

Planning Report

In respect of

Proposed Amendments to a Permitted ICT Facility Development at Clondalkin Industrial Estate

Prepared by

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On behalf of

Echelon Clondalkin DC Services Limited

April 2022



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DOCUMENT CONTROL SHEET

Client:	Echelon Clondalkin DC Services Limited
Project Title:	ICT Facility Development - Amendments
Document Title:	Planning Report
Document No:	Final

Rev.	Status	Author(s)	Reviewed By	Approved By	Issue Date
DV1	Draft	LW	PT	PT	31/03/2022
FINAL	Final	LW	PT	PT	01/04/2022

1.0 INTRODUCTION / EXECUTIVE SUMMARY

- 1.1 On behalf of the applicant, Echelon Clondalkin DC Services Limited, this planning report forms part of a planning application for amendments to the development permitted under South Dublin County Council Reg. Ref.: SD20A/0309, which relates to the provision of a new information and communications technology (hereinafter 'ICT') facility development, comprising 4 no. new ICT buildings along with access and parking, landscaping, and associated infrastructure on a site located at Clondalkin Industrial Estate, Clondalkin, Dublin 22.
- 1.2 The proposed amendments relate primarily to two of the permitted ICT facility buildings on site, and entail internal and external amendments to the permitted buildings. The amendments will result in a slight increase in the main parapet heights of the buildings, however this will be offset by the reduction in plant at roof level to keep its height below the parapet height, and the omission of flues and extracts from roof level (which punctuate the roofline of the buildings in the extant permission subject of the amendments).
- 1.3 In this regard, it is considered that the proposed amendments result in a slight, but positive, impact on the appearance and visual impact of the permitted buildings.
- 1.4 The proposed amendments are described as follows within the public notices for the application:

"Echelon Clondalkin DC Services Limited, intend to apply for full planning permission for development on a site at 3-4, Crag Avenue, Clondalkin Industrial Estate, Clondalkin, Dublin 22. The application site comprises an area of c. 13.38 hectares.

The proposed development comprises amendments to the development permitted under Reg. Ref.: SD20A/0309. The proposed amendments comprise the following:

- *Alterations to permitted ICT Facility buildings 2 and 3, to include internal reconfiguration of the ICT equipment halls, associated electrical and mechanical plant rooms, loading bays, maintenance and storage space, office administration areas, and reconfiguration of screened plant.*
- *Alterations to the external facades of permitted ICT Facility buildings 2 and 3 to include modification and reconfiguration of fenestration, louvers, loading bays, and access doors, along with an increase in height of 1.2 metres to main parapet level and reduction in the height of rooftop plant to not exceed the parapet height of the buildings, along with the omission of previously permitted flues and exhaust ducts at roof level.*
- *Omission of emergency generators and associated flues from permitted ICT Facility buildings 2 and 3.*
- *The proposed amendments to ICT Facility buildings 2 and 3 result in an increase in their gross floor area (GFA) of 2,511 sq.m for each building, resulting in an overall increase in the GFA of the two buildings of 5,022 sq.m.*
- *Alterations to the water storage tanks serving the permitted ICT Facility buildings, including total increase of 268 sq.m GFA to the permitted pumphouses and a reduction in the scale of the associated water storage tanks.*
- *All associated and ancillary works.*

The application site is subject to an EPA Industrial Emissions Licence¹ relating to the Energy Centre permitted on site (under Reg. Ref.: SD18A/0068 as amended by Reg. Ref.: SD19A/0185)."

- 1.5 As was the case in respect of the extant permission to which the amendments relate (Reg. Ref.: SD20A/0309) the permitted energy centre and substation on site will be unaffected by the current proposals, and are shown for context on the permitted and proposed site layout plans submitted herewith.
- 1.6 An Environmental Impact Assessment Report (EIAR) was submitted with the extant parent permission under Reg. Ref.: SD20A/0309. However, the amendments now proposed do not give rise to the requirement for completion of a new Environmental Impact Assessment, as they do not represent development that would meet or exceed any threshold for mandatory EIA and are not considered to result in any likely significant environmental impact having regard to their modest scale and their location within the subject site. The relatively minor amendments now proposed do not require EIA as they fall below any of the relevant thresholds for mandatory EIA (including Class 13, relating to changes or extensions to developments), and it is considered that any preliminary assessment by the Planning Authority will determine that the modifications would not give rise to any significant environmental impact.
- 1.7 The planning rationale for the proposed amendments to the permitted ICT facility development on the subject site can be summarised as follows:
 - The proposed amendments relate primarily to two of the four permitted ICT facility buildings on site. The amendments will result in an improvement in the overall appearance and design of these two buildings, via the provision of a revised, cleaner parapet and roof line for the buildings, along with the omission of flues and extracts from roof level, and the omission of the permitted emergency generators from within the structures (these emergency generators will be located within a single, consolidated location further away from any public road or site boundary, subject to a separate potential future application).
 - The proposed amendments respond to specific intended occupier requirements, and are not considered material in the context of the scale and location of the proposed development. The proposed amendments will have no material impact on the appearance and scale of the development from the surrounding area, with a slight positive impact predicted in relation to views of ICT facility buildings 2 and 3 when viewed from the M50 motorway to the east.
 - The proposed alterations to permitted water storage tanks and pump rooms have arisen on foot of detailed design considerations, but do not have any significant impact on the overall scale or footprint of the water storage / pumphouse locations within the overall site.
 - When considered cumulatively, the uplift in floor area provided within the ICT facility buildings and the ancillary water pumphouses (comprising 5,290 sq.m cumulatively) represents a relatively modest uplift in gross floor area when considered in the context of the permitted development under Reg. Ref.: SD20A/0309 (which was 47,714.5 sq.m including pump rooms). The proposed amendments will represent a change of just 11% in the context of the permitted gross floor area.
 - When considered either individually or cumulatively, the proposed amendments are considered to be relatively minor and positive in nature, resulting in an improvement in the appearance of ICT facility buildings 2 and 3

¹ The application site is subject to an EPA Industrial Emissions Licence relating to the Energy Centre permitted on site. The current development proposals do not require such a licence and the permitted energy centre is unaffected by the current proposed amendments.

when viewed from the public road, and allowing for the permitted development (which represents a significant investment in the area) to proceed in line with detailed design and intended occupier requirements.

- The proposed amendments are also considered to represent an appropriate form of development in the context of national, regional, and local planning policy as set out in further detail below.

