

Ref; Planning Application – SD22A/0156

Dear sir/madam,

I wish to lodge an observation to the planning application as referenced above for the reasons below;

1. Under the Planning and Development Act (2000) (as amended) the designated entity when it comes to developments which may have an impact on energy infrastructure is the Commission for Energy Regulation (now the Commission for Regulation of Utilities (CRU)). Given that the construction of additional data centres may potentially impact the stability of the national grid going forward, it is evident that that the CRU has not been notified of the proposed planning permission given its potential impact on national energy infrastructure, which would encompass the national grid, under the relevant legislation.
2. As noted in the planning report prepared by Brock McClure, ESB have indicated that it would be “6-8 years before the development would be considered for connection to the grid.”¹ It must be considered that the application must be premature, particularly given the guidance issued by the CRU under “*Direction to the System Operators related to Data Centre grid connection processing,*” issued on the 23rd of November, 2021.
3. It would appear that no EIAR was prepared as part of this application in light of the modifications to permission applied for under SD21A/0186. Given that the applicant now wishes to change the quantum of energy supply on site to provide for greater on-site power greatly changes the status of the “*back up generators*” as per the original application.” This change absolutely alters the climate and emissions profile of the development, given that the grid is supplied by some renewable energy whereas this will be 100% powered by fossil fuel, and has not been reflected in a revised EIAR. The fact that a revised EIAR has not been provided should render the application invalid given the changes proposed under this permission.
4. It is disappointing to note that there is no intention by the applicant to supplement the significant energy demands of the data centre with alternative energy supply to include renewable energy sources and battery storage, particularly given the scale of the buildings under consideration contrary to SDCCs Development Plan (2016-2022) Objectives E2 Objective 3. and EN13. Renewables will never provide the required energy to fully power a building of this scale but should make a contribution to the energy needs of this facility.
5. There is limited provision for Green roofs and greenwalls as per SDCCs Development Plan (2016-2022) E2 Objective 8 which is extremely disappointing when you consider the monolithic and drab appearance of the development in the various CGI’s presented.
6. Given that the applicant has submitted a 2nd application and a modification to the original grant of permission, I understand that this site notice should have been presented on yellow paper in accordance with Article 19(4) of the Planning and Development Regulations 2001-2006 as amended, as is not the case as per the site notice submitted as part of this application. This should render this application invalid under

For the reasons above I hope that SDCC will give strong considerations to the matters raised and refuse permission to the revised changes applied for under this application.

Kind regards,



Proinsias Mac Eanáir

¹ Planning Report – Brock McClure (page 7)

An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department
Telephone: 01 4149000 Fax: 01 4149104

Email: Planningdept@sdblincoco.ie

Proinsias Mac Fhlannchadha
6, Wilkins Court
Limekiln Farm
Dublin 12

Date: 29-Jun-2022

Dear Sir/Madam,

Register Ref: SD22A/0156

Development: 10 year permission on a site is bounded to the east and south by Grange Castle Golf Club, to the north by Nangor Road (R134) and to the west by an estate road known as Falcon Avenue) for modifications to the permitted data centre granted under SDCC Reg. Ref. SD21A/0186 comprising the following, reconfiguration and alterations to the data centre building to include removal of front of house offices at third floor level, alterations to floor levels at second floor to provide consistency between front of house and data halls, parapet height increase of front of house to c.16.8m, provision of storage at second floor level in lieu of relocated internal generators to the external generator yard and associated elevational alterations; extension of loading dock at ground floor level by c.60sqm in area with minor height increase to c.5.3m; removal of 3 air plenums to the front (north) elevation and provision of screening to generator flues in lieu of omitted plenums; alterations at roof level to include removal of 2m high gantry screening; alterations to the permitted generator plant yard to the north of the data centre to include the removal of fuel tanks, reconfiguration of plant and generators, provision of 2 additional external generators (increase from 5 to 9 external generators), provision of 4 additional external plant rooms, provision of diesel pump tank cabinets and stepover, relocation of generator yard doors and enlarged generator yard to accommodate the proposed modifications; increase in plant areas by c.77sq.m; reconfiguration of plant within the permitted chiller plant yard to the south of the data centre; removal of 1 sprinkler/water tank and removal of stairs and door to the side of the waste compound; reconfiguration of car parking and motorcycle spaces and removal of 1 accessible space. 64 total number of car parking spaces; the proposal also includes provision of on-site gas power generation compound (c.2,604sq.m in area) in the area previously reserved for a future data centre; the compound comprises 7 modular plant rooms (totalling c.180sq.m in area), 10 gas fired generators and associated flues c.14.7m high, gas skid, associated modular plant, boundary treatment surrounding the compound c.6.5m high and 2 vehicular access points including general and emergency access; all associated site development works, services provision, drainage works, access, landscaping and boundary treatment works, no buildings are proposed above the existing ESB and SDCC wayleaves to the west and north of the site; the overall Gross Floor Area of the development is reduced by c.44sq.m to c.9,795sq.m from previously

permitted under SDCC Reg. Ref. SD21A/0186; the application is accompanied by a Natura Impact Statement.

Location: Plot 100, Profile Park, Nangor Road, Clondalkin, Dublin 22
Applicant: Equinix (Ireland) Ltd
Application Type: Permission
Date Rec'd: 30-May-2022

I wish to acknowledge receipt of your submission in connection with the above planning application. The appropriate fee of €20.00 has been paid and your submission is in accordance with the appropriate provisions of the Planning and Development Regulations 2001(as amended). The contents of your submission will be brought to the attention of the Planning Officer during the course of consideration of this application.

This is an important document. You will be required to produce this document to An Bord Pleanála if you wish to appeal the decision of the Council when it is made. You will be informed of the decision in due course. Please be advised that all current applications are available for inspection at the public counter and on the Council's Website, www.sdublincoco.ie.

You may wish to avail of the Planning Departments email notification system on our website. When in the **Planning Applications** part of the Council website, www.sdublincoco.ie, and when viewing an application on which a decision has not been made, you can input your email address into the box named **"Notify me of changes"** and click on **"Subscribe"**. You should automatically receive an email notification when the decision is made. Please ensure that you submit a valid email address.

Please note: If you make a submission in respect of a planning application, the Council is obliged to make that document publicly available for inspection as soon as possible after receipt. Submissions are made available on the planning file at the Planning Department's public counter and with the exception of those of a personal nature, are also published on the Council's website along with the full contents of a planning application.

Yours faithfully,

M. Furney
for **Senior Planner**