

Comhairle Chontae Atha Cliath Theas

PR/0951/22

Record of Executive Business and Chief Executive's Order

Reg. Reference: SD22A/0156 **Application Date:** 30-May-2022

Submission Type: New Application **Registration Date:** 30-May-2022

Correspondence Name and Address: Brock McClure Planning and Development
Consultants 63, York Road, Dun Laoghaire, Co.
Dublin

Proposed 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

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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 Name: Equinix (Ireland) Ltd

Application Type: Permission

(SW)

Description of Site and Surroundings:

Site Area

Stated as 2.65 hectares

Site Description

The site is located with Profile Park. The surrounding area is generally developed for employment, although Profile Park itself is largely undeveloped. The site is predominantly flat. A golf club lies to the east.

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Proposal

The application consists of the following proposal:

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 increases 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

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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.

Zoning

The site is subject to zoning objective EE – ‘To provide for enterprise and employment related uses.’

SEA: Indicates overlap with SFRA B. The Site is located within the Department of Defence Inner Zone.

Consultations

Water Services:	Request Additional Information.
Roads:	No objection, subject to conditions.
Heritage:	No report received at time of writing.
Parks:	No comments / objections.
EHO:	No objection, subject to conditions.
Irish Water:	No objection, subject to conditions.
Waste Management:	No report received at time of writing.
TII:	No observations.

Submissions/Observations /Representations

A number of submissions were received:

- CRU has not been notified
- Proposal is premature in light of CRU policy
- No EIAR provided.
- No renewable energy included
- Limited provision of green roofs and green walls.
- Site notice was not yellow in accordance with Article 19(4)
- Proposal does not comply with Policy E2, objective 3 and E4 objective 1 or SDCC climate action plan or Climate Action and Low Carbon Development (Amendment) Act 2021
- Does not comply with EIA or Habitats directive – insufficient detail on grid connection provided.
- EIAR required

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- Inadequate detail in NIS on impact on birds. AA screening does not provide sufficient reasons or findings. Zone of Influence in NIS is not reasoned or explained.
- No regard had to cumulative effects
- High electricity consumption will increase Ireland's carbon emissions at a time when we urgently need to reduce them
- Already a disproportionate number of data centres in SDCC
- Will impact water usage
- E2 objective 3 required green roofs.
- Government target of 70% electricity from renewable
- Ireland is one of EUs worst carbon emission offenders and faces fines. – data centre industry was responsible for 1.85% of electricity related carbon emissions

Relevant Planning History

SD21A/0186 Construction of a 3 storey (part 4 storey) data centre known as 'DB8' to include data halls, electrical/plant rooms including internal generators, offices, lobbies, ancillary staff areas including break rooms and toilets, stores, stair/lift cores throughout and photovoltaic panels at roof level; the total gross floor area excluding hot air plenums and external staircase is c.9,601sq.m and the overall height of the data centre ranges from c.16m to c.20m to roof parapet level and up to c.24.48m including roof top plant, flues and lift overrun; provision of 5 external generators, 8 fuel tanks and ancillary plant contained within a plant yard to the north of DB8; provision of a water tank plant room, air cooled chillers and ancillary plant contained within a chiller plant yard to the south of DB8; provision of a water sprinkler pump room (c.23sqm), 2 sprinkler tanks (c.12m high each), heat recovery plant room (c.17sqm), ESB substation (c.44sqm), waste/bin stores (c.52sqm); total floor area of ancillary structures and plant (c.303sqm); provision of a delivery yard and loading bays, 64 car parking spaces, 5 motorcycle spaces, bicycle shelter serving 14 spaces, smoke shelter, internal access roads and footpaths, vehicular and pedestrian access to the west from Falcon Avenue and closure of an existing vehicular entrance from Falcon Avenue; all associated site development works, services provision, drainage works including attenuation, landscape and boundary treatment works including berming, hedgerow protection areas and security fencing; no buildings are proposed above the existing ESB wayleave and SDCC watermain wayleave to the west and north of the site; the area to the southwest of the site (temporary meadow) is reserved for a future data centre, subject of a separate application to South Dublin County Council on a site 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. This application is accompanied by a Natura Impact Statement. **Permission Granted**

