

## 15.0 CUMULATIVE IMPACTS

### 15.1 INTRODUCTION

This chapter of the EIA Report considers the potential cumulative impacts on the environment of the proposed development with other developments (i.e. existing data storage facilities, the permitted substation and potential future development) and other developments in the locality (including planned and permitted developments).

The cumulative effects are analysed in this chapter in compliance with the requirements of the Draft EPA “Guidelines on Information to be Contained in Environmental Impact Assessment Reports” (2017). Cumulative effects are defined in the aforementioned Guidelines as *the addition of minor or significant effects, including effects of other projects, to create larger, more significant effects.*

As described in Chapter 2 Description of the Proposed Development, the proposed development will comprise an underground double circuit 110kV transmission cable installation from the existing Belcamp 220kV and 110kV Substation to a permitted 110 kV Substation (Darndale Substation) (Planning Ref. 3288/16 & 3874/16) located on the former Diamond Innovations site (Unit 1C), Clonshaugh Business & Technology Park and adjacent lands.

This chapter considers the cumulative impact of the proposed development with other proposed development in the surrounding area and is discussed in the below sections. There will be no perceptible environmental impacts during the operational phase of the cable installation (i.e. once installed and the ground re-instated) and temporary impacts only during construction.

The assessment also considers the potential cumulative impact of the proposed development with the existing permitted data storage facilities in Clonshaugh Business & Technology Park and adjacent lands. (i.e. Building A, which was completed in 2017, Building B which is scheduled for construction completion at the end of 2018, a new data storage facility (Building C) which was permitted in August 2018 and the potential future development of a further data storage facility in the south eastern portion of the site (submitted for planning in November 2018).

Reinforcement of the local network is a potential requirement of the indicative future development of the data storage facility. It is not anticipated that it will coincide with the construction of the proposed development. It would typically involve the installation of a system which will manage reactive power, which will be up to c. 10m in height within a compound c. 20m x 20m, adjacent to an existing substation, likely to be the Belcamp substation. For the purpose of this assessment it is assumed that it will be adjacent to the Belcamp substation but this is subject to agreement with Eirgrid. The asset, if constructed, would be owned by ESB Networks. The potential cumulative impact of the proposed development for the transmission cable, the data storage facility and the potential reinforcement project, has been assessed to the extent possible, having regard to the preliminary nature of both plans.

The permitted 110kV Substation on the site commenced construction in Q2 2018 and is due to be completed at the end Q 4 2018. It is noted that there is a potential for minor cumulative impacts from electrical installation works required to complete this substation with the proposed development.

