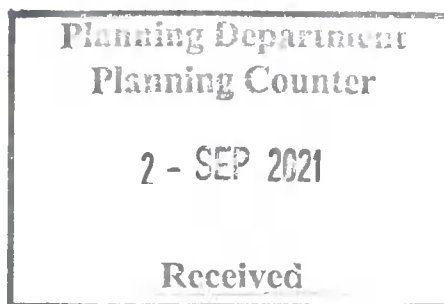


MARSTON

PLANNING CONSULTANCY

Senior Administrative Officer,
Planning Department,
South Dublin County Council,
County Hall,
Town Centre,
Tallaght,
Dublin 24



Our Ref: 16008

1st September 2021

Re: Planning and Development Act 2000-2021 and the statutory regulations (as amended). Application by EdgeConneX Ireland Limited for development at this site within the townland of Ballymakailly to the west of the R120 (Newcastle Road), Lucan, Co. Dublin. The development will consist of the construction of two no. single storey data centres with associated office and service areas; and three no. two storey gas powered generation plant buildings with an overall gross floor area of 24,624sqm

Reg. Ref. SD21A/0042

Date of additional information request: 20th April 2021

ADDITIONAL INFORMATION

Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by EdgeConneX Ireland Limited to submit this formal response to the request for additional information in relation to the planning application for the development as described above.

This response and accompanying reports and drawings, have comprehensively addressed all the elements of the Additional Information request in a reasonable manner fully justifying the development. Our response is submitted fully within the six month timescale for responding to an Additional Information request and following an informal submission and meeting with the Parks Department of the Council in relation to the public access of land within the RU zoned land to the north of the site.

The response is undertaken following significant levels of consultation with the Planning Authority and the case planner in relation to comprehensively dealing with the issues raised and in accordance with the Additional Information request. We refer the Planning Authority that the red line of the application has been altered to address the correct legal boundary of the applicant. This issue was raised in the AI request and in our discussions with Waterways Ireland and has been fully addressed in this response.

Addressing the Addition Information request

The scheme as presented as part of this Additional Information response has fully addressed the concerns of the Planning Authority in terms of all elements but particularly in relation to augmenting the amenity use of part of the RU zoned lands; justification for, and site suitability for the gas power plant requirement as well as all other issues raised under the AI request.

This response is accompanied by additional studies, reports and drawings that have been undertaken by the design team that address all of the points raised in the AI request. The full set of accompanying documents are set out in the cover letter from Henry J Lyons Architects who are the agent for the applicant in this instance.

In summary the response sets out the following justification for the proposed development:

- Clarification of uses within the RU zone and an opening up of parts of this zone as an amenity space;
- Justification of the energy generation element of the proposal having regard to climate change and renewable energy policy;
- Additional photomontages and site sections(with landscaping) to indicate the fully developed proposal within its context having regard to levels and landscaping;
- Updated design statement that sets out the sensitive design approach (single storey) and overall landscape master planning approach to the development;
- Confirmation that there is no section 22 landfill on the site;
- Confirmation of drainage connections;
- Additional landscaping details including boundary along the Grand Canal; and
- An assessment of the impact of the proposal on natural site features.

