

MARSTON

PLANNING CONSULTANCY

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

Our Ref: 16008

26th January 2022

Re : Planning and Development Act 2000-2021 and the statutory regulations (as amended). Application by EdgeConneX Ireland Limited for the retention and continuance of the use for a further two years of the temporary gas powered generation plant, that is located to the rear of the Takeda Ireland complex, that is sited within a walled yard of 2,836sqm containing 12 no. generator units with associated flues (each 15m high), that was permitted initially for a period of three years under Reg. Ref. SD16A/0345; and subsequently extended for an additional period of 2 years from the 4th February 2020 under Condition no. 2 of permission granted under SD19A/0342. Vehicular access to the generation plant will remain from the permitted service road into the Edgeconnex site and Grange Castle Business Park as originally permitted for development within the townland of Grange at this site to the rear of Takeda Ireland Limited, Grange Castle, Lucan, Co. Dublin.

Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by EdgeConneX Ireland Limited to submit this supporting planning letter in respect of this planning application for the development as described above on this site within lands to the rear of Takeda Ireland Limited, Grange Castle that lies immediately to the east of the Edgeconnex campus.

This letter accompanies a package of architectural drawings undertaken by Henry J Lyons Architects. No physical works are being proposed in this instance. The application forms an extension of the life of the temporary gas generation plant that was initially permitted for a period of three years under condition no. 3 of Reg. Ref. SD16A/0345 that received its Final Grant of permission on the 10th January 2017. This permission was subsequently extended for a period of two years under condition no. 2 of Reg. Ref. SD19A/0342 that received its Final Grant of permission on the 4th February 2020.

Whilst the original application was accompanied by an EIS (now known as an EIAR) this was primarily due, considering its sub-threshold nature, to the fact that the application included also for a new data centre hall development of 4,176sqm. The original application made in 2016 included a comprehensive assessment of the impact of the proposed development, and the principle of these findings will not be altered as a result of the current proposal. We refer the Planning Authority that the noise environment has not materially altered since the previous permission was granted in February 2020. We refer the Planning Authority to the noise assessment that was undertaken as part of that application. The conclusions of this report remain valid today in that the retention of the temporary generator plant for a further two years would not result in a negative noise impact on local residents, and that the noise requirements set out under condition no. 15 of Reg. Ref. SD16A/0345; and subsequent permissions would not be broken.

The previous assessments that remain valid clearly sets this out in detail following noise surveys at the most noise sensitive locations. In this regard we note that the temporary generator plant will be decommissioned prior to the operation of either of the data centres granted under Reg. Ref. SD18A/0298, which was also the case under the most recent application for the temporary gas powered generation plant. The first three data centres only formed the basis of the noise assessment. Whilst the other two data centres are currently under construction; they will not substantially be operational until such time as the Eirgrid connection becomes live via the substation and the connections to the National Grid that were permitted for the Strategic Infrastructure Development application by An Bord Pleanála under ABP Ref. ABP-309951-21.

The noise impact assessment undertaken in 2019, that remains pertinent, indicates the site is operating within the 45dB(A) criterion applied to noise as outlined under Condition 15 (Ref: SD16A/0345 Decision Order No. 1151), and is operating in accordance with the noise levels set under Condition no. 4 of the permission granted under Ref. SD19A/0342.

The assessment undertaken in 2019 also indicated that the cumulative noise levels can satisfy the 46.2dB(A) outlined in Condition 13 (Reg. Ref: SD17A/0141) based on the measured noise levels presented. The proposal will therefore remain fully in accordance with the proper planning and sustainable development of the area.

1. Compliance with Statutory Regulations

The plans and particulars which accompany this application have been screened by reference to the Planning and Development Regulations 2001-2018, as set out below.

