

Planning Report

In respect of

Proposed Amendments to a Permitted Substation

Prepared by

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On behalf of

EdgeConnex Ireland Limited

Date: April 2022



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CONTENTS

<u>Section</u>	<u>Page Number</u>
1.0 Introduction / Executive Summary	1
2.0 Site Location and Context	2
3.0 Planning History	4
4.0 Description of the Proposed Development	8
5.0 National and Regional Planning Policy	14
6.0 Local Planning Policy	15
7.0 Summary and Conclusions	21

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1.0 INTRODUCTION / EXECUTIVE SUMMARY

1.1 On behalf of the applicant, EdgeConnex Ireland Limited, this planning report forms part of a planning application for development comprising amendments to the permitted 110kV electrical substation compound and structures permitted under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19 on a site within the townland of Ballymakailly, West of Newcastle Road (R120), Lucan, Co. Dublin. The substation to which the current amendments relate will be known as the Kishoge substation.

1.2 The description of the proposed development as set out within the public notices is as follows:

- *“Amendment to the layout and extent of the permitted substation compound, to include an extension of the compound area to c. 0.77 hectares.*
- *Reorientation of the Gas Insulated Switchgear (GIS) substation building to a north-south orientation, and associated amendments to the building footprint, layout, and elevations, providing for a two storey building with a gross floor area (GFA) of c. 1,456 sq.m.*
- *Alterations to the permitted single storey Client Control Building to provide for the substitution of this structure with 5 no. single storey modular client control units, with a combined total GFA of c. 231 sq.m (GFA of c. 46.2 sq.m per module).*
- *Associated amendments to the permitted substation access arrangements (3 no. gated access points provided), transformers, security fencing (to be 2.6 metres high in place of the 2.4 metre high fencing permitted), lighting, services, MV substation, parking, utility cabling, amendments to permitted landscaping and berms adjoining the substation compound and associated and ancillary works.”*

1.3 An Environmental Impact Assessment Screening Report (EIA Screening) has been prepared and is submitted as part of this planning application. An Appropriate Assessment Screening Report has also been prepared and is submitted herewith. These reports provide the requisite information to allow the Planning Authority (as competent authority) to undertake screening for Environmental Impact Assessment and Screening for Appropriate Assessment in respect of the proposed amendments.

1.4 The planning rationale for the proposed substation amendment application on the subject site can be summarised as follows:

- The proposal accords with the EE – enterprise and employment zoning objective pertaining to the application site and will support the delivery of a high technology employment generating datacentre use at this strategic location.
- The subject site benefits from extant planning permission for development, with the proposed amendments currently being brought forward to ensure the safe and effective servicing of this development with electricity, via updates to the design of the previously permitted substation on site.
- The architectural design of the proposed development utilises high quality materials and responds effectively to the site context and the surrounding permitted development on the wider landholding, in addition to the separately proposed development on the landholding which is currently under consideration by the Planning Authority.
- The scheme incorporates a high-quality landscape design, which serves to fully integrate the development into its surroundings while limiting the impact of the proposed development on views and the wider landscape.
- The siting of the proposed buildings and the design and landscaping of the proposed development have been informed by the need to avoid impact on the amenity of the Grand Canal Corridor to the north.
- The national, regional and local planning policy context is supportive of a development to provide for ICT related development and the subject site and

wider landholding already benefit from permission for such a use, which the amendments to the permitted substation will support and facilitate.

- The proposed development has been prepared to accord with the relevant policies, objectives and standards of the South Dublin County Development Plan 2016-2022 and the Regional and National planning policy context. Regard has also been had to the emerging planning policy context set out within the Draft South Dublin County Development Plan 2022-2028.
- The proposed development will be compatible with its surroundings and the established and permitted employment uses on the wider landholding and other nearby lands.
- The EIA Screening report submitted demonstrates that the proposal will not have any significant adverse impacts on the environment, that the development is sub-threshold in nature, and does not require the preparation of a sub-threshold EIAR.

2.0 SITE LOCATION AND CONTEXT

- 2.1 The site of the substation is located on lands within the townland of Ballymakailly to the west of the Newcastle Road (R120). The site is greenfield in nature. As noted previously, there is an extant permission for a substation on site under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19. The site has an area of c. 1.2 hectares.
- 2.2 The R120 road to the east was recently realigned, while the eastern boundary of the wider landholding at this location was previously subject to a compulsory purchase order by the Local Authority to facilitate the construction of a roads scheme (Adamstown / Newcastle Road). The Grand Canal is located to the north of the wider landholding in the ownership of the applicant at this location. The substation site is greenfield in nature.
- 2.3 The wider area surrounding the substation site is defined by existing industrial and data storage facility development to the east and southeast, with greenfield lands to the south and west, and the Grand Canal to the north. The Kishoge substation site is located c. 750m from the Adamstown SDZ. The site of the Kishoge substation is located within a significant landbank of Enterprise and Employment zoned lands, much of which has yet to be developed.
- 2.4 The wider landholding in the ownership of the applicant which surrounds the substation site
- 2.5 The eastern side of the R120 opposite the subject landholding is defined by a number of detached houses, behind which is an existing and permitted data storage facility development delivered by the applicant.