2.0 SITE LOCATION AND CONTEXT

- 2.1 The subject site to which the current amendment application relates has an area of c. 13.38 hectares. The site is located within a setting defined by industrial and logistics type development at Clondalkin Industrial Estate. The site formerly contained cable depot buildings and a significant area of hardstanding which was previously used for vehicle and materials storage / parking. It is noted that the site was previously cleared under the extant permission pertaining to the site, with the previous structures on site also having been removed.
- 2.2 The lands have been partially developed under extant permissions with the site now being substantially cleared of all previous buildings and scrub vegetation, with only remnants of the former marshalling yards remaining together with temporary stockpiles associated with site clearance activity. The site area now presents as an expansive open brownfield site, with areas of clearer soil and areas of marshalling yards, and temporary stormwater collection drain and silt retention ponds have been constructed.
- 2.3 The site is relatively flat though there is a slight fall towards the south, the Gallanstown stream runs along the southern boundary of the site and flows to the east. A toe drain runs north to south along the M50 and also joins the Gallanstown Stream. The southern boundary water course referred to as the Gallanstown Stream is ecologically now considered a drainage ditch due to its linear properties, and modification of the original stream channel. The Gallanstown stream drains the land to the west of Clondalkin and borders the Grand Canal but does connect to the canal..
- 2.4 The M50 motorway is located to the east of the site and is set above the level of the prospective application site, thereby reducing the prominence of the site in views from this important route. The Grand Canal is located to the south of the subject site, beyond which lies an area of residential development. The area to the west of the site is occupied by a range of industrial, employment, and logistics / warehousing uses within the Clondalkin Industrial Estate. To the north is the Dublin to Limerick / Cork railway line.
- 2.5 The site is separated from the M50 motorway by a landscaped embankment, which rises from the existing level of the site to the motorway above. The embankment is heavily planted with trees. Beyond the M50 motorway to the east is an area of commercial and residential development, separated from the subject site by a distance of c. 200 metres, including the motorway itself.
- 2.6 Further to the south of the site, and separated from the site by a distance of c. 100 metres (including the Grand Canal and the R134) is an area of existing residential development, comprising a mix of apartment and low/ medium density terraced and semi-detached dwellings. Thus, the site is removed from the closest residential development by a significant distance.
- 2.7 To the north of the subject site is the main Dublin-Cork railway line. The site is within c. 500 metres of Park West and Cherry Orchard train station as the crow flies, however the walking route to the railway station is relatively circuitous (c. 2.5 km or 25-30 minutes on foot). The railway station would be accessible by bicycle within c. 8 minutes. Clondalkin / Fonthill station is located within c. 20 minutes walking distance, or c. 7 minutes by bicycle from the subject site.

- 2.8 The rail line provides hourly services to both Grand Canal Dock and Heuston Station at present. It is noted however that this station will benefit from upgrade as part of the DART + expansion programme, and will subsequently be served by higher frequency DART services connecting to Heuston Station and a new planned rail station at Glasnevin. Completion of the Dart + upgrade is expected in 2024, with the first phase of public consultation currently ongoing.
- 2.9 Bus services are provided at Ninth Lock Road and the R134 to the southwest of the subject site. Stops here are served by the number 76, 76a, 151 and 68 bus routes. These include both orbital routes (for example to Tallaght – Chapelizod) and spine routes into the city centre (including the Docklands and Poolbeg Street). The majority of routes referred to provide for c. 20 minute frequency. The R134 will also fall on the proposed Clondalkin to Drimnagh Bus Connects route, which will provide for a significant enhancement of cycle, pedestrian, and bus infrastructure in the vicinity of the development.
- 2.10 The proposed amendments relate primarily to permitted ICT Facility buildings 2 and 3, which are located in the north-eastern portion of the site alongside the M50 motorway. The proposed amendments will allow for a rationalised building design for these two ICT buildings, including the provision of cleaner rooflines which will be now not interrupted by flues or plant as described in further detail below. The approximate location of the area to which the amendments are located is identified on Figure 2.1 below.

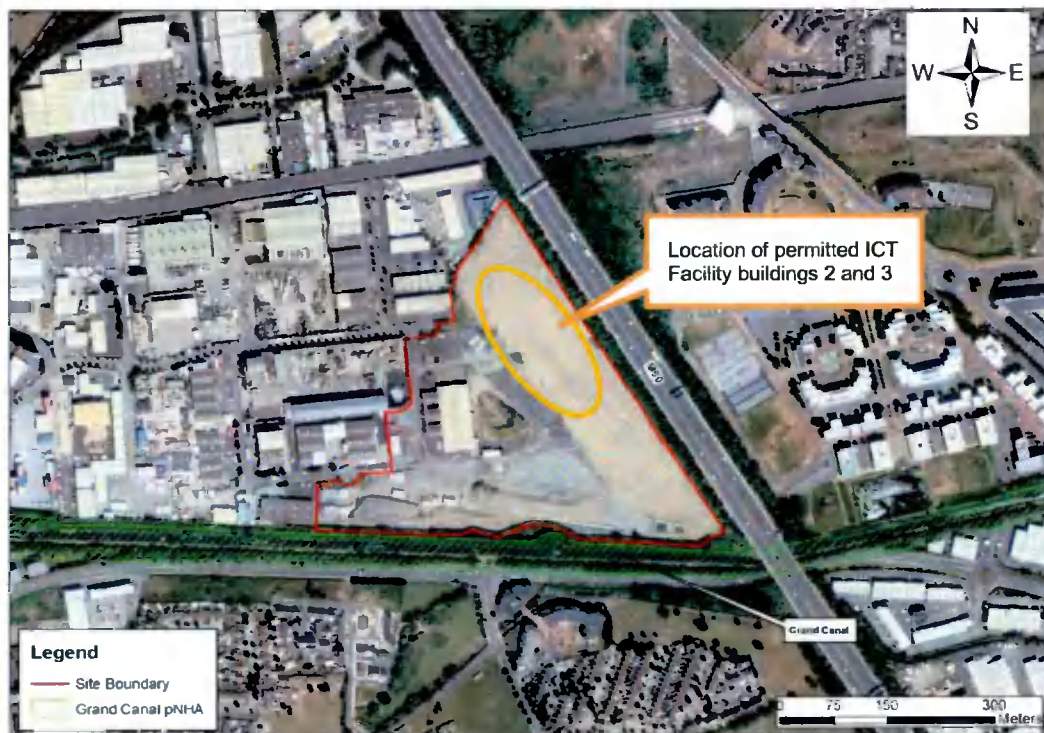


Figure 2.1: Aerial view of the subject site and surrounding area (Source: Google Maps)

3.0 PLANNING HISTORY

- 3.1 The following comprises a summary of relevant planning history pertaining to the subject site. This planning history is based on a review of the South Dublin County Council online planning search system.