- The Site Location Map has been prepared on an OS base to a scale of 1:2,500 for the retention application. An Ordnance Survey Datum local benchmark is indicated on the Map. The application site is outlined in red on this map. The OS map indicates the location of all three site notice locations as well as indicating all other land on the map in the control / ownership of the applicant.
- The Proposed Site Layout Plan is to a scale of 1:1,000 as agreed previously with South Dublin County Council under previous applications on the site. It indicates the location of the application site in relation to the surrounding environment. Relevant features (such as buildings, trees and roads) adjoining or in the vicinity of the application site are all shown. The drawing indicates the built roof plan of the data centres and layout of the temporary gas generator plant, as well as the currently under construction data centres permitted under Reg. Ref. SD18A/0298. A separate site plan at a scale of 1:500 indicates the temporary generator plant site only.
- As per article 22(2)(iv), the site notice positions (3 no.) are shown clearly on the Site Location Map and wider map in accordance with the application made under Reg. Ref. SD19A/0342. These positions are conspicuous and meet the requirements of article 19(1)(c) as they are located at an existing main vehicular and pedestrian entrance to the site from a public road to the west, at the entrance to the Edgeconnex campus, and at the site itself. As the application site substantially overlaps with a current live application that was lodged on the 13th January 2022 under Ref. SD22A/0009, and therefore within 6 months of the making of this first application, the site notices are printed on yellow background paper in accordance with Article 19(4) of the Planning and Development Regulations 2001 (as amended)
- All other statutory plans, elevations and sections are drawn to scales not less than 1:200, in accordance with Article 23(1)(b) and (2) of the Regulations. This ensures that a detailed level of information is provided to the Planning Authority to enable their full assessment of the retention application.
- The proposed floor and roof plans and elevations for the building are indicated on drawings submitted with the application. These drawings show the levels pertaining to the site. Floor levels are shown on all plans, sections and elevations of the proposed development. All levels are relative to Ordnance Survey Datum.
- The principal dimensions including height of the different elements of the proposal and the site are indicated on the plans, elevations and sections as lodged with this application in accordance with article 23(1)(f).
- All drawings are clearly coloured and marked to distinguish the proposal, in accordance with article 23(1)(e).
- All OS mapping is appropriately identified in accordance with article 23(1)(g).
- The north point is indicated on all relevant maps and plans in accordance with article 23(1)(h).
- The newspaper notice appeared in the Irish Daily Mail, and which is recognised as an appropriate newspaper for an application in this area.

The legal interest of the applicant in making this application is fully set out in the application package within the accompanying letter from Mason Hayes and Curran.

2. Site analysis

The proposed retention application applies to a small portion of lands to the rear and partly within and to the rear of the Takeda complex of buildings that are located within the Grange Castle Business Park. The site is the location of the existing gas powered generator plant that was permitted for a period of three years and constructed under Reg. Ref. SD16A/0345. A subsequent permission was granted under Reg. Ref. SD19A/0342 for a further two years on the 4th February 2020.

The plant has now been in operation for just over four years. We note that during this time that no complaints have been received by the Planning Authority in relation to the noise generated by the existing plant that now forms this retention application.

The gas powered generation plant is accessed through the main entrance into the Edgeconnex site from the Grange Castle Business Park. The access into the application site remains as previously permitted from the service access within the Edgeconnex campus lands.

The application site is bounded by the Takeda development to the north and east; and the Edgeconnex campus development to the south and west. The data centre campus of the applicant granted under Ref. SD16A/0214, SD16A/0345 and SD17A/0141/SD17A/0392, SD18A/0298 and SD19A/0342 (as well as other minor permissions) is located to the rear of these residential properties to the east of the R120. The permission granted under Ref. SD18A/0298 is currently under construction and will not be fully operational until such time as the power supply arrangement via the transmission line connections from the existing Grange Castle – Kilmahud Circuits to the permitted Coolderrig 110kV Gas Insulated Switchgear(GIS) substation that were permitted under ABP Ref. ABP-309951-21 are realised

The former two applications granted the two data halls to the south of the temporary gas powered generation plant. The second of these applications granted under Reg. Ref. SD16A/0345 as well as granting a data hall also permitted the temporary gas powered generation plant that is the subject of this application.

3. Concept plan of proposal

The proposal is to seek retention for a period of an additional two years for the temporary gas generation plant that was initially permitted for a period of three years only under Condition no. 3 under Reg. Ref. SD16A/0345; and was subsequently extended for a period of two years under condition no. 2 of Reg. Ref. SD19A/0342 that received its Final Grant of permission on the 4th February 2020. The Proposed Development is a temporary gas generation plant within a walled yard and containing 12 no. 1.875 MVA sized container units to the east of the site of the main Edgeconnex main campus.