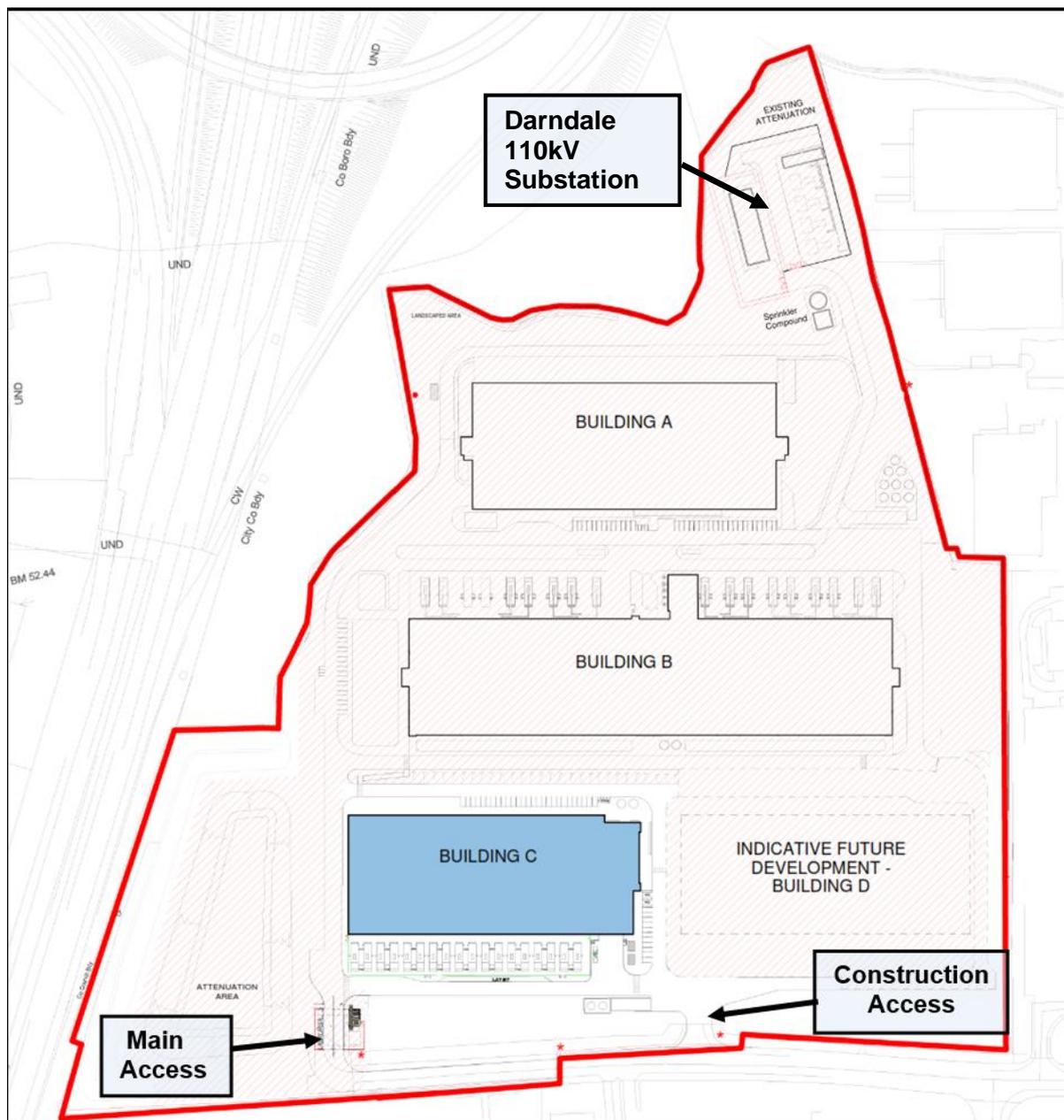
A list of other developments in the area that have been granted planning permission in the past five years is provided in Chapter 3 (Section 4.4). As the proposed

development is close to the local authority boundary of Dublin City Council (DCC) with Fingal County Council (FCC), developments within both local authority areas have been listed in Tables 4.1 and 4.2 of Chapter 3. The assessment considers the potential cumulative impact of the proposed development with other notable developments in the area, where relevant.

The potential cumulative effects are considered for each environmental aspect in Sections 15.2 – 15.12.

#### **15.1.1 Existing Data Storage Facilities, Future Data Storage Facility (Building C - Permitted and Building D -submitted for planning), and Permitted 110kV Substation**

The Darndale 110kV substation (currently being constructed) is located on the northern section of the former Diamond Innovations site (Unit 1C), Clonshaugh Business & Technology Park, and adjacent lands. Figure 15.1 shows that a number of data storage facilities are associated with the Clonshaugh site including Building A (currently operational), Building B (construction is well advanced) and Building C (permitted) and Building D (submitted for planning November 2018).



**Figure 15.1** Proposed Site Layout showing Darndale 110kV Substation to the north of the site

It is anticipated that (subject to grant of permission) the construction of the proposed development is likely to coincide with construction of the data storage development, Building C and or D, and possibly final installation within the permitted Substation on the site.

## 15.2 POPULATION AND HUMAN HEALTH

There will be a temporary, imperceptible, positive effect on local business as a result of the proposed development with the presence of c.10-30 construction workers using local facilities during the construction phase. The recently permitted Building C data storage facility will bring the total number of permanent jobs created at Clonshaugh to c. 96 full time jobs and creating employment in the area during construction phases as well as indirect employment into the future (logistics, maintenance etc).

The potential cumulative impact of the proposed data storage development (Building C and Building D) and the proposed cable transmission development on population and human health (Chapter 4) in terms of air quality and climate (Chapter 8) and noise and vibration (Chapter 9) are discussed in the relevant sections of the population and human health chapters for the proposed development. As described in each chapter for the proposed development, there is no significant effect associated with the proposed development on human health and therefore no overall cumulative impact during construction or operation.