Reg. Ref.: SD20A/0309 – Permission to which the Current Amendments relate

3.2 On the 4th of May 2021, following receipt and consideration of Further Information, the Planning Authority issued a final grant of permission for the extant permission to which the current amendments relate.

3.3 The development was described as follows within the public notices:

“The proposed development comprises the provision of 4 no. new information and communications technology (ICT) Facility buildings and associated development at the subject site, superseding elements of the extant planning permissions on site (Reg. Ref.: SD18A/0068 and Reg. Ref.: SD19A/0185). The application site is subject to an EPA Industrial Emissions Licence (Ref. No.: P1113-01) relating to the Energy Centre permitted on site.

The single storey Energy Centre, gas pressure reduction station, and 110kV Gas Insulated Switchgear (GIS) substation permitted under Reg. Ref.: SD18A/0068 and Reg. Ref.: SD19A/0185 will be constructed as previously approved and are not affected by the current application.

The proposed development will comprise the following:

- *The construction of 4 no. ICT Facility buildings (ICT Facilities 1, 2, 3, and 4) with a combined total gross floor area (GFA) of c. 47,564.5 sq.m. Each ICT Facility building includes associated external plant areas, totalling c. 20,649.5 sq.m.*
- *ICT Facilities 1, 2, and 3 will be located in the eastern portion of the site, and each comprise a GFA of c. 15,196 sq.m (including ancillary office and administration space) over part two and part three levels with a maximum height of c. 25 metres and a parapet height of c. 19.5 metres. Each of the ICT Facilities will include an associated external plant area of c. 6,624 sq.m.*
- *ICT Facility 4 will be located in the southern portion of the site and comprises a GFA of c. 1,976.5 sq.m (including ancillary office and administration space) over two levels with a maximum height of c. 15 metres and a parapet height of c. 10.5 metres. This ICT Facility includes an associated external plant area of c. 777.5 sq.m.*
- *Each ICT Facility building will accommodate ICT equipment halls, associated electrical and mechanical plant rooms, loading bays, maintenance and storage space, office administration areas, and screened plant.*
- *Construction of internal road network and circulation areas, footpaths, provision of 153 no. car parking spaces and 54 no. cycle parking spaces.*
- *Connections to vehicular access routes, roads, services and permitted infrastructure relating to the Energy Centre and 110kV GIS substation permitted under Reg. Ref.: SD18A/0068 and Reg. Ref.: SD19A/0185.*
- *Provision of emergency generators with associated flues, water storage tanks and associated pump rooms (comprising 150 sq.m in total) to serve each of the proposed ICT Facility Buildings.*
- *Hard and soft landscaping and planting, lighting, and all associated works, including underground foul and storm water drainage network, boundary treatments and security fencing, attenuation areas, and utility cables.*

An Environmental Impact Assessment Report (EIAR) will be submitted to the Planning Authority with the planning application and the EIAR will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy at the offices of the Planning Authority.”

3.4 The current amendments relate primarily to ICT facility buildings 2 and 3, and are considered to provide for an improvement in the overall appearance of the permitted

development, particularly when viewed from the M50 adjacent to the site. An extract of the permitted site layout plan is included below.



Figure 3.1: Extract from the site layout plan for the permitted development

Reg. Ref.: SD18A/0068 – Other Previous Extant Permission on Site

- 3.5 On the 8th of May 2019, following the withdrawal of a third party appeal to An Bord Pleanála, a final grant of permission was issued for a development comprising *inter alia* a 2 storey data storage facility with a gross floor area of c.44,323sq.m associated single storey combined heat and power plant (Energy Centre) with a gross floor area of c.7,109sq.m with ancillary 2 storey operations building with part basement with a gross floor area of c. 2,998sq.m.
- 3.6 This was an alternate data centre development to that previously granted under SD13A/0271 (discussed below). This permission relating to the subject site which was subsequently amended under SD19A/0185 (discussed below) and has a duration that extends up to 2024 (standard five year permission under Section 251 of the Act).
- 3.7 This revised planning application on the subject site retained a similar overall layout to the previous permission, with a large data centre proposed along the eastern site boundary, presenting an unbroken elevation to the M50 motorway, with standby generators and associated flues set out along the eastern side of the building. An extract from the site layout plan from the application is provided below.

