

An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department
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PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING REGULATIONS THEREUNDER

Decision Order Number: 0493	Date of Decision: 20-Apr-2021
Register Reference: SD21A/0042	Registration Date: 24-Feb-2021

Applicant: EdgeConneX Ireland Limited

Development: Construction of two single storey data centres with associated office and service areas; and three gas powered generation plant buildings with an overall gross floor area of 24,624sq.m that will comprise of the following: Demolition of abandoned single storey dwelling, remaining agricultural shed and derelict former farm building; Construction of 2 single storey data centres (12,797sq.m), both with associated plant at roof level, with 24 standby diesel generators with associated flues (each 25m high) that will be attached to a single storey goods receiving area/store and a single storey office area (2,404sq.m) located to the west of the data centres as well as associated water tower and sprinkler tank and other services; Amendments to the internal access road and omission of access to loading bay permitted under SDCC planning Ref. SD19A/0042/ABP Ref. PL06S.305948 that include the relocation of permitted, and new, internal security gates; and new internal access roads to serve the proposed development that will provide access to 39 new car parking spaces (including 4 electric and 2 disabled spaces) and sheltered bicycle parking to serve the new data centres; The development will also include the phased development of 3 two storey gas powered generation plants (9,286sq.m) within three individual buildings and ancillary development to provide power to facilitate the development of the overall site to be located within the south-west part of the overall site. Gas plant 1 (3,045sq.m) will contain 20 generator units (18+2) with associated flues (each 25m high) will facilitate, once operational the decommissioning of the temporary Gas Powered Generation Plant within its open compound as granted under SDCC Planning Ref. SD19A/0042/ABP Ref. PL06S.305948. Gas plant 2 (3,045sq.m) will contain 20 generator units (18+2) with associated flues (each

25m high). and, Gas plant 3 (3,196sq.m) will contain 21 generator units (19+2) with associated flues (each 25m high). These plants will be built to provide power to each data centre, if and, when required. The gas plants will be required as back up power generation once the permitted power connection via the permitted substation is achieved; New attenuation pond to the north of the site; Green walls are proposed on the southern elevation of each power plant, as well as to the northern elevation of the generator compound of the data centres, and enclosing the water tower/pump room compound, and a new hedgerow is proposed linking east and west of the site; Proposed above ground gas installation compound to contain single storey kiosk (93sq.m) and boiler room (44sq.m). 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. 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. An EPA-Industrial Emissions (IE) licence will be applied for to facilitate the operation of the gas powered generation plant. An Environment Impact Assessment Report (EIAR) has been submitted with this application. All on a site of 22.1hectares.

Location: Site within the townland of Ballymakailly, West of Newcastle Road (R120), Lucan, Co. Dublin

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 24-Feb-2021 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. The Planning Authority is concerned that non-conforming development may occur in 'RU' zoned lands as a result of this proposed development. It is proposed to undertake development in the 'RU' zoned lands (to the north), including attenuation basins/ponds and environmental mitigation measures, to support the proposed development on EE zoned land (to the south). The proposed structural development will be built to the edge of the EE zoned lands to the north. It is proposed to demolish a dwelling and several outbuildings, which are located in the Rural zoned lands to provide for the attenuation and mitigation measures. Having regards to this aspect of the proposed development on rural zoned land located in immediate proximity to the Grand Canal a pNHA, which is in itself an important amenity within the County that provides opportunities for tourism and links Dublin City to the east with the Counties to the west via a cycle/walking route, it is considered prudent that any proposed development located within the Rural zoned in close proximity to the canal should be investigated for its potential to augment the amenity and useability of Grand Canal. In this regard:

- (1) The applicant is requested to clarify if development features proposed within the rural zoned land (with the exception of the pond already granted permission on the foot of SD19A/0042) will be accessible for the use of the public and/or contribute to the amenity of the canal.
 - (2) The applicant is requested to provide further justification for the loss of the dwelling in 'RU' zoned lands. The applicant is requested to provide evidence to its current state/use.
 - (3) The applicant is requested to provide a layout plan that indicates both the proposed development and the County Development Plan zoning for the site. This will enable the Planning Authority to note the elements that would be within the 'RU' zoning.
2. The applicant is advised that the Planning Authority has concerns in relation to the justification and site suitability for the significant energy generation element of the proposal, in the context of national, regional and local policy. The applicant is requested to submit the following additional information in order for the Planning Authority to undertake a proper assessment of the proposed development:
 - (1) Justification for the form of energy production proposed in relation to climate change and renewable energy policy.
 - (2) provide more detail regarding the alternative sources of power generating assessed as part of the alternatives.
 - (3) consider whether it is possible to incorporate a portion of renewable energy generation.
 - (4) Information on whether the existing site is serviced in terms of utilities and if not the proposals for undertaking the development required to facilitate servicing.
 - (5) Information on proposals to connect the power plant and site to the national grid and the source of gas proposed.
 - (6) The mitigation measures associated with the gas generators at this sensitive site should be listed and justified.
 - (7) A rationale detailing why this application is not premature pending alternative energy supply should be submitted.
3. The applicant is requested to submit a site plan to indicate how access to the adjacent zones 'EE' lands will be possible following the proposed development. At present, the areas to the west of the site have limited access opportunities.
4. The applicant is requested to provide further contiguous elevations, CGIs and photomontages (clearly illustrating the fully developed structure(s) within their context. These should address the following:
 - (1) The contiguous elevations should show the current and proposed site levels and OD (if there is any change) and also any landscaping/boundary treatments.
 - (2) Photomontages and CGIs should provide a wider variety of views, taking in the nearby protected structures and Grand Canal. Longer distance views should be provided, as should more views at a close distance to the site.
 - (3) The photomontages should indicate the proposed structures, landscaping and boundary treatment and not just an outline of the building.
 - (4) It is noted that the applicant has omitted the landscaping and security fencing from the contiguous elevations. It is considered that this information is necessary to get a true impression of the impact. Existing and proposed levels should also be indicated on the contiguous elevations.
 - (5) A full boundary treatment plan should be submitted. This plan should take cognisance of Item 1(1) of this additional information request and consultation with Waterways Ireland.

5. The applicant is requested to submit a Design Statement in accordance with section 11.2.1 of the SDCC County Development Plan (2016-2022), clearly demonstrating how the initial site analysis has informed the overall design, in order for the Planning Authority to undertake a proper assessment of the proposed development.
6. The applicant is requested to consider the impacts of the proposed development on the operations of Weston Aerodrome.
7. The applicant is requested to investigate and consider the impact of a potential Section 22 landfill identified on the site.
8. (a) There is no drawing submitted which shows the proposed surface water drainage layout for the proposed data hall area to the west/north west of the site. The applicant is requested to submit a drawing showing existing and proposed surface water drainage layouts for the proposed data hall area of the site. The drawing shall include the location of all AJs, manholes, pipe size, material type and direction of flow.
(b) The applicant is requested to submit a drawing showing cross section views of the proposed attenuation pond. The drawing must show the water level in the attenuation pond for flood events in relation to proposed finished floor levels. There should be a minimum freeboard of 500mm between attenuation pond water level and proposed finished floor levels of buildings on site.
(c) Submitted drawing number PIN-05-ZZ-DR-C-0202 specifies a maximum discharge rate of 24L/S and 9.6L/S from proposed attenuation pond. The applicant is required to clarify on a drawing what the proposed maximum surface water discharge rate from the site is.
(d) The applicant shall include further SuDS (Sustainable urban Drainage Systems) features for the proposed development such as but not limited to the following to convey, treat and attenuate water as well as providing bio diversity and amenity value:
 - Swales
 - Filter Drains
 - Further Permeable/ Porous paved areas
 - Tree pits
 - Rain Gardens
 - Rainwater Harvesting for use within data halls where possible.The applicant shall clarify what attenuation volumes can be provided in all proposed SuDS features and shall provide cross sectional details of all SuDS features.
9. In order to assess the feasibility of a connection to public water infrastructure the applicant is requested to engage with Irish Water through the submission of a Pre-Connection Enquiry (PCE) in order to determine the feasibility of connection to the public water infrastructure. Please note this is required for indirect connections to the public system also. The Confirmation of Feasibility (COF) must be submitted to the planning department as the response to this further information request. Pre-connection enquiries can be made at <https://www.water.ie/connections/get-connected/>.
10. (a) There is no drawing submitted which shows the proposed foul water drainage layout for the proposed data hall area to the west/north west of the site. The applicant is required to submit a drawing showing existing and proposed foul water drainage layouts for the proposed data hall area of the site. The drawing shall include the location of all AJs, manholes, pipe size, material type and

direction of flow.

(b) In order to assess the feasibility of a connection to public waste water infrastructure further information is requested as follows; The applicant is requested to engage with Irish Water through the submission of a Pre-Connection Enquiry (PCE) in order to determine the feasibility of connection to the public waste water infrastructure. Please note this is required for indirect connections to the public system also. The Confirmation of Feasibility (COF) must be submitted to the planning department as the response to this further information request. Pre-connection enquiries can be made at <https://www.water.ie/connections/get-connected/>.