The potential impacts on local residences and businesses associated with construction of the proposed transmission cable installation will be in relation to air quality, noise and vibration, visual impact and traffic impact. The proposed development will have a relatively short construction period (c. 19 weeks) so any cumulative impacts from road openings and traffic diversions will be temporary in duration. The potential impact of local service diversions on the local population will be temporary and likely to be imperceptible. The proposed route does not cross directly in front of any business or residence; passing c. 70m from the Clayton Hotel Dublin Airport and c. 40m from the apartments in Clonshaugh Woods at its closest point. There will be a positive, long term impact during the operational phase in terms of increased available electricity supply, to facilitate future development post construction.

As described in Chapter 12 Traffic, considering local planned development, there will be a temporary, slight, negative effect on traffic during the construction phase of the proposed development, with negligible trip generation during operation phase (c. one return vehicular trip every 3 years) to the area. As such there is long-term, neutral and imperceptible cumulative effect.

The potential reinforcement project is expected to have a relatively short construction period and require a limited number of construction staff and deliveries so any cumulative impact of the construction of the indicative future development and potential reinforcement project, are expected to be temporary and imperceptible. The cumulative effect of both projects for the operation phase is predicted to be imperceptible.

A number of the permitted developments listed in Table 3.1 and 3.2 generally refer to relatively small projects on existing facilities within the Clonshaugh Business and Technology Park which are considered to have an imperceptible effect on the local population. Planning permission has been granted for construction of an aviation fuel line (Reg. Ref. F15A/0141 and 2552/15) along the R139. The construction of the aviation fuel line along the R139 will not coincide with the construction of the proposed development as they will be subject to T2 applications to the Local Authority (DCC and/or FCC) for road opening licences and the Local Authority would generally not permit two separate projects requiring road opening licences to occur at the same time along the same section of road. Mitigation measures as outlined in Chapter 12 for the construction phase include all works requiring access to the R139 carriageway to be conducted between the hours of 7pm to 6am. There is no cumulative impact associated with the operational phase of these projects.

It is expected that the proposed development will have a positive and long-term effect on the immediate hinterland through facilitating the provision of adequate electricity supply that could potentially facilitate in turn future employment opportunities. The data storage developments will have a positive impact in Dublin Region through continued expanding employment and the associated economic and social benefits,

it is concluded that any cumulative impacts on population and human health will be **positive** and **long term**.

### 15.3 HYDROLOGY

The Former Diamond Innovations site (Unit 1C) has already been largely cleared as part of the construction of data storage developments already permitted at the site. Attenuation ponds are in place that have been designed to accommodate the additional hardstanding areas created by Buildings A, B, C and future development (Building D) of the south-eastern portion of the site. Surface and foul water drainage connections for the proposed development and indicative future development will be facilitated by expansion of the existing drainage networks on site. There are no surface water bodies on the site itself or along its boundaries. An Environmental Safety and Health Management System and associated operational procedures are in place for operations at Building A and a Construction Environmental Management Plan (CEMP) is currently being implemented for the construction phase of Building B and similar is proposed for Building C (permitted). Therefore, the cumulative impact is considered to be **imperceptible** and **neutral**.

The route of the proposed cable installation will cross the Mayne River at one point. It is proposed to manage the water flow within the river during construction by placing a dam in the river, with an over pumping arrangement in place during the short term works (c. 1 week). The construction of the cable installation will have no impact on existing water supplies, wastewater and storm water drainage in the area. Construction works in areas of existing underground infrastructure will need to be managed to ensure no damage is caused to existing services. As such the predicted cumulative impact of the data storage development and the proposed development on the hydrological environment is predicted to be **temporary, imperceptible** and **neutral**. The cumulative impact provided the mitigation measures outlined in Chapter 5 are implemented for the proposed development, is predicted to be **neutral** in terms of quality and of an **imperceptible** significance, following EPA criteria for impact assessment.

The potential reinforcement project, indicative future data storage development and other proposed projects listed Tables 3.1 and 3.2 of Chapter 3 will introduce an additional hardstanding area. This increase in hardstanding will include measures for attenuation of run-off to ensure no increase in flooding. As the proposed transmission cable has no resultant increase in hardstand, the cumulative impact is predicted to be **neutral** in terms of quality and of an **imperceptible** significance, following EPA criteria for impact assessment.

Overall, the impact on the hydrological environment as a result of the wider developments in the area are considered to be **long-term** and **imperceptible**. Provided mitigation measures are in place at each of the developments, the overall impact is expected to be **neutral**.

