

1st July 2021

Planning Department,
South Dublin County Council,
County Hall Tallaght,
Dublin 24,
D24 A3XC

Re: Plot 100, Profile Park, Nangor Road, Clondalkin Dublin 22

Reg. Ref.: PR/0062/22

Applicant: Equinix (Ireland) Ltd.

Response re. Planning Clarification of Further Information

Dear Sir/Madam,

I write in reference to the above planning permission. Following is a clarification of the response to condition 6. Clarification of information was requested of which items 1(b) and 1(c) is relevant to Landscape Architecture, as these requests are multidisciplinary please see architects and engineers Planning correspondence for further detail and for updates on the status of all other conditions.

Request for Clarification 1(b):

“(b) There is a significant lack of SuDS features proposed for the development. The planning Authority, the Water Services Department, and the Parks and Public Realm Department have all raised concerns regarding this element. The following is required:

(i) The applicant, in their response was requested to provide SUDS throughout the development. The response to the AI request did not significantly address this important issue. The applicant is therefore requested to submit revised proposals showing significantly increased proposals for SuDS features for the development such as green roofs, living walls, swales, channel rills, integrated SuDS bioretention tree pits, bioretention features, rain gardens, rainwater harvesting, above ground attenuation, detention basins, reed bed/wetland etc. and other such SuDS and show what attenuation capacity is provided by such SuDS

(ii) The applicant is required to submit Engineering drawings showing the inclusion of more SuDS for the development as outlined in Item b)i. The drawing should show how the SuDS features are incorporated with the surface water drainage network on the site. A cross sectional detail is required of all proposed SuDS features.

(iii) Underground tanks remain beneath landscaped areas, these are generally not acceptable. These areas could be used for above-ground attenuation and/or conveyance - the tanks render these areas sterile for tree planting. 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 is requested to seek alternative solutions to minimise underground tanks and provide for significant SUDS across the entire site and is requested to clearly demonstrate, in revised proposals, the full potential for the natural drainage features explored across the site. *Note: The applicant should note that SuDS is an interdisciplinary issue their drainage engineers need to address and is not simply a landscaping requirement as indicated by the report by Pinnacle Engineers in the response to the AI request. 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.

(iv) The applicant is requested to demonstrate, in revised proposals, how the design has made use of the soft landscape to manage surface water and demonstrate how SuDS features have been integrated into the landscape proposal and provide details on how they work...

Response:

(i) See enclosed Landscape Masterplan (DB080-MA-LS-XX-DR-L-PLNT-1050) for location of additional swales and associated planting, Green roofs, and structural tree pits. See enclosed Landscape detail sheet for details of Structural tree pits. See architects pack for details of Green roofs and Engineers pack for details of all other Suds.

(ii) See Engineers pack.

(iii) See enclosed landscape masterplan (DB080-MA-LS-XX-DR-L-PLNT-1050) for the location of no.2 swales and associated native wetland planting in addition to the previously submitted above ground attenuation pond. See enclosed Landscape detail sheet 3/3 (DB080-MA-LS-XX-DR-L-PLNT-7052) for marginal planting details.

Proposed swale to the lower south of the site will result in the removal of 3 no. Ash trees, please see 'Arboricultural Impact Plan' (DB080-MA-LS-XX-DR-V-PLNT-104) and 'Arboricultural Inventory And Impact Assessment' (DB080-MA-LS-XX-RP-V-PLNT-7040).

Extract from the Arboricultural Inventory And Impact Assessment states *"Three category C Ash trees all showing signs of Ash Dieback are marked for removal to accommodate a swale at the southwest corner of the site, native replacement planting is proposed for this area."*

Additional native tree and hedgerow planting in this area will ensure the overall canopy cover will be maintained into the future, despite the removal of or subsequent loss of trees due to dieback.

"Additional replanting will works will mitigate any loss of trees as a result of the Ash Dieback, and will be a net positive to the tree cover in this particular location." -Arboricultural Inventory And Impact Assessment.

(iv) See enclosed Landscape detail sheet 3/3 (DB080-MA-LS-XX-DR-L-PLNT-7052) for Structural tree pit detail, see engineers pack for all other details. See landscape masterplan (DB080-MA-LS-XX-DR-L-PLNT-1050) for the relationship between above ground attenuation to associated planting.