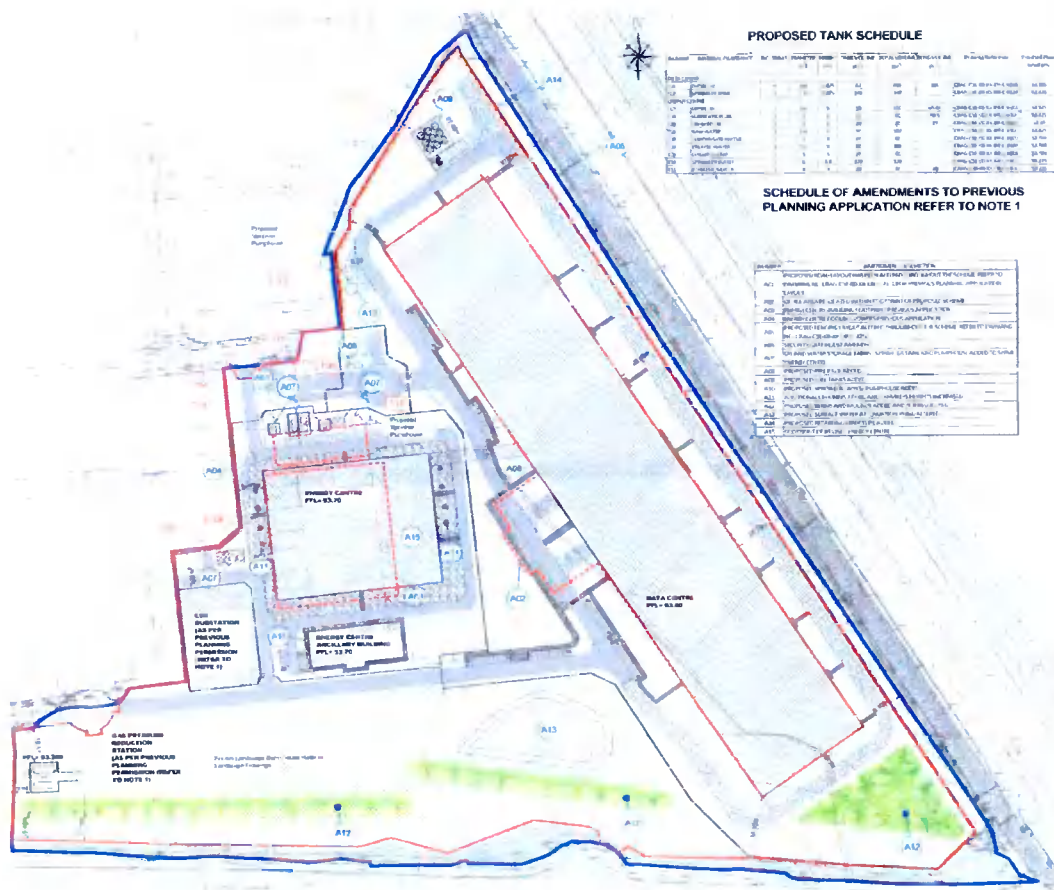


Figure 3.2: Extract from site layout plan of Reg. Ref.: SD18A/0068

Reg. Ref.: SD19A/0185 – Amendment to Extant Permission on Site

- 3.8 On the 9th of September 2019, a final grant of permission was issued on a site comprising a portion of the subject site, at the location of the permitted 110kV substation on site. The duration of this permission was specified by condition to correspond to that of the permitted development under Reg. Ref.: SD18A/0068 and the permission therefore is also extant until 2024.
- 3.9 The development was described as follows in the public notices:

“Alterations to approved plans (Grant of Permission ref PL06S.243151 and PA Reg Ref SD13A/0271 and SD18A/0068) to the previously granted planning permission for the construction of an ESB 110kV Gas Insulated Substation for the use by Crag Digital Limited in support of the development and to incorporate an ESB Network Substation to improve and upgrade power supply to Clondalkin and adjoining areas; the proposed ESB 110kV Gas Insulated Substation is a two storey building of gross floor area of 1,586sq.m and Client Control Room building of an area of 116sq.m; single storey 2MV ESB Substation of 38sq.m floor area is proposed to be constructed to facilitate the construction of the already granted development until completion and commissioning of the proposed ESB 110kV GIS Substation, including for 3 ESB external transformers and 3 Crag Digital Limited external transformers; alterations include for the relocation on site of previously granted client transformers, control building and energy centre ancillary building to facilitate the revised ESB 110kV Substation building layout; ESB Substation and client control building and transformer compound are to be secured with a 2.6m and 3m high palisade fence and access gates; all landscaping and ancillary site works as per previously granted planning permission SD18A/0068.”

- 3.8 An extract of the site layout plan for the development is included below. The data centre permitted under this application was a single, extremely large building which followed the eastern boundary of the subject site, presenting a single unbroken elevation to the M50 motorway. An energy centre and 110kV substation were permitted at the western side of the site.



Figure 3.4 Extract from site layout plan of Reg. Ref.: SD13A/0271

Reg. Ref.: SD20A/0242 – Amendment and Ducted Services

- 3.9 This application was subject to a final grant of permission on the 15th of February 2021, following the consideration of Further Information by the Planning Authority. The development comprised the provision of alternate entrance and access arrangements from Crag Avenue to serve the permitted data storage centre, energy centre and substation development permitted under Reg. Ref. SD18A/0068, as amended by Reg. Ref. SD19A/0185, including the provision of ducted services connections between the permitted substation on site (permitted under Reg. Ref. SD18A/0068 as amended by Reg. Ref. SD19A/0185) and existing services to the south of the Grand Canal.

Conclusion

- 3.10 Having regard to the planning history pertaining to the subject site as summarised above, it is noted that the principle of data centre / ICT facility development is well established on the subject site. The Planning Authority have considered applications for data centre and associated development on the subject site on several occasions in the recent past as outlined above, and have concluded that the development of such uses at this location would accord with the provisions of the County Development Plan and the proper planning and sustainable development of the area. On this basis it is submitted that the proposed amendments to the permitted development on site represent an acceptable form of development.

4.0 DESCRIPTION OF THE PROPOSED AMENDMENTS TO THE PERMITTED DEVELOPMENT

4.1 As set out above, the brief description of the proposed development provided within the public notices is as follows:

"The proposed development comprises amendments to the development permitted under Reg. Ref.: SD20A/0309. The proposed amendments comprise the following:

- *Alterations to permitted ICT Facility buildings 2 and 3, to include internal reconfiguration of the ICT equipment halls, associated electrical and mechanical plant rooms, loading bays, maintenance and storage space, office administration areas, and reconfiguration of screened plant.*
- *Alterations to the external facades of permitted ICT Facility buildings 2 and 3 to include modification and reconfiguration of fenestration, louvers, loading bays, and access doors, along with an increase in height of 1.2 metres to main parapet level and reduction in the height of rooftop plant to not exceed the parapet height of the buildings, along with the omission of previously permitted flues and exhaust ducts at roof level.*
- *Omission of emergency generators and associated flues from permitted ICT Facility buildings 2 and 3.*
- *The proposed amendments to ICT Facility buildings 2 and 3 result in an increase in their gross floor area (GFA) of 2,511 sq.m for each building, resulting in an overall increase in the GFA of the two buildings of 5,022 sq.m.*
- *Alterations to the water storage tanks serving the permitted ICT Facility buildings, including total increase of 268 sq.m GFA to the permitted pumphouses and a reduction in the scale of the associated water storage tanks.*
- *All associated and ancillary works.*

The application site is subject to an EPA Industrial Emissions Licence relating to the Energy Centre permitted on site (under Reg. Ref.: SD18A/0068 as amended by Reg. Ref.: SD19A/0185)."

Alterations to ICT Facility Buildings 2 and 3

4.2 The proposed alterations to ICT facility buildings 2 and 3 on site relate primarily to the internal reconfiguration of the buildings in order to respond to the requirements of the intended occupier of these buildings and detailed design development. The internal alterations include internal reconfiguration of the ICT equipment halls, associated electrical and mechanical plant rooms, loading bays, maintenance and storage space, office administration areas, and reconfiguration of screened plant.

