

# MARSTON

## PLANNING CONSULTANCY

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

Our Ref: 14036

18<sup>th</sup> May 2022

**Re : Planning and Development Act 2000-2021 and the statutory regulations (as amended). Application by Interxion Ireland DAC are applying for permission for development at this site at Grange Castle Business Park, Clondalkin, Dublin 22. The development will consist of amendments and modifications to the permitted data centre development granted under Reg. Ref. SD18A/0323 to include: 1 no. screened bin compound to be relocated to the south-east corner of the site; 2 no. transformers within individual compounds and adjoining switch room (35.2sqm) to be located to the east of the permitted data centre to replace screened transformer compound to the south-east of the site; 1 no. new plantroom (19.8sqm) and 1 no. water storage tank to be located to the west of the permitted data centre to replace previously approved fire suppression enclosure; and New double gates to replace sliding gates at entrance into the permitted data centre site.**

Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin, D18 T3Y4 are instructed by Interxion Ireland DAC to submit this planning submission in respect of this planning application for amendments and modifications to the permitted data centre development granted under Reg. Ref. SD18A/0323 within their overall campus within the Grange Castle Business Park, Clondalkin, Dublin 22.

The originally permitted development as granted under Reg. Ref. SD18A/0323 included for a two storey data centre of 7,246sqm that is located to the immediate south of the existing data centre. Work has not commenced on this development.

The nature of the current application is to address minor modifications and amendments to the parent permission that are required for a range of reasons of which none relate to the height, floorspace, scale and form of the data centre or its power requirements. We respectfully submit that none of the modifications of the permitted scheme, materially change the nature or the principle of the originally permitted development that led to the reasons and considerations on which the positive nature of the original South Dublin County Council decision was made. All these changes are set out in detail within this report.

### 1. Compliance with Statutory Regulations

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

- The Site Location Map has been prepared on an OS base to a scale of 1:2,500 for the application. An Ordnance Survey Datum local benchmark is indicated on the Map. The application site is outlined in red on this map with land also in the control of the applicant outlined in blue. The OS map indicates the location of the three no. site notice locations.
- The Proposed and Permitted Site Layout Plan are to a scale of 1:500 (Drawing no. P-003) and indicate the elements of the permitted layout under Planning Ref. SD18A/0323 to be modified; as well as the proposed layout with the amendments suitably noted and coloured. Both layout plans indicate them in the context of the existing data centre permitted and built following a grant of permission under Planning Ref. SD15A/0034. Relevant features (such as buildings, trees and roads) adjoining or in the vicinity of the application site including those permitted under the 2018 application are all shown.

- An Existing Site Layout Plan (Drawing no. P-002) to a scale of 1:500 indicates the existing site plan with no development on the application site and the data centre granted and built under Planning Ref. SD15A/0034 in place.
- As per article 22(2)(iv), the site notice positions (3 no.) are shown clearly on the Site Location Map. These positions are conspicuous and meet the requirements of article 19(1)(c) as they are located at the existing main vehicular and pedestrian entrance to the site and properties from a public road, and at the site itself.
- All other statutory plans, elevations and sections are drawn to scales not less than 1:200, in accordance with Article 23(1)(b) and (2) of the Regulations. This ensures that a detailed level of information is provided to the Planning Authority to enable their full assessment of the application. However, as the scale of the data centre is such that at a scale of 1:200 a contiguous elevation of the proposal in the context of the entire data centre does not fit onto an A0 plan we have submitted it at 1:250 as was agreed with the Planning Authority under the original application.
- The permitted floor plans and elevations for the data centre are indicated on drawings submitted with the application. There are no changes to any of these but are provided for completeness. These drawings show the levels pertaining to the site. Floor levels are shown on all plans, sections and elevations of the proposed development. All levels are relative to Ordnance Survey Datum.
- The principal dimensions including height of the various modifications are indicated on the plans, elevations and sections as lodged with this application in accordance with article 23(1)(f).
- All drawings are clearly coloured and marked to distinguish the modifications, in accordance with article 23(1)(e).
- All OS mapping is appropriately identified in accordance with article 23(1)(g).
- The north point is indicated on all relevant maps and plans in accordance with article 23(1)(h).
- The newspaper notice appeared in the Irish Daily Mail, and which is recognised as an appropriate newspaper for an application in this area.

## 2. Subject application in context

The proposed amendments to the permitted development as granted under Reg. Ref. SD18A/0323 is located within the Grange Castle Business Park and to the immediate south of the existing Interxion data centre and associated elements granted and built under Ref. SD15A/0034.



