

MARSTON

PLANNING CONSULTANCY

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

Our Ref: 16008

21st July 2022

Re : Planning and Development Act 2000-2021 and the statutory regulations (as amended). Application by EdgeConneX Ireland Limited for Retention and completion of amendments to the permitted internal road layout, internal fencing and other ancillary internal layout amendments that were permitted under SDCC Planning Ref. SD18A/0298 on this site to the east of the Newcastle Road, Lucan, Dublin

Reg. Ref. SD22A/0009

Date of Clarification of Additional Information request: 16th June 2022

ADDITIONAL INFORMATION

Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by EdgeConneX Ireland Limited to submit this formal response to the request for the Clarification of Additional Information in relation to the planning application for the development as described above.

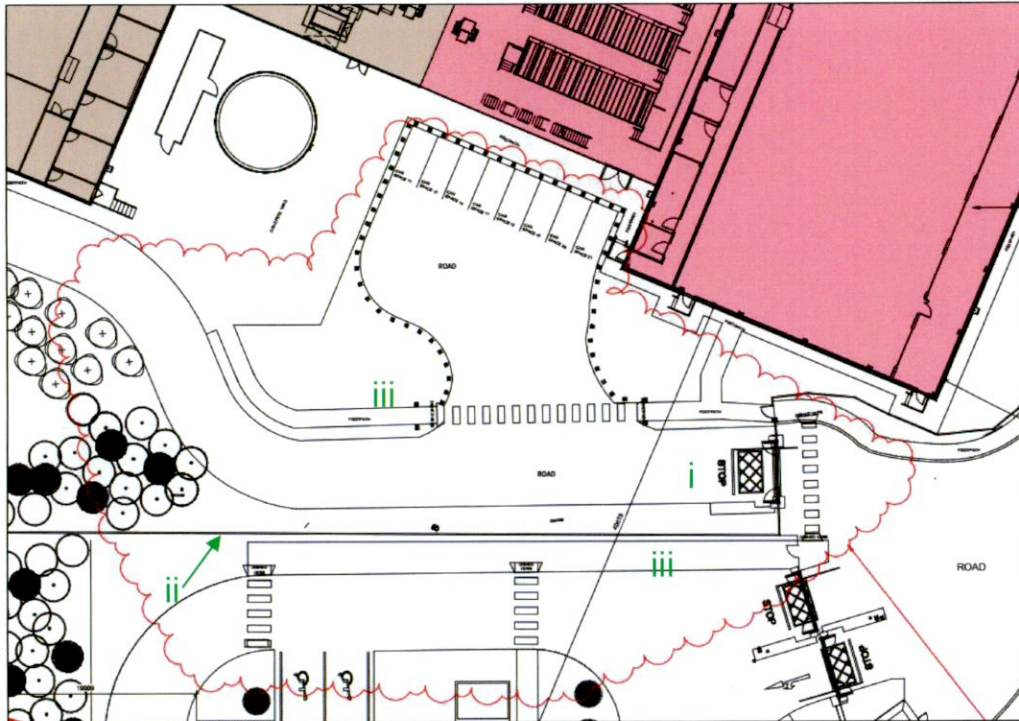
This response and accompanying reports and drawings, have comprehensively addressed all the elements of the Clarification of Additional Information request in a reasonable manner fully justifying and explaining the development. Our response is submitted fully within the six month timescale for responding to Additional Information and Clarification of Additional Information requests.

CLARIFICATION OF ADDITIONAL INFORMATION POINT 1

We refer the Planning Authority to the submitted Transport Statement report and drawings by Pinnacle, Consulting Engineers that comprehensively address this matter. This includes a text rationale for the traffic layout and how vehicles will move within the site both prior and following the implementation of the application. This also includes a detailed note on each of the changes. We refer the Planning Authority in particular to Figure 9 that sets out the Proposed Access Layout, and details all of the proposed changes that is replicated on the following page.

The drawing on the following page is an excerpt from Drawing no. P1.06 from Henry J Lyons that indicates the originally permitted road layout that is subject of this retention of the new road layout. This indicates the permitted vehicular access to the northern part of the data centre campus (Point i) that is to be removed; the location of the fence line (Point ii) to be removed; and the location of the revised road arrangement (Point iii).

The submission includes a range of auto-track analysis that shows how cars, fire tender, HGV and cranes can access and egress the site. The various drawings also indicates traffic movements, traffic lights, one way and two way systems, road signage etc. as per the request of the Planning Authority.