4.3 These alterations do not give rise to any material change in the built footprint of these buildings, however the proposed internal reconfiguration, including the omission of the emergency generators from within the building footprint do allow for an increase in the GFA of each building of 2,511 sq.m for each building, resulting in an overall increase in the GFA of the two buildings of 5,022 sq.m. This increase is considered relatively modest in the context of the extent of permitted floorspace on site.

4.4 The accompanying permitted and proposed architectural drawings prepared by ARC:MC clearly highlight and list the proposed alterations on the 'proposed' site layouts and other detailed building drawings, to assist the Planning Authority in assessing the proposed amendments.

4.5 The proposed alterations to the permitted development result in changes to external facades of permitted ICT Facility buildings 2 and 3 to include modification and reconfiguration of fenestration, louvers, loading bays, and access doors, along with an increase in height of 1.2 metres to main parapet level and reduction in the height of

rooftop plant to not exceed the parapet height of the buildings, along with the omission of previously permitted flues and exhaust ducts at roof level.

- 4.6 The proposed amendments result in an improvement in the overall architectural appearance of ICT facility buildings 2 and 3, with the buildings now featuring a slightly (c. 1.2m) higher parapet line that serves to screen any rooftop plant from view, while the omission of flues and extracts from the roofline allows for a cleaner and more consistent roofline overall. While the proposed amendments will not have any material impact on views of the site from the south, the proposals will improve the appearance of the scheme when viewed from the M50 motorway to the east.



Figure 4.1: Permitted ICT facility building 2 façade

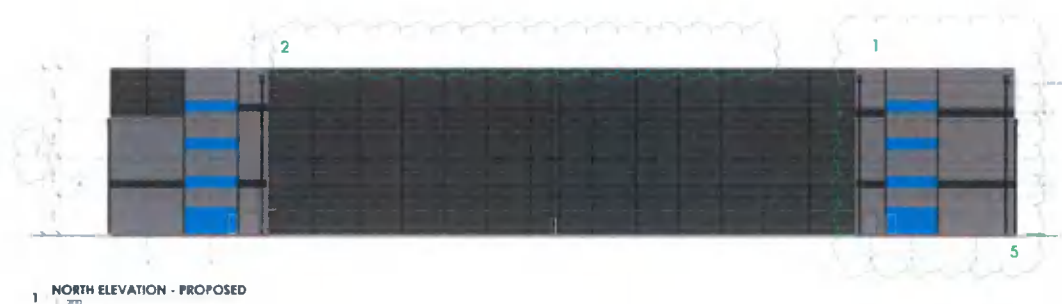


Figure 4.2: Proposed ICT facility building 2 facade

- 4.7 The following table provides a brief overview of some of the key metrics for the current amendment proposals compared to the previously permitted development on site and the other extant permission on site which Reg. Ref.: SD20A/0309 superseded in part.

Key Metric	Extant Permission Reg. Ref.: SD18A/0068	Extant Permission Reg. Ref.: SD20A/0309 (subject of current amendments)	Proposed Amendments
Gross Floor Area	44,323 sq.m (part 1, part 2 storey ICT facility)	47,564.5 sq.m (4no. ICT facility buildings excluding external plant areas)	53,004.5 sq.m (increase in GFA to ICT facility buildings 2 and 3, and increase in area of pump rooms)
Height of Development	20.9 metres (parapet height)	19.5 metres (parapet height), 24.5 metres (max height)	20.7 metres (parapet and max height for ICT facility buildings 2 and 3). No change to ICT facility buildings 1 and 4.
Employment Generation	c. 45 per shift	c. 93 per shift	c. 93 per shift
Cycle Parking	48	54	54
Car Parking	94	153	153

Table 1: Key metrics – extant permission and proposed development

Alterations to Ancillary Pumprooms and Water Storage Tanks

- 4.8 The proposed amendments also include alterations to the ancillary water storage tanks and pumprooms permitted on site. The footprint of the pumprooms and storage tanks will remain similar to the permitted scheme, however the area of pumprooms on site will increase by c. 268 sq.m in total, while the extent and size of the permitted water storage tanks will reduce.
- 4.9 This alteration has been brought forward due to detailed design considerations in relation to the sizing of the pumprooms and the equipment required therein, along with the detailed design of the permitted water tanks.
- 4.10 Overall, the amendments proposed do not give rise to any new considerations in relation to the layout, access arrangements, services, or infrastructure on site, with the alterations limited solely to ICT facility buildings 2 and 3, and the ancillary water storage tanks and pump rooms.
- 4.11 An Environmental Impact Assessment Report (EIAR) was submitted with the extant parent permission under Reg. Ref.: SD20A/0309. However, the amendments now proposed do not give rise to the requirement for completion of a new Environmental Impact Assessment, as they do not represent development that would meet or exceed any threshold for mandatory EIA and are not considered to result in any likely significant environmental impact having regard to their modest scale and their location within the subject site. The relatively minor amendments now proposed do not require EIA as they fall below any of the relevant thresholds for mandatory EIA (including Class 13, relating to changes or extensions to developments), and it is considered that any preliminary assessment by the Planning Authority will determine that the modifications would not give rise to any significant environmental impact.

5.0 NATIONAL AND REGIONAL PLANNING POLICY CONTEXT

National Planning Framework – Ireland 2040

- 5.1 The National Planning Framework was published in February 2018 and contains policies which are supportive of the development of ICT infrastructure, with particular reference made to 'data centres', which the proposed ICT facility would fall under.
- 5.2 National Strategic Outcome 6 of the NPF relates to the creation of "A Strong Economy Supported by Enterprise, Innovation and Skills". This strategic outcome is underpinned by a range of objectives relating to job creation and the fostering of enterprise and innovation.
- 5.3 The following objective, relating to ICT infrastructure (including datacentres) is included under National Strategic Outcome 6:
- "Promotion of Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities."*
- 5.4 The current application proposes amendments to two permitted ICT facility buildings forming part of a wider permission for ICT facilities on a site which already benefits from previous permission for ICT facility development and associated infrastructure, in a location which is well suited and serviced to accommodate such a use.
- 5.5 The NPF further states under National Strategic Outcome 6:

“Ireland is very attractive in terms of international digital connectivity, climatic factors and current and future renewable energy sources for the development of international digital infrastructures, such as data centres. This sector underpins Ireland’s international position as a location for ICT and creates added benefits in relation to establishing a threshold of demand for sustained development of renewable energy sources.”