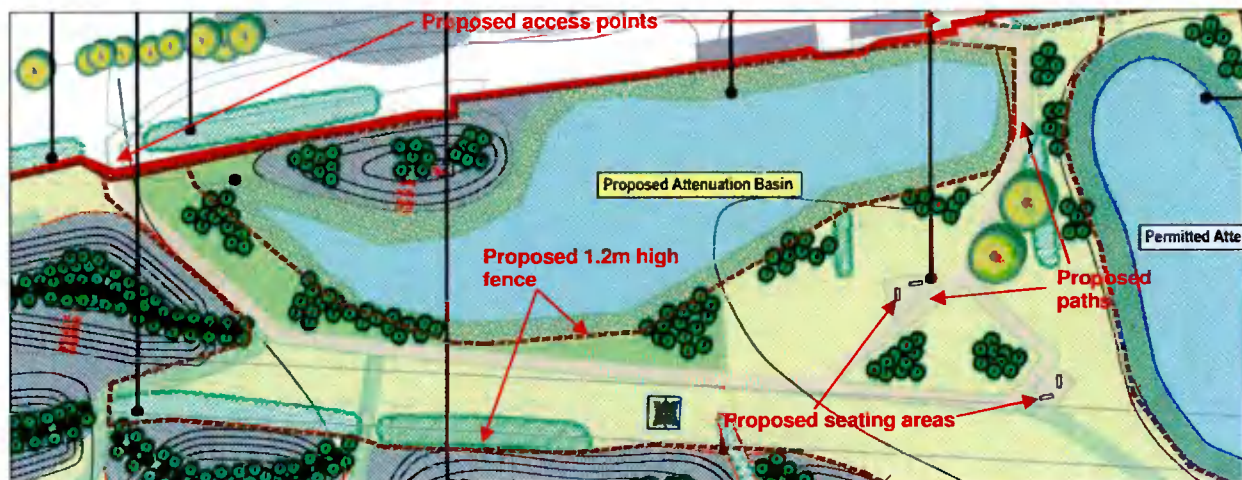
Our written response, which should be assessed in conjunction with the submitted details listed above and in the cover letter, is provided below in respect of each point raised in the Council's request.

ADDITIONAL INFORMATION RESPONSE

1. RU zoned lands

Response

Further to discussion with both the Planning and the Park Departments of the Council it has been agreed to provide controlled access to a portion of the RU zoned land along the northern / Grand Canal side of the site. We propose to provide two access points to the west and east of the new attenuation pond. A new public path will connect the RU zoned land with the existing canal towpath to facilitate access to the new wetland and woodland habitat that will be created by the implementation of the 2019 permission and new attenuation pond proposed in this instance (Please refer to Drawing no. 101 submitted by Kevin Fitzpatrick Landscape Architecture – see below with additional notes for clarity).



Excerpt from Drawing no. 101 submitted by Kevin Fitzpatrick Landscape Architecture showing proposed public access

Access is controlled to avoid uncontrolled access to the attenuation ponds and the wider landscaped RU zoned lands by a 1.2m high timber post and rail fence (brown dashed line). It is proposed to create two seating areas that will overlook the wetland habitats that will be created by the permitted and proposed attenuation ponds.

The access points to the RU zoned lands will be opened up by the applicant / operator of the proposed development in a similar manner to a public park at 10am-4pm during the winter months and from 8am – 7pm during the summer months. The provision of such public access fully conforms to Policy ET3 SLO1 and ET6 Objective 1 of the County Development in providing and improving public amenity along the canal.

Demolition of existing dwelling

The existing dwelling to be demolished is in extremely poor condition and has not been in residential use for a number of years. Its abandonment has led to it being in a ruinous state prior to our clients taking over the

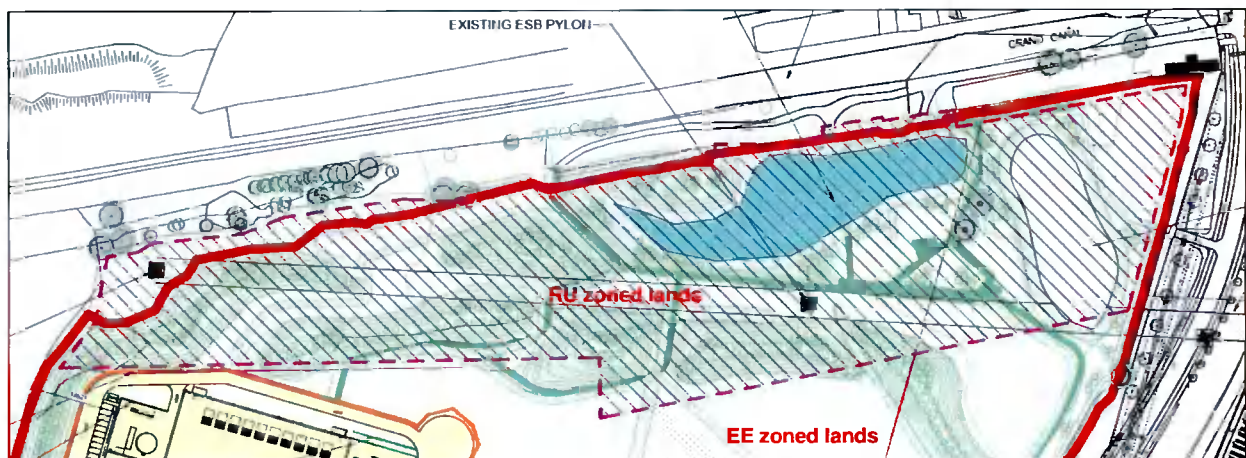
ownership of the land. We respectfully submit that the aim of achieving public access to the lands runs at cross purposes with seeking to retain, and in this instance refurbishing this house of no architectural merit or quality. Its removal will have a positive impact both on the amenity of the canal but also on the attractiveness of providing public access to the RU zoned lands and in providing further access along the southern side of the canal in the future.



