

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

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 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: 15/06/2023

Planning Officer: Sarah Watson

Recommendation: Refusal

REASONS:

1. Removal of Hedgerows / Green Infrastructure

Removal of hedgerows particularly along a primary Green/Blue corridor conflicts with our Green Infrastructure Policies. New hedgerows cannot be considered to mitigate this loss. In a recent Judgement by Justice Humphreys delivered on the 21st of June this year, the Judge stated that “Mature or indeed ancient hedgerows are just not equivalently replaceable by freshly created ones”, in addition his judgement read “the point remains that hedgerows are not a fungible item that can simply be removed and replaced with fresh vegetation. Therefore “mitigating” measures – the planting of new hedgerows – just don’t have the same value in replacing the losses, especially if the hedgerows being culled have any degree of maturity”. Therefore, as recognised by the courts, developers must make every effort to retain existing hedgerows and trees within a development site and that hedgerow removal and subsequent mitigation planting does not have the same value and that mature hedgerows and their associated ecological benefits cannot simply be replaced by the planting of new ones.

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 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.

Existing Green Infrastructure within the subject site is going to be significantly impacted and compromised as a result of the proposed development in an area of such high importance.

Policy 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 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.

2. Green Space Factor

The applicant has failed to reach the minimum Green Space Factor Score for the relevant land use zoning objective. The applicant has only achieved a score of 0.40 when a score 0.50 is required and is therefore not in compliance with **GI5 Objective 4**.

The applicant shall liaise with the Public Realm Section to determine what additional measures can be provided. Additional measures that should be considered for incorporation into the landscape design proposals in order to enhance GI, biodiversity and ecology values of the site include the following:

- Additional Open Space and Street Trees Planting: Street trees proposed should include SUDS features and provide bioretention and bio attenuation.
- Miyawaki/Mini woodland Style Planting: Consideration could be given to the inclusion of Mini-woodland Style Planting within the main open space areas – inclusion of mini woodland style planting contributes to GSF (SDCC CDP 2022-28 Policy GI5 Objective 4) and Climate Action / Tree management Strategy (SDCC CDP 2022-28 Policy GI5 Objective 3)
- Use of native and pollinator friendly planting – perennial planting and pollinator friendly bulb planting
- Tree & Plant Quantities: Increases in tree numbers and planted areas wherever possible through increases in planting density
- Specification enhancements with regard to biodiversity and native plants should be included in the detailed design for the site
- Inclusion of Bird & Bat Boxes
- Use of Wildflower Seed Mixes that are of native provenance.
- Improvements in the SuDS Design - applicant should seek to implement additional opportunities for bioretention and bio-attenuation, inclusion of green roofs, swales, suds trees pits etc. Any proposed swales should include check dams to improve bio-retention and should be detailed to maximise rooting space for planting. Applicant should refer to SDCC's SuDS Explanatory, Design & Evaluation Guide, which is available on below link: [sdcc-sustainable-drainage-explanatory-design-and-evaluation-guide.pdf](#)

As per Chapter 12 Implementation and Monitoring of the CDP 2022-2028 where the minimum GSF Score is not achieved *“the Council will engage with the applicant to help determine an alternative GI solution, to ensure that the proposed development does not detract from the local environment and makes a positive contribution to local GI provision. Where site-specific constraints do not allow for adequate landscaping features in line with minimum requirements (for example, for infill development or certain brownfield sites) a developer will be permitted to provide alternative GI interventions or contributions to make up for this shortcoming, see below. Those GI measures ultimately chosen will be dictated by the site-specific context and will be subject to agreement with Council.*

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).

Green Infrastructure is going to be compromised at an unacceptable in an area of such high importance. **Policy 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 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.

Public Realm would recommend refusal.

Conditions:

In the event that this application is granted, all buildings must be moved back a minimum of 10m from the base of any hedgerow and a much higher percentage of the existing hedgerows on site to be retained, protected and enhanced.

Hannah Johnston

Graduate Landscape Architect

Endorsed By: Laurence Colleran

Senior Executive Parks Superintendent