- 5.6 Having regard to the above, the National Planning Framework is clearly favourably disposed to the location of ICT infrastructure in Ireland, and the proposed development, which relates to amendments to a permitted ICT facility development is therefore considered to be wholly in accordance with this key body of national planning policy.

Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly

- 5.7 The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA) were adopted by the Regional Assembly on 28th June 2019. Arklow is identified within the RSES as one of the *‘strong network of county and market towns that have a good level of local employment, services and amenities, which serve not just their resident populations but a wider catchment area’*. These towns are considered to *‘require “catch-up” investment in local employment and services in order to become more self-sustaining’*.

- 5.8 Within the RSES, Regional Policy Objective (RPO) 8.25 states the following:

“Local Authorities shall:

- *Support and facilitate delivery of the National Broadband Plan.*
- *Facilitate enhanced international fibre communications links, including full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland.*
- *Promote and facilitate the sustainable development of a high-quality ICT network throughout the Region in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.*
- *Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations.*
- *Promote Dublin as a demonstrator of 5G information and communication technology.”*

- 5.9 The proposed amendments to the permitted ICT facility development are considered to comply fully with the relevant policies of the RSES having regard to the site’s planning history, its strategic and accessible location in close proximity to the M50 motorway and having regard to the level of employment to be provided by the current proposals.

6.0 LOCAL PLANNING POLICY CONTEXT

South Dublin County Development Plan 2016-2022

- 6.1 The current section of this planning report sets out the consistency of the proposed development with the South Dublin County Development Plan 2016-2022.

Zoning

- 6.2 The application site is subject to the EE zoning objective with a stated objective *“To provide for Enterprise and Employment related uses”* under the current County Development Plan.

- 6.3 To the south, the Grand Canal corridor has an OS (open space) zoning objective, while there is also a cycle objective along the canal corridor. The subject site is located within an Approach Zone for Baldonnell Aerodrome.
- 6.4 The Grand Canal corridor to the south is also noted as a Proposed NHA on the Development Plan zoning map. The permitted ICT facility development on the subject site maintains a significant element of landscaping, berming, and planting to this southern boundary, thereby ensuring that the integrity and amenity of the Grand Canal corridor will be maintained. These aspects of the permitted development remain unchanged on foot of the proposed amendments.

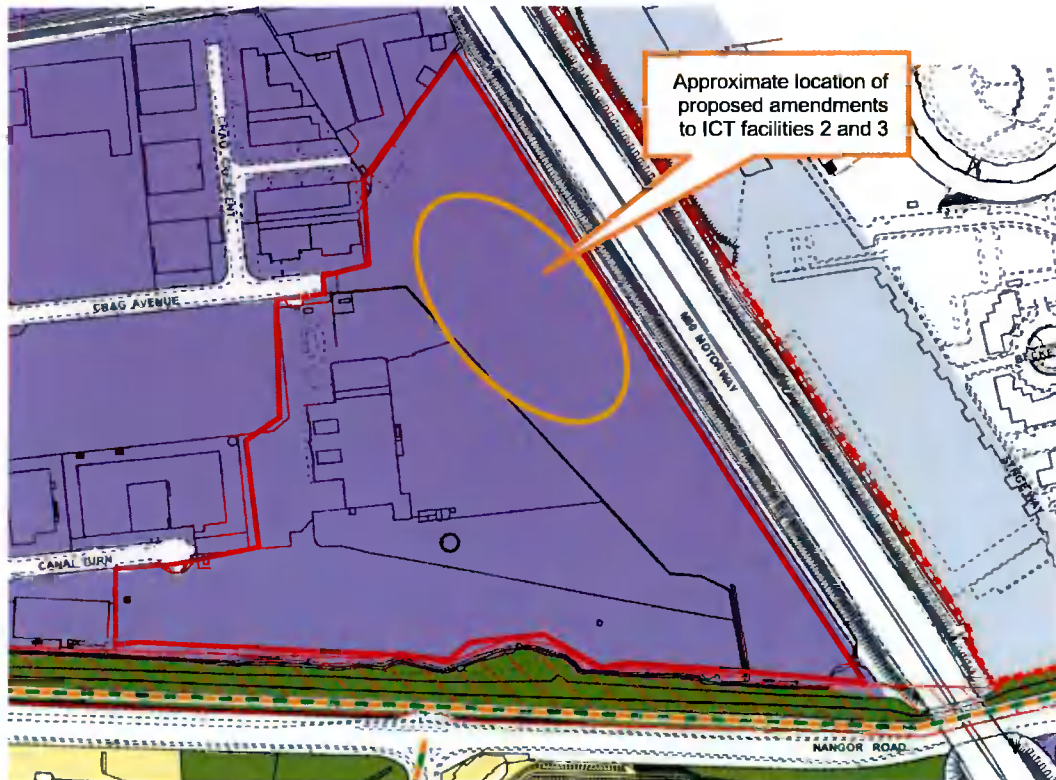


Figure 7.1: Extract from the Development Plan zoning map with the approximate area of the application site outlined in red

- 6.5 Uses which are permitted in principle under the EE zoning objective pertaining to the subject site are as follows:

“Abattoir, Advertisements and Advertising Structures, Boarding Kennels, Enterprise Centre, Fuel Depot, Heavy Vehicle Park, Home Based Economic Activities, Industry-General, Industry-Light, Industry-Special, Office-Based Industry, Office less than 100 sq.m, Open Space, Petrol Station, Public Services, Recycling Facility, Refuse Transfer Station, Science and Technology Based Enterprises, Scrap Yard, Service Garage, Shop-Local, Transport Depot, Traveller Accommodation, Warehousing, Wholesale Outlet.”

- 6.6 Uses which are open for consideration under the EE zoning objective are as follows:

“Agriculture, Allotments, Car Park, Childcare Facilities, Concrete/Asphalt Plant in or adjacent to a Quarry, Garden Centre, Hotel/Hostel, Industry-Extractive, Motor Sales Outlet, Nightclub, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Public House, Refuse Landfill/Tip, Restaurant/Café, Retail Warehouse, Social Club, Sports Club/Facility, Stadium, Veterinary Surgery.”

