

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: 1295	Date of Decision: 29-Sep-2021
Register Reference: SD21A/0042	Date: 02-Sep-2021

Applicant: EdgeConneX Ireland Limited
Application Type: Additional Information
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

Dear Sir /Madam,

With reference to your planning application, additional information received on 02-Sep-2021, in connection with the above, I wish to inform you that before the application can be considered under the above Act(s), **6 copies** of the following **Clarification of Additional Information** must be submitted:

1. Following the further information response, the Planning Authority considers that there is a need to balance the demand for development with climate action and resilience as well as the capability of the national grid to provide for such developments. The Planning Authority is concerned with the current proposal to partially power the data centres with a gas generator due to the absence of capacity in the national grid.

The applicant is advised that the Planning Authority has concerns in relation to the number and extent of large demand connections in this area and the demand for future grid reinforcements. It is noted that Action 20 of the Climate Action Plan, 2019 states:

'Implement energy actions under the Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy to ensure that large demand connections are regionally balanced to minimise grid reinforcements'.

The absence of power supply via Eirgrid appears to demonstrate that the proposed development will contribute to a future demand for grid reinforcements in this area. In this context, the applicant is advised that the proposed development may be premature pending a stable connection to the national grid and the use of gas powered generators conflicts with the macro policies in the Development Plan around Energy and Climate Action.

In relation to Item 2 of the Additional information request, the applicant is requested to provide

clarification by provision of the following:

- Justification for the form of energy production proposed in relation to climate change and renewable energy policy.
- More detailed information on the feasibility of renewable energy technology. The applicant states that it may be possible to incorporate measures at the 'detailed design stage', however, the Planning Authority is of the opinion that it should be provided at the planning stage.
- Details and evidence of connection agreements of power and gas. Correspondence from Eirgrid indicating the flexible connection agreements must be provided. The applicant should also clarify what would happen should a separate infrastructure application not receive permission.
- A list of mitigation measures associated with the gas generators, along with detailed justification of each measure and the details of operations.

2. The response to Item 6 of the Additional Information request is not considered to be satisfactory. The applicant is requested to clarify whether the Irish Aviation Authority is satisfied with the proposed development.
3. The response to Item 8 of the Additional Information request is not considered to be satisfactory.
 - (a) The applicant is requested to provide details of intervening features such as swales, channel rills, rain gardens to treat and convey water to the attenuation pond. SuDS are limited to permeable paving and tree pits with the intervening part of the treatment train, prior to discharge to the attenuation pond, missing and detailed proposals are requested that include SuDS features that convey and treat runoff in the intervening ground between the building/car park zone and the attenuation basin. The profile of the attenuation pond should be stepped and planted in zones to provide greater ecological diversity and access for wildlife. The drawings submitted shall highlight the location and detail section view of all SuDS features, shall also highlight available surface water attenuation capacity within each feature and demonstrate how these features are linked to the on site surface water drainage system.
 - Swales/Filter Drains to drain surface water run off from Roads
 - Tree pits
 - Bio Retention Rain Gardens
 - Rainwater Harvesting for use within data halls where possible
 - (b) Initial attenuation assessments carried out by Water Services indicate that the overall proposed attenuation volumes for the 1 in 100 year storm (2645m³) is potentially undersized by 20%. The applicant is requested to submit a drawing showing an additional overall attenuation volume of 20% is provided for the site by way of the use of Sustainable Drainage features (SuDS).
4. The response to Item 10 of the Additional Information request is not considered to be satisfactory. 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/>.
5. The response to Item 11 of the Additional Information request is not considered to be satisfactory. The applicant has indicated that there is water present in some of the ditches on the site and that culverts are also present. The applicant is requested to provide a strategy for

removing the culverts and also for reinstating any potential watercourses. The filling in of any ditches should be justified in terms of how it would not impact the wider network negatively.

6. The response to Item 13 and 15 of the Additional Information request is not considered to be satisfactory. An arborist report and tree constraints plan has been prepared by The Tree File Consulting Arborist. An Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement is also required. The applicant is requested to provide this.
7. The response to Item 14 of the Additional Information request is not considered to be satisfactory. The applicant is requested to provide correspondence with Waterways Ireland indicating they are satisfied with the proposed boundary along the canal.
8. The response to Item 1 of the Additional Information request is not considered to be satisfactory. The applicant is requested to provide a plan clearly indicating the extent of the public park and boundary treatments, with access points, in the interests of clarity.

Please ensure that you submit a covering letter, mark your reply “CLARIFICATION OF ADDITIONAL INFORMATION” and quote the Planning Register Reference Number given above.

NOTE: The applicant must submit the further information **within six months of the date of the original Request for Additional Information**. If the information is not received within this period the Council will declare the application withdrawn.

Yours faithfully,



for **Senior Planner**

30-Sep-2021