The development will consist of the retention and continuance of the use for a further two years of the temporary gas powered generation plant, that is located to the rear of the Takeda Ireland complex, that is sited within a walled yard of 2,836sqm. The 12 no. generator units each have a thin and associated flue that are 15m high. The height of the walled yard remains 9.5m high.

Vehicular access to the generation plant will remain from the permitted service road into the Edgeconnex site and Grange Castle Business Park as originally permitted.

It is important to note that the permanent power supply arrangement for the site will continue to be realized from the construction of the permitted Coolderrig 110kV substation and transformer yard on the EdgeConneX campus. The permitted transmission lines granted under ABP Ref. ABP-309951-21 have been built, but ESB has encountered delays that are outside the control of the applicant, in the energization of the 110kV network serving the substation. Upon successful energization of the onsite substation and transition of the site power supplies, the gas plant will be decommissioned immediately and the site restored as per previous conditions under Reg. Ref. SD16A/0345 and SD19A/0342.

The temporary gas generator plant is required to bridge the timeline between the cessation of the permission granted under Ref. SD19A/0342 and the date at which the energization by ESB occurs. We respectfully submit, and for the avoidance of doubt, EdgeConneX has a Maximum Import Capacity (MIC) connection

agreement with ESB Networks that provides full power for the EdgeConneX campus from the National Grid via its connection granted that is facilitated by the works permitted and implemented under the SID decision.

We can confirm that the applicant has received and executed a grid connection agreement with ESB Networks and, therefore, the permanent supply of electricity will come from the national grid infrastructure. Whilst Eirgrid / ESB have stipulated under the Data Centre Connection Policy 2019 that in order for data centres to receive a firm grid connection, it must install on-site generation to match its load, our client's agreement predates this, and does not require an on-site generation solution.

The temporary power plant is run off gas fired engines that result in lower emissions than the comparable diesel fired alternative. The temporary plant will operate on a continual basis until such time as the load demand can be accommodated on the electrical utility grid, which is currently predicted to be well within the 2 year timeframe of the permission.

The gas connection feeding the generator plant will continue to be provided at medium pressure by Gas Networks Ireland from their high pressure transmission network with a pressure reducing skid. The plant will be decommissioned as soon as the energisation by ESB and the contracted permanent national grid connection is implemented.

4. Compliance with County Development Plan

The South Dublin County Development Plan is the statutory planning document that covers the entire South Dublin administrative area. The Plan was adopted in June 2016. The proposed development is to be located within an area zoned EE (Enterprise and Employment) under the County Development Plan with the stated aim:

"To provide for enterprise and employment related uses."

The proposal is a permitted use under this zoning. Significant precedent exists for the establishment of this use on other EE zoned lands in the area and particularly under the original permission under Reg. Ref. SD16A/0345. EE zoned areas are established economic industrial areas running essentially in an arc northwards from City West to Grange and Grange Castle.

5. Environmental considerations

Screening for sub-threshold EIAR

Schedule 7 of the Regulations details the criteria the Planning Authority must consider in determining whether a sub-threshold EIAR should be undertaken. This schedule is a direct transposition of Annex III of EU Directive 2011/92/EU. EU Directive 2014/52/EU provides a revised Annex III and its transposition into national legislation is mandatory. Accordingly, the table below, provides a screening statement of the proposed development against the Annex III criteria of 2014/52/EU.

Based on the information provided in accordance with Annex IIA and Annex III of the 2014 Directive, it is considered that a sub-threshold EIAR is **not required** for the proposed development, as adequate measures are already in place to avoid, reduce or mitigate likely impacts, under both the permissions granted under Reg. Ref. SD16A/0345 and SD19A/0342; and in terms of cumulative measures subsequent to this permission under Reg. Ref. SD17A/0141; such that the operational phase of the overall development will not have a significant negative impact on the environment. There will be no construction impacts.