SD12A/0150 Erection of a 2.4m high perimeter fence along Nangor Road boundary (approximately 250m long) with separate entrance gates for vehicular, bicycle and pedestrian access; construction of a single storey security hut with security barriers. **Permission Granted**

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SD07A/1059 Block A comprises a five storey office building of 3,019.6sq.m. gross floor area which fronts onto the Nangor Road and which will accommodate 18 no. own door office units and 1 no. ESB substation; (2) Block B comprises a five storey office building of 2,905.1sq.m gross floor area which fronts onto the Nangor Road and is located adjacent to the boundary with Grange Castle Golf Course - this block will accommodate 26 no. own door office units; (3) Block C comprises a four storey office building of 2,684.8 sq. m. gross floor area located adjacent to the boundary with Grange Castle Golf Course which will accommodate 24 no. own door office units. The proposed blocks are arranged in a u-shaped configuration around a central landscaped square. Vehicular access to the site is proposed via a left-turning entry and exit slip lane from the Nangor Road and also via the internal Spine Road permitted under application Reg. Ref. SD06A/0568. The proposed development includes 30 no. surface level car parking spaces and one level of underground car parking which will accommodate 200 no. car spaces. The development also includes all ancillary services, landscaping and site works on a site of 1.3163 hectares. This application is being lodged pursuant to application Reg. Ref: SD06A/0568 under which planning permission was granted for the development of roads and services to facilitate the 'Profile Park' Business Park. **Permission Granted**

SD06A/0568 Provision of roads and services infrastructure to facilitate the future development of a business park, to be known as 'Profile Park' on these lands. The development includes the provision of 1,675 metres of internal distributor roads consisting of 267 metres to dual carriageway standard (at the main entrance) with a further 1,408 metres to single carriageway standard and one internal roundabout. The development also includes surface water drainage, foul drainage and water supply infrastructure, associated landscaping and all ancillary works, on a site of 39.84 hectares. Access to the site will be provided at the northern boundary off the existing roundabout to Kilcarbery Business Park. This application is accompanied by an Environmental Impact Statement. **Permission Granted.**

SD06A/0568/EP Provision of roads and services infrastructure to facilitate the future development of a business park, to be known as 'Profile Park' on these lands... **Granted**

Relevant Enforcement History

None recorded for subject site.

Pre-Planning Consultation

PP032/22 Proposed on-site power generation building and compound (c.2,552sq.m in area) with associated plant rooms (c. 196sq.m) and associated works to serve the concurrent application Ref. SD21A/0186.

PP013/21 Proposed 3 storey Data Centre (c.9562m²) with ESB Substation, District Heat Exchange Building, ancillary car parking, bike parking, landscaping, and boundary treatment with vehicular access via Falcon Avenue.

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Planning Policy and Guidance

Relevant Policy in South Dublin County Council Development Plan (2016-2022)

Section 1.12.0 Employment Lands

Section 4.2.0 Strategic Policy For Employment

Policy ET1 Economic and Tourism Overarching Policies and Objectives

It is the policy of the Council to support sustainable enterprise and employment growth in South Dublin County and in the Greater Dublin Area, whilst maintaining environmental quality.

Policy ET3 Enterprise and Employment (EE)

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.

ET3 Objective 2

To prioritise high tech manufacturing, research and development and associated uses in the established Business and Technology Cluster to the west of the County (Grange Castle and Citywest areas) to maximise the value of higher order infrastructure and services that are required to support large scale strategic investment.

ET3 Objective 5

To ensure that all business parks and industrial areas are designed to the highest architectural and landscaping standards and that natural site features, such as watercourses, trees and hedgerows are retained and enhanced as an integral part of the scheme.

ET3 Objective 6

To ensure that business parks and industrial areas are designed to promote walking, cycling and public transport.