### 15.4 LAND, SOILS, GEOLOGY AND HYDROGEOLOGY

Building A, B and Building C have already been largely cleared as part of the construction of developments already permitted at the site. An Environmental Safety and Health Management System and associated operational procedures are in place for operations at Building A and a Construction Environmental Management Plan (CEMP) is currently being implemented for the construction phase of Building B and

similar is proposed for Building C (permitted in August 2018) and will be included for potential future development on the site as well. The area surrounding the site and the proposed cable installation route is underlain by up to 20m of stiff Dublin Boulder Clay. This aids in the protection of the underlying aquifer with the vulnerability rating defined as low. There are no historic mines, designated mineral resources or quarries in the immediate vicinity of the proposed cable installation. Adherence to the procedures and plans already in place and the mitigation measures set out in Chapter 6 Land, Soils, Geology and Hydrogeology, will ensure the cumulative impact of the build out of the Clonshaugh data storage facility and the transmission cable installation on the land, soils, geology and hydrogeology will be **imperceptible** and **neutral**.

An historic illegal landfill has been identified on lands immediately north of the R139. A site investigation was carried out in 2006, on behalf of IDA Ireland, as part of an EIS. Evidence suggested that the illegal landfill was created in the early 1980's and that up to 50,000m<sup>3</sup> of waste was deposited at the site. The proposed route for the cable installation has taken account of the predicted location of the 'waste body' and the proposed route is to the southern side of the R139 to minimise the likelihood of crossing the illegal landfill area. It is anticipated that the presence of Dublin Boulder Clay is also protecting the underlying aquifer and acting as a confining layer for vertical migration of any residual contamination from the landfill site.

The potential reinforcement project, if it were to proceed, would require site clearance and levelling to facilitate construction. The proposed location of the compound at the Belcamp substation does not coincide with the illegal landfill area referred to above. The reinforcement project will be required to adhere to legal and best practice requirements. Similarly, construction of the indicative future development on the Clonshaugh data storage site, which may be carried out at the same time, may require some site clearance/levelling works. The indicative future development will be subject to EIA and planning conditions which include appropriate mitigation measures to minimise impacts on the soils, geological and hydrogeological environment.

A comprehensive list of current planning applications for the area surrounding the proposed development are presented in Tables 3.1 and 3.2 of Chapter 3. The primary potential cumulative impact considered is local increase in hard standing and subsequent decrease in local groundwater recharge. Given the relative scale of the proposed development which does not result in any significant increase in hard stand area and that of the geological and hydrogeological environments in which they are based, i.e. the "local important" bedrock aquifer with low vulnerability, the potential cumulative impact with respect to the land, soils, geology and hydrogeology of the local and surrounding areas is deemed to be insignificant. Each project currently permitted or under construction is subject to EIA and/or planning conditions which include appropriate mitigation measures to minimise impacts on the land, geological and hydrogeological environment. Cumulative impacts, if any, will be limited to the construction stage and will, therefore, be **temporary** to **short-term** in duration. As long as mitigation measures for the developments are carried out as permitted, there will be no significant cumulative impacts on the land, geological and hydrogeological environment.

Overall the cumulative impact of the construction of the proposed development with the current (Buildings A and B) and proposed development (Building C and D) are predicted to be **neutral** in terms of quality and of an **imperceptible** significance (temporary in duration), following EPA criteria for impact assessment. Following the NRA criteria for rating the magnitude and significance of impacts on the geological

and hydrogeological related attributes, the magnitude of impacts is considered ***negligible***.

## 15.5 BIODIVERSITY

As part of the Screening for an Appropriate Assessment (AA), in addition to the proposed development, other relevant projects and plans in the region must also be considered at this stage. This step aims to identify at this early stage any possible significant cumulative effects / impacts of the proposed development with other such plans and projects on the Natura 2000 sites.

A search of the Fingal County and Dublin City Planning databases were undertaken for the Belcamp area for applications that have been granted planning permission within the last five years. The majority of projects refer to alterations to existing developments with no potential for cumulative effects. The following specific projects are considered further due to their scale and/or the inclusion of an EIS/AA.

Moore Group contributed to an environmental appraisal of the data storage developments in Clonshaugh technology and industrial park and the proposed route for the proposed development and determined that there would be no significant impacts on nearby European sites and therefore cumulative impacts can be ruled out.