- 6.7 Permitted in principle uses under the EE zoning applicable to the subject site include science and technology based enterprises, industry (general) and industry (light) uses. The fact that data centre / ICT facility development is compliant with and permissible under this zoning is well established, having regard both to the precedents for data centre development on the subject site itself, and other permitted and existing similar developments at locations such as Grange Castle and Citywest within the operational area of South Dublin County Council which are also subject to the EE zoning objective.

Economic Development

- 6.8 Chapter 4 of the Development Plan pertains to Economic Development and Tourism. Section 4.1.1 notes that the County benefits from a strong and diverse economic base across a range of sectors. This section of the Development Plan highlights enterprise lands and economic clusters within the county, with Figure 4.1 illustrating the location of enterprise and employment opportunities within the area. The subject site falls within such a location identified on the extract of Figure 4.1 included below.

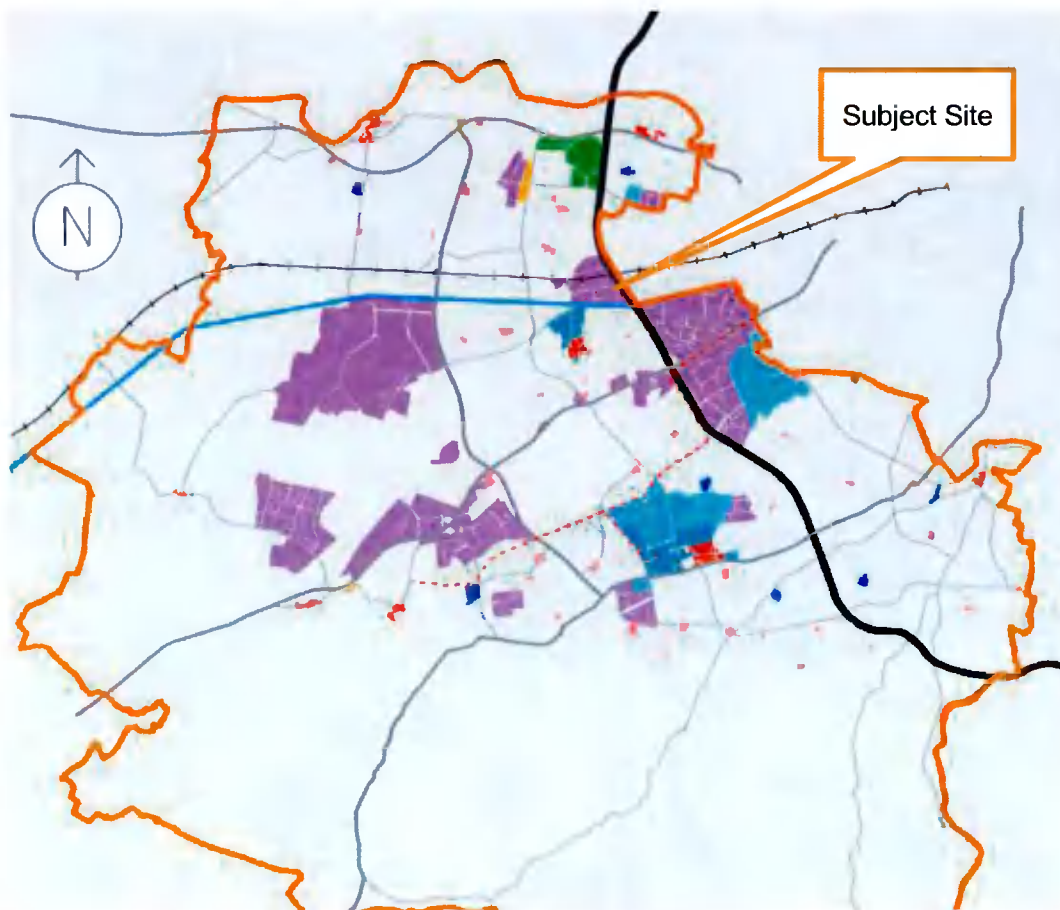


Figure 7.2: Extract from Figure 4.1 of the Development Plan, which illustrates locations for employment generating development in the county

- 6.9 The Development Plan notes that the Council will support the provision and intensification of employment uses at older industrial locations in the county. The subject site represents such a location, with the current application providing for a further uplift in the level of employment created and the efficiency of the use of scarce urban employment land *vis a vis* the currently permitted ICT facility development on site, which the current application seeks to amend. The Plan highlights that some areas of employment land zoned REGEN would be suitable for more intensive and mixed use regeneration and a mix of employment and residential uses. It is noted that the subject site does not fall into this category, but rather is clearly zoned specifically for enterprise and employment related uses of the nature proposed.

- 6.10 This chapter of the Development Plan contains policies in relation to employment generating development and in relation to EE zoned lands such as the subject site. The following policies are noted in particular.
- 6.11 Policy ET1 of the Development Plan seeks *"to support sustainable enterprise and employment growth in South Dublin County and the Greater Dublin Area, whilst maintaining environmental quality."*
- 6.12 Policy ET2 seeks *"to facilitate and support the regeneration of underutilized industrial areas that are proximate to urban centres and transport nodes and to promote and support more intensive compatible employment and or residential led development of regeneration zones."*
- 6.13 Policy ET3 relates to enterprise and employment areas (EE zoned lands such as the subject site) and states that *"It is the policy of the Council to support and facilitate enterprise and employment uses (hightech manufacturing, light industry, research and development, food science and associated uses) in business parks and industrial areas."*
- 6.14 Policy ET3, objective 3 seeks *"To support the phased expansion of the established Business and Technology Cluster to accommodate strategic high-tech manufacturing investments, research and development and associated uses."*
- 6.15 The foregoing policies and objectives support the delivery of employment generating, high technology uses such as the proposed development on lands zoned for enterprise and employment use.

Infrastructure and Environmental Quality

- 6.16 Chapter 7 of the Development Plan relates to infrastructure and Environmental Policy and contains several policies of relevance to the current development proposals.
- 6.17 Section 7.4.0 of the Plan relates to information and communications technology, and IE Policy 4 notes that it *"is the policy of the Council to promote and facilitate the sustainable development of a high quality ICT network throughout the County in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas"*. The current application relates to proposed amendments to permitted critical ICT infrastructure on an appropriately located site, on which the principle of such uses is well established.