Section 6.4.4 Car Parking

Policy TM7 Car Parking

Section 7.1.0 Water Supply & Wastewater

Policy IE1 Water & Wastewater

Section 7.2.0 Surface Water & Groundwater

Policy IE2 Surface Water & Groundwater

Section 7.3.0 Flood Risk Management

Policy IE3 Flood Risk

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*Section 7.5.1 Waste and Resource Policy and Legislation
Policy IE5 Waste Management*

*Section 7.6.0 Major Accidents Directive
Policy IE6 Major Accidents*

*7.7.0 Environmental Quality
Policy IE6 Environmental Quality*

Policy IE8 Casement Aerodrome

*Section 8.0 Green Infrastructure
Policy G5 Sustainable Urban Drainage Systems
Policy G6 New Development in Urban Areas*

*Section 9.3.1 Natura 2000 Sites
Policy HCL12 Natura 2000 Sites*

Section 10.0 Energy

Policy E1 Responding to European and National Energy Policy & Legislation

Policy E2 South Dublin Spatial Energy Demand Analysis

Policy E3 Energy Performance in Existing Buildings

Policy E4 Energy Performance in New Buildings

Policy E5 Waste Heat Recovery & Utilisation

It is the policy of the Council to promote the development of waste heat technologies and the utilisation and sharing of waste heat in new or extended industrial and commercial developments, where the processes associated with the primary operation on site generates waste heat.

E5 Objective 1

To promote the development of waste heat technologies and the utilisation and sharing of waste heat, in new or extended industrial and commercial developments, where the processes associated with the primary operation on site generates waste heat.

Section 11.7.6 Waste Heat Recovery & Utilisation

Table 11.18: Key Principles for Development within Enterprise and Employment Zones

Section 11.2.1 Design Statements

Section 11.2.5 Enterprise and Employment Areas

Section 11.2.7 Building Height

Section 11.2.8 Signage – Advertising, Corporate and Public Information

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Schedule 6: Outdoor Advertising Strategy

Section 11.4.1 Bicycle Parking Standards

Table 11.22: Minimum Bicycle Parking Rates

Section 11.4.2 Car Parking Standards

Table 11.23: Maximum Parking Rates (Non Residential)

Section 11.4.4 Car Parking Design and Layout

Section 11.4.6 Travel Plans

Section 11.6.1 (i) Flood Risk Assessment

Section 11.6.1 (ii) Surface Water

Section 11.6.1 (iii) Sustainable Urban Drainage System (SUDS)

Section 11.6.1 (iv) Groundwater

Section 11.6.1 (v) Rainwater Harvesting

Section 11.6.1 (vi) Water Services

Section 11.6.3 Environmental Hazard Management

Section 11.6.3 (i) Air Quality

Section 11.6.3 (ii) Noise

Section 11.6.3 (iii) Lighting

Section 11.6.4 Major Accidents – Seveso Sites

Section 11.6.5 Waste Management

Section 11.7.2 Energy Performance In New Buildings

Section 11.8.1 Environmental Impact Assessment

Section 11.8.2 Appropriate Assessment

National and Regional Policy

Government Policy Statement on Security of Electricity Supply (November 2021)

Climate Action Plan 2021

Project Ireland 2040 National Planning Framework, Government of Ireland, 2018.

Regional Spatial & Economic Strategy 2019-2031, Eastern & Midland Regional Assembly (2019)

Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Department of the Environment, Heritage, and Local Government, (2009)

Smarter Travel – A Sustainable Transport Future. A New Transport Policy for Ireland 2009 – 2020, Department of Transport, (2009)

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Assessment

The main areas for consideration are the following:

- Zoning and Policy
- Residential Amenity
- Design and Visual Amenity
- Parking, Transport and Access
- Services and Drainage
- Archaeology
- Landscaping
- Energy Analysis
- Ecology / Heritage
- Aviation safety
- Environmental Impact Assessment
- Appropriate Assessment

Zoning and Policy

The application site is located within an area that is zoned 'Enterprise and Employment' and is subject to zoning objective 'EE - To provide for enterprise and employment related uses.' In terms of the use class proposed, a power plant is considered to fall under 'Public Services' as defined in Schedule 5: Definition of Use Classes & Zoning Matrix Table of the County Development Plan (CDP) which is permitted in principle within lands zoned EE. The applicant states in their Planning Statement (Brock McClure) that it will be 6-8 years before the development would be considered for connection to the grid and the proposal to provide the onsite generation plant will proceed without a grid connection. It is stated 'it can therefore be assumed that this proposal is not a 'public services' until such time that ESB can confirm terms and conditions for a grid connection'. The applicant is, therefore requested, via **additional information** to set out how the proposed development is in keeping with the Land Use Matrix of the CDP.

