

Addendum No.1
Appropriate Assessment Screening Report
For DUB06 EdgeConneX Data Centre Development,
Ballymakaily, Co. Dublin
Response to Decision Order 1281 for SD22A/0333

Date: 17th May 2023

1 Introduction

This technical note has been prepared as an Addendum, Addendum No.1, to an Appropriate Assessment (AA) Screening report (herein referred to as 'the AA Screening report') that was prepared by Scott Cawley Ltd. on 26th July 2022 for the DUB06 EdgeConneX Data Centre Project, submitted to South Dublin County Council under planning register referenced SD22A/0333.

This technical note documents changes to the proposed development on foot of a request for further information (RFI) from South Dublin County Council under decision order 1281 of planning reference SD22A/033 dated 11th October 2022. In brief, the changes to the proposed development arising from the RFI comprise:

- The creation of a new hedgerow to the west and south of the proposed data centre facility; and,
- The creation of a new bioswale to replace underground pipe work to the north of the proposed data centre facility.

This technical note, in conjunction with the information contained within the AA Screening report, is intended to provide information to the competent authority (in this instance Tipperary County Council) in the discharge of their statutory duties in relation to AA.

The methodology followed for assessment of effects on European sites is contained within Section 2 of the AA Screening report. The description of proposed development is provided in Section 3.1, the overview of the receiving environment is provided in Section 3.2, and the assessment of effects on European sites is provided in Section 3.3 of the AA Screening report. The conclusion of the AA Screening report is that the possibility of any significant effects on any European sites, arising from the project on its own or in combination with other plans and projects, can be excluded for the reasons documented in Section 3.3 of the AA Screening report, and that the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS).

2 Description of Proposed Changes to the Proposed Development

Following receipt of the RFI from the council, the applicant has emended the proposal to include the following additional items:

- The creation of a new hedgerow to the west and south of the proposed data centre facility; and,

- The creation of a new bioswale to replace underground pipe work to the north of the proposed data centre facility.

Refer to Landscape Proposals Landscape Masterplan Drawing No. 0453_101 for details of the aforementioned items.

3 Assessment of Effects of Changes on European Sites

The modifications to the proposed development do not materially affect the assessment completed by Scott Cawley of the proposed development as documented in their AA Screening report of 26th July 2022 and do not have the potential to affect the qualifying interests (QIs), special conservation interests (SCIs), or conservation objectives underpinning any European sites.

4 Conclusion

As there is no possibility of the amendments to the project affecting any European sites, the amendments to the project will not affect the conclusion of the AA Screening report prepared by Scott Cawley Ltd.

Therefore following an examination, analysis, and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded, for the reasons set out in Section 3.3 of the AA Screening report, and as set out in Section 3 of this AA Screening Addendum No. 1, above. In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.

Therefore, it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS).

Technical Note

Date: 17th May 2023 Issue 2

Re: Response to Biodiversity related items in a Request for Additional Information (Decision Order 1281) for planning register reference SD22A/0333.

Introduction

This technical note has been prepared in response to a request for additional information from South Dublin County Council in their decision on planning application SD22A/0333. The request for additional information is documented in full in Decision Order 1281, dated 10th October 2022. This technical note aims to provide clarity in relation to items 8, 9, 10, and 13.

Response to Biodiversity Issues documented in Request for Additional Information

Item 8

The planning authority requested the following:

8. 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 is requested to demonstrate what mitigation is proposed for bats foraging along these routes which are to be kept dark.

In response to the above, the potential impacts of habitat loss, including loss of hedgerow on commuting and foraging bats arising from the proposed development has been considered and documented in paragraph 6.145 of the EIAR for the project. The assessment contained in paragraph 6.145 was that *"the habitat loss will not result in a significant negative effect on the population of bat species at any geographic scale"*.

Scott Cawley Ltd., follow the approach advocated by the Chartered Institute of Ecology and Environmental Management (CIEEM) with respect to assessment of impacts and mitigation, as documented in *Guidelines for Ecological Impact Assessment in the UK and Ireland*¹ (herein referred to as "the guidelines"). According to the guidelines, *"1.11 ...Emphasis in EclA is on 'significant effects'... rather than all ecological effects..."*. Following the guidelines, it is appropriate to mitigate for significant effects rather than all ecological effects. As the effects of hedgerow loss on commuting and foraging bats has been determined not to be significant at any geographic scale, there was not a requirement to provide mitigation.