Figure 1: Location of the Kishoge Substation

3.0 PLANNING HISTORY

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

South Dublin County Council Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19 – Extant permission for substation and data storage facility development

- 3.2 On the 5th of October 2020, an Order to grant permission was issued by An Bord Pleanála following consideration of a third party appeal of South Dublin County Council's decision to grant permission for a development which included the permitted substation and a data storage facility along with a temporary gas powered generation plant.
- 3.3 The permitted development comprises the following:

"Phased development that will include 4 single storey data halls all with associated plant at roof level; 32 standby generators with associated flues (each 15m high); associated office and service areas; service road infrastructure and car parking; ESB sub-station/transformer yard with an overall gross floor area of 17,685sq.m, temporary gas powered generation plant within a walled yard containing 19 generator units with associated flues (each 17m high) to be located to the west of the proposed data halls on a site within the townland of Ballymakailly; Phase 1, 2 single storey data halls (6,950sq.m.) with roof plant and 16 stand-by generators with associated flues (each 15m high) as well as associated water tower and pump room and other services; single storey goods receiving area/store and single storey office area (1,522sq.m.) located attached and to the north-east of the data halls; temporary gas powered generation plant with 15 generators with associated flues (each 17m high) to be located within a compound to the west of the proposed data halls; attenuation pond; two storey ESB sub-station (494sq.m) with associated transformer yard and single storey transformer building (247sq.m) within compound; Phase 2, 2 single storey data halls (6,950sq.m.) with roof plant and 16 stand-by generators with associated flues (each 15m high) as

well as associated water tower and pump room and other services; single storey goods receiving area/store and single storey office area (1,522sq.m) located attached and to the east of the data halls under this Phase and attached and to the north of the offices proposed under Phase 1; 4 additional generators with associated flues (each 17m high) to be constructed within the temporary gas powered generation plant; also ancillary site works; connections to existing infrastructural services as well as fencing, signage; vehicular access off the realigned R120 to provide a new vehicular access into the site as well as internal service roads and entrance gates; car park for 39 car parking spaces (including 4 disabled car parking spaces); sheltered bicycle parking to serve the development. The development will be enclosed with landscaping to all boundaries of the overall site of 22.1ha. Application for enabling works to facilitate this development has been made under Reg. Ref. SD19A/0004."

- 3.4 It is the substation permitted under this application to which the current application for amendments relates. The EIAR submitted with the application noted the following in relation to the permitted substation:

"The permanent power supply arrangement to the site will be realised by the construction of a two storey ESB 110kV substation towards the north-west part of the development site within the southeast of the overall lands. The sub-station will comprise of an ESB networks building that will be two storey and 14m in height; and four no. client owned transformer yards with associated switch-room and control rooms."

- 3.5 The application included drawings and details of the substation to which the current amendments relate. The 'permitted' architectural drawings of the substation compound and buildings submitted herewith reflect those submitted with the parent permission, while the 'proposed' drawings illustrate the proposed amended substation layout and buildings proposed under the current amendment application.
- 3.6 The application noted that an Industrial Emissions Licence would be applied for to facilitate the operation of the second phase of the development. An Environmental Impact Assessment Report was submitted with the application.