Power Supply & Climate Action

Project Ireland 2040 (National Planning Framework and National Development Plan 2018-2027) includes an objective for the promotion of Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities. The strategic importance of data centres is reflected in the thematic infrastructure priorities in Project Ireland 2040, which embeds policy support for data centres into the planning policy hierarchy. The 2018 Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy sets out that data centre development is supported.

It is noted that there is support for data centres in national planning policy and planning permission has been granted for a data centre on this site, however, this application also includes a significant element of on-site power generation.

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National Strategic Outcome 8 of the NPF seeks to transition to a low carbon and climate resilient society. Whilst at a regional level Chapter 7 of the Eastern & Midland Regional Assembly RSES seeks to decarbonise the energy sector with a shift from its reliance on using fossil fuels and natural gas as its main energy source to a more diverse range of low and zero-carbon sources.

In terms of local policy, the South Dublin County Development Plan (2016-2022) set out Energy policies in Chapter 10 – Energy of the County Development Plan (2016-2022). E1 states *“It is the policy of the Council to respond to the European and National Energy Programme through the County Development Plan – with policies and objectives that promote energy conservation, increased efficiency and the growth of locally based renewable energy alternatives, in an environmentally acceptable and sustainable manner”* and E4 states *“It is the policy of the Council to ensure that new development is designed to take account of the impacts of climate change, and that energy efficiency and renewable energy measures are considered in accordance with national building regulations, policy and guidelines”*.

E5 relates to Waste Heat Recovery & Utilisation and states *“It is the policy of the Council to promote the development of waste heat technologies and the utilisation and sharing of waste heat in new or extended industrial and commercial developments, where the processes associated with the primary operation on site generates waste heat”*.

Policy E11 states *“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”*.

Chapter 10 of the CDP is clear in its focus on moving away from carbon-based fossil fuels including gas and the use of alternative non-polluting, low carbon and renewable energy sources such as wind, solar, hydro, and geothermal. It is also clear that, where new facilities are proposed, it should be in conjunction with the relevant service providers.

As stated, whilst it is apparent that there is planning policy support for data centres and planning permission has been granted for a data centre on site, there is also a need to balance the demand for development with climate action as well as the capability of the national grid to provide for such developments.

The Planning Authority considers that limited justification for the gas power generation is provided in the planning application report. The long term plan for energy supply is not apparent for the site and the potential for the gas infrastructure to adapt is not outlined. The Planning Authority is concerned with the lack of consideration for alternative energy supply, including renewable energy. In relation to the power generation on site, the applicant is requested to clarify the following:

- The appropriateness of the proposal for an on-site gas plant based on national, regional, and local policy in terms of energy requirements and climate change, including the Government Policy Statement on Security of Electricity Supply and CRU Direction to the System Operators related to Data Centre grid connection processing;

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- provide more detail regarding the alternative sources of power generating assessed as part of the alternatives.
- consider whether it is possible to incorporate a portion of renewable energy generation.
- Outline the long term plan for the energy supply of the data centre and the use/need for the gas power generation area if a connection to the electricity grid is secured.
- Details of any connection agreements with Eirgrid / ESB, existing or pending, as well as details of any consultation undertaken with Eirgrid / ESB
- Details of any consultation undertaken with Gas Networks Ireland
- Information on whether the existing site is serviced in terms of utilities and if not the proposals for undertaking the development required to facilitate servicing.
- Details of the connection to the surrounding area and national gas grid

Furthermore, the applicant is advised that the Planning Authority remains concerned with regard to the number and extent of large demand connections in this area and the demand for future grid reinforcements. The absence of power via Eirgrid and the use of gas-powered generators conflicts with the macro policies in the Development Plan around Energy.

The other elements of the proposal involve altering an existing permission and are therefore acceptable in principle.

EPA and CRU

No comments have been received from the Commission for Regulation of Utilities or the Environmental Protection Agency. The applicant states that they will apply to the CRU for the necessary Authorisations and Licenses following receipt of planning permission for the proposed power plant. The Planning Authority considers that further information should be sought by way of **Additional Information request.**

10 Year Permission

The Planning Authority is not of the opinion that a 10 year permission is necessary in this instance. The applicant is requested to provide a justification for seeking 10 years. It is noted that the Planning Statement states that this is 'in order to carry out the development and facilitate the installation of all necessary equipment relating to the data centre and OSPG. **Additional information** is therefore requested.