Similarly, the potential reinforcement project would be initially screened for AA and if requiring Stage 2 AA, ensuring that appropriate employable mitigation measures would be put in place to avoid, reduce or ameliorate negative impacts if any.

F15A/0609 refers to an application for the proposed development of houses, apartments and shops and the change of use of Belcamp Hall, Belcamp, Malahide Road, Dublin 17. The case was referred to An Bord Pleanála and granted permission with conditions. The Board completed an AA Screening and concluded that considering the information presented that, by itself or in combination with other development in the vicinity, the proposed development would not be likely to have a significant effect on any European site.

F18A/0058 refers to an application for amendments to permitted development Reg. Ref. F15A/0609, PL06F.248052, at Belcamp, a protected structure (RPS No. 463), to replace 9 no. three storey bedroom houses with 8 no. two storey three-bedroom houses, on a 0.19ha portion of the lands, with access from Malahide Road. The development includes 16 no. on-curtilage car parking spaces and all associated and ancillary site works. The application was granted permission from FCC with conditions including those outlined for the original application. The proposed development would not be likely to have a significant effect on any European sites.

F15A/0141 refers to an application to provide an aviation fuel supply line from Dublin Port to Dublin Airport with a section along the R139 in the same area of the proposed project. The Heritage Officer of Fingal CC reviewed the information presented by the applicants in the Natura Impact Statement (NIS) and was satisfied that full consideration was given to the impacts with the potential to affect Natura 2000 sites in this case. The view was expressed, that with full implementation of the proposed mitigation measures, the proposed development will not have significant adverse impacts on Natura 2000 sites either alone or in combination with other plans and projects. He was also satisfied that with full implementation of the proposed mitigation measures set out in the EIS there will be no significant adverse impacts to

biodiversity as a result of the project. The project was granted permission with conditions in July 2015.

F16A/0397 refers to an application for the proposed development of a complex comprised three 5-storey office blocks, which will provide a total of 23,970 sq.m. of office floorspace, together with undercroft areas providing a further 5,048 sq.m. Moore Group also contributed to the EIS and compiled an AA Screening Report which found that there would be no significant effects on any European sites if the project were to proceed.

A SID application by Eirgrid to ABP (VA0014) for a 220 kV powerline from Belcamp substation through Belcamp Park and south to Clonshaugh was considered by the board and a finding by the Fingal Heritage Officer was included in that he was satisfied with the conclusions reached that significant impacts to Natura 2000 sites as a result of this development are highly unlikely and that a full AA is not required. The project was granted permission in 2012 with conditions relating to *inter alia* the control of pollution of surface waters.

These adjacent developments will have no predicted impacts on European sites and the proposed project will have no predicted impacts on European sites cumulative impacts can be ruled out.

The Dublin City Development Plan and Fingal County Development Plan in complying with the requirements of the Habitats Directive requires that all Projects and Plans that could affect the Natura 2000 sites in the same zone of influence of the proposed development site would be initially screened for Appropriate Assessment and if requiring Stage 2 AA, that appropriate employable mitigation measures would be put in place to avoid, reduce or ameliorate negative impacts. In this way any, cumulative impacts with Plans or Projects for the development area and surrounding townlands in which the development site is located, would be avoided.

Any new applications for the project area will initially be assessed on a case by case basis by Dublin City Council and Fingal County Council which will determine the requirement for AA Screening as per the requirements of Article 6(3) of the Habitats Directive.

## 15.6 AIR QUALITY AND CLIMATE

There is one fully constructed and operational data storage facility (Building A) and another nearing completion (Building B) within the Clonshaugh Business & Technology Park adjacent to where the permitted Darndale substation will be constructed. Should the construction phase of the proposed development coincide with the construction of the permitted substation or any other proposed or permitted developments within 350m of the site then there is the potential for cumulative dust impacts to the nearby sensitive receptors (residential dwellings). The dust mitigation measures outlined in Section 8.6.1 during construction and similar mitigation measures applied for other proposed or permitted developments will avoid significant cumulative impacts on air quality. With appropriate mitigation measures in place, the predicted cumulative impacts on air quality and climate associated with the construction phase of the proposed development and the existing, permitted, proposed and future developments on the site and / or simultaneous construction of any other proposed or permitted developments within 350m of the site' are deemed **short-term** and **not significant**.

