

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM PUBLIC REALM PLANNING REPORT

Proposal: Development on a Site that includes a two storey residential property on lands to the south of 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 3.79hectares; The development will consist of the demolition of the two storey dwelling (207.35sqm) and associated outbuildings and farm structures (348.36sq.m); and the construction of 1 two storey data center with plant at roof level and associated ancillary development that will have a gross floor area of 12,893sqm that will consist of the following, 1 two storey data center (Building 13) with a gross floor area of 12,893sqm. It will include 13 emergency back-up generators of which 12 will be double stacked and one will be single stacked within a compound to the south-western side of the data center with associated flues that each will be 22.316m in height and 7 hot-air exhaust cooling vents that each will be 20.016m In height; The data center 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 that 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 data center will have a primary parapet height of 14.246m above ground level, with plant and screen around plus a plant room above at roof level. The plant room has an overall height of 21.571m; Construction of an internal road network and circulation areas, with a staff entrance off Falcon Avenue to the east, as well as a secondary vehicular

access for service and delivery vehicles only across a new bridge over the Baldonnel Stream from the permitted entrance as granted under SDCC Planning Ref. SD21A/0241 from the south-west, both from within Profile Park that contains an access from the New Nangor Road (R134); Provision of 60 car parking spaces (to include 12 EV spaces and 3 disabled spaces), and 34 cycle parking spaces; Signage (5.7sq.m) at first floor level at the northern end of the eastern elevation of the data center building; Ancillary site development works will include footpaths, attenuation ponds that will include an amendment to the permitted attenuation pond as granted to the north of the Baldonnel Stream under SDCC Planning Ref. SD21 A/0241, as well as green walls and green roof. 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 that will include an amendment to the permitted landscaping as granted under SDCC Planning Ref. SD21A/0241, lighting, fencing, signage, services road, entrance gates, and sprinkler tanks; An Environmental Impact Assessment Report (EIAR) has been submitted with this application.

Location: Site within the townlands of Ballybane & Kilbride, Clondalkin, Dublin 22
Applicant: Vantage Data Centers DUB11 Ltd.
Reg. Ref: SD22A/0420
Report Date: 12/12/2022
Planning Officer:
Recommendation: REQUEST ADDITIONAL INFORMATION

RELEVANT STATUTORY LOCAL POLICIES

South Dublin County Development Plan 2022-2028

Section 3.3.6 Protection of Trees and Hedgerows

Policy NCBH11

Section 3.4.3 Landscapes

Policy NCBH14

Section 4.0.1 GI and Climate Action

Policy GI1: Overarching

Section 4.2.1. Biodiversity

Policy GI2: Biodiversity

Section 4.2.2. Sustainable Water Management

Policy GI3: Sustainable Water Management

Policy GI4: Sustainable Drainage Systems

POLICY GI5: Climate Resilience

SECTION 4.2.4 Recreation and Amenity (Human Health and Wellbeing)

Policy GI6

Section 4.2.5 Landscape, Natural, Cultural and Built Heritage

Policy GI7

Section 8.7.1 Principles guiding public open space provision

Policy COS5: Parks and Public Open Space – Overarching

Section 8.7.4 Delivery of Public Open Space and Contributions in Lieu

Section 8.7.5 Quality of Public Open Space

Section 8.7.6 Play Facilities

Section 12.4.3 Riparian Corridors

South Dublin County Council’s Tree Management Policy “Living with Trees” 2021-2026

South Dublin County Council Tree Management Policy “Living with Trees” 2021-2026 contains information within Chapter 7 Tree and Development that relates to the retention, protection and planting of trees within 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.
- 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 interest as part of a group of broader landscape features
- 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, infrastructure projects and private development sites.

Main Concerns:

1. Significant loss of existing trees/fragmentation of green infrastructure. The direct impact of the proposed development will result in:
 - A total of 72 trees or 55% of the total survey tree population will need to be removed to facilitate the construction of the proposed development
 - A total of 162m of hedgerow or 62% of the total surveyed hedgerows will need to be removed to facilitate the construction of the proposed development
 - 54 category B trees (77% of the total Cat B), 17 category C (48% of the total Cat C) and 1 Category U (100% category U) will need to be removed to facilitate the construction of the proposed development.

