

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

SARAH WATSON

Planning Officer

Development: Construction of 2 adjoined single storey data centres with associated office and service areas with an overall gross floor area of 15,274sq.m comprising of the construction of 2 adjoined single storey data centres with a gross floor area of 12,859sq.m that will include a single storey goods receiving area / store and single storey office area (2,415sq.m) with PV panels above, located to the east of the data centres as well as associated water tower, sprinkler tank, pump house and other services; The data centres will also include plant at roof level; with 24 standby diesel generators with associated flues (each 25m high) that will be located within a generator yard to the west of the data centres; New internal access road and security gates to serve the proposed development that will provide access to 36 new car parking spaces (including 4 electric and 2 disabled spaces) and sheltered bicycle parking to serve the new data centres; New attenuation ponds to the north of the proposed data centres; Green walls are proposed to the south and east that will enclose the water tower and pump house compound; 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 and Ref. SD21A/0042; 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 and Ref. SD21A/0042; An

Environmental Impact Assessment Report (EIAR) has been submitted with this application.

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

Applicant: EdgeConneX Ireland Limited

Reg. Ref: SD22A/0333

Report Date: 04th Oct 2022

Recommendation: ADDITIONAL INFORMATION

Site Area: 5.18 ha

Zoning: Objective Res-EE - To provide for enterprise and employment related uses
Objective RU - To protect and improve rural amenity and provide for the development of agriculture

Main Concerns:

1. **Impacts of the proposed development on existing trees, hedgerows and local biodiversity.**
The proposals involve the removal of all hedgerows on site including boundary hedgerow.
2. **Impacts on bat commuting and foraging routes.** The hedgerows proposed for removal have a high biodiversity value and provide good commuting and foraging routes for bats, a protected species.
3. **Does not comply with SDCC Green Infrastructure (GI) Strategy** A GI Strategy has not been provided. The proposals involve the removal of all hedgerows on site. The applicant needs to demonstrate how they will re-instate these connections.
4. **Greening Factor not provided.** The applicant has not submitted any information in relation to the Green Space Factor. This is a requirement of the SDCC County Development Plan 2022-2028.
5. **Pond proposals** There appears to be variations between the landscape architect's pond edge detail showing shallow planting and those shown in the engineer's drawings (steep section which doesn't allow for a stepped profile with varied habitat).

In order to be compliant with the South Dublin County Council Development Plan (2022-2028),the proposals need to comply with the following requirements:

CHAPTER 3 NATURAL CULTURAL AND BUILT HERITAGE

Policy NCBH2 Biodiversity: *Protect, conserve, and enhance the County's biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.*

NCBH5 Objective 1: *To ensure that development does not have a significant adverse impact on biodiversity, including known rare and threatened species, and that biodiversity enhancement measures are included in all development proposals.*

NCBH5 Objective 2: *To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals.*

Policy NCBH10: Invasive Species *Protect against and prevent the introduction and spread of invasive species within the County and require landowners and developers to adhere to best practice guidance in relation to the control of invasive species.*

NCBH10 Objective 1: *To ensure that development proposals do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, applicants should submit a control and management programme with measures to prevent, control and / or eradicate the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477 / 2011).*

NCBH11 Objective 3: *To protect and retain existing trees, hedgerows, and woodlands which are of amenity and / or biodiversity and / or carbon sequestration value and / or contribute to landscape character and ensure that proper provision is made for their protection and management taking into account Living with Trees: South Dublin County Council's Tree Management Policy (2015-2020) or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area.*

NCBH11 Objective 4: *To protect the hedgerows of the County, acknowledging their role as wildlife habitats, biodiversity corridors, links within the County's green infrastructure network, their visual amenity and landscape character value and their significance as demarcations of historic field patterns and townland boundaries. (Refer also to Chapter 4: Green Infrastructure).*

CHAPTER 4 GREEN INFRASTRUCTURE

Policy GI1: Overarching

GI1 Objective 1: *To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County.*

GI1 Objective 3: *To facilitate the development and enhancement of sensitive access to and connectivity between areas of interest for residents, wildlife and biodiversity, and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites and protected habitats outside of Natura 2000 sites.*

GI1 Objective 4: *To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.*

GI1 Objective 7: *To develop linked corridors of small urban ‘Miyawaki’ native mini-woodlands, a minimum of 100 sq m in size, to capture carbon and encourage biodiversity in suitable existing built-up areas, in low grade parkland, and other areas of zoned lands where deemed suitable and appropriate.*

GI1 Objective 8: *To increase over the lifetime of this plan the percentage of land in the County, including residential, managed for biodiversity including supporting the delivery of the objectives of the County Pollinator Plan and to continue to investigate the potential for the use of low-mow methods during the lifetime of the Plan.*

Policy GI2: Biodiversity

GI2 Objective 1: *To reduce fragmentation and enhance South Dublin County’s GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage*

Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.

