

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Department: **Parks & Landscape Services / Public Realm**

Date: **19/01/2022**

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
<u>Site Area:</u>	22.1 ha
<u>Zoning:</u>	Objective EE – To provide for enterprise and employment. Objective RU – To protect and improve rural amenity and to provide for the development of agriculture.
Recommendation:	GRANT WITH CONDITIONS

Outstanding concerns:

1. Public Open Space and Attenuation Ponds

- a) Cross sections indicate a 1:2 sloped embankment to the attenuation pond which is not best practice for health and safety, maintenance and biodiversity.
- b) The attenuation ponds are fenced off and have no access for maintenance.
- c) The maintenance access gate to the Public Open Space is not wide enough to allow access for vehicles.
- d) Fencing to Public Realm is not sufficiently robust.

e) Areas to be taken in charge require delineation.

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

CHAPTER 4 ECONOMIC AND TOURISM (ET) Policy 3 Enterprise and Employment (EE)

ET3 Objective 5: To ensure that all business parks and industrial areas are designed to the highest architectural and landscaping standards and that natural site features, such as watercourses, trees and hedgerows are retained and enhanced as an integral part of the scheme.

CHAPTER 7 INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE)

Policy 2 Surface Water & Groundwater

It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.

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.

CHAPTER 8 GREEN INFRASTRUCTURE

It is the policy of the Council to promote and develop a coherent, integrated and evolving Green Infrastructure network in South Dublin County that can connect to the regional network, secure and enhance biodiversity, provide readily accessible parks, open spaces and recreational facilities.

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 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 4 Public Open Space and Landscape Setting

G4 Objective 1: To support and facilitate the provision of a network of high quality, well located and multifunctional public parks and open spaces throughout the County and to protect and enhance the environmental capacity and ecological function of these spaces.

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 3: To enhance and diversify the outdoor recreational potential of public open spaces and parks, subject to the protection of the natural environment.

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 5: To promote the planting of woodlands, forestry, community gardens, allotments and parkland meadows within the County's open spaces and parks.

G4 Objective 6: To take steps, in conjunction with communities and businesses, to plant existing areas of grassed open space to promote the development of multifunctional amenity areas with enhanced biodiversity value.

GREEN INFRASTRUCTURE (G) Policy 5 Sustainable Urban Drainage Systems

It is the policy of the Council to promote and support the development of Sustainable Urban Drainage Systems (SUDS) in the County and to maximise the amenity and biodiversity value of these 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.

CHAPTER 9 . HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 1 Overarching

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

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.

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.

CONDITION

2. Landscape Design Proposals

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- i. .
- ii. Maintenance access gate to be 4m wide to allow vehicular access. The material needs to be robust i.e. heavy duty metal suitable for public realm.
- iii. Fencing of Public Park to be robust i.e. heavy duty round bar, minimum 16mm diameter galvanised and powder coated matt black metal railing, 1.8m high, suitable for public realm.

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.

CONDITION

3. Landscape Masterplan

- i) The site shall be landscaped in accordance with the detailed comprehensive scheme of landscaping which accompanied the application, unless otherwise agreed in writing with the Planning Authority.
- ii) Prior to the commencement of development of any works on the site, the applicant shall submit, for the written agreement of the Planning Authority, the following revised landscape proposals:
 - a. Detailed section and planting plan for the attenuation pond edge, which shall incorporate a profile that shall be stepped and planted with emergent plant species. It shall be clearly demonstrated that planting plan for the attenuation pond edge shall create habitat and enhance biodiversity and create a safe space for humans.
 - b. The fencing around the attenuation ponds within the public park shall be removed and revised safety measures shall be delivered through profiling and planting/landscaping.

- c. Details of maintenance accessibility for those responsible for 'taking in charge'.
 - d. The maintenance access gate, located in the west of the Publicly Accessible Biodiversity Park, as notated on Kevin Fitzpatrick Landscape Architecture Drawing 201 dated 04/11/21, shall be a minimum 4m wide to enable vehicular access.
 - e. All access gates and fencing specification, shall be a minimum:
 - i. Constructed of heavy-duty metal, round bar, minimum diameter 16mm
 - ii. Galvanised
 - iii. Powder coated matt black
 - iv. Maximum 1.8m high
 - v. All details of gates and fencing shall be agreed with the Planning Authority.
- iii) Prior to the commencement of development, an additional pedestrian/cyclist public access to the park, which shall be provided at the eastern boundary of the site at the R120, shall be agreed in writing with the Planning Authority.

CONDITION

REASON:

1. 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.
2. In the interests of providing full accessibility to the park and in the interest of proper planning and sustainable development of the area.

4. SuDS Implementation

The submitted SuDS scheme shall be implemented within a timescale to be agreed and approved by the Planning Authority and thereafter managed and maintained in accordance with the approved details and submitted within the Sustainable Drainage Strategy.

REASON: To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies under Section 8.4.0 Sustainable Urban Drainage Systems of the CDP 2016-22 in particular G5 Objective 1 and G5 Objective 2.

5. Tree Protection

- i) The applicant shall implement all the recommendations pertaining to tree retention, tree protection and tree works, as detailed in The Tree File Ltd Tree Protection Plan and Arboricultural Report, both dated November 2021 and submitted on 14 December 2021.
- ii) Prior to the commencement of development, the arborist shall submit photographs and confirmation that fencing for retained trees meets BS5837:2012 "Trees in Relation to Design, Demolition and Construction – Recommendations" for the written agreement of the Public Realm Section.
- iii) 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 (1st day of March to the 31st day of August inclusive) or as stipulated under the Wildlife Acts 1976 and 2000.

CONDITION

Reason: To ensure the protection of trees to be retained on site in the interests of climate adaptation, proper planning and sustainable development.

6. Retention of Qualified Arborist/Tree Works

- i) 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.
- ii) 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.

7. Tree and Hedgerow Management

The applicant shall implement all the recommendations pertaining to tree and hedgerow management as detailed in The Tree File Ltd, Tree and Hedge Management Report dated 14th August 2021 submitted 2nd September 2021.

8. Retention of the Landscape Architect:

- i) 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.
- ii) 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.
- iii) The installation of attenuation tree pits shall be supervised by the project landscape architect.

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

7. EIAR Mitigation Measures

- i. 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.
- ii. 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

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

9. Taking in Charge

- i. All areas proposed for taking in charge shall be to a taking in charge standard that ensures ease of maintenance including ease of access.
- ii. A taking in charge drawing shall be submitted to SDCC, clearly identifying what sections, if any, are proposed to be taken in charge by SDCC and should also include any phasing provisions which will apply to the public open space.
- iii. If a management company is taking in charge public open space the management company's details shall be submitted with the written confirmation and a detailed drawing.

Reason: To ensure that designs, materials and specifications shall meet with the requirements of the Local Authority and the Development Agency and in the interests of proper planning and sustainable development.

10. Biodiversity Management Plan

a) Given the numerous policies and objectives regarding Green Infrastructure in the County Development Plan 2106-2022, and given the size and nature of the proposed development. It is requested that an overarching Biodiversity Management Plan be drawn up by the applicant/developer to oversee the various biodiversity issues on the site including bats, birds, amphibians, invertebrates, mammals etc. and the provision of a range of appropriate habitat types to mitigate against potential biodiversity impacts.

The plan shall indicate how biodiversity and green infrastructure is to be protected, enhanced and developed on this site during construction and into the future, taking into account matters that include the following:

- i. The protection of hedgerows
- ii. Protections and enhancement measures for bats
- iii. Protection and enhancement of breeding birds and their habitats
- iv. The use of SUDS and Climate Adaption Measures

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