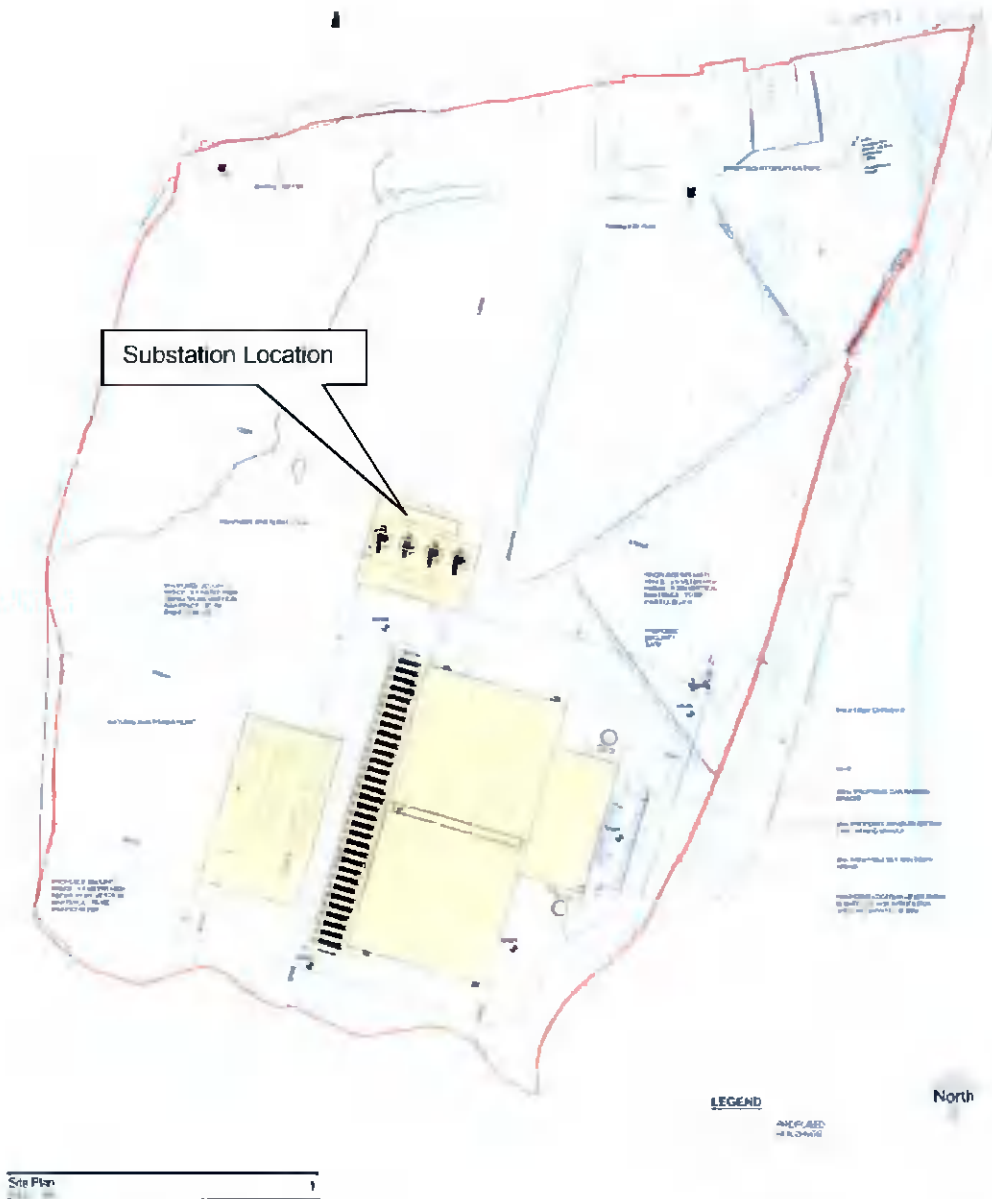


Figure 2: Extract from the site layout plan of Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19, labelled to indicate the location the substation

South Dublin County Council Reg. Ref.: SD21A/0042 – Data Centre and Gas Powered Generation Plant on lands adjoining the Kishoge substation site

3.7 On the 24th of February 2021, a planning application was submitted for the following development on the wider landholding within which the subject substation will be located:

“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.”

- 3.8 A final grant of permission was issued in respect of the development on the 24th of March 2022, following the consideration of Further Information and Clarification of Further Information by the Planning Authority. The application drawings for this application on the wider landholding indicate the permitted substation as permitted under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19.



Figure 3: Extract from the Further Information stage site layout plan of Reg. Ref.: SD21A/0042, labelled to indicate the location the permitted substation

South Dublin County Council Reg. Ref.: SD21A/0042 – Application for enabling works on the southern portion of the wider landholding within which the Kishoge substation site is located

- 3.9 On the 16th of April 2019, a final grant of permission was issued by the Planning Authority for the following development:

“Enabling works to facilitate the future development of the site; topsoil strip and a cut and fill operation across the site; temporary construction access will be created off the R120 to facilitate the works within the townland of Ballymakailly to the west of the Newcastle Road (R120).”

4.0 **DESCRIPTION OF THE PROPOSED 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 electrical substation compound and structures permitted under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19.

The proposed amendments will comprise the following:

- *Amendment to the layout and extent of the permitted substation compound, to include an extension of the compound area to c. 0.77 hectares.*
- *Reorientation of the Gas Insulated Switchgear (GIS) substation building to a north-south orientation, and associated amendments to the building footprint, layout, and elevations, providing for a two storey building with a gross floor area (GFA) of c. 1,456 sq.m.*
- *Alterations to the permitted single storey Client Control Building to provide for the substitution of this structure with 5 no. single storey modular client control units, with a combined total GFA of c. 231 sq.m (GFA of c. 46.2 sq.m per module).*
- *Associated amendments to the permitted substation access arrangements (3 no. gated access points provided), transformers, security fencing (to be 2.6 metres high in place of the 2.4 metre high fencing permitted), lighting, services, MV substation, parking, utility cabling, amendments to permitted landscaping and berms adjoining the substation compound and associated and ancillary works."*

Site Layout

4.2 The proposed development encompasses amendments to the layout and extent of the permitted 110kV substation compound, which formed part of the wider data centre and energy centre development permitted under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19. As noted within the introduction to this report, it is intended that the substation subject of the proposed amendments will be known as the Kishoge substation.