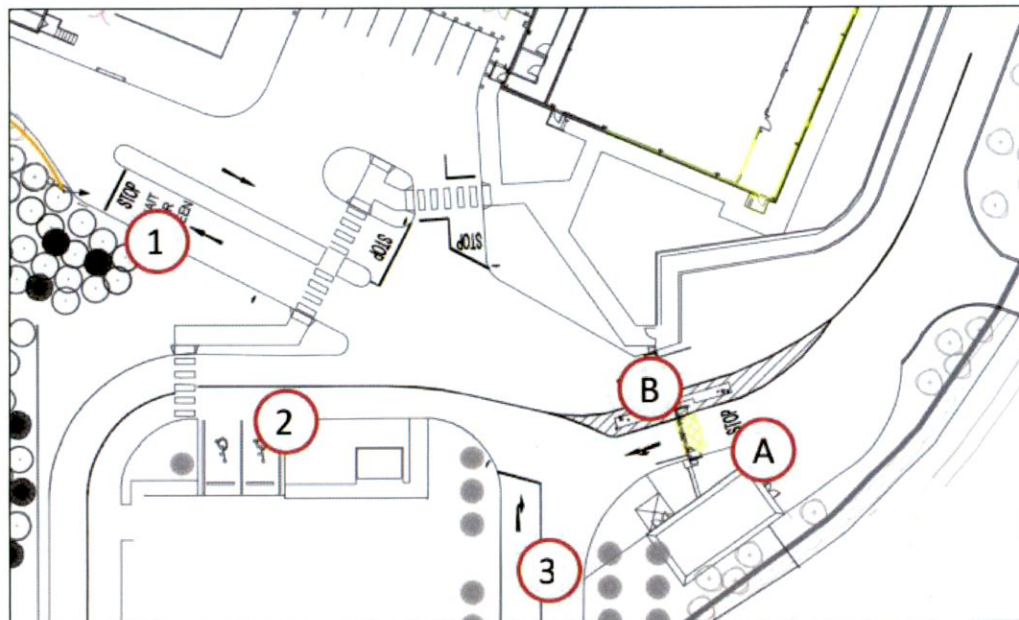


Permitted road and access arrangements

As outlined previously the rationale for the works is required to facilitate the Edgeconnex data centre campus to operate under one single future operator as opposed to two operators, as originally permitted. This is reflected in the permitted separate access points to the various data centres that will coalesce as a single entry and exit point (see Figure 9 below).

The accompanying Pinnacle report sets out in a comprehensive manner the various details as requested by the Planning Authority in terms of the proposed internal road layout changes, and can be summarised as follows:

- A – all vehicles enter the site via the security gate
- B – all vehicles leave the site via the security gate



