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**PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING
REGULATIONS THEREUNDER**

Decision Order Number: 1281	Date of Decision: 10-Oct-2022
Register Reference: SD22A/0333	Registration Date: 16-Aug-2022

Applicant: EdgeConneX Ireland Limited

Development: Construction of 2 adjoined single storey data centres with associated office and service areas with an overall gross floor area of 15,274sq.m comprising of the construction of 2 adjoined single storey data centres with a gross floor area of 12,859sq.m that will include a single storey goods receiving area / store and single storey office area (2,415sq.m) with PV panels above, located to the east of the data centres as well as associated water tower, sprinkler tank, pump house and other services; The data centres will also include plant at roof level; with 24 standby diesel generators with associated flues (each 25m high) that will be located within a generator yard to the west of the data centres; New internal access road and security gates to serve the proposed development that will provide access to 36 new car parking spaces (including 4 electric and 2 disabled spaces) and sheltered bicycle parking to serve the new data centres; New attenuation ponds to the north of the proposed data centres; Green walls are proposed to the south and east that will enclose the water tower and pump house compound; 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 and Ref. SD21A/0042; 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 and SD21A/0042; An Environmental Impact Assessment Report (EIAR) has been submitted with this application.

Location: Site within the townland of Ballymakailly, West of Newcastle Road (R120), Lucan, Co. Dublin

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 16-Aug-2022 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. Employment.

The applicant is requested to demonstrate compliance with the following employment policies of the SDCC County Development Plan 2022-2028:

- EDE1 Objective 6
- EDE3 Objective 5
- EDE4 Objective 4
- EDE4 SLO1

2. It is noted that an element of the site is zoned 'RU'. The applicant is requested to submit a plan indicating the delineation of this area and also to detail what works would take place within 'RU' zoned lands.

3. Space Extensive.

The applicant is requested to demonstrate compliance with each section of the following space extensive policies of the SDCC County Development Plan 2022-2028:

- EDE7 Objective 2
- EDE7 Objective 3

4. Implementation.

The applicant is requested to demonstrate compliance with the following implementation sections of the SDCC County Development Plan 2022-2028:

- 12.4.2 Green Infrastructure and Development Management
- 12.5.1 Universal Design
- 12.5.2 Design Considerations and Statements
- 12.5.3 Density and Building Heights
- 12.5.4 Public Realm: (At the Site Level)
- 12.5.5 Healthy Placemaking and Public Realm: (At the Neighbourhood Level) and Table 3.18 Key Principles for Healthy Placemaking and Public Realm at Neighbourhood level
- 12.7.3 Travel Plans
- 12.8.6 Public Art
- 12.9.2 Enterprise and Employment Areas
- Table 12.27: Key Principles for Development within Enterprise and Employment Zones
- 12.9.4 Space Extensive Enterprises
- 12.10.1 Energy Performance in New Buildings - The applicant has provided a Commercial Energy Statement. The applicant is requested to address the matters not covered in the submitted statement.
- 12.10.2 Low Carbon District Heating Networks
- 12.10.3 Energy from Waste
- 12.11.1 Water Management
- 12.11.3 Waste Management

5. Design.

(a) The applicant is requested to demonstrate compliance with the following design policies of the SDCC County Development Plan 2022-2028:

- QDP2 Objective 1
- Policy QDP3: Neighbourhood Context and objective 1
- QDP4 Objective 2
- QDP7 Objective 6
- QDP7 Objective 7
- QDP7 Objective 8
- QDP8 Objective 1
- Policy QDP11: Materials, Colours and Textures and objectives 1 and 2

(b) The applicant is requested to provide details / photomontages of the visual impact without screening. The applicant is also requested to indicate the length of growing time required to achieve the desired landscape mitigation. Photomontages of the development from closer angles where the development would be most notable in the surrounding landscape are also requested.

(c) The applicant is requested to provide full details of fencing and signage.

6. EHO.

1. An acoustic assessment must be undertaken by a suitably qualified acoustic consultant describing and assessing the impact of noise emissions from the proposed development to include accumulative noise impacts. The investigation must include, but not be necessarily limited to, the following:

(a) The identification of any neighbouring noise sensitive receivers who may be potentially impacted by the