*Aerial view of application site*

The overall site is located to the immediate south of the Grand Canal. Phase 1 of the data centre development was granted permission under Ref. SD15A/0034 on the 18<sup>th</sup> May 2015 and subsequently implemented in full. The second permitted data centre that is subject of this amendment application received its final grant of permission on the 10<sup>th</sup> December 2018, and we can confirm that no work has commenced relating to this permission.

The site of the existing data centre is bounded by the Grand Canal and planting, including planting implemented as part of Phase 1, as well as a pedestrian bridge over to the north; a landscape strip to the west; and sub-station to the east. The wider context of these lands is that there is future development land under the control of SDCC and an attenuation lake to the east; and a landscape bund and further planting as well as an internal business park access road to the south. There is a ESB substation and the site of a permitted power station (that remains undeveloped) as granted under Planning Ref. SD15A/0061 and SD16A/0398 located to the west, and which is separated from the application site via a narrow strip of land.

The existing site is currently accessed from the east and south-east via the roundabouts on the Grange Castle Business Park Road. Most of the surrounding lands within the business park are occupied by industrial campuses including pharmaceutical, data centre and food manufacturing uses. Pfizer Irelands campus is located to the south-east; Microsoft's data centre campuses are located to the south; with other facilities further to the south-west. Dwellings in the area immediately around the site are sparse and largely limited to one-off houses to the north-east and north-west of the canal.

The proposed development is located within an area zoned EE (Enterprise and Employment) under the South Dublin County Development Plan 2016-2022 with the stated aim:

*"To provide for enterprise and employment related uses."*

The permitted data centre is a permitted use under this zoning. No element of this amendment and modification application alters this premise. Significant precedent exists for data centres on other EE zoned lands in the area, and the acceptance of this was clearly evident in the positive decision of the Council under the parent permission.

The legal interest of the applicant in making this application is fully set out in the application package. The applicant is in full ownership of the entire data centre site; and a letter of consent is provided by SDCC as they are in ownership of the already permitted access road.

### **3. Permitted development**

The permission granted by the Planning Authority in 2018 was for a two-storey data centre with a gross floor area of 7,246sqm that is located to the immediate south of the existing data centre. The permitted data centre is to be separated into three main data halls of 582.5sqm on each floor (six overall) and includes a reception area (274.4sqm) and shipping area (264.3sqm) at ground floor with a mezzanine storage area (476sqm) above the shipping area; and an office area (560sqm) at first floor at the south-east corner of the data centre. A three storey service spine will separate the western and eastern wings of the data halls.

The data centre will include 7 no. generators to the western side that will be packed in two groups of three stacked, plus a single generator to their south with two groups of three flues and one single flue extending above the generator stacks (each flue was permitted to be 17.29m high above ffl). The data centre will include 9 no. cooling modules on roof level as well as air handling units at first floor of the three storey service spine.

A single storey ESB sub-station will be located at the entrance to the application site. The development will include all site development works including updated infrastructure, including extended attenuation pond, and independent vehicular access to service the development, including 22 car parking spaces plus bicycle parking.

Permission was also sought and granted for 72 temporary construction worker parking spaces, temporary construction compound and temporary construction access to the west of the data centre site. This has been subject to a compliance submission under Condition no. 9 of the 2018 permission, in which the construction compound was relocated from the west to the east of the site. A decision was made by the Planning Authority that this relocation of the construction compound was deemed compliant in a letter issued on the



1<sup>st</sup> April 2022. A licence agreement has been provided by South Dublin County Council for the temporary use of these lands to the east of the site, and therefore these lands have not been included within the red application boundary of the current application.

The overall height of the permitted development, which has not changed, is dictated by the parapet screen of the roof plant of the data hall which will be 17.44m above ground level, with a parapet of 15.35m to the data hall element and 13.35m above the office element. The external plant consisting of 7 no. standby generators will be located to the west of the data halls. These will be packed in two groups of three (one on top of each other) and a single generator that will be at first floor level. A 12m high green wall will screen the seven generators from the west and south. The generator flues will extend above the green wall that surrounds them. No element of the permitted data centre building are proposed to be amended under this application.