11. There potentially is a series of drainage ditches/watercourses traversing the site. The applicant is requested to submit a drawing showing all existing watercourses/drainage ditches which traverse the site and which run around the perimeter of the site. The applicant shall clarify what these drainage systems currently serve, what condition they are in and how they will be modified as part of this development.
12. The applicant is requested to submit a written statement and or a revised layout showing the proposed number of bicycle parking spaces for the development. External bicycle parking spaces shall be sheltered.
13. (A) The applicant is requested to submit further landscape plans/specification details. These shall include the following:
 - (i) A cross section details of the tree pits and growing mediums, the applicant shall clearly outline how SuDS features within the tree pits will function.
 - (ii) A tree management plan for the future. This shall be conducted by a qualified arborists.
 - (iii) The applicant shall test the soil nutrition's in proposed wildflower areas to ensure selected seed for the wildflower area will be adequate for the existing soil nutrition's and shall be in line with the national pollinator plan.
 - (iv) The applicant shall demonstrate the rate hedgerow restocking per m² in the revised planting plan. Hedgerow restocking should be at 2/m². Where new hedgerow is being planted it shall be at 3/m².
 - (v) Car parking trees should be provided every 5/6 car parking spaces to reduce the hard urban impact of the proposed development. Trees should have SuDS features incorporated into the tree pits.
 - (vi) Further details shall be submitted in relation to the SuDS attenuation basin, pond and wetland feature. This should include, proposed levels (ensure there is a slope from the development site into the feature), capacity of storage, planting plans, maintenance, etc. In addition, SuDS features that convey and treat runoff in advance of the attenuation basin should be proposed.
 - (vii) Further details in relation to the cross section details of the tree pits in the soft landscape shall be submitted. The applicant should ensure that there is adequate subsoil/sand under the root ball to ensure that no compaction occurs due to the weight of the root balls and that water can percolate through.
 - (viii) Details of any green wall proposals as presented at the pre planning and also as set out in the proposed development should be provided. The applicant is requested to maximise the use of green walls, particularly on the northern elevation, given the sensitive location of the site.
- (B) It is noted that there are 'native wildflower meadows' located within the 'EE' zoned elements of the site. It is also noted that some of these areas were included on the landscape masterplan for the development permitted under SD19A/0042. It is noted the previous landscape masterplan defines this

area as “area to be managed as wildflower meadow to improve the biodiversity of the local environment and reduce maintenance operations”. The land in which the current proposal is located was also highlighted as a wildflower meadow previously. The applicant is requested to clarify the purpose of these meadows as it is clear that the applicant intends to develop further in future.

14. The applicant is requested to submit further details of the boundary along the Grand Canal, which is shared with Waterways Ireland. This shall be agreed with Waterways Ireland.
15. Notwithstanding the numerous data centres that have been granted planning permission within areas zoned ‘EE’, within the County to date, this current proposal is located in immediate proximity to the Grand Canal, a pNHA. ET3 Objective 5 clearly states that ‘natural site features, such as watercourses, trees and hedgerows [should be] retained and enhanced as an integral part of the scheme’. Substantial mitigation and augmentation measures are required to ensure that any development on the site will comply with County Development Plan policy. Aerial mapping indicates the presence of three linear hedgerows running in a north-south alignment (with an east-west aligned hedgerow connecting two of these), linking lands to the south with the Canal. The proposal will result in the removal of two of the north south aligned hedgerows and the east-west hedgerow running through the centre of the site. In this regard, the applicant is requested to:
 - (1) outline the impact of the proposed development on ecological movement from and to the Canal and the overall impact (net gain/loss) of the proposal on biodiversity. The applicant is requested to consider amendment to improve the ecological movement, including consideration of an additional north-south aligned ecological provision within the overall design.
 - (2) submit details of proposals to augment existing ecological connections to and from the Grand Canal
 - (3) submit proposed mitigating measures, including any layout changes required (relocation of structures away from the western boundary).

NOTE: The applicant should note that any submission made in response to the above will be examined and MAY be deemed to be SIGNIFICANT ADDITIONAL INFORMATION by the Planning Authority. In this event the applicant(s) will be subsequently notified and requested to publish a notice in an approved newspaper and erect or fix a site notice on the land or structure to which the further information relates and to submit copies of the both the newspaper and site notices to the Planning Authority in accordance with Article 35 (1) (a) and (b) of the Planning and Development Regulations 2001 (as amended).

Note: The applicant must submit the Further Information within **6 months** of the **date of decision**. If the information is not received within this period the planning authority shall declare the application to be withdrawn.

Please ensure that your reply to this Request for Additional Information is accompanied by a covering letter marked “ADDITIONAL INFORMATION” and that the Planning Register Reference Number given above is quoted on the covering letter.

Signed on behalf of South Dublin County Council

Register Reference: SD21A/0042

Date: 21-Apr-2021

Yours faithfully,

A handwritten signature in black ink, appearing to be 'R. O. O.', written over a horizontal line.

for **Senior Planner**