4.3 It is noted that the development permitted under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19 is subject of an existing, executed connection agreement with EirGrid. The permitted substation to which the current amendments relate will facilitate the servicing of the permitted development on site, and any further phases of development (subject to separate applications, including that which is currently under consideration under Reg. Ref.: SD21A/0042) with electricity. The substation (as previously permitted and subject to the current amendment proposals) will however be required to serve the first phase of permitted development on site, even in the absence of any further intended phases of data centre development.

4.4 The connection of the permitted substation, as amended by the current application, to the electricity grid will be facilitated by way of a separate application for an underground transmission line connection between the Kishoge substation site and the Aungierstown – Castlebaggot underground 110kV transmission line. A pre-application request (ABP Ref.: 311907-21) has been made to An Bord Pleanála to determine whether the underground transmission line connection should be progressed via an application directly to the Board under section 182A of the Planning and Development Act. However, any such application will be separate and distinct from the substation, which is already permitted on site, and to which the current amendment application relates.

4.5 As set out within the public notices, the amendments include an increase in the overall extent of the substation compound, when compared to the permitted compound, in order to satisfy the current requirements of the utility provider. The increase in

substation extent will ensure that the substation operates in a safe and efficient manner, in line with ESB / EirGrid requirements.

- 4.6 The amendments include the reorientation of buildings and services within the substation compound, including the revised orientation of the main Gas Insulated Switchgear (GIS) building, to locate it along a north/south axis within the compound. The number of permitted transformers remains unchanged at 4 no. in total.
- 4.7 The following table provides a brief overview of some of the key metrics for the current development proposal compared to the extant permission for development on site, to which the current amendments relate:

Key Metric	Extant Permission	Proposed Development
Area of Substation Compound	3,580 sq.m	7,772 sq.m
Gross Floor Area of GIS Building	494 sq.m	1456 sq.m
Gross Floor Area Client Control Building	247 sq.m	231 sq.m (within 5 no. modular units)
Height of Compound Fence	2.4 metres	2.6 metres

Table 1: Key substation metrics – extant permission and proposed development

- 4.8 The proposed amendments to the GIS substation building and client control building are described below.