Site Notice

In accordance with Article 19(4) "*Where a valid planning application is made in respect of any land or structure, and a subsequent application is made within 6 months from the date of making the first mentioned application in respect of land substantially consisting of the site or part of the site to which the first mentioned application related, in lieu of the requirements of sub-article (1)(b), the site notice for the subsequent application shall be inscribed or printed in indelible ink on*

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a yellow background and affixed on rigid, durable material and be secured against damage from bad weather and other causes”.

The current planning application was valid on 30 May 2022. The most recent previous application prior to this was made on 5 July 2021 and not within 6 months.

Residential Amenity

The EHO has stated that there are no objections, subject to conditions.

Design and Visual Amenity

Design

Section 11.2.1 Design Statements of the CDP requires developments over 1,000sq.m to be accompanied by a Design Statement consisting of a site analysis, a concept plan and/or masterplan, a statement based on the design criteria listed in Section 11.2.0 and/or tables 11.17 and 11.18 and a statement or Quality Audit addressing street design as outlined within the Design Manual for Urban Roads and Streets.

The applicant has submitted a design statement. This sets out:

- background
- details of the site and surrounding area
- concept ideas
- proposed site plan
- landscaping
- transport and access
- design and layout

The design statement is considered adequate in this instance.

Visual Amenity

The site is currently greenfield (although it is noted it has previously been used as a builder's compound). It is located at the entrance to profile park and fronts Nangor Road. It is therefore in a highly prominent location. The surrounding lands are predominantly undeveloped. The proposal seeks amendments to a datacentre granted permission under SD21A/0186:, as follows:

- o reconfiguration and alterations to the data centre building to include removal of front of house offices at third floor level – *This would have a negligible visual impact*
- o alterations to floor levels at second floor to provide consistency between front of house and data halls, – *This would have a negligible visual impact*
- o parapet height increases of front of house to c.16.8m, – *This would have a negligible visual impact*
- o provision of storage at second floor level in lieu of relocated internal generators to the external generator yard and associated elevational alterations; - *Inclusion of internal storage*

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- has no visual impact. The relocation to the generator yard would have a negligible impact. Noted that there are minor elevations changes, but these do not have a significant impact.*
- extension of loading dock at ground floor level by c.60sqm in area with minor height increase to c.5.3m; - *this would be to the west elevation at the main entrance and could potentially have a significant impact on the main entrance plaza. The applicant is requested to provide further details of this area, including visuals and details of materials via additional information.*
 - removal of 3 air plenums to the front (north) elevation and provision of screening to generator flues in lieu of omitted plenums; - *this would have an impact on visual amenity; however, the proposed amendment is considered acceptable and the proposed detail on the northern elevation would still contain detailing and breaking up of massing.*
 - alterations at roof level to include removal of 2m high gantry screening; - *These alterations are considered acceptable. The removal of items at roof level would decrease visual impact.*
 - 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; - *This would have a negligible visual impact*
 - increase in plant areas by c.77sq.m; - *Noted that ancillary plant buildings are a max. of approx. 3.5m and would therefore have a limited visual impact*
 - reconfiguration of plant within the permitted chiller plant yard to the south of the data centre; - *this would be to the rear of the proposal and would have an acceptable impact.*
 - removal of 1 sprinkler/water tank and removal of stairs and door to the side of the waste compound; -*This would have a negligible visual impact*
 - reconfiguration of car parking and motorcycle spaces and removal of 1 accessible space. 64 total number of car parking spaces; -*This would have a negligible visual impact*

The applicant is also proposing an onsite power generation compound. It is noted that from the submitted elevations, the north and south elevations are elongated, while the east and west elevations are shorter. It is apparent that the building has a different orientation to the main data centre and what is labelled 'west' is more south or south west. Similarly, the east elevation is more north or north east. The south is more east or south east and the north is more west or north west. The applicant is requested to submit revised elevations detailing the correct orientation. It is noted that some green walls are proposed, with the main material of the building being composite panels (light grey). The flues would be stainless steel and 14.5m high. The photomontages submitted indicate that the proposal would not largely be visible. However, given the overall length of the building, the Planning Authority would welcome more localised visuals, indicating in particular the

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north, south and west elevations. This should include a visual incorporating the entrance plaza with DB8. **Additional information** is therefore requested.