Green Infrastructure

- 6.18 Chapter 8 of the Development Plan relates to green infrastructure within the County. Policy G2 sets out the policy of the Council in relation to the green infrastructure network of the County and states that *"it is the policy of the Council to promote and develop a coherent, integrated and evolving Green Infrastructure network in South Dublin County that can connect to the regional network, secure and enhance biodiversity, provide readily accessible parks, open spaces and recreational facilities."*
- 6.19 The following objectives set out under Policy G2 are of relevance to the current application, which adjoins the Grand Canal corridor to the south:
- *G2 Objective 1: To reduce fragmentation of the Green Infrastructure network and strengthen ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network.*
 - *G2 Objective 2: To protect and enhance the biodiversity value and ecological function of the Green Infrastructure network.*

- *G2 Objective 4: To repair habitat fragmentation and provide for regeneration of flora and fauna where weaknesses are identified in the network.*
- *G2 Objective 5: To integrate Green Infrastructure as an essential component of all new developments.*
- *G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within design proposals and supporting their integration into the Green Infrastructure network.*
- *G2 Objective 10: To promote a network of paths and cycle tracks to enhance accessibility to the Green Infrastructure network, while ensuring that the design and operation of the routes responds to the ecological needs of each site.*
- *G2 Objective 11: To incorporate appropriate elements of Green Infrastructure e.g. new tree planting, grass verges, planters etc. into existing areas of hard infrastructure wherever possible, thereby integrating these areas of existing urban environment into the overall Green Infrastructure network.*

- 6.20 The permitted development on site complies with the foregoing objectives, and represents a bespoke design solution in terms of landscaping and green infrastructure in the context of the site's location. The proposed amendments subject to the current application do not lead to any alteration to the permitted landscaping scheme on site or the wider site layout, with the amendments solely relating to permitted ICT facility buildings 2 and 3, and the ancillary water storage tanks and pump rooms.
- 6.21 The permitted development provides for a significant enhancement in the ecological and amenity value of the area via the careful treatment and design of the landscaping on site, and in particular along the southern boundary. This will promote greater biodiversity and protect and enhance the Grand Canal Corridor which is a Proposed NHA, effectively replacing a significant expanse of hard standing in this portion of the site with areas of planted berms, attenuation features and landscaping. The proposed amendments do not change any aspect of this approach.
- 6.22 Policy G5 of the Development Plan relates to the use of Sustainable Urban Drainage Systems in new developments. In accordance with this policy, a comprehensive range of SUDS measures are provided for under the permitted development. The proposed amendments do not give rise to any change in relation to drainage or SUD's with these aspects of the permitted development remaining unchanged.

Heritage, Conservation, and Landscapes

- 6.23 Chapter 9 of the Development Plan relates to Heritage, Conservation, and Landscapes. As noted previously the Canal Corridor to the south of the subject site is designated as a proposed Natural Heritage Area (NHA). Policy HCL 19 of the Plan is as follows:
- "It is the policy of the Council to protect the ecological, visual, recreational, environmental and amenity value of the County's proposed Natural Heritage Areas and associated habitats."*
- 6.24 As noted above, the permitted development on site incorporates a range of measures and landscape features along the southern boundary of the site which will protect and enhance the proposed NHA to the south, whilst also providing a high degree of visual screening of the development. The proposed amendments will have no material impact on the appearance of the scheme from the Grand Canal corridor.
- 6.25 HCL13 Objective 1 of the Development Plan is *"To ensure that any proposal for development within or adjacent to a proposed Natural Heritage Area (pNHA) is designed and sited to minimise its impact on the biodiversity, ecological, geological*

and landscape value of the pNHA particularly plant and animal species listed under the Wildlife Acts and the Habitats and Birds Directive including their habitats.” The permitted development on site accords with this objective, while the proposed amendments are not considered to give rise to any material change in relation to the compliance of the scheme with this objective of the Development Plan.

Implementation (Development Management Standards)

- 6.26 Section 11.2.1 of the Development Plan requires that a design statement be submitted with applications for larger residential or commercial developments. A design statement was submitted with the application for the parent permission, and the proposed amendments are considered to be in keeping with the design rationale submitted and approved previously.
- 6.27 Section 11.4.5 of the Development Plan requires the undertaking of Traffic and Transport Assessment for larger developments. A TTA is incorporated was Chapter 13 (Traffic and Transportation) of the EIAR submitted as part of the application for the parent permission, with the proposed amendments having no impact on the level of trip generation or the roads layout on site.

Car and Bicycle Parking

- 6.28 Bicycle parking standards are set out under Table 11.22 of the Development Plan, with car parking standards provided under Table 11.23. The proposed amendments do not entail any change to the permitted level of car or cycle parking on site, with the parking provision related directly to the number of employees likely to be on site at any given time. The permitted level of car parking is not affected by the proposed amendments, and remains 153 no. spaces, while the 54 bicycle parking spaces are also unchanged. The provision of EV charging spaces, as provided for at FI stage under Reg. Ref.: SD20A/0309 will also remain unchanged.
- 6.29 This level of car and bicycle parking remains adequate to serve the permitted development as amended by the proposed alterations subject to this application.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 This application seeks permission for the provision of amendments to the previously permitted development under SDCC Reg. Ref.: SD20A/0309. The proposed amendments which are considered relatively minor (albeit positive) in the context of the permitted development. The proposed amendments have arisen on foot of detailed design consideration and are required in order to meet the operational requirements of the identified intended occupier for ICT facility buildings 2 and 3.
- 7.2 The nature of the permitted development, and by extension the current amendment proposals responds directly to the site's enterprise and employment objective which seeks to attract major investment and employment generating development of the nature proposed.
- 7.3 The proposed amendments will not give rise to any material change to the overall footprint of ICT facility buildings 2 and 3, but rather provide for a more efficient use of space within the building footprint, including the omission of emergency generators and associated flues, in order to provide for a building design meeting the operational requirements of the intended occupier, while also allowing for a modest increase in the overall useable GFA of the two buildings. The other permitted ICT facility buildings on site remain unchanged, with the proposed amendments having no material impact on the appearance of the development from the Grand Canal corridor to the south.

- 8.4 The development of this site is in accordance with the policies and objectives of the National Planning Framework, Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly, and the South Dublin County Development Plan 2016-2022.
- 8.5 It has been demonstrated within this report, as well as within the accompanying drawings that the proposed amendments will result in relatively minor but positive modifications to the permitted development on site. On this basis, it is respectfully requested that the Planning Authority issue a decision to grant permission for the proposed amendments.