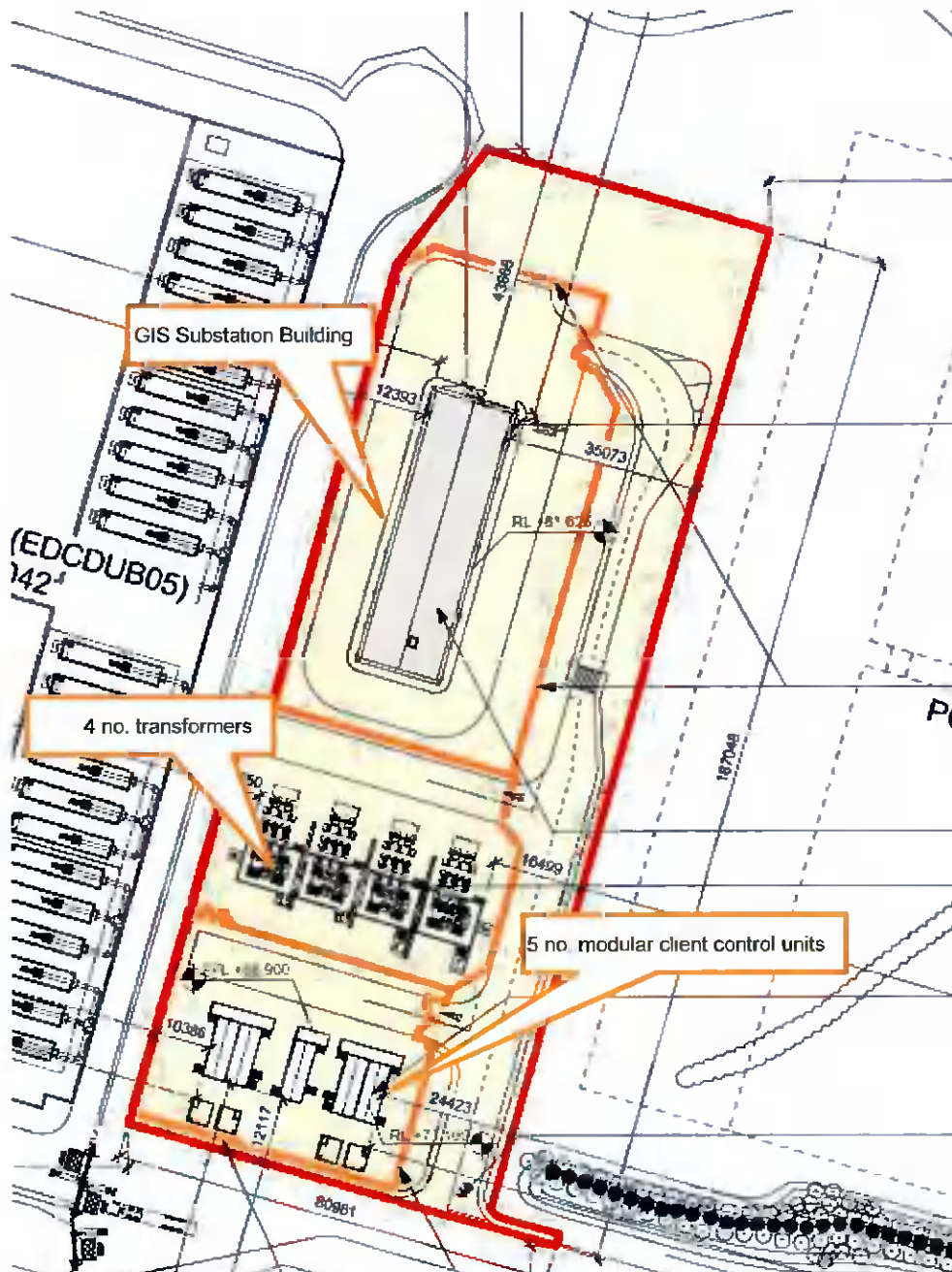


Figure 4: Extract from HJL Proposed Site Layout Plan illustrating the proposed amendments

Proposed GIS Substation Building

- 4.9 As noted above, the proposed amendments provide for the reorientation of the permitted GIS substation building within the substation compound. The proposed amendments also provide for a revised design for this building, to provide for a building with a GFA of 1,456 sq.m set out over two storeys.
- 4.10 The building will have an overall height of 15 metres, with entrance / access doors provided to all elevations. The height of the amended building represents an increase in height of 1 metre *vis a vis* the building provided for within the extant permission on site. The building will accommodate a control room, workshop, generator room, cable pit, battery room, restroom, and circulation space at ground floor level. A store room and GIS room will be provided at first floor level.

- 4.11 The materials and colour proposed for this building remain unchanged from the extant permission, with the building to be primarily clad with a metal cladding system finished in a basalt colour.
- 4.12 The use of the building (to accommodate gas insulated switchgear equipment) remains unchanged.

Client Control Buildings

- 4.13 As noted within the public notices, the proposed amendments include the replacement of the permitted single storey client control building / MV switchroom building within the compound, with 5 no. smaller modular client control units. These will have a combined GFA of c. 231 sq.m, a slight reduction on the floor area of the single client control building under the parent permission (which has a permitted GFA of 247 sq.m).
- 4.14 The single storey modularised structures will be set out within the southern portion of the wider compound, and include access plinths and steps to each unit. The units will be laid out in two pairs, with a fifth stand-alone control room unit located between the two pairs of switch room units. Each unit will have a height of c. 4.1 metres, and the structures will be clad with metal panelling to match the colour and finish of the main GIS substation building.

Materials & Finishes

- 4.15 The proposed buildings will be constructed from a palette of good quality, durable materials. While the substation is internally located within the site, and will be substantially screened by adjoining permitted and proposed development to the west and south, and by permitted landscaped berms and planting to the north and east, the design of the proposed buildings has been undertaken to provide for a highly durable, good quality finish, in keeping with the pattern and design of development on the wider landholding at this location.
- 4.16 Please refer to the HJL Architects drawing pack for further details in relation to the proposed materials and finishes.

Visual Impact and Amenity

- 4.17 As set out previously, the subject site and the proposed development is significantly removed from the nearest residential uses, with the site of the substation subject to the current amendment application set within a significant landholding. Boundary treatments and berms to provide visual screening for the wider landholding have been permitted under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19. The nearest dwelling is located over 100 metres from the substation site.
- 4.18 The EIA Screening Report prepared by AWN Consulting includes further assessment of the visual impact of the proposed amendments.

Access

- 4.19 The amended substation compound will be provided with three vehicular access points, entry to which will be gained from the permitted internal circulation routes within the wider landholding. These access points will be gated, with the boundary treatment and gates to match.
- 4.20 The development includes alterations to the access arrangements and vehicular circulation within the substation compound itself, in order to provide for the safe and efficient operation and maintenance of the substation.

Ancillary Structures and Ancillary Works

- 4.21 The proposed development includes the provision of an MV (house supply) substation, and the provision of compound fencing of 2.6 metres in height (an alteration to the permitted height of 2.4 metres).
- 4.22 The application also provides for amendments to the permitted substation access arrangements (3 no. gated access points provided), transformers, lighting, services, MV substation, parking, utility cabling, amendments to permitted landscaping and berms adjoining the substation compound and associated and ancillary works.

