the processing of planning applications, the Council will seek the retention of trees of high amenity / environmental value taking consideration of both their individual merit and their interaction as part of a group or broader landscape feature.
- On construction sites all work must be in accordance with British Standard 5837 (2012): Trees in Relation to Design, Demolition and Construction – Recommendations.
- The Council will promote the replacement of trees removed to facilitate approved planning and development of urban spaces, buildings, streets, roads, infrastructural projects and private development sites.

In meeting the needs of development, the Public Realm Section seeks to ensure the appropriate protection and enhancement of **blue/green infrastructure** and the appropriate provision of **new blue/green infrastructure**.

The Public Realm Section has assessed the proposed development in accordance with the CDP and best practice guidelines and recommends the following:

1. Tree Survey

- i. The applicant is requested to extend the tree survey, arboricultural assessment and tree protection plan to incorporate all of the area within the redline boundary and immediately adjacent and to include hedgerows as well as trees. The location of tree protection fencing should be shown on the plans. A tree and hedgerow bond will be required. **ADDITIONAL INFORMATION**

2. Landscaping

The applicant is requested to revise the landscape proposals to include:

- i. existing hedgerows, particularly along the eastern boundary with the golf course/Kilcarbery development. It is impossible to assess the impact of the proposed stream diversion on these trees and hedgerows. The stream diversion appears to be dug

within the root protection zone of trees and hedgerows. We require an arborist method statement and an arborist to be appointed to oversee these works.

- ii. proposed swales on the landscape plan, sections and details. These are mentioned in the Engineering Report but not included in the landscape proposals. All proposed SuDS features to be included in the landscape proposals.
- iii. boundary screening: berms along the southern boundary to be shown on the landscape plans and sections. (Although the landscape design report mentioned berms, these are not shown in the landscape plans and cross sections). Mixed native hedgerow planting to be shown along the western boundary.
- iv. varied hydromorphology of the rerouted stream to create ecological diversity and amenity. Section 5.3 of the Ecological Impact Assessment sets out ecological enhancement measures to include *'a stepped bank and occasional boulders in the stream'* to *'allow for varied flow and subsequently create a variety of habitats'*. This should be reflected in the landscape plan and detailed landscape proposals.

ADDITIONAL INFORMATION

3. SUDS

There is a lack of SuDS (Sustainable Drainage System) shown for the proposed development. Further natural SUDS features should be incorporated into the proposed drainage system that address amenity, biodiversity and water quality as well as volume attenuation. The use of underground tanks should be avoided. SUDS should be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022. SDCC do not approve of using underground tanks as part of SuDS schemes where the full potential for the natural drainage features has not been explored.

The applicant shall show further proposed SuDS features for the development such as green roofs, living walls, further natural swales, channel rills, integrated tree pits, bioretention, above ground attenuation, detention basins, reed bed/wetland etc. and other such SuDS and show what attenuation capacity is provided by such SuDS. The SuDS features should be integrated into the landscape proposal and details provided on how they work. The hydromorphology of the stream diversion should be varied to create ecological diversity and enhanced amenity, water quality improvement and attenuation. The landscaped area to the south, zoned rural, would be an ideal location for SuDS features as part of a treatment train that provides multifunctional benefit. **ADDITIONAL**

INFORMATION

Summary

The proposed data centre and gas-powered energy plant development introduces significant hardstanding and prominent buildings into the landscape which in its current configuration would materially contravene policy IE2 Objective 5. Policy GI5 Objective 1 and 2, Policy GI2 and GI3 in the County Development Plan.

The Public Realm Section is requesting that the applicant provides a landscape layout that includes:

- i. existing hedgerows and how they are to be protected,
- ii. a higher percentage of soft natural SuDS features in the landscape – the southern landscaped area should be used as part of the SuDS treatment train;
- iii. planted berms along the southern boundary to mitigate the substantial visual impact.
- iv. living green walls should be investigated for the southern building facades

Fionnuala Collins
Assistant Parks Superintendent

Endorsed By: Laurence Colleran
Senior Executive Parks Superintendent