GI2 Objective 2: *To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.*

GI2 Objective 3: *To retrospectively repair habitat fragmentation and provide for regeneration of flora and fauna where weaknesses are identified in the network through the implementation of new GI interventions.*

GI2 Objective 4: *To integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter.*

GI2 Objective 5: *To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.*

GI2 Objective 6: *To continue to support and expand the County Pollinator Plan through the management and monitoring of the County's pollinator protection sites as part of the Council's commitment to the provisions of the National Pollinator Plan 2021-2025.*

GI2 Objective 7: *To enhance the biodiversity value of publicly owned hard infrastructure areas by incorporating the planting of new trees, grasses and other species, thereby integrating this infrastructure into the overall GI network.*

GI2 Objective 8: *To take all possible steps to mitigate the impacts on biodiversity of increased recreation within the GI network, bearing in mind the effects of scramblers, dogs, drones, littering and illegal dumping.*

GI2 Objective 10: *To enhance biodiversity and the health of pollinator species by banning the use of glyphosphate in or close to public parks, public playgrounds, community gardens / allotments and within residential estates, whether by directly employed Local Authority staff or private contractors*

Policy GI4: Sustainable Drainage Systems *Require the provision of Sustainable Drainage Systems (SuDS) in the County and maximise the amenity and biodiversity value of these systems.*

GI4 Objective 1: *To limit surface water run-off from new developments through the use of Sustainable Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Explanatory Design and Evaluation Guide, 2022.*

GI4 Objective 2: *To incorporate a SuDS management train during the design stage whereby surface water is managed locally in small sub-catchments rather than being conveyed to and managed in large systems further down the catchment.*

GI4 Objective 3: *To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.*

GI4 Objective 4: *To require that all SuDS measures are completed to a taking in charge standard.*

GI4 Objective 5: *To promote SuDS features as part of the greening of urban and rural streets to restrict or delay runoff from streets entering the storm drainage network.*

GI4 Objective 6: *To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Drainage Systems (SuDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.*

Policy GI5: Climate Resilience

GI5 Objective 4: *To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).*

SDCC Living with Trees – Tree Management Policy 2021 – 2026

South Dublin County Council's Tree Management Policy 'Living with Trees' 2021-2026 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 and with the Councils Open Space Development and Taking in Charge.*
- *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 CDP and best practice guidelines and recommends that the Planning Authority seek the following additional information:

1. Arboricultural Impact of the Proposed Development

The proposals involve the removal of all hedgerows on site including boundary hedgerow which is contrary to the objectives of the SDCC County Development Plan 2022-2028, in particular:

NCBH11 Objective 3: *To protect and retain existing trees, hedgerows, and woodlands which are of amenity and / or biodiversity and / or carbon sequestration value and / or contribute to landscape*

character and ensure that proper provision is made for their protection and management taking into account Living with Trees: South Dublin County Council's Tree Management Policy (2015-2020) or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area.

NCBH11 Objective 4: *To protect the hedgerows of the County, acknowledging their role as wildlife habitats, biodiversity corridors, links within the County's green infrastructure network, their visual amenity and landscape character value and their significance as demarcations of historic field patterns and townland boundaries. (Refer also to Chapter 4: Green Infrastructure).*

GI1 Objective 4: *To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.*

GI2 Objective 1: *To reduce fragmentation and enhance South Dublin County's GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.*

GI2 Objective 2: *To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.*

GI2 Objective 4: *To integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter.*

GI2 Objective 5: *To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native*

species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.

- i. Revised proposals that include the western boundary hedgerow into the layout by moving the building proposals eastward.
- ii. Revised proposals to include an updated Arboricultural Impact Report and Plan, Tree Protection Plan and Arboricultural Method Statement.

ADDITIONAL INFORMATION

2. Impacts on bat commuting and foraging routes

The Environmental Impact Assessment Report (EIAR) identifies the hedgerow habitat proposed for removal as providing good commuting and foraging routes for bats, a protected species. The applicant should demonstrate what mitigation is proposed for bats foraging along these routes which are to be kept dark. Refer **NCBH5 Objective 1** and related objectives above.

ADDITIONAL INFORMATION

3. Green Infrastructure

The EIAR identifies the '*hedgerows located along field boundaries*' forming '*part of a wider ecological corridor network which connects the site to the surrounding area...and beyond*'. The submitted plans propose removal of these hedgerows, in conflict with the County's Green Infrastructure Strategy. Please refer to Chapter 4 of the County Development Plan: [chapter-4-green-infrastructure.pdf \(sdcc.ie\)](http://chapter-4-green-infrastructure.pdf (sdcc.ie)).