Environmental Impact Assessment Screening and Appropriate Assessment Screening

- 4.23 An Environmental Impact Assessment (EIA) Screening Report has been prepared by AWN Consulting and other specialist consultants, and is submitted along with this planning application.
- 4.24 An Appropriate Assessment Screening Report is included within the EIA Screening Report as an appendix. The AA Screening Report concludes that it is not necessary to undertake any further stage of the Appropriate Assessment process.
- 4.25 These reports provide the necessary information to allow the Planning Authority, as competent authority, to undertake screening for EIA and for Appropriate Assessment in respect of the proposed development.

5.0 NATIONAL AND REGIONAL PLANNING POLICY CONTEXT

Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy

- 5.1 The Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy was published by the Department of Business, Enterprise and Innovation in June 2018. The Statement notes the role which data centres play in Ireland's ambition to be a digital economy hot-spot in Europe. This policy document is of relevance to the current development proposals, as the amendments to the permitted substation will support the delivery and operation of permitted and currently under consideration data storage facility / data centre development on the wider landholding at this location.
- 5.2 The Statement includes a section dealing with electricity infrastructure (page 8 onward refers). The Statement includes the following statement in relation to the electricity infrastructure requirements of planned and projected data centre development:

"Currently, a large portion of existing and planned data centres that are due to connect to the electricity system are expected to be in the Dublin area. Based on existing data centres, committed expansion and expected growth, total demand could treble within the next ten years. A consistent and supportive whole of government approach will be brought to the realisation of the transmission and distribution assets required to support the level of data centre ambition that we adopt."

- 5.3 The current proposal constitutes the provision of infrastructure required to provide electricity for the development of the area, including permitted and under consideration datacentres at the wider landholding. The current proposed amendments and are therefore supported by this Government policy.

National Planning Framework – Ireland 2040

5.4 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 'datacentres'.

5.5 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.

5.6 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.”

5.7 The current application proposes infrastructure to support the delivery of permitted data storage facility development. Thus, the proposed amendments to the permitted substation accord with the foregoing principles of the NPF.

5.8 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.”

5.9 Having regard to the above, the National Planning Framework is clearly favourably disposed to the location of ICT development and supporting infrastructure in Ireland, and the proposed development, comprising infrastructure to support permitted and currently under consideration development in the vicinity, 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

5.10 The RSES recognises the need to facilitate the provision of sufficient electricity to meet increasing demand in the region. Regional Policy Objective (RPO) 10.20 states the following:

“Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. Including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.”

5.11 The proposed development constitutes a project which is required to serve the electricity needs of permitted development in the area in accordance with the foregoing objective.

5.12 The strategy goes on to state the following:

“The Dublin Region is the major load centre on the Irish electricity transmission system. Approximately one third of total demand is located here, similarly the Eastern Region is a major load centre on the Irish transmission system. The main urban demand centres are composed of a mix of residential, commercial and industrial demand, which is expected to grow up to 2025 and beyond. Developing the grid in the Region will enable the transmission system to safely accommodate more diverse power flows from renewable generation and also to facilitate future growth in electricity demand. These developments will strengthen the grid for all electricity users, and in doing so will improve the security and quality of supply. This is particularly important if the Region is to attract high technology industries that depend on a reliable, high quality, electricity supply.”

- 5.13 The current proposal seeks to provide for the development of the grid via the incorporation of amendments to a permitted substation, which will supply high technology industry in the area, which is dependent on a reliable, high quality electricity supply.

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 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.
- 6.3 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.”

- 6.4 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.”

- 6.5 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.”*
- 6.6 The proposed development represents a “Public Services” use, which is permissible under the relevant zoning objective. Public Services, as defined within Schedule 5 of the Development Plan entail *“A building or part thereof or land used for the provision of public services. Public services include all service **installations necessarily required by electricity**, gas, telephone, radio, telecommunications, television,*

drainage and other statutory undertakers, it includes: public lavatories, public telephone boxes, bus shelters, bring centres, green waste and composting facilities” (emphasis added). The substation to which the current amendments relate will also serve a Science and Technology Based Enterprise (i.e. the permitted datacentre use on the wider landholding), and therefore is fully compliant with the zoning objective in this respect. It is submitted that the proposed amendments clearly align with the zoning objective pertaining to the site, as established under the parent permission to which the current amendments relate.

- 6.7 The County Development Plan (s. 10.2.9) supports the provision of transmission and energy infrastructure with the appropriate service providers such as ESB Networks and Eirgrid that facilitates the economic development and expansion of the County.
- 6.8 Policy E11 of the County Development Plan specifically states that *“It is the policy of the Council to ensure that the provision of energy facilities is undertaken in association with the appropriate service providers and operators, including ESB Networks, Eirgrid and Gas Networks Ireland. The Council will facilitate the sustainable expansion of existing and future network requirements, in order to ensure satisfactory levels of supply and to minimise constraints for development”*.