We have considered the impacts in this instance solely on the operational impacts due to the fact that the temporary gas generation plant has been constructed under permission, and it is solely the length of period of life of the permission that is being altered under this application. The operation impacts only are therefore considered in this screening statement.

Screening Statement with reference to Annex III EU Directive 2014/52/EU

Criteria for assessment of EIA sub-threshold	Operational Impacts
<p>Characteristics of proposed development The characteristics of the proposed development, in particular:</p>	
<p>- the size and design of the whole project</p>	<p>The operational impacts of the proposal will remain within the noise limits imposed under the parent permission under condition no. 15 of Reg. Ref. SD16A/0345; condition no. 4 of SD19A/0342; and Condition no. 13 of SD17A/0141. The proposal remains in accordance with the terms of the original permission and subsequent permissions and therefore there will be no significant impact.</p>
<p>- cumulation with other existing and / or proposed development</p>	<p>The cumulative impact in terms of noise has previously been assessed with the permissions granted and built under Ref. SD16A/0214, SD16A/0345 and SD17A/0141/SD17A/0392. Other permissions will not be fully operational until such time as full external power becomes available. The noise impact assessment undertaken as part of the application made under concludes that the existing plant is operating within the terms of Condition no. 15 of Reg. Ref. SD16A/0345. It also showed that it will operate within the terms of Condition no. 13 of Ref. SD17A/0141 and therefore there are no significant impacts that are likely.</p>
<p>- the use of natural resources, in particular land, soil, water and biodiversity</p>	<p>Consumption of electricity and energy related to the use of the completed development will continue to occur at the rate it has been operational for the last two years. No out of the ordinary use of natural resources is likely during the extension of the operation phase. No significant negative impacts are likely.</p>
<p>- the production of waste impacts are likely.</p>	<p>Waste will be generated through the flues. The air quality impact assessments undertaken under the original and subsequent permissions indicate that there is no significant negative impacts on air quality as a result of wastes.</p>
<p>- pollution and nuisances</p>	<p>The noise impact assessment undertaken as part of the 2019 application and the air quality assessments undertaken in relation to all permissions indicate that there is no potential for the development either individually or cumulatively to have a negative impact.</p>
<p>- the risk of major accidents and / or disasters</p>	<p>None foreseen, subject to compliance with building and fire regulations With mitigation measures in place no significant negative impacts are likely.</p>
<p>- the risks to human health</p>	<p>No emissions other than from the flues and generators are anticipated. No significant negative impacts are likely.</p>
<p>Location of proposal</p>	
<p>- Land use</p>	<p>The land use is already established and will continue for a further two years as already permitted up to early 2022 under Reg. Ref. SD19A/0342. No significant impacts are likely.</p>
<p>- the relative abundance, availability quality and regenerative capacity of natural resources</p>	<p>The proposed operational phase will not have any out of the ordinary impact on natural resources. No significant negative impacts are likely.</p>
<p>- the absorption capacity of the natural environment</p>	<p>Proposed use is compatible with the geographical area. The development is a temporary development within an evolving business park development that has already been established for over four years. No significant negative impacts are likely.</p>

Type and characteristic of potential impacts	
- the magnitude and spatial extent of the impact	The proposal is located within the Grange Castle Business Park and the use is considered appropriate given that the Planning Authority have already granted permission for the development previously and the strategic requirement to service the existing data centres on site. No significant negative impacts are likely.
- the nature of the impact	The operational phase will result in the development of a temporary use that following its maximum use for an additional two years will be removed to enable the lands to be available to Takeda for future expansion. No significant negative impacts are likely.
- the transboundary nature of the impact	There are no operational phase transboundary impacts.
- the intensity and complexity of the impact	The operational phase of the development is moderate in scale and will be actively managed so that it operates within the noise criteria set out under the already stated permissions. No significant negative impacts are likely.
- the probability of the impact	Measures are in place to avoid, reduce, or mitigate any likely impacts.
- the expected onset, duration, frequency and reversibility of the impact.	The development will be operational for two years from the time of the final grant of permission and will then be decommissioned and removed ensuring the development is fully reversible.
- the cumulation of the impact with the impact of other existing and / or approved projects	The proposal is located close to several data centres and the impact of these have been considered in previous assessments. It is important to note that the more recent decision under Reg. Ref. SD18A/0298 will not be fully operational prior to the decommissioning of the proposal. No significant negative impacts are likely.
- the possibility of effectively reducing the impact	The design of the proposed development has avoided, reduced or mitigated significant negative impacts in relation to views; noise and air quality. No significant negative impacts are likely.