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GI2 Objective 2: *To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.*

GI2 Objective 4: To integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter.

GI2 Objective 5: To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.

This development has not considered the impacts on Green Infrastructure and is in direct conflict with the above objectives. Additional Information is required in relation to this:

12.4.2 GREEN INFRASTRUCTURE AND DEVELOPMENT MANAGEMENT

All planning applications shall demonstrate how they contribute to the protection or enhancement of Green Infrastructure in the County through the provision of green infrastructure elements as part of the application submission, having regard to the following:

- i. *In the case of small-scale developments this may consist of a simple landscape plan which includes objectives to protect or restore existing on site GI assets, provides for connection to local or primary GI corridors or includes elements which allow the site to act as a local stepping stone;*
- ii. *Where the development site is located within or close to a Core or Corridor the development should, at a minimum, protect any existing GI assets and enhance same (for example, not breaking a GI Corridor but enhancing same with a connecting piece of planting, retaining hedgerows or woodlands);*
- iii. *The characteristics and assets of the proximate GI Core, Corridor or Stepping Stone should be reflected within proposed development, for example continuation of hedgerows, tree planting, waterways;*
- iv. *Development should seek to enhance or restore features that act as ecological corridors, particularly water features, hedgerows, tree lines, areas of un-cultivated land. These, or some element of them, should be incorporated into the proposed development to create pathways for wildlife and / or increase amenity value;*

- v. *Development sites which are not located proximate to designated GI Cores or Corridors should identify the nearest designated GI Core, Corridor or Stepping Stone and make provision for GI interventions on the site which could eventually provide a link to local Stepping Stones, Cores or Corridors;*
- vi. *Developers should be aware that ecological corridors can also act to quickly spread non-native invasive species. Therefore, identification and control of invasive species site should be included in planning applications and the GI Plan.*
- vii. *All development proposals shall be accompanied by a Green Infrastructure Plan, which will normally be submitted as part of the suite of Landscape Plans that are required for a development. Plans shall include the following:*
- viii. *Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County;*
- ix. *Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;*
- x. *Indicate how the development proposals link to and enhance the wider GI Network of the County;*
- xi. *Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site; à Proposals for identification and control of invasive species.*

ADDITIONAL INFORMATION

4. Green Space Factor (GSF)

The applicant has not submitted any information in relation to the Green Space Factor.

GI5 Objective 4: *To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).*

The quantity and quality of green infrastructure provided by new development will be improved by the implementation of a Green Space Factor (GSF) for South Dublin. The GSF is a measurement that

describes the quantity and quality of landscaping and GI across a defined spatial area. This measurement comprises a ratio that compares the amount of green space to the amount of impermeable ‘grey’ space in a subject site. As a planning tool, this ratio is used to assess both the existing green cover within a site and the impact of new development, based on the quantity and quality of new green space provided. Greening factors have been adopted and implemented across the UK, Europe and the United States to help ensure that new development makes a positive contribution to the local environment. By ensuring that new development meets minimum standards for the provision of GI the GSF aims to secure a positive contribution to biodiversity, amenity, air quality, stormwater management, temperature regulation and other ecosystem services. The GSF prioritises the retention of existing GI features within a subject site, in order to support the protection of the County’s existing GI network. At the same time, the GSF will ensure that new development incorporates new landscaping and GI features, contributing to the enhancement of the overall GI network. Chapter 12, section 12.4.2 provides further detail on the requirements for the GSF as part of planning applications.

ADDITIONAL INFORMATION

5. Pond proposals

Resolution of the variations between landscape architect’s pond edge detail and planting plan indicating shallow planting and varied slopes and those shown in the engineer’s drawings (steep section which doesn’t allow for a stepped profile with varied habitat. Pond proposals and details to demonstrate delivery of the four pillars of SuDS: amenity, biodiversity, water treatment and attenuation. Refer *SDCC Sustainable Drainage Explanatory Design and Evaluation Guide 2022*.

ADDITIONAL INFORMATION

Summary

The proposed development in its current configuration would have a significant detrimental impact on hedgerows and biodiversity and lacks a green infrastructure strategy. The proposed development would materially contravene policies and objectives for green infrastructure, biodiversity, sustainable drainage, in SDCC County Development Plan (2022-2028).

The Public Realm Section is requesting that the applicant alter the layout of the proposed development providing:

- i. Proposals that retain the western boundary hedgerow
- ii. Proposals that mitigate the loss of commuting and foraging routes for bats
- iii. a green infrastructure strategy
- iv. green space factor

- v. landscape architect and engineer proposals for pond profile and habitat proposals to be in accord – demonstrate all four pillars of SuDS can be achieved

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