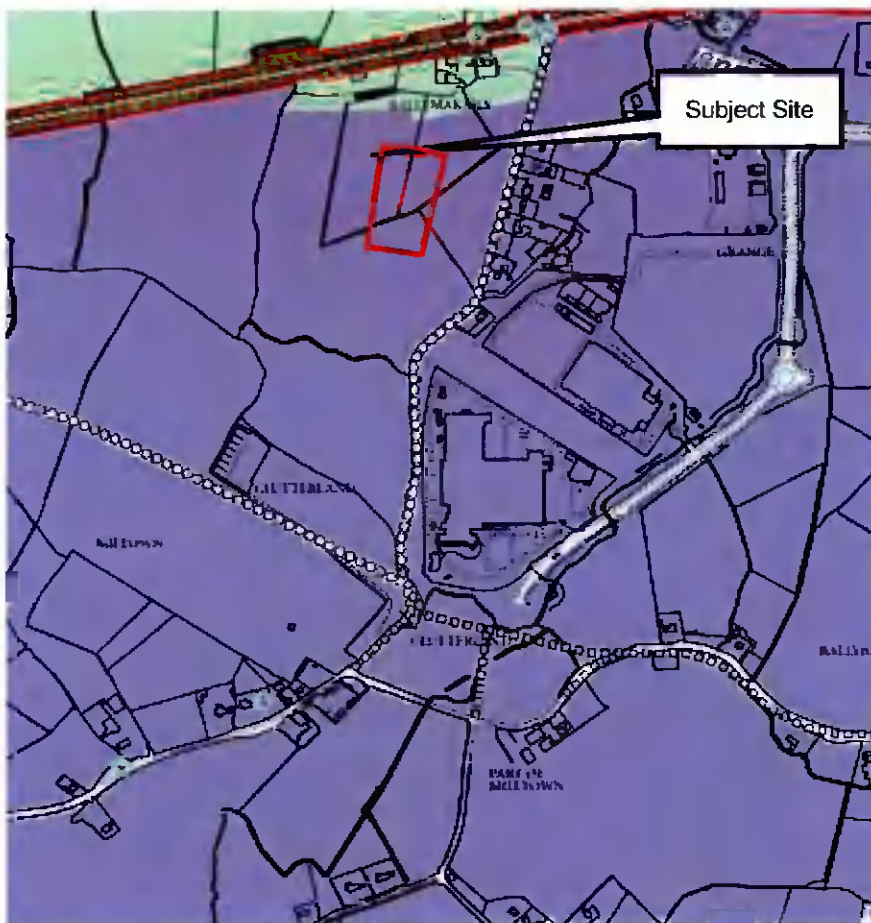


Figure 5: Extract of Map No. 4 of the South Dublin County Development Plan 2016-2022 with the approximate site location indicated in red

Economic Development

- 6.9 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.

