

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Department: Parks & Landscape Services / Public Realm

Date: 20/04/2022

Sarah Watson

Planning Department

Development: Demolition of the abandoned single storey dwelling and associated outbuilding (206sqm); construction of 2 two storey data centers with plant at roof level of each facility and associated ancillary development which will have a gross floor area of 40,589sq.m consisting of 1 two storey data center (Building 11) which will be located to the south of the site and will have a gross floor area of 24,667sq.m. including 22 emergency generators located at ground floor level within a compound to the western side of the data center with associated flues that will be 22.3m in height; 1 two storey data center (Building 12) which will be located to the north of the site, and to the immediate north of Building 11 and will have a gross floor area of 12,915sq.m including 11 emergency generators located at ground floor level within a compound to the western side of the data center with associated flues that will be 22.3m in height; each of the two data centers will include data storage rooms, associated electrical and mechanical plant rooms, loading bays, maintenance and storage spaces, office administration areas, and plant including PV panels at roof level as well as a separate house generator for each facility which will provide emergency power to the admin and ancillary spaces; each generator will include a diesel tank and there will be a refuelling

area to serve the proposed emergency generators; the overall height of each data center apart from the flues and plant at roof level is c. 14.23m above the finished floor level; the overall height of each data center apart from the flues and plant at roof level is c. 14.23m above the finished floor level; single storey step-up substation (38sq.m) as well as 2 single storey switch substations (121sq.m); AGI Gas Regulator compound that include 3 single storey buildings (134sq.m); construction of a gas powered generation plant in the form of a 13m high single storey building with a gross floor area of 2,714sq.m that will contain 10 gas generators with associated flues that will be 25m in height, and grouped in pairs and threes; the Gas Plant will be located to the west of Building 11; ancillary site development works, that will include reorientation of the Baldonnel Stream, biodiversity management initiatives, attenuation ponds and the installation and connection to the underground foul and storm water drainage network, and installation of utility ducts and cables, that will include the drilling and laying of ducts and cables under the internal road network within Profile Park; other ancillary site development works will include hard and soft landscaping, lighting, fencing, signage, services road, entrance gates, sprinkler tanks and pump room; a temporary gas powered generation plant within a fenced yard containing 21 generator units in containers, each with associated flues (each 25m high), 12 transformers and 10 containers of controls to be located to the west of, and associated with the first phase of Building 11, and will be required for a period of up to 2 years if connection to the national grid is delayed; this temporary plant will not be built if the connection to the national grid is in place prior to the operation of Building 11 at this site that includes an abandoned single storey residential property on the New Nangor Road (R134), Dublin 22; and on land within the townlands of Ballybane and Kilbride within Profile Park, Clondalkin, Dublin 22 on an overall site of 8.7 hectares.

Location: In the townlands of Ballybane & Kilbride within Profile Park, Clondalkin, Dublin 22

Applicant: Vantage Data Centers Dub 11 Ltd.

Reg. Ref: SD21A/0241

Recommendation: Grant with conditions

Site Area

8.7 ha

Zoning

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

Main Concerns

1. We welcome revised proposals that retain the alignment of the Baldonnel stream; and the introduction of SuDS resulting in the elimination of an underground attenuation tank. The use of underground oil separators should be avoided with suitable SuDS source control measures such as filter strips/swales or basins used to manage polluted runoff.

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 1: To maintain, improve and enhance the environmental and ecological quality of our surface waters and groundwater by implementing the programme of measures set out in the Eastern River Basin District River Basin Management Plan.

IE2 Objective 2: To protect the regionally and locally important aquifers within the County from risk of pollution and ensure the satisfactory implementation of the South Dublin Groundwater Protection Scheme 2011, and groundwater source protection zones, where data has been made available by the Geological Survey of Ireland.