Front elevation of abandoned dwelling

Demarcation of the RU zoning

We can confirm that all built elements of the proposed development are located within the EE zoned lands (Please refer to Drawing no. P1-06 by Henry J Lyons Architects) of which an excerpt is shown below, with the boundary between the EE and RU zoned lands marked by way of a pink dashed line clearly indicating all built elements are outside of the RU zoned lands.



Demarcation of boundary between EE and RU zoned lands

We can confirm that all landscaping and the attenuation pond to the north-east of the site were permitted under the application granted under SDCC Planning Ref. SD19A/0042 / ABP Ref. PL06S.305948 and are located within the RU zone. The only new elements within the RU zone are the new attenuation pond that is located centrally within the northern boundary of the site and shaded blue in the excerpt above; as well as the proposed public access, as previously outlined. We refer the Planning Authority to the fact that the new attenuation pond was designed for under the 2019 permission and does not require any reduction to the permitted landscaping scheme under that permission.

2. Justification for the gas powered plant

Response

We refer the Planning Authority to the attached letter by Ethos Engineering Limited that comprehensively addresses all aspects of this part of the AI request. Their letter provides a reasoned justification and site suitability for the gas powered generation plant. It also addresses the potential suitability for utilising renewable energy and fully explains why the proposal is not premature pending alternative energy supply.

3. Access to EE zoned lands to the west of the site

Response

This issue was raised at the pre-planning meeting and was addressed at that time by both Eoin Burke, Senior Planner within SDCC, as well as ourselves. The permission granted under SDCC Planning Ref. SD19A/0042 / ABP Ref. PL06S.305948 facilitated and required a significant landscaping buffer of the overall site. The landscape master planning of the site was a key part of the 2019 permission that was requested by the Council.

Any requirement as well as undermining the viability and security of the site that is of critical importance to all operators; it would also reduce the biodiversity linkages that are existing and permitted to be enhanced under both the 2019 and current application to the western boundary, and furthermore under this application through the creation of an east to west biodiversity corridor through the site. In addition, we refer the Council to its own Part 8 development of the access roadway into the Grange Castle West lands to the south of the site that will form a natural extension to the New Nangor Road; and would, in our considered opinion, more appropriately and naturally facilitate access to the lands to the west of the site as it will form a more traditional business park layout.

4. Further contiguous elevations and additional photomontages

Response

A number of additional contiguous elevations (Drawing no. P4-03) have been prepared by Henry J Lyons Architects and are submitted with this AI Response from outside of the site, on all sides, that indicate the proposed development with landscape berms and trees shown one year after initial planting. As planting is proposed within the first planting season following the commencement of development on the wider site under the permission granted under SDCC Planning Ref. SD19A/0042 / ABP Ref. PL06S.305948 all trees are shown at 5.5m to reflect growth over a year from planting. The trees are likely to be at a greater height than this when the current proposal is built given their association with the 2019 permission.