It is noted that the applicant has included a number of CGIs / photomontages and that these do not indicate a significant change from the approved scheme.

Parking, Transport and Access

Roads has stated:

“This application is a modification of SD21A/0186. There are two vehicular access points including general and emergency access. The applicant has proposed to engage with SDCC to remove the redundant entrance on the New Nangor Road separately, this could be achieved as part of the planning conditions. Drawing for Existing Access no. 1 general layout “DB080-RKD-00-ZZ-DR-A-SITE-1035” by RKD, shows the location of the proposed vehicular access. Existing access to be widened to 10820 mm. Access no. 3 located on the north west boundary and access no. 1 on to Nangor Road (R-120) shall be closed.

Access & Roads Layout:

The reconfiguration of car parking and motorcycle spaces and removal of 1 accessible space. 64 total number of car parking spaces; there are four mobility impaired spaces. The proposal is to provide 64 no. parking spaces at the proposed development including 25 no. spaces for the future development, Parking is located to the north of the proposed development. The roads department are satisfied with the justification for this parking provision.

Permeability:

A proposed pedestrian access gate is proposed at Falcon Avenue connecting DB5 with Profile Park via landscaped entrance plaza. SDCC road section is satisfied with proposed pedestrian access.

Car Parking:

A total of 10% of vehicular parking spaces shall be EV charging ready on the first opening of the development and 100% of the remaining g spaces shall be ducted for future EV connections. A total of 9no. vehicular spaces shall be mobility impaired spaces. This is greater than the 5% minimum requirement in the SDCC County Development Plan.

Bicycle Parking:

Applicant has proposed 14 no. sheltered bicycle spaces. SDCC road section believe the low worker numbers at a development of this nature justify a lower number of sheltered bicycle spaces in this instance. This level of provision shall still encourage greater numbers of cycle journeys at this development. The proposed bike parking is located conveniently to the entrance of the Building”. There are no objections, subject to conditions.

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Services and Drainage

Water Services has assessed the proposal and has requested additional information relating to:

- water catchments and where each catchment drains to
- Flood risk

This should be provided via **additional information**.

Irish Water has raised no objections subject to conditions.

Archaeology

An Archaeological Assessment has been prepared by Reliqua Limited. The applicant requests conditions regarding potential archaeology on site and monitoring during construction. This is considered acceptable

Landscaping

Public Realm has raised no objections.

Energy Analysis

It is noted that under SD21A/0186, The applicant has provided a report entitled "Energy Statement and Part L Compliance". They have also indicated a waste heat recovery building.

The application is considered acceptable in this regard, subject to conditions.

Heritage and Bats

The applicant has provided an Ecological Impact Assessment, prepared by Malone O'Regan Environmental. Surveys (May 2022), surveys undertaken include desk, field, habitat, protected/notable species. A number of mitigation measures are set out. The proposal is considered acceptable in this regard, subject to conditions.

Aviation Safety

The site is located within the Department of Defence Inner Zone. It is noted that the proposed development on site does not increase the overall height to that which was previously permitted. There are, however, additional flues, and the applicant is requested to consult with the Department of Defence regarding any requirement for the proposed development. This should be done via **additional information**.

Environmental Impact Assessment Report

The applicant has submitted an Environmental Impact Assessment Screening Report. This sets out that the development does not require a mandatory EIAR, nor does it meet the criteria where a sub-threshold EIA would be warranted. The Planning Authority is concerned that the cumulative impacts of recently permitted developments, particularly within Profile Park have not been

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considered and, as such, the applicant is requested to undertake a wider screening process. The Planning Authority is concerned that, cumulatively, the proposal is of a scale and nature that would result in significant effects on the environment. The need for environmental impact assessment cannot, therefore, be excluded at this stage. **Additional information** is requested.