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 4: To incorporate Sustainable Urban Drainage Systems (SUDS) as part of Local Area Plans, Planning Schemes, Framework Plans and Design Statements to address the potential for Sustainable Urban Drainage at a site and/or district scale, including the potential for wetland facilities.

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 6: To promote and support the retrofitting of Sustainable Urban Drainage Systems (SUDS) in established urban areas, including integrated constructed wetlands.

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).

Chapter 8. Green Infrastructure

Section 8.1.0 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 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.

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.

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.

CHAPTER 9 . HERITAGE, CONSERVATION AND LANDSCAPES (HCL)

Policy 15 Non-Designated Areas

It is the policy of the Council to protect and promote the conservation of biodiversity outside of designated areas and to ensure that species and habitats that are protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992 are adequately protected.

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.

The Public Realm Section has assessed the proposed development in accordance with the County Development Plan and best practice guidelines. We recommend the following conditions are applied to any grant of planning permission:

1. Retention of Arborist/Tree and Hedgerows Protection

- i) Prior to the commencement of any permitted development, the developer shall engage the services an independent, qualified arborist, for the entire period of construction activity.
- ii) 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.
- iii) To ensure the protection of trees to be retained with the site the applicant shall implement all the recommendations pertaining to tree retention, tree protection and tree works, as detailed in the Tree Survey, Tree Protection Plan and Arboricultural Method Statement/Tree Protection Strategy in the Arborist Associates Ltd tree report dated 15th December 2021. *This will include the preparation of a Construction Stage Method Statement as per page 12 of the report. The Method Statement shall incorporate the recommendations in 3.6.4, P6 of the report pertaining to the retention on Hedge 5 and Tree No. 0817, 0818 and Tree No.1.*

- iv) 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.
- v) All works on retained trees shall comply with proper arboricultural techniques conforming to BS 3998:2010 Tree Work – Recommendations.
- vi) 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.
- i) The arborist shall carry out a post construction tree survey and assessment on the condition of the retained trees.
- vii) 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.
- viii) The certificate shall be submitted to the planning authority 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.

2. **Landscape Proposals**

- i. The landscape plan (Drawing No. Dub11.1-DR-SP-C150-V0-WS2-KFA) as submitted to the Planning Authority in March 2022 shall be carried out within the first planting season following substantial completion of overall construction works. *Greyed areas at river crossings to be treated with river washed cobbles as per KFLA email 14/04/2022.*

- ii. All Planting shall be adequately protected from damage until establishment. Any plants which die, are removed or become seriously damaged or diseased, within a period of 3 years from the completion of the development shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.
- iii. The applicant shall retain the services of a suitably qualified Landscape Architect throughout the duration for the site development works.
- iv. The applicant's Landscape architect shall provide a certificate of completion with the approved landscape proposals within six months of substantial completion of the development.

Reason: In the interests of residential and visual amenity and to ensure full and verifiable implementation of the approved landscape design.

3. Sustainable Drainage Proposals

We welcome the introduction of SuDS and the elimination of an underground attenuation tank. However, the use of below ground petrol interceptor tanks is not best practice SuDS and should be avoided.

Prior to the commencement of any permitted development, the developer is requested to submit revised proposals, for agreement with the Public Realm Department, that utilise above ground natural source control feature(s) such as filter strips/swales or basins that eliminate the need for below ground oil interceptors.

Refer to SDCC Sustainable Drainage Explanatory Design and Evaluation Guide (sections 7.4.5 and 7.4.7).

4. Retain Ecologist

- i) Prior to the commencement of any permitted development, the developer shall engage the services an independent, qualified ecologist to implement the management recommendations of the Biodiversity Management Plan.

- ii) The applicant shall inform the planning authority in writing of the appointment and name of the consultant, prior to commencement of development.

- iii) The ecologist shall inform the planning authority in writing when the recommendations of the BMP have been implemented. This shall include the creation of wildlife shelters, bat boxes, bird boxes, hibernaculae, invertebrate banks and their final locations.

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