Noise and vibration

Noise modelling was undertaken for the development in relation to the operational phase of the proposal at the most sensitive neighbouring properties as part of the application made under Ref. SD19A/0342. The assessment was undertaken on the basis of the noise impacts associated with the existing site, temporary generator and future Phase 3 buildings in light of the relevant conditions associated with the various permissions.

The noise survey indicated that the site is operating within the 45dB(A) criterion applied to the site noise as outlined under Condition no. 15 of the permission granted under Reg. Ref. SD16A/0345.

However as the applicant is now seeking to extend the life of the permission by two years it was prudent to consider impacts associated with Phase 3 that was permitted subsequent to the parent permission for the temporary gas powered generation plant under Reg. Ref. SD17A/0141. This data centre as of the writing of this report remains not fully operational.

The assessment indicated that the cumulative noise levels can satisfy the 46.2dB(A) outlined in Condition no. 13 of Reg. Ref. SD17A/0141. The full details of this were presented in the AWN report that accompanied the previous application in 2019.

The application of noise limits, along with implementation of appropriate noise and vibration control measures, has and will continue to ensure that noise and vibration impact is kept to a minimum. Proprietary noise and vibration control measures will continue to be employed in order to ensure that noise emissions

from the generators do not exceed the adopted criterion at the façade of any nearby noise sensitive locations. No significant negative impacts are likely.

Air quality

Air quality modelling was undertaken in relation to the proposed development as part of the parent and subsequent applications. This indicated that no significant negative impacts are likely.

6. Appropriate Assessment

An appropriate assessment screening report was undertaken by Scott Cawley, Consulting Ecologists, in relation to the parent application in 2016, and an abridged version was attached to the 2019 application. Similar AA screenings have been undertaken for subsequent applications under Reg. Ref. SD17A/0141 and SD18A/0298, and indeed for the SID application that adjoins and crosses part of the application site that was made to An Bord Pleanála under

In all cases it was found that there was no impact either individually or cumulatively on European sites. The AA screening process identified that five European sites lie within 15km of the proposed the proposed development; with another three hydrologically connected to the proposed development site via the River Liffey. This remains the case although importantly there are now no proposed construction works.

Following a detailed analysis, no European sites were deemed to be at risk of likely significant effects from construction or operation of the proposed development. This conclusion remains correct taking into consideration of an analysis of Qualifying Interests (QIs) of all sites, and of the threats potentially preventing these QI's from maintaining favourable conservation status. The contribution of other potential projects in the same area was also assessed in this screening exercise. The assessment has shown that there are no elements of the proposed development that could, on their own or in combination with other plans or projects, lead to a risk of significant impacts on European sites.

7. Conclusion

It is our respectful submission that the nature of the proposal continues to fully accord with the zoning, policies and objectives of the County Development Plan and best practice in terms of compliance with putting forward suitable mitigation measures on noise to ensure that nearby residential properties are not adversely impacted by the permission being granted for a further two years. In this regard it is important to note that the data centre halls granted under Reg. Ref. SD18A/0298 will not become fully operational until such time as the temporary gas powered generator plant, which is the subject of this application, is decommissioned.

The cumulative noise impact of the proposal with Phase 1, Phase 2 and Phase 3 and other surrounding developments has also been fully addressed in previous applications and it has been demonstrated, and the environment has not materially altered since, that the noise generated by the proposal will meet the required noise conditions already applicable in this area under the various permissions.

In conclusion, for all of the foregoing arguments, reason and considerations, we respectfully request South Dublin County Council to accept the contents of the application, and to assess the subject development 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,



Anthony Marston (MIPI, MRTPI)
Marston Planning Consultancy