



Planning Ref: VA06F.311528
(Please quote in all related correspondence)

23rd November 2021

Secretary
An Bord Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902

Via email: sids@pleanala.ie

Re: Notification to the Minister for Housing, Local Government and Heritage under the Planning and Development Act, 2000, as amended.

Proposed Development: SID application for the construction of a 2 storey 220 kv Gas Insulated Switchgear (GIS) electricity substation and underground 220 kv cables to service a data centre proposed under a concurrent application on lands adjacent to Huntstown Power Station, North Road, Finglas, Dublin 11.

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

This Department notes that the site of this proposed development consists of a total of 4.33 ha, and comprises parts of two fields of fallow arable land separated by a treeline, with sections of hawthorn dominated hedgerow with some ash trees on some of the site boundary. The habitats present are not of high conservation value. Site drainage is to ditches including a large ditch along the treeline. Surface water runoff into these ditches mainly seeps into the ground, but water flows from the main ditch intermittently reach the Huntstown Stream 800 m to the north and by this watercourse run into the Ward River 6.6 km away. The latter having joined the Broadmeadow Water eventually enters the Malahide Estuary over 15 km from the development site.

Aonad na nIarratas ar Fhorbairt

Development Applications Unit

Oifigí an Rialtais

Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90

Newtown Road, Wexford, County Wexford, Y35 AP90



Seven common bird species which typically nest in trees or shrubs were recorded during survey work on the site, and these will suffer a loss of nesting habitat as result of the removal of circa 150 m of treeline and hedgerow to facilitate the proposed development. While the incorporation of large scale tree and shrub planting in the landscaping of the wider site will in the long run compensate to a considerable extent for this loss of nesting habitat, removal of woody vegetation from the site during the bird breeding season could potentially lead to the direct destruction of nests, eggs and nestlings.

Bat surveys of the development site located no roosts but identified foraging over the east of the site by the three commonest bat species in Ireland, the common and soprano pipistrelles and Leisler's bat. Single records of the more light sensitive long-eared bat and a myotis species were also made over the wider development site. To restrict the impact of light pollution on bat usage of the site, it is proposed to design the lighting for the proposed development in conformity with guidelines to avoid light spillage which might detrimentally effect bats.

The Appropriate Assessment (AA) Screening submitted in support of this application considers whether the development proposed could potentially result in any impacts on Natura 2000 sites, and in particular the Malahide Estuary Special Area of Conservation (SAC) and the Malahide Estuary Special Protection Area (SPA), but determines that because of the significant distance between the proposed development and these Natura sites, and the very weak and ecological pathway involved, the present proposal will not result in any likely changes to the Malahide Estuary European sites. The AA Screening goes on to conclude: "It can be *excluded* on the basis of objective information and in the Absence of mitigation measures, that the Proposed Development, individually or in combination with other plans pr projects, will have a significant effect on a European site." The Department of Housing, Local Government and Heritage accepts this conclusion.

Recommendations:

In the light of the above the National Parks & Wildlife Service (NPWS) recommends that any planning permission granted in response to the present application should be subject to the following conditions:

1. That any clearance of vegetation from the development site should only be carried out in the period between the 1st of September and the end of February i.e. outside the main bird breeding season.

Reason: To avoid the destruction of the nests, nestlings and eggs of breeding birds.

- 2 That before the commencement of any works on site, the lighting scheme for the proposed development shall be reviewed to ensure that its design is in accordance with guidance contained in Institution of Lighting Professionals (ILP). (2018). Guidance Note 08/18: Bats and artificial lighting in the UK. Bats and the Built Environment series [ONLINE] Available at:



<https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>

and is signed off on by a bat specialist before submission to the planning authority for its written agreement.

Reason: To avoid light pollution and conserve bat species afforded a regime of strict protection under the Habitats Directive (92/43/EEC).

You are requested to send further communications to this Department's Development Applications Unit (DAU) at referrals@housing.gov.ie where used, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

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A handwritten signature in purple ink, appearing to read 'Simon Dolan', is written over a horizontal line.

Simon Dolan
Development Applications Unit
Administration