In addition to the above, we have provided sections from outside of the site, including from the Grand Canal, through the permitted south, west and northern boundaries through the landscape treatment and berming permitted under SDCC Planning Ref. SD19A/0042 / ABP Ref. PL06S.305948 (Drawings no. P3-04 and P4-04 by Henry J Lyons and Drawing no. 102 by Kevin Fitzpatrick Landscape Architecture) to the proposed development. These sections show clearly how the scale, positioning and form of the berming will ensure that the visual amenity of the canal is protected as is clearly evident in section A-A by Kevin Fitzpatrick Landscape Architecture that is replicated below.



Excerpt of section A-A from Drawing no. 102 by Kevin Fitzpatrick Landscape Architecture

These contiguous sections also indicate the position of the security fencing that are all inside the berms and either a 1.2m post and rail fence or existing hedgerows at the boundary of the site in accordance with point (4) of this part of the AI request. Further boundary treatment details are provided in the landscape drawings (Drawing no. 105) and details submitted by Kevin Fitzpatrick Landscape Architecture.

In addition two additional photomontages have been taken from the canal from the canal cottage, which is a protected structure to the north-east (View 8), as well as a further distance view from the bridge at Gollierstown to the west (view 9). These views have been incorporated into the LVIA that was submitted with the application and is reproduced at A3 for clarity purposes. The photomontages are also supplemented by additional images that show a more mature landscaping some five years after planting to

provide the Council with an idea of the visual impact of the proposal on completion of the development at the end of the five year period for implementing the permission. This further increases the screening of the site.



Excerpt from Photomontage no. 8 showing 5 year growth of landscaping – glimpse view between landscaping will disappear as landscaping matures on slope of berms

In all views, where parts of the proposed development will not be visible it is shown by way of a red outline; and where it will be visible a fully rendered finish as per the proposal, taking into account landscaping is shown in accordance with part (3) of this part of the FI request. An outline of the building is only shown, when landscaping screens the development for information purposes.

In addition to the normal images on day one of operation an additional set of images show the proposal in the context of the development following 5 years from planting. This further increases the screening of the site. A full boundary treatment plan is submitted by Kevin Fitzpatrick Landscape Architecture with this response in accordance with part (5) of this part of the FI request.

5. Design Statement

Response

A comprehensive design statement is submitted by Henry J Lyons Architects that addresses and is in accordance with section 11.2.1 of the SDCC County Development Plan 2016-2022. The design statement clearly demonstrates how the site analysis that informed the permission granted under SDCC Planning Ref. SD19A/0042 / ABP Ref. PL06S.305948 has also informed the overall design that forms the proposed development with green walls incorporated on the north façade of the temporary generators and around the water tank compound of the data centre building; and on the southern elevation of the gas power generating buildings. In addition the incorporation of colour coated insulated panels to the key external walls of the data centre will both create an interface with the background greenery and helps to break down the scale and massing of the building facades.

6. Impacts on the operations of Weston Aerodrome

Response

The application site is located some 3kms from Weston Aerodrome that is located to the north-west of the site. The runways are orientated in a north-east to south-west alignment. The application site is located within the outer conical surface of the Weston Aerodrome that is listed as being 146.3m OD. The flues of the proposed data centre and gas plants are at a height of 92.48m OD and therefore significantly below this height.

In addition, we have reviewed the planting and attenuation ponds having regard to the potential for them to attract additional birds. The proposed attenuation ponds / wetlands reflect the existing environment and do not present a significant probability of increasing hazardous bird presence. It is also suggested that the planting palette used for landscaping shall not exceed 15% berry bearing bushes; and the fact that public

access will be facilitated around the attenuation ponds/ wetlands will ensure that they are not attractive to birds and cause no impacts on the operation of Weston Aerodrome.

7. Potential Section 22 landfill

Response

In response to this request AWN Consulting Ltd. have undertaken a review and a comprehensive assessment of this issue. Having consulted with South Dublin County Council they have reached a conclusion to the best of their knowledge that there is no Section 22 landfill on the application site, with the nearest such site being the Bolands Garage on the New Nangor Road some 1.1kms to the south-east of the site. This is fully covered in their note that accompanies this AI response submission.