Appropriate Assessment

Stage 1: Screening

Information for the purposes of assisting in screening for Appropriate Assessment was prepared by Malone O'Regan Environmental (May 2022). The screening report concludes

“the screening exercise has identified a number of designated bird species which have been brought forward for further consideration due to the potential for significant likely effects, as outlines in Table 6-1, as a result of the Proposed Development, in the absence of mitigation measures”.

Stage 2: Assessment of Potential Significant Impacts

The submitted NIS identifies potential impact on the conservation objectives of sites within the Natura 2000 network during both the construction and operational phases. Therefore, progression to Stage 2 of the Appropriate Assessment process is required. Section 7 of the submitted NIS further assesses the potential issues arising from the Proposed Development and the mitigation measures required to negate any potential significant likely effects on these habitats and species”.

Stage 2 examines:

- Potential impairment of water quality during construction and
- Potential impairment of water quality during the operational phase

The report states that it is considered highly unlikely that any construction work pollutants could impact on water quality of the South Dublin Bay and River Tolka Estuary SPA. If pollutants did enter, they would dilute or settle over the 27.2km distance. Taking the precautionary approach, measures are proposed to be put in place in accordance with best practice guidance to avoid impacts on these receptors. Inland fisheries Ireland and National Road Authority best practice guidelines will be followed.

During the operational phase, petrol interceptors, attenuation pond and hydrobrake will be utilised. Fuel tanks will be double skinned and have a minimum of 10% additional capacity and will be stored on hardstanding with a dedicated refuelling point. Spill kits will be provided.

The stage 2 report concludes *“the Proposed Development and all associated sites works, alone or in-combination with other projects, will not adversely affect the integrity and conservation status of any of the qualifying interests of the South Dublin Bay and River Tolka Estuary SPA or any other Natura 2000 sites”.*

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Having reviewed the submitted information, the Planning Authority has concluded that, having regard to the nature of the development, connection to public services and the distance from the Natura 2000 sites, the proposed development, including the proposed mitigation, would not result on any significant impacts on Natura 2000 sites.

Development Contributions Assessment Overall Quantum

on-site gas power generation compound c.2,604sq.m

Reduction in data centre permitted under SD21A/086 by 44sq.m to 9,795sq.m

Ancillary plant and site works.

SEA Monitoring Information

Building Use Type Proposed: Data Centre and Power Generator

Floor Area: 12,399sq.m

Land Type: Greenfield.

Site Area: 2.65 Ha

Conclusion

Overall, it is considered that although the application site is located within lands that are zoned EE in which the principle of a data centre has been deemed acceptable, the applicant has failed to provide sufficient information to enable the Planning Authority to make an informed decision or support the proposal. Based on the size, scale, and significance of the piece of infrastructure that is proposed, it is considered that additional information in relation to a number of matters to ensure the proposal is in keeping with the planning and sustainable development of the area.

Recommendation

I recommend that **ADDITIONAL INFORMATION** be requested from the applicant with regard to the following:

1. The application site is located within an area that is zoned 'Enterprise and Employment' and is subject to zoning objective 'EE - To provide for enterprise and employment related uses.' In terms of the use class proposed, a power plant is considered to fall under 'Public Services' as defined in Schedule 5: Definition of Use Classes & Zoning Matrix Table of the County Development Plan (CDP) which is permitted in principle within lands zoned EE. The applicant states in their Planning Statement (Brock McClure) that it will be 6-8 years before the development would be considered for connection to the grid and the proposal to provide the onsite generation plant will proceed without a grid connection. It is stated 'it can therefore be assumed that this proposal is not a 'public services' until such time that ESB can confirm terms and conditions for a grid connection'. The applicant is, therefore requested to set out how the proposed development is in keeping with the Land Use Matrix of the Development Plan.