Nonetheless, the provision of new hedgerows, tree shelter belts, ponds and wet meadows will enhance the suitability of those parts of the proposed development site for foraging bats. The provision of shelter belts and hedgerows is likely to have a neutral effect on common species such as common pipistrelle bat,

¹ CIEEM (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland*. version 1.2. Chartered Institute of Ecology and Environmental Management, Winchester

soprano pipistrelle bat and Leisler's bat, as their installation is not anticipated to result in a change to the number of bats of these species that will use the site for foraging and commuting.

The provision of 2 no. attenuation ponds within the proposed development site, and associated riparian planting will enhance the site for bat species associated with waterways and open water, specifically Daubenton's bat *Myotis daubentonii* which are known to occur along the adjacent Canal. Upon their establishment, which is likely to take 2-3 years following construction, the ponds will provide stepping stone sites for this species, which uses the adjacent Grand Canal ecological corridor for foraging. The effects of enhancement of the proposed development site for this species is likely to be significant at the local scale, e.g. the proposed development site will contain high quality habitat for this species that was not present prior to its development.

The EIAR Biodiversity Chapter has been amended to include consideration of ecological enhancement on bats, as outlined in paragraphs 6.206 and 6.207.

Item 9

The planning authority requested the following:

9. The EIAR identifies the 'hedgerow 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):

GI1 Objective 4, GI2 Objective 2, GI2 Objective 4, and GI2 Objective 5.

This development has not considered the impacts on Green Infrastructure and is in direct conflict with the above objectives. Additional information is requested to address this.

Please refer to the revised text provided in paragraphs 6.195 through 6.198 of the EIAR Biodiversity Chapter, which provides clarity for the competent authority in relation to the linkages between the proposed development site and the surrounding area, including the local green infrastructure network (referred to as ecological corridors). For clarity, a response has also been provided below.

It should be noted that planning permission has been granted for developments to the west and south of the proposed development site under register references SD19A/0004, SD21A/0042, SD22A/0289. These developments include some removal of existing hedgerows but also include the provision of shelter belts of trees which will provide equivalent connectivity between the development site and the surrounding landscape. The existing hedgerow along the western boundary of the site provides connectivity to another boundary hedgerow further west of the proposed development site, however this hedgerow will be lost arising from the construction of the consented development SD21A/0042. The point of connectivity with a viable ecological corridor (e.g. a corridor that remains continuous), is with the Grand Canal to the north of the proposed development site.

The proposed development includes provision of attenuation ponds in the north of the proposed development site, and the provision of planting of hedgerows / woodland planting with native tree species on berms that separate the site from the adjacent Grand Canal. The provision of these new habitats will offset the loss of hedgerows within the proposed development site. Following receipt of the request for additional information, the landscape plan has been revised to include a new hedgerow along the western boundary of the site (refer to Landscape Proposals Landscape Masterplan Drawing No. 0453_101), which will be planted during the construction of the proposed development. The planting of this hedgerow will offset the loss of the equivalent length of hedgerow to be removed to facilitate the construction of the proposed development in the long term. The provision of a visual screening belt (this item has been permitted and is a condition of SDCC Planning reference SD19A/0042) on the eastern boundary of the site

fronting the R126 road and along the northern boundary of the site will also offset the loss of hedgerow habitat within the proposed development site.

It is acknowledged that the loss of hedgerow habitat will not be offset by an equivalent length of habitat. However, the new habitats will provide the equivalent landscape linkages that are provided by the existing hedgerow network. The existing on-site hedgerow network, albeit forming part of the wider ecological corridor, provides poor connectivity to areas to the south and west of the proposed development site, but provide a link to the Grand Canal ecological corridor to the north. The replacement planting will continue to provide ecological connectivity to this corridor. The existing hedgerows on site are also patchy and in many places derelict and dominated by low sections comprising *Rubus fruticosus* agg. with little overstorey woody species. In this context the replacement of relatively poor quality hedgerows by denser hedgerow and broader areas of immature woodland (e.g. the screening belts) comprising native species represents a neutral effect on hedgerow habitats in the long term e.g. the loss of hedgerow habitat will be offset in the medium to long term (5+ years) by the establishment of areas of higher quality habitat

In relation to 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."