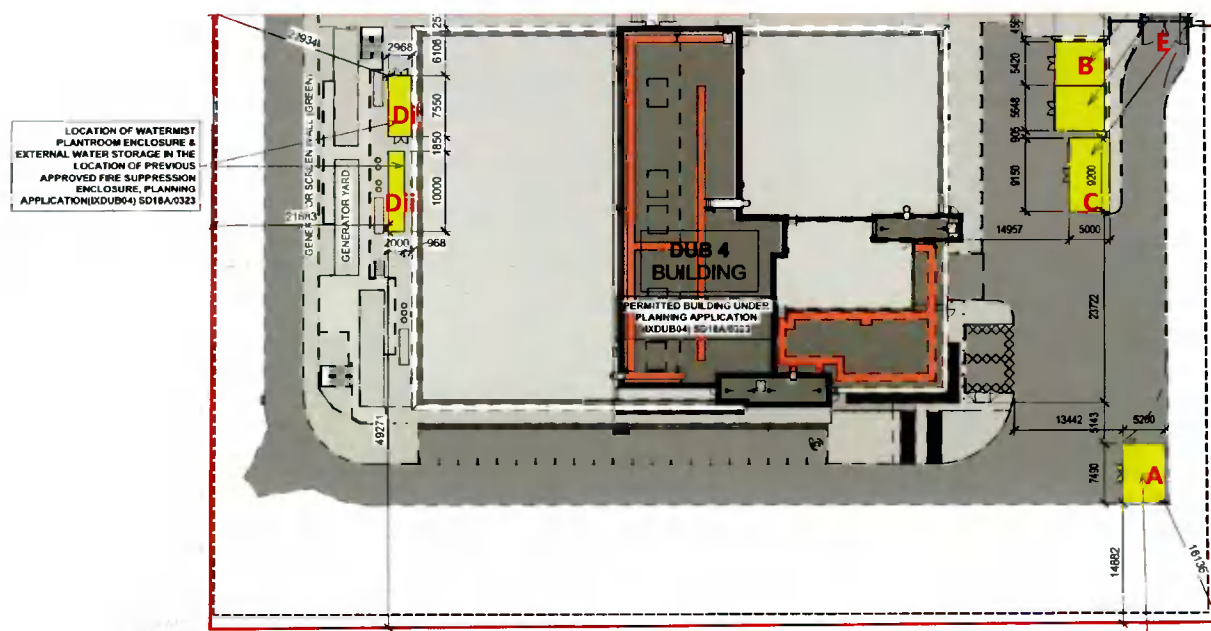
An ESB substation is permitted adjacent to the site entrance at the north-east corner of the development to the east of the substation built under the 2015 permission. This will be located in a landscaped zone adjacent to the existing sub-station serving the existing data centre with particular attention paid to high quality external finishes.

#### 4. Proposed development

This application is for minor modifications and amendments to the to the permitted data centre development granted under Reg. Ref. SD18A/0323 to include:

- 1 no. screened bin compound to be relocated to the south-east corner of the site;
- 2 no. transformers within individual compounds and adjoining switch room (35.2sqm) to be located to the east of the permitted data centre to replace screened transformer compound permitted to the south-east of the site;
- 1 no. new plantroom (19.8sqm) and 1 no. water storage tank to be located to the west of the permitted data centre to replace previously approved fire suppression enclosure; and
- New double gates to replace sliding gates at entrance into the permitted data centre site.

These are all detailed in the excerpt from the proposed site plan below and described in more detail within the following text.



Proposed site layout plan indicating five modifications being proposed

#### A. New screened bin compound

The parent permission included a bin compound that was permitted to be located to the immediate north-east of the data centre building and to the west of the entrance into the gated data centre entrance. It is proposed to relocate the bin compound to the south-east corner to replace the permitted transformer

compound. The bin compound screen will be 3.025m in height and will contain no roof, and with double doors along its western elevation. It will be constructed using a block wall with an insulated wall panel on the outside. As there is no roof to the compound its size (29.5sqm) is not considered as gross floor area, and is therefore not detailed within the planning notices (see Drawing no. P-004).

#### **B. New transformers and compound**

The parent permission included a single transformer compound that was permitted to be located in the south-east corner of the data centre compound under Planning Ref. SD18A/0323. It is proposed as part of this modification application to create individual compounds for the two transformers to replace the originally permitted single transformer. The new transformer compounds will be located to the immediate north-east of the data centre building and to the west of the entrance into the data centre compound. Each compound will be enclosed by a 4.5m high compound wall to be finished with an insulated panel to its north, south and west elevation; and a caged wall exterior, with double doors to each of their western elevations. As there is no roof to either compound their size (both 31.8sqm) is not considered as gross floor area, and is therefore not detailed within the planning notices (see Drawing no. P-005).

#### **C. Switch room**

The switch room is a new element that was not permitted under the parent permission. It will be located the immediate south of the two transformer compounds, and will be enclosed on all sides by a 4m high compound wall to be finished with an insulated panel, with a roof over. The switch room has a gross floor area of 35.2sqm that is detailed in the planning notices (see Drawing no. P-005).

#### **D. Plantroom**

The parent permission included a fire suppression enclosure to the west of the permitted data centre that was sited immediately adjoining the western elevation of the data centre building. The revised fire suppression strategy will include an external water tank (Di) that will serve a water mist plant room (Dii) of 19.8sqm that will replace the fire suppression enclosure (see Drawing no. P-006).