2. The applicant is requested to submit revised proposals in order to ensure that the central hedgerow and trees located in the northern portion of the site when is proposed to be removed to accommodate the development is retained and protected as required under **NCBH11 Objective 3, GI1 Objective 4 and GI2 Objective 2** of the CDP 2022-2028.

3. The proposals have not sufficiently demonstrated compliance with GI policies. GI Plans need to be developed to reduce fragmentation of existing GI and show connections through site and into wider GI Network.

Public Realm Comments:

In relation to the above proposed development, this section has reviewed the application and has the following comments:

LANDSCAPE DESIGN PROPOSALS

The applicant shall provide the following information and consider a re-design of the proposed landscape scheme to address the following issues:

- i) The proposals have not sufficiently demonstrated compliance with GI policies. GI Plans need to be developed to reduce fragmentation of existing GI and show connections through site and into wider GI Network. The applicant is required to strengthen and enhance the GI proposals and proposed green route along the northern boundary of the site. This will require

a redesign of the landscape proposals in this area and removal of the proposed car parking space in this area.

- ii) Significantly reduce the impact of the proposed development on existing trees and hedgerows

ARBORICULTURAL IMPACT

The tree loss to facilitate the proposed development is significant. The direct impact of the proposed development will result in:

- A total of 72 trees or 55% of the total survey tree population will need to be removed to facilitate the construction of the proposed development
- A total of 162m of hedgerow or 62% of the total surveyed hedgerows will need to be removed to facilitate the construction of the proposed development
- 54 category B trees (77% of the total Cat B), 17 category C (48% of the total Cat C) and 1 Category U (100% category U) will need to be removed to facilitate the construction of the proposed development.

The applicant is requested to submit in tabular form a summary of the sites existing and proposed tree and hedgerow cover. The applicant should clearly state if the landscape proposals/mitigation planting will result in a positive or negative gain in terms of tree canopy cover. This is not acceptable to the Public Realm Section and is contrary to the following policies and objectives in the CDP 2022-2028:

- **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.
- **GI5 Objective 6:** To provide more tree cover across the county, in particular to areas that are lacking trees, with an emphasis on planting native Irish trees as appropriate

However, it is accepted as stated in the submitted Tree Survey Report "the existing pattern of tree cover in the eastern part of the site is thus quite unsuited to incorporation within an efficient revised land use layout for the site, and this makes its removal and replacement unavoidable if the site is to be re-developed for high-density residential use." In addition the Public Realm Section agree with the proposals to remove the line of Cypress trees along the southern boundary region of the site and replacing them with a native woodland mix which will help improve the biodiversity and ecology along

this riparian corridor by the removal of the heavy shading of the Cypress thereby allowing the naturalisation of the banks with understory and ground cover species.

Given the above the applicant is therefore requested to review the extent of tree removals proposed to ensure that a much higher number can be retained if possible. Failing an increase in existing trees to be retained, then the applicant is required to significantly increase the new proposed tree planting as part of the development proposals to ensure there is a positive net gain in terms of tree cover. As a minimum, existing trees removed should be replaced on a 3:1 ratio basis.

SuDS

A SuDS strategy should be developed for the proposed development which takes account of quantity, quality, and amenity issues. The design of SuDS features is required to be of high quality to achieve a multifunctional space for amenity, biodiversity and surface water management. The proposed SuDS features should aid the maintenance of the existing greenfield runoff rates or potentially reduce the amount of surface water entering the piped surface water system. In relation to Surface Water Management the new County Development Plan 2022-2028 requires Developers to include natural SuDS features as an integral part of the surface water management strategy for new developments:

- **COS5 Objective 12:** To ensure that proposed SuDS measures are only accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity value.

GREEN INFRASTRUCTURE

As required under Section 12.4.2 of the CDP 2022-2028, 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. The applicant has submitted a Green Infrastructure Plan however the applicant has failed to demonstrate how they are contributing to the protection and enhancement of GI within the development site area. The applicant is proposing to remove the central hedgerow within the site which is a key GI link through the site and into the wider GI network.

GREEN SPACE FACTOR (GSF)

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. 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. The applicant has submitted a GSF worksheet and has achieved the minimum score required of 0.5.