It should be noted that the transmission cable will be underground once construction is completed and there will be no emissions to air quality or climate during the operational phase. Therefore, there are no cumulative impacts on air quality or climate from the operational phase of the proposed development.

Indirect air emissions from electricity power generating stations are covered under the individual licences for these sites which are monitored and enforced by the EPA, ensuring emissions do not impact on ambient air quality.

## 15.7 NOISE AND VIBRATION

There is one fully constructed and operational data storage facility and another nearing completion within the Clonshaugh Business & Technology Park adjacent to where the permitted Darndale substation will be constructed. Should the construction phase of the proposed development coincide with the construction of the permitted substation or any other proposed or permitted developments within close proximity of the proposed development here there is a possibility for cumulative noise and vibration impacts.

The application of appropriate noise and vibration mitigation measures outlined in Chapter 9.0 during construction and similar mitigation measures applied for other proposed or permitted developments will avoid significant cumulative impacts on noise and vibration. Overall, the cumulative construction noise impacts are likely to be *negative* in terms of quality and slight in terms of significance (due to *temporary* duration and expected compliance with outlined criteria), following EPA criteria for impact assessment.

It should be noted that the transmission cable will be underground once construction is completed and there will be no emissions to noise and/or vibration during the operational phase. Therefore, there are no cumulative impacts on noise and/or vibration from the operational phase of the proposed development.

## 15.8 LANDSCAPE AND VISUAL

Cumulative effects were considered with regard to other developments outlined in Table 3.1 and Table 3.2 including:

- Permitted and Proposed Data Storage facilities at Clonshaugh Industrial Estate;
- 220Kv underground power line leading northwards along the main access through the Clonshaugh Industrial Estate, across Clonshaugh Road, along the path network within Belcamp Park, along the R139 and connecting to the Belcamp Substation;
- Proposed underground Aviation Fuel Line coming from Stockhole Lane to the roundabout on the R139 at the Clayton Hotel, and continuing eastwards along the R139 past Belcamp Substation;

The different nature, scale and development areas of the Data Storage facilities and the proposed underground transmission cable are such that cumulative landscape and visual effects will be **imperceptible**, during construction.

The proposed 220Kv line and the proposed Aviation Fuel line have potential for cumulative landscape and visual effects with the proposed development during construction should one or both of them be constructed at the same, and where they

will be located along the same portion of the R139 carriageway. It is anticipated that the construction of these projects along the R139 will not coincide as they will be subject to T2 applications to the Local Authority (DCC and/or FCC) for road opening licences and the Local Authority would generally not permit two separate projects requiring road opening licences to occur at the same time along the same section of road. Undertaken individually there would be a temporary **imperceptible** cumulative construction stage effect due to physical disruption arising from temporary and short-term works, general construction activity, localized hoarding, clearance and excavation, as well as use of construction vehicles and equipment.

Given the underground nature of all three proposed developments within the R139 carriageway, there will be no cumulative operational stage effects.

## 15.9 ARCHAEOLOGY

The construction of the proposed development and other developments within the vicinity, including the Data Centre, the Belcamp Sub-station, an office development at Stockhole Lane and a mixed used development in the grounds of Belcamp Hall the potential to cause cumulative impacts on archaeological, architectural and cultural heritage sites in the landscape. Where the developments have been identified as having impacts on features which are subject to statutory protection including sites included in the Record of Monuments and Places, the Record of Protected Structures or Architectural Conservation Areas, appropriate archaeological and architectural heritage mitigation measures have been recommended and agreed in advance with the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht, the Dublin City Archaeologist or the Dublin City Conservation Officer.

Therefore, the effects of cumulative impacts on archaeological, architectural and cultural heritage are not considered significant.

## 15.10 TRAFFIC AND TRANSPORTATION

The traffic and transportation impacts of the proposed development were assessed taking the cumulative traffic impacts of the permitted (Buildings A and B) and proposed data storage development (Building C) and indicative future data storage developments (Building D) on the Clonshaugh Business and Technology Park and the proposed development into account.

This cable installation project is estimated to last c. 19 weeks. The off-road section of the underground cable (approximately 900m in length) will be installed between the hours of 8am and 6pm. During installation, staff will arrive on site at approximately 7am and take circa 1 hour to mobilise before commencing works.