#### **E. New gated entrance**

The gates to the data centre compound permitted under Planning Ref. SD18A/0323 was originally granted as being a cantilevered sliding security gate. The gate is proposed to be amended under this application to be a double swinging security gate (see Drawing no. P-009)

### **5. Overall assessment**

We respectfully submit that the massing, scale and height of the permitted data centre as granted by the Planning Authority under Planning Ref. SD18A/0323 remains the same. The revisions being proposed in this instance are minor and will have no impact on the visual impact of the proposal; and will have no impact on the noise and air quality assessments undertaken as part of the parent permission. The changes will also not impact upon the permitted landscape scheme in any way.

As this application forms a modification of the parent permission we refer the Planning Authority to the various compliance submissions that have been made and deemed to be compliant in terms of the parent permission. In this regard we refer the Council to their own decisions that have deemed the applicant's submissions on conditions 4, 8, 9, 17, 21 as being compliant with the terms of these conditions under Planning Ref. SD18A/0323.

Furthermore, additional compliance submissions have been made in relation to Conditions 3 that related to noise. This submission was made by Arup to South Dublin County Council and to the Environmental Health Officer. This has comprehensively addressed all matters required. Furthermore, we can confirm that the changes proposed in this instance will not materially alter the noise impact of the permitted development as only one transformer will be in operation at any one time, and that the operational transformer will have a noise level of 75dB(A) at 1m. The transformer enclosures will have a 4.5m high 'fire wall' to their north, east and south that will form an effective noise barrier for the closets noise sensitive receptors (identified in the previously issued Arup acoustic assessment report under the compliance submission under Condition no. 3 of the parent permission).

The combination of the single transformer operating and effective noise barrier to the enclosure is such that the predicted transformer noise does not exceed the (day, evening or night time) noise limits at the nearest sensitive receptors and does not cause an increase to the 'change in noise level' previously reported under the compliance submission under Condition no. 3 of the parent permission.

We respectfully submit that the water mist system will be enclosed and also screened from the nearest noise sensitive receptors by the existing and permitted data centre building. Based on a conservative assessment approach based on data for similar plant, combined with a conservative amount of screening attenuation from both the enclosure, adjacent buildings and topography), the predicted noise level for the water mist system is still significantly below the emergency plant noise emission limit.

We also refer the Council to further submissions that have been made as part of these compliance submissions in relation to Conditions 5, 6, 7, 19 and 20 of the parent permission. As in excess of 8 weeks has passed since these compliance submissions were made, and no additional correspondence was received then in accordance with section 34 (as amended) of the Planning and Development (Amendment) Act 2018, the principal conditions of the parent permission have been complied with. Furthermore, no element of this application will alter the submissions made under the compliance conditions relating to this parent permission.

## **6. Appropriate Assessment**

An appropriate assessment screening report was undertaken by Scott Cawley, Consulting Ecologists, in relation to the parent application. The AA screening process identified that four European sites lie within 15km of the proposed development site; with another four hydrologically connected to the proposed development site via the River Liffey. A detailed analysis showed no European sites were deemed to be at risk of likely significant effects from construction / operation of the proposal.

This conclusion was reached previously and again under the current proposal, given the minor amendments, was reached by an analysis of Qualifying Interests (QIs) of all sites, and of the threats potentially preventing these QI's from maintaining favourable conservation status. The contribution of other potential projects in the same area has also been assessed in this screening exercise. The assessment has shown that there are no elements of the proposed development that could, on their own or in combination with other plans or projects, lead to a risk of significant impacts on European sites.

## **7. Conclusion**

The nature of the proposal fully accords with the zoning, policies and objectives of the South Dublin County Development Plan and the primacy of the parent permission granted under Reg. Ref. SD18A/0134. The modifications and amendments are all minor and will not be visible from surrounding lands.

The nature of the amendments do not alter the primacy of the original decision and the reasons why South Dublin County Council granted permission for the parent permission. The changes in terms of the modifications do not alter the reasons and considerations that led to the positive decision.

In conclusion, for all of the foregoing arguments, reason and considerations, we respectfully request South Dublin County Council to accept the contents of the retention application, and to assess the subject development on its own individual merits and to grant planning permission for this development on the basis that by its nature and extent, it will not compromise in any way the permitted development and would accord with the proper planning and sustainable development of this area including the preservation and improvement of amenities thereof. We trust that everything is in order and look forward to a favourable decision in due course.

Yours faithfully,



Anthony Marston (MIPI, MRTPI)  
**Marston Planning Consultancy**