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2. It is noted that the applicant states that there would be no immediate connection to the grid. However, it is noted that there is potential to connect in future. The applicant is therefore requested to provide the following details in relation to the power generation on site:
 - The appropriateness of the proposal for an on-site gas plant based on national, regional and local policy in terms of energy requirements and climate change, including the Government Policy Statement on Security of Electricity Supply and CRU Direction to the System Operators related to Data Centre grid connection processing;
 - provide more detail regarding the alternative sources of power generating assessed as part of the alternatives (including renewables).
 - consider incorporating a portion of renewable energy generation.
 - Details of the future proofing of the data centre and the gas power plant to adapt to an alternative energy supply
 - Long term plan for the gas powered generation plant when data centre is connected to grid
 - Details of any connection agreements with Eirgrid / ESB, existing or pending, as well as details of any consultation undertaken with Eirgrid / ESB
 - Details of any consultation undertaken with Gas Networks Ireland
 - Information on whether the existing site is serviced in terms of utilities and if not the proposals for undertaking the development required to facilitate servicing.
 - Details of the connection to the surrounding area and national gas grid
3. The applicant is requested to engage with the Property Management Branch of the Department of Defence in terms of the construction and operation phases of development, to assess any potential impact on flight procedures and communication, navigation and surveillance equipment present at Casement Aerodrome, a letter of consent shall be obtained from the Department of Defence.
4. The applicant is requested to provide correspondence from the Commission for Regulation of Utilities/Eirgrid that connection is feasible and the timeline for the connection, as well as details of any consultation undertaken with these bodies. The applicant is also requested to provide any details of discussions with the EPA.
5. The Planning Authority is not of the opinion that a 10 year permission is necessary in this instance. The applicant is requested to provide a justification for seeking 10 years.
6. The applicant is requested to provide the following additional details in relation to design:
 - a) alterations to DB08:
 - extension of loading dock at ground floor level by c.60sqm in area with minor height increase to c.5.3m; - this would be to the west elevation at the main entrance and would could potentially have a significant impact on the main entrance plaza. The applicant is requested to provide further details of this area, including visuals and details of materials
 - b) on site power generator

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- The applicant is requested to provide revised elevations detailing the correct orientation of each elevation.
 - given the overall length of the building, the Planning Authority would welcome more localised visuals, indicating in particular the north, south and west elevations. This should include a visual incorporating the entrance plaza with DB8
7. The applicant is requested to:
 - a. Submit a report and drawing showing where each catchment is draining to. The drawing shall show how water flow is controlled in each catchment. The maximum discharge rate shall not exceed Q_{bar} or green field runoff rate for the site. Show on revised drawing and report what the discharge rate is for each catchment in the development. Prior to submission of this report, the applicant is requested to contact water services in South Dublin County Council to discuss the revised submission.
 - b) Submit a report and drawing to show what flood risk there is for the site. If there is a flood risk, the applicant is requested to show what mitigation measures are proposed in respect to such a flood risk.
 8. The applicant has submitted an Environmental Impact Assessment Screening Report. This sets out that the development does not require a mandatory EIAR nor does it meet the criteria where a sub-threshold EIA would be warranted. The Planning Authority is concerned that the cumulative impacts of recently permitted developments, particularly within Profile Park have not been considered and, as such, the applicant is requested to undertake a wider screening process. The Planning Authority is concerned that, cumulatively, the proposal is of a scale and nature that would result in significant effects on the environment. The applicant is requested to undertake a revised EIAR Screening and, if necessary, undertake a full EIA.
 9. The applicant is advised that the South Dublin County Development Plan 2022 - 2028 was made by resolution by the Elected Members on June 22nd and will come into effect on August 3rd 2022. In accordance with Section 34 (2) of the Planning and Development Act 2000 (as amended), the Planning Authority will have regard to the South Dublin County Development Plan 2022-2028 as the development plan for the area when making decisions in relation to applications from August 3rd 2022.
In this context, the applicant is requested to provide a report demonstrating that the proposed development is in accordance with the South Dublin County Development Plan 2022-2028.

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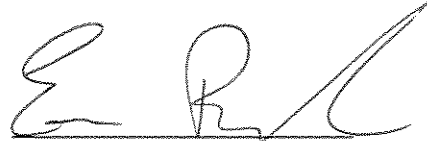
REG. REF. SD22A/0156

LOCATION: Plot 100, Profile Park, Nangor Road, Clondalkin, Dublin 22

Colm Harte

Colm Harte.

Senior Executive Planner



Eoin Burke, Senior Planner

ORDER: I direct that **ADDITIONAL INFORMATION** be requested from the applicant as set out in the above report and that notice thereof be served on the applicant.

Date:

25/7/22



**Mick Mulhern, Director of Land Use,
Planning & Transportation**