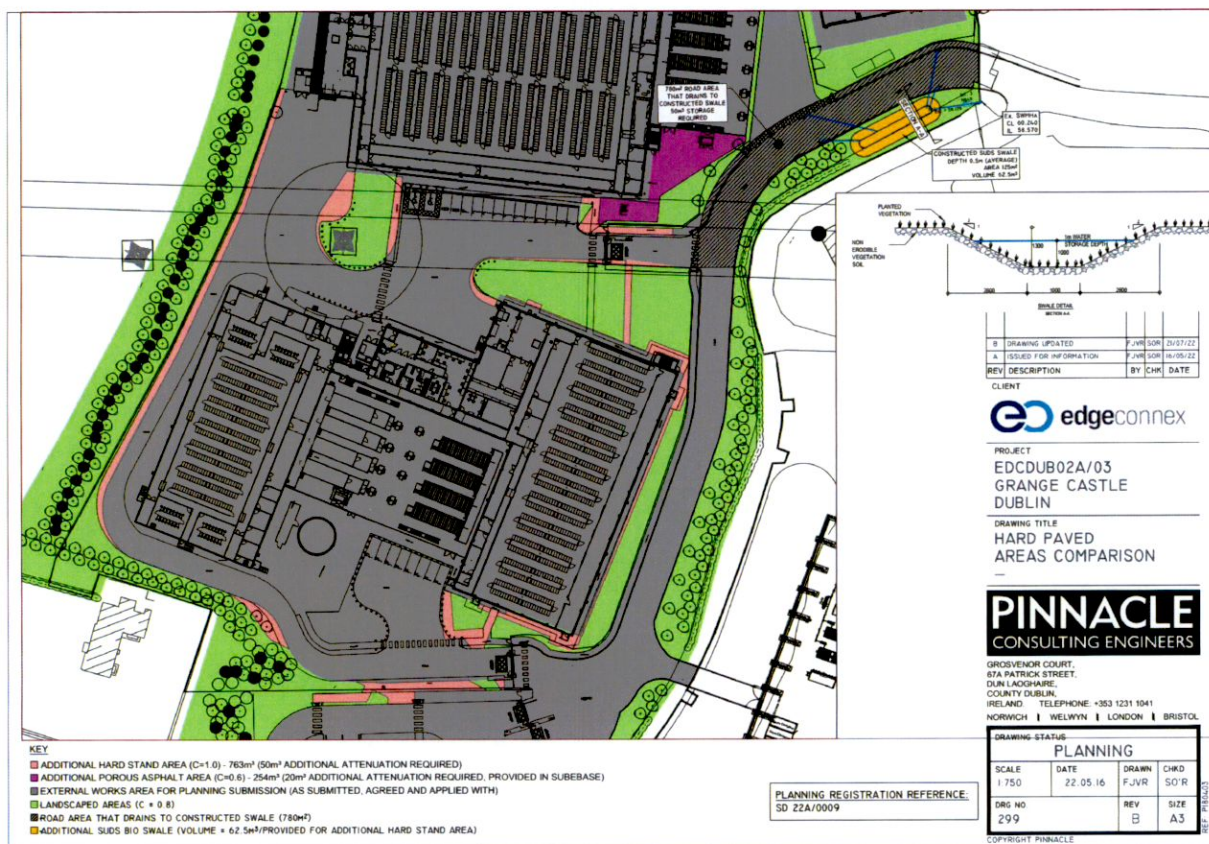
1 – Vehicles traveling to the northern half of the campus do so via a metered system. The route to the northern half of the campus is narrow and it is not possible to have two-way traffic. This route involves a signalised system that will meter access to the access route. No vehicles will be allowed to enter the system unless they have a signal to proceed.

2 – Vehicles traveling to the southern half of the campus do so via Route 2 or 3.

CLARIFICATION OF ADDITIONAL INFORMATION POINT 2

A review of the Clarification of Additional Information request has been comprehensively addressed by Pinnacle Consulting Engineers that addresses the surface water attenuation of the application and overall site in a comprehensive manner. Their response was discussed and agreed with Brian Harkin, Engineer within SDCC prior to the making of this response.

Drawing no. P180403-299 Rev. B submitted by Pinnacle indicates the additional hard paved areas that form part of this retention application, in addition to the associated SUDS elements, ie. Permeable asphalt and a bio-swale (see excerpt below). This indicates an additional area that has been constructed as a permeable asphalt surface above that indicated in the Additional Information submission, that provides an additional 20m³ of storage within the sub-base below the permeable asphalt surface.



The response by Pinnacle Consulting Engineers, indicates that this can therefore reduce the additional 70m³ of storage can be reduced to c. 55m³ from that was outlined in the Clarification of Additional Information. In addition a bio-swale has been constructed as part of the overall campus, and is located to the left and inside the main entrance to the campus.

This swale has the storage capacity of circa 62.5m³, based on the as-constructed width and depth of this feature. This swale is currently catering for a section of access road (asphalt), of circa 780m², which would generate a storage requirement of circa 50m³. The attenuation for this section of road is dealt with via this swale and is not dealt with under the two permitted attenuation ponds to the north of the site. The Pinnacle Report on this issue concludes that they are of the considered opinion that they have adequately demonstrated that the applicant has provided additional attenuation storage for this application in the order of 82.5m³, i.e. 20m³ (permeable asphalt) & 62.5m³ (bio-swale) within the overall campus, which is in excess

of 27.5m³ over the agreed reduced storage volume of 55m³. There is therefore adequate surface water attenuation to address the SUDS requirements of the revised road arrangement as proposed under this application.

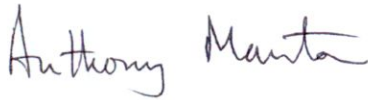
CONCLUSION

It is our respectful submission that this response has comprehensively addressed the two issues raised by the Planning Authority in the Clarification of Additional Information request.

In conclusion, for all of the foregoing arguments, reason and considerations, South Dublin County Council are invited to assess the subject scheme and our Clarification of Additional Information response on its own individual merits and to grant planning permission for this development on the basis that by its nature and extent, the proposal 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