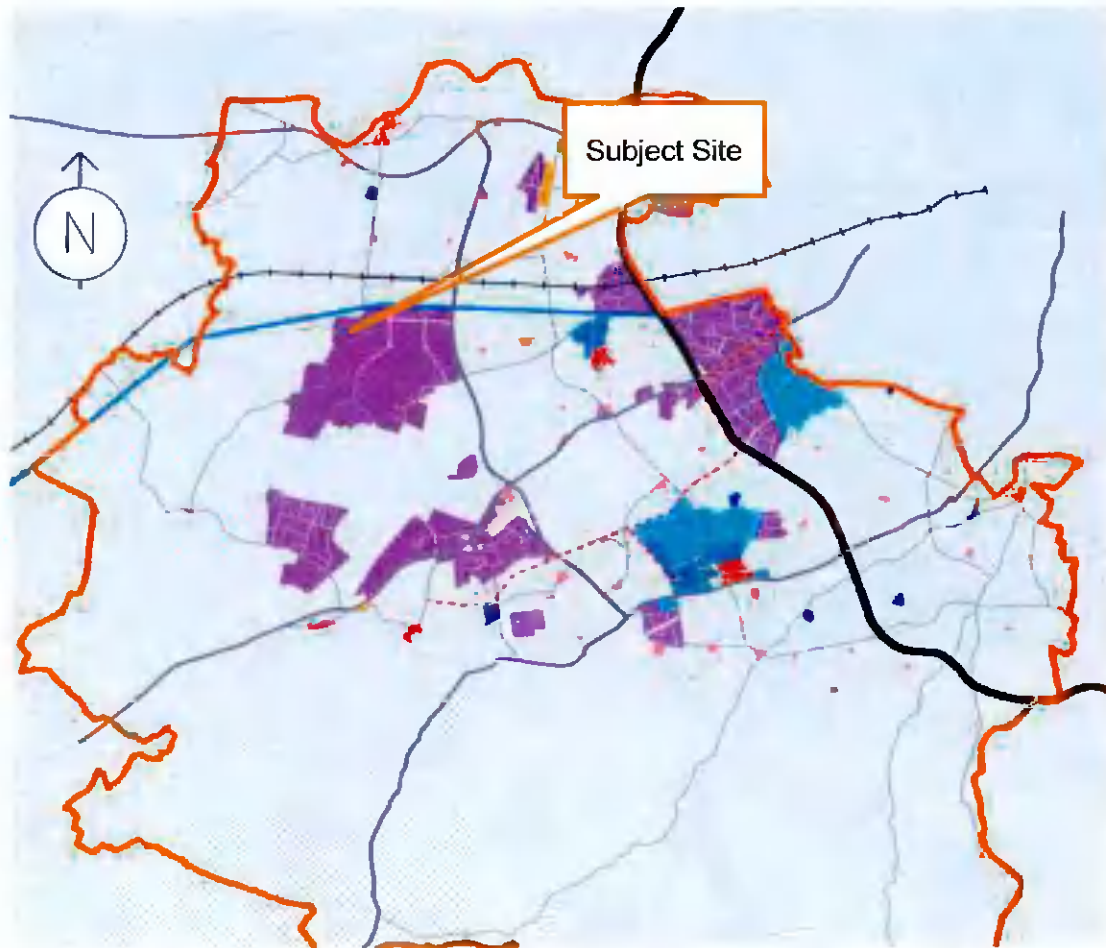


Figure 6: Extract from Figure 4.1 of the Development Plan, which illustrates locations for employment generating development in the county

- 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 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."*
- 6.13 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."*
- 6.14 The foregoing policies and objectives support the delivery of employment generating, high technology uses at locations such as the subject site. The proposed amendments to the permitted substation on site will support the delivery of such development.

Infrastructure and Environmental Quality

- 6.15 Chapter 7 of the Development Plan relates to infrastructure and Environmental Policy and contains several policies of relevance to the current development proposals.

- 6.16 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 proposed amendments to the permitted substation will facilitate the development of ICT infrastructure on the wider landholding.
- 6.17 IE Policy 7 of the Development Plan and the objectives thereunder relate to the control of air quality, light pollution, and noise pollution. The current application is accompanied by an EIA Screening Report prepared by AWN Consulting and other specialist consultants, which includes detailed assessments of noise and air quality.

Energy

- 6.18 Chapter 10 of the Development Plan relates to energy infrastructure and provision. As noted previously in this report, the proposed development
- 6.19 Policy E11 of the Plan is as follows:
- “It is the policy of the Council to ensure that the provision of energy facilities is undertaken in association with the appropriate service providers and operators, including ESB Networks, Eirgrid and Gas Networks Ireland. The Council will facilitate the sustainable expansion of existing and future network requirements, in order to ensure satisfactory levels of supply and to minimise constraints for development.”*
- 6.20 The proposed amendments arise from the need to meet service provide requirements for the permitted substation on site, in order to ensure its safe an efficient operation. The foregoing policy of the Development Plan supports the current proposals.

Draft South Dublin County Development Plan 2022-2028

- 6.21 The Draft South Dublin County Development Plan was issued for public consultation on the 7th of July 2021. While the application for amendments to the permitted substation will be decided under the operative 2016-2022 Development Plan, it is considered appropriate to briefly address the Draft Development Plan as it relates to the subject site.
- 6.22 The site remains zoned objective EE under the Draft Plan.



Figure 7: Extract from zoning map 4 of the Draft Plan, with the approximate location of the application site indicated

- 6.23 Public services use remains permitted in principle under the EE zoning within the Draft Plan.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 This application seeks permission for amendments to a permitted substation, to include alterations and layout changes to the permitted substation compound and an increase in its overall extent. These amendments are necessary to facilitate the safe and effective servicing of the permitted and under consideration datacentre development on the wider landholding at this location. The amendments are also formulated to meet the specifications and requirements of the electricity utility operator.
- 7.2 The nature of the proposals responds directly to the site's enterprise and employment objective which seeks to attract major investment and employment generating development of the nature permitted on the wider landholding. The substation to which the current amendments relate is required to support these uses.
- 7.3 It is considered that the proposed development is a positive design solution for the site and will integrate appropriately with the area, as demonstrated within the accompanying architectural drawings prepared by HJL architects, and as discussed in further detail within the Landscape and Visual Impact section of the EIA Screening Report submitted herewith, which has been prepared by AWN Consulting.
- 7.4 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. This report has also set out compliance with the Draft South Dublin County

Development Plan 2022-2028, albeit the current application is likely to be decided under the current 2016-2022 Development Plan.

- 7.5 It has been demonstrated within this report, as well as within the accompanying drawings, documents and Environmental Impact Assessment Screening Report that the proposal provides a suitable use for the subject lands and accords with the proper planning and sustainable development of the area.