The Public Realm Section has assessed the proposed development in accordance with the policies and objectives of the County Development Plan 2022-2028 and with best practice guidelines and recommends the following:

1. Revised Landscape strategy

The applicant is requested to submit a revised landscape strategy for the subject site which meets the requirement of the Public Realm Section in terms of Green Infrastructure as required under the CDP 2022-2028. The applicant 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. As part of the revised landscape proposals The applicant shall provide the following additional information:

- i. The applicant is requested to submit a fully detailed Planting Plan to accompany the landscape proposals for the entire development. The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape.
- ii. The revised proposals shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated/bio-retention tree pits.
- iii. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site
- iv. Demonstrate how natural SUDs features can be incorporated into the design of the proposed Development
- v. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on this existing site and show connections to the wider GI Network. These proposals should include additional

landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population.

2. Arboricultural Impact

The proposed development would result in the removal of a centrally located hedgerow and associated mature trees of significant biodiversity and ecology value. The applicant is requested to submit revised proposals in order to ensure that this central hedgerow and trees are retained and protected. Additional information is required to demonstrate how the plans contribute to the protection or enhancement of existing Green Infrastructure (which included the trees and hedgerows) within and adjacent to the subject site through the provision of green infrastructure elements as part of the application submission, having regard to the following:

- i. Where the development site is located close to 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);
- ii. The characteristics and assets of the Corridor should be reflected within proposed development, for example continuation of hedgerows, tree planting, waterways;
- iii. 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;
- iv. 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.

3. Retention and Enhancement of Existing Central Hedgerow

The applicant is required to submit a revised layout plan which ensures the retention and enhancement of the existing central hedgerow located in the northern portion of the site. The current proposals and design layout for the development which requires the removal of this important hedgerow and GI asset is not acceptable to the Public Realm Section and its removal contravenes the following policies and objectives which the CDP 2022-2028.

- **NCBH11 Objective 3**

- **GI1 Objective 4**
- **GI2 Objective 2**

4. Additional Mitigation Tree Planting

Additional Tree planting shall be provided as part of the landscape proposals in order to ensure that there is a positive net gain in terms of new trees proposed compared to those being removed. As a minimum existing trees lost should be replaced on a 3:1 ratio basis. Full details of all proposed tree planting shall be provided on a detailed planting plan. This planting plan will include planting and maintenance specifications, including cross-section drawings, use of guards or other protective measures and confirmation of location, species and sizes, nursery stock type, supplier and defect period. Any trees that are found to be dead, dying, severely damaged or diseased within three years of the completion of the building works shall be replaced in the next planting season by specimens of similar size and species in the first suitable planting season.

5. Landscape Maintenance and Management

A scheme for the maintenance and management of the landscape scheme for the lifetime of the development shall be submitted. The scheme shall include the following:

- i) methods for the proposed maintenance regime;
- ii) detailed schedule;
- iii) details of who will be responsible for the continuing implementation
- iv) details of any phasing arrangements

6. SUDS

(A) The applicant should demonstrate compliance with the SDCC SUDS Design Guide 2022, and Policies GI3, GI4, GI5, IE3, SM2, SM7, and sections 4.3.1, 12.7.6, 12.11.1, and 12.11.3. of the South Dublin County Development Plan 2022 - 2028 in relation to sustainable drainage systems.

(B) In relation to SUDs, the applicant is requested to submit plans showing how surface water shall be attenuated to greenfield run off rates and showing what SuDS (Sustainable Drainage Systems) are proposed.

(C) SUDs Management - The applicant is requested to submit a comprehensive SUDS Management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan should also be included as a demonstration of how the system will function following implementation.

(D) Natural SUDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits, permeable paving, green roofs, filtration planting, filter strip etc. In addition, the applicant should demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details.

- (E) The applicant is requested to submit a report to show surface water attenuation calculations for proposed development. Show on a report and drawing what surface water attenuation capacity each SuDS (Sustainable Drainage System) system has in m³ . Show in report what surface water attenuation capacity is required for proposed development. Show what different surface types, areas in m² are proposed such as, green roofs, permeable paving, buildings, roads and their respective run off coefficients. Submit a drawing first phase of the development to mitigate the impacts of the construction activity on the site.

7. Green Infrastructure

The applicant is requested to provide additional information as follows and in accordance with the quoted policies and sections of the South Dublin County Development Plan 2022 - 2028:

- a) To demonstrate how they intend to reduce fragmentation of existing green infrastructure

8. Bird and Bat Boxes and hedgehog passes

A scheme to provide bird boxes and bat boxes/tubes/ hedgehog passes on the site shall be submitted.

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