8. Surface Water Layout

Response

We refer the Planning Authority to the report by Pinnacle Consulting Engineers as well as Dwg. No. 201107-PIN-ZZ-ZZ-DR-DR-C-201 Rev. P02; Dwg. No. 201107-PIN-ZZ-ZZ-DR-DR-C-263 and Dwg. No. 201107-PIN-05-ZZ-DR-C-202 Rev. P02 that comprehensively address this aspect of the Additional Information request

9. Irish Water feasibility

Response

A PCE was submitted and a positive response, i.e. a COF, (Ref: CDS 21000754 dated 10th June 2021), has been received from IW in respect of same. The water supply connection can be facilitated with no upgrades required to the network – refer to Appendix B of the Pinnacle Consulting Engineers report that accompanies this AI response.

10. Foul Water Layout

Response

The foul water layout and drainage is addressed in Dwg. No. 201107-PIN-ZZ-ZZ-DR-DR-C-201 Rev. P02 and Pinnacle Consulting Engineers report that accompanies this AI response.

11. Drainage ditches

Response

In response to this request AWN Consulting Ltd. have undertaken a comprehensive review and assessment of the ditches within the site that was undertaken on the 25th June 2021. The visit confirmed the internal drainage network on site. Figure 2 of their accompanying report indicates the drainage ditches on site and their flow direction. Their assessment concluded that they were predominantly artificial drainage ditches that ultimately link into the wider drainage network. Full details are enclosed within the report by AWN Consulting Ltd. that accompanies this submission.

12. Bicycle parking

Response

A revised and sheltered bicycle parking layout is enclosed and shown on Drawing no. P5-02 prepared by Henry J Lyons Architects.

13. Landscape plans and details

Response

We refer the Planning Authority to the further landscape plans and specifications prepared by Kevin Fitzpatrick Landscape Architecture that accompanies this response and in addition to those provided in response to point 4 of this AI response. These comprehensively address points i – viii of part A of this part of the AI request. It includes details on tree pits, tree management plan, and details of the soil testing that indicates the soils have an adequate nutrition level for the wildflower planting proposed to be undertaken in a temporary manner until such time as that part of the site is subject to further development. The landscape report also addresses the level of hedge restocking in accordance with the requirements of the Council request.

The aim of the native wildflower planting of the remaining EE zoning lands is to maximise biodiversity gain of the wider site until such time as an application is made, permitted and development. In our considered opinion it remains best practice that rather than leaving the non-developed part of the site as being fallow that the maximum biodiversity gain is encouraged throughout the site. This should be seen as a temporary measure to maximise biodiversity gain.

14. Boundary along the Grand Canal

Response

The boundary along the Grand Canal is fully detailed within the landscape drawings submitted with this further information (Drawing no. 102 by Kevin Fitzpatrick Landscape Architecture). It will form a mix of hedgerow and a 1.2m high timber post and rail fence. This will ensure that the amenity of the canal is protected, with the added public access to part of the RU zoned lands adding to the amenity of the canal.

15. Ecological connections

Response

The overall master planning design of the site both under this application and the previously permitted scheme has been predicated on enhancing and maintaining the natural site features, such as water courses, trees and hedgerows. Where possible all such features are retained and where they required to be removed additional replacement green infrastructure in terms of trees and hedgerow planting are proposed so that the proposal is fully in accordance with ET3 Objective 5 of the County Development Plan.



Aerial view of application site with application boundary shown outside application site for clarity purposes to show existing green infrastructure

We respectfully submit that there is a need to consider any removal in the context of the overall proposal and landscaping being proposed. The existing site prior to development contains c. 2,480m of hedgerows and tree lines that are located along the southern and western boundary; which form part of the northern boundary of the site and around properties along this northern boundary as well as boundaries around fields that are formed by the three linear hedgerows that run in north to south and north-east to south-west direction across the centre of the site. These hedgerows link into the green infrastructure to the north of the site and to the canal.