The on-road section of the route extends 1.2km along the R139 beneath the nearside westbound lane. This would require closure of the nearside westbound lane (staged to include approximately 100m sections at a time) to facilitate the works. The 15-metre section of the underground cable that crosses the carriageway just south of the Belcamp 220kV Substation will require the staged closure of two westbound lanes and two eastbound lanes for short periods to facilitate the works. Traffic management measures will be put in place such that one lane will remain open in each direction during this element of work.

All works requiring the closure of one or more traffic lanes along the R139 will be done at night.

The traffic management proposals for the ducting installation will be subject to a T2 application to the Local Authority (DCC and/or FCC) for a road opening licence which allows the Local Authority to ensure adequate measures are put in place to minimise impact on traffic movements.

While it is anticipated that construction works on the cable installation will occur at the same time as construction of the data storage development (Building C), only construction traffic associated with the installation of the section of cable through the off-road area between the Darndale Substation and the west side of the roundabout of the R139 with Clonshaugh Road (before the cables route moves on-road) will experience a cumulative traffic impact.

This section is approximately 600 metres long and construction workers will access this section of the cable installation area from within the Clonshaugh Business and Technology Park, via the R104. Construction workers associated with the construction of Building C will also access the site from the R104.

Given the temporary nature of this section of the transmission cable works and the low vehicle volumes associated with its construction (in the order of 8 vehicle per day during peak construction), the cumulative impact of these construction works, and the construction works associated with construction of Building C will be temporary, and slightly negative.

The remainder of the cable installation route (the 1.2 km on road section and the 300 metre off-road section that connects to the Belcamp Substation) will be accessed via the R139 and, given the fact that it is not anticipated that construction workers associated with Building C will use the R139, there will be no cumulative impacts associated with the construction of the Building C when these works are ongoing.

As per Tables 3.1 and 3.2, there is also an aviation fuel pipeline permitted for construction over a short section of the R139 which overlaps with the proposed cable installation route. The potential cumulative impact of these (as they relate to each other) on traffic along the R139 from these works will be coordinated with the Local Authority. It is anticipated that these developments would not be permitted to coincide along the same section of the R139.

There will be no cumulative impacts from the cable installation works during the operational phase as there are no perceptible operational impacts for the cable installation with negligible trip generation during operation (c.one return vehicular trip every 3 years). Similarly, it is not anticipated that there will be any operational impacts on traffic and transportation from the installation of the aviation fuel line in the vicinity of the proposed development site or the potential reinforcement project, should it proceed.

In summary, there will be a temporary, slightly negative effect on traffic on the R104 and R139 and the trip generations associated are of minor significance, during the construction phase of the transmission cable and there will be no cumulative impact on either road (R104 or R139) during operation.

## 15.11 MATERIAL ASSETS

The proposed development does not have any requirement for water, foul sewer, electrical and drainage utilities and, therefore, will not have any cumulative impact on these utilities. Similarly, it is not anticipated that the aviation fuel pipeline works will have any notable additional demand.

Short term service diversions of local services to the R139 (e.g. traffic lights, public lighting, power ducting) may be required to facilitate construction of the proposed development, which is currently being discussed with the relevant stakeholders. The predicted cumulative impact of these local diversions on material assets are considered to be imperceptible.

## **15.12 WASTE MANAGEMENT**

The proposed development, if it was to proceed, will require removal of c. 52,840m<sup>3</sup> of mostly soils/stones, some tarmacadam and trees/shrubbery. The excavation and waste removal will be undertaken and completed within the short construction phase of 19 weeks. Mitigation measures included in Chapter 14 will result in a short term and imperceptible impact.

The compliance requirements and mitigation measures set out in Chapter 14 would also be applicable to the proposed data storage development and the implementation of these measures will ensure that there are no negative cumulative impacts on the environment from the management of waste materials.

The permitted data storage development, proposed data storage development and potential reinforcement project will require site clearance/levelling works, which will generate surplus excavation materials. The legislative and best practice mitigation measures set out in Chapter 14 would also be applicable to these projects and the implementation of these measures will ensure that there are no negative cumulative impacts on the environment from the management of waste materials from these projects with the proposed development, should all projects proceed. There will be no waste generated during the operational phase of the proposed development, potential reinforcement projects and therefore there will be no cumulative impact.

Other developments in the area will be required to manage waste in compliance with national and local legislation, policies and plans which will minimise/mitigate any potential cumulative impacts associated with waste generation and waste management.