The following species have been proposed:

Marginal / Emergent Plants-

Marsh Margold - *Caltha palustris*
Yellow Flag Iris- *Iris pseudacorus*
Flowering Rush- *Butomus umbellatus*
Bog Bean- *Menyanthes trifoliata*
Marsh Cinquefoil- *Potentilla palustris*
Water Mint-*Mentha aquatica*
Arrowhead- *Sagittaria sagottifolia*

Oxygenating Plants-

Curled Pondweed- *Potamogeton crispus*
Lesser Pondweed- *Potamogeton perfoliatus*

Floating / Deep Water Plants

Brandy Bottle - *Nuphar lutea*
White Water Lilly- *Nymphaea alba*

Design by nature EC05 Wetland Wild Flora Mix

Devils Bit Scabious
Common Sorrel
Cowslip

Fleabane*
Greater Trefoil*
Hemp Agrimony
Lesser Knapweed
Marsh Cinquefoil
Marsh Marigold
Meadow Buttercup
Meadowsweet
Meadow Rue
Oxeye Daisy
Purple Loosestrife
Ragged Robin
Red Clover
Red Rattle
Ribwort Plantain
Selfheal
Sneezewort*
Tufted Vetch
Water Avens*
Wild Angelica
Wild Valerian
Yarrow
Yellow Flag Iris
Yellow Rattle
Red Rattle*
Corn Marigold
Corn Poppy
Corncockle*
Cornflower*
Scented Mayweed

*Denotes a species that is either of diminished national geno-type or specific to only a few sites, or who's habitat is increasingly threatened, or the species is uncommon, rare, becoming rare, is endangered, reintroduced or saved from extinction.

Request for Clarification 1(c):

“(c) The southern landscaped/SUDS area located along the southern boundary of the site should demonstrate that 10m buffer (minimum) from the top of the northern edge of the stream is provided for its entire length in compliance with Objective G3-2 of the South Dublin County Development Plan 2016-2022. Note: All amendments to the overall proposed development should demonstrate compliance with policies and objectives as laid out in Chapters 7 and 8 of the County Development Plan. It should be clearly demonstrated that natural SuDS have been explored sufficiently and incorporated within the site (this may require the area stated for future development to be used to provide therequired SuDS.)”

Response:




The 10 m required by the county development plan is set for a watercourse:

“To promote and protect native riparian vegetation along all watercourses and ensure that a minimum 10m vegetated riparian buffer from the top of the riverbank is maintained/reinstated along all watercourses within any development site”

Source:- DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028, pg.143

The ditch to the boundary of our site could not be considered a watercourse, as it is only occasionally wet after heavy rain, but rather is a dry ditch and so an appropriate 8m setback has been provided. Refer to DB080-RKD-00-ZZ-DR-A-SITE-1021 biodiversity plan for the location of

biodiversity setbacks. Due to increased areas overall biodiversity area exceeds what would have been provided by a 10m setback alone, see table below.

BIODIVERSITY LOSS/GAIN			
	8M WIDE BIODIVERSITY PROTECTION AREA	+	4156m ²
	INCREASED BIODIVERSITY AREA	+	904m ² +100m ² =408 m ²
	LOSS DUE TO VEHICULAR ACCESS	-	103m ²
	TOTAL BIODIVERSITY AREA	=	5651m ²

Additional Native and biodiverse planting in this zone will enhance the existing ecological feature in line with:

“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.”

Additional planting in the Ecological zone include:

- Native woodland and hedgerow planting, to regenerate and enhance the existing ecological corridor.
- Diversification of tree Species. Currently, all trees along this boundary are Ash suffering from dieback, while these will be monitored into the future the planting of varied native species now will ensure tree cover is maintained as the existing trees succumb to the disease.
- Infill of Bee and insect-friendly wildflower mix to increase biodiversity value of banks and green space, providing valuable sources of food for pollinating insects.
- Wetland oxygenating plants and marginal planting naturally purify water.
- Wetland wildflower mixes make use of species that are rare, becoming rare, is endangered, reintroduced, or saved from extinction.

Overall, the planting in this area is to be maintained, enhanced, and diversified, creating a more valuable ecological zone.

ENCL.

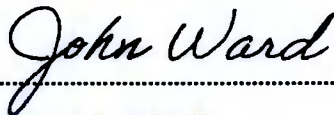
DB080-MA-LS-XX-DR-L-PLNT-1050 (Landscape Masterplan)

DB080-MA-LS-XX-RP-V-PLNT-7040 (Arboricultural Report)

DB080-MA-LS-XX-DR-V-PLNT-1041 (Arboricultural Impact Plan)

DB080-MA-LS-XX-DR-L-PLNT-7052 (Landscape Detail Sheet 3/3)

Yours sincerely,



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John Ward, Director

For and on behalf of Murray & Associates

murray & associates
landscape architecture

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