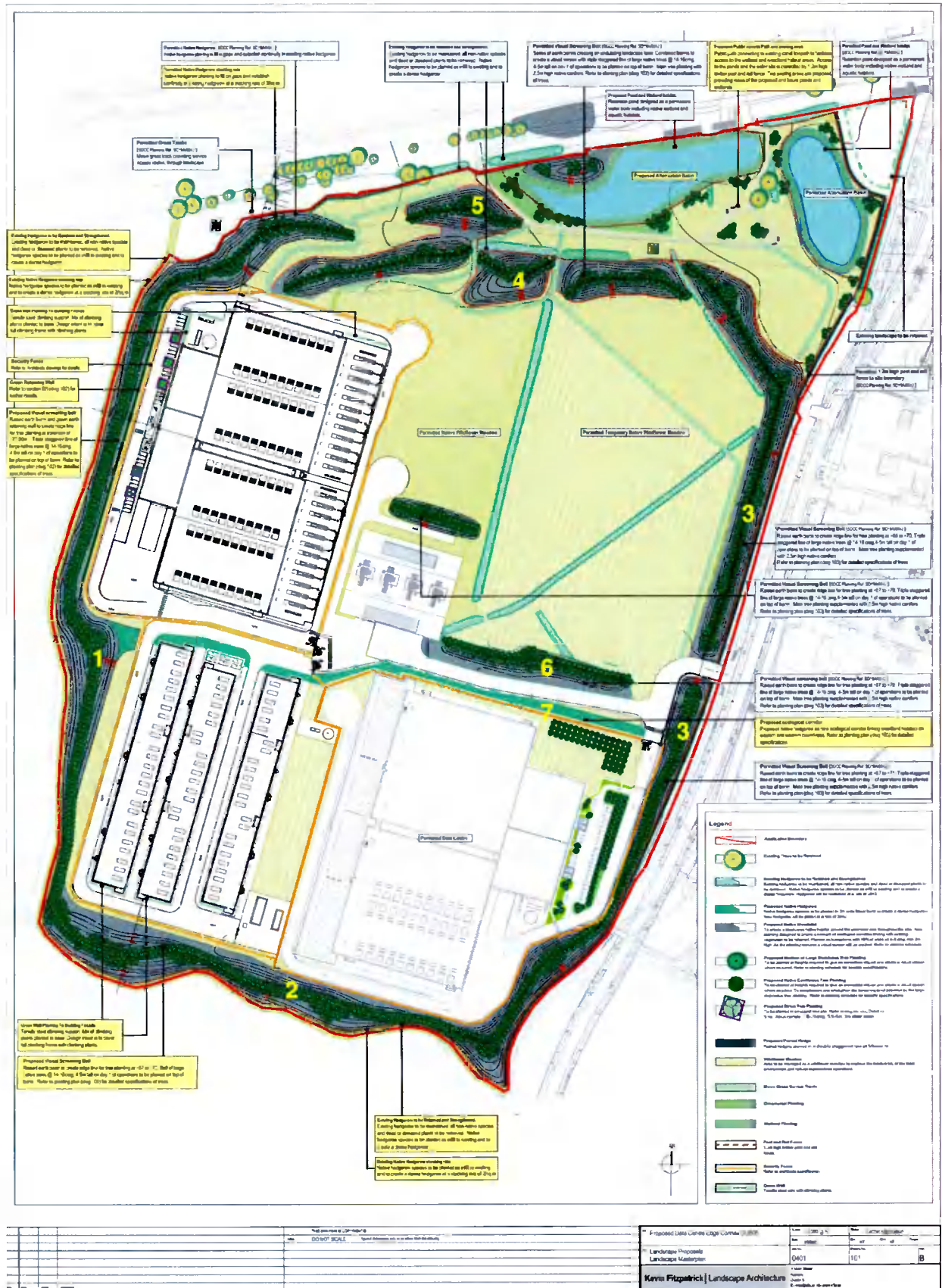
The current proposal seeks to remove c. 390m of this hedgerow as shown on the previous page (shaded yellow) with c. 250m having been lost under the 2019 application and permission (shaded purple). This amounts to a c. 640m loss overall that has been mitigated through carefully considered landscape design and planting. Substantial mitigation and augmentation measures are already proposed and permitted around the site. This includes the following:

- 480m stretch of triple staggered row of native tree planting and low level planting that will sit inside the existing western boundary hedgerow to create a 20m wide wildlife corridor along the western boundary of the site (see 1 on next page);
- 310m stretch of triple staggered row of native tree planting and low level planting that will sit inside the existing southern boundary hedgerow to create a 20-30m wide wildlife corridor along the southern boundary of the site (see 2 on next page);
- 600m stretch of triple staggered row of native tree planting and low level planting, broken only by the permitted access road that will sit on the eastern boundary of the site, where there is currently no planting, to create a 10m wide wildlife corridor along the southern boundary of the site (see 3);
- 400m stretch of triple staggered row of native tree planting and low level planting within the RU zoned lands on a similar alignment and to the immediate south of the existing east to west hedgerow between the fields referenced in the AI request and the farm buildings to the north of the site. This planting is broken only by the permitted landscape management paths that will sit between the berms, where there is currently no planting, to create a 20-30m wide wildlife corridor within the RU zoned lands that will link into the new green infrastructure to the east and west as well as the existing the southern boundary of the site (see 4);
- Additional planting (c. 100m) and wetland planting within and adjacent to the northern boundary within the RU zoned lands that will link the new east to west planted berms with the canal corridor to the north where it is proposed to retain and supplement any existing hedgerow planting as per point 4 of the AI request (see 5).
- A further triple staggered row of native tree planting and low level planting of c. 100m in length is proposed to the immediate north of the permitted access road in a east to west orientation that will connect the eastern boundary planting with the existing hedgerow planning that is proposed to remain on completion of the current application (see 6).
- A new ecological hedgerow corridor is proposed under the current application to run east to west across the centre of the site on the southern side of the main access road to the proposed data centre and gas powered plant. This wide biodiversity corridor of c. 400m in length will connect the eastern with the western ecological corridor (see 7 on next page).

We respectfully submit that there will be an overall creation of c. 2,390m of additional green infrastructure on the site as shown on the drawing on the following page in implementing the current proposal and the permitted development. A key part of the approach to the site from day one was to maximise ecological corridors around and through the site that will connect into the Grand Canal. We submit that this has been fully set out under this response.

This additional infrastructure is further supplemented by green walls to the south of each of the proposed gas powered plants; as well to the north of the temporary generator yard of the proposed data centre and surrounding the plant to the north-west of the data centre. There will be a net gain of 1,750m of green infrastructure on the site on completion of the permitted development with the current application. The design of the proposal, and the potential 3rd phase of development may also provide the potential for augmenting an additional north to south hedgerow if the existing hedgerows are required to be realigned in the future. Proposing such green infrastructure now would be premature as two of the existing north to south hedgerows and southern connection to them are currently being retained. These are clearly shown on the landscaping master plan that forms part of this FI Response and is replicated on the following page. These clearly show that the proposed landscaping and planting will significantly augment existing ecological connections that will enhance the existing ecological connections throughout the site. This will improve

ecological connections to and from the Grand Canal and therefore there is no requirement for additional mitigation measures in terms of layout changes to address this part of the AI request.



CONCLUSION

It is our respectful submission that this response has comprehensively addressed all the issues raised by the Planning Authority in the Additional Information request.

In conclusion, for all of the foregoing arguments, reason and considerations, South Dublin County Council are invited to assess the subject scheme and our Additional Information response on its own individual merits and to grant planning permission for this development on the basis that by its nature and extent, the proposal would accord with the proper planning and sustainable development of this area including the preservation and improvement of amenities thereof.

We trust that everything is in order and look forward to a favourable decision in due course.

Yours faithfully,

A handwritten signature in cursive script that reads "Anthony Marston".

Anthony Marston (MIPI, MRTPI)
Marston Planning Consultancy