Green infrastructure has been incorporated into the design of the proposed development, as described in paragraphs 6.195 through 6.198 of the revised EIAR Biodiversity chapter and will be delivered in the form of attenuation ponds, hedgerows in northern part of site, and the newly planted hedgerow along the western site boundary. The biodiversity measures included within the proposed development will provide the equivalent level of connectivity between the proposed development site and ecological corridors/green infrastructure in the surrounding area.

In relation to 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"

It has not been feasible to retain much of the onsite vegetation within the proposed development site, whilst also delivering the development. As already documented above, and in the revised text provided in paragraphs 6.195-6.198 of the revised EIAR Biodiversity Chapter, the loss of hedgerow habitats arising from the proposed development will be the longer term be offset by the creation of new hedgerow and areas of mixed woodland planting (tree shelter belts). Additionally, the delivery of 2 no. attenuation ponds, and swales and associated wetland planting will comprise a biodiversity enhancement for the site, by replacing low value habitats (recolonising bare ground and grassy verges) with floristically higher value wetland habitats which in turn likely support greater diversity of fauna, particularly insects.

In relation to 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."

As mentioned above, attenuation features which have included the consideration of biodiversity in their design represents a biodiversity enhancement of the proposed development site that is compliant with the GI2 Objective 4.

In relation to 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."

The hedgerows within the proposed development site do not form townland, parish or barony boundaries, based on review of historic maps of the lands hosted on the Ordnance Survey Ireland (OSi) website. As mentioned already, the loss of hedgerows within the proposed development site will be offset by the planting of a new hedgerow along the western boundary of the site, and the provision of new woodland planting in association with berms in the eastern and northern part of the proposed development site. While the length of these habitats is not equivalent to the relatively dense hedgerow network within the proposed development site, the existing hedgerows on site are patchy and in many places rank in structure and dominated by low sections comprising *Rubus fruticosus* agg. with little overstorey woody species. In this context the replacement of relatively poor quality hedgerows by denser hedgerow and broader areas of immature woodland (e.g. the screening belts) comprising native species represents a neutral effect on hedgerow habitats in the long term e.g. the loss of hedgerow habitat will be offset in the medium to long term (5+ years) by the establishment of areas of higher quality habitat.

Item 10

The planning authority requested the following:

10.. The applicant is requested to 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 development 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 the 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, area 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; Proposals for identification and control of invasive species.*

The proposed development site is located adjacent to the Grand Canal, which forms one of the Green Infrastructure Corridors in South Dublin County (referred to as Strategic Corridor 3 in the *South Dublin County Development Plan 2022-2028*). As documented in paragraphs 6.195-6.198 of the revised EIAR Biodiversity Chapter, the proposed development will include the provision of hedgerow and tree planting that will maintain the existing level of connectivity between the proposed development site and the surrounding area (Refer also to the Landscape Proposals Landscape Masterplan Drawing No. 0453_101, submitted under separate cover as part of the RFI response). The proposals for hedgerow and treeline planting, alongside the proposal for new habitat creation (wetlands and wet meadows) represent an improvement of the sites' biodiversity value relative to the existing baseline with respect to diversity and value of habitat types. The wetland habitats are complementary to the habitats found along the Grand Canal, and will provide a stepping stone function for wetland bird species and over time, for insect fauna associated with wetlands.

Item 13

13. 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.*

As outlined in our response to item 9 above, it was not possible to retain the western boundary hedgerow whilst also facilitating the proposed development of the site, however the revised landscape proposals include for the planting of a new hedgerow along the western boundary of the site.

In relation to Item 13 (ii), this has been answered under item 8 above.

Please refer to responses from the project landscape architect and project planner in relation to items 13 (iii) – (v).

Conclusion

Scott Cawley Ltd., have presented their responses to matters raised by South Dublin County Council in a request for additional information in relation to planning application SD22A/0333. The responses are provided in this technical note for clarity, and where appropriate, cross references have been made to the revised EIA Biodiversity Chapter and to the plans of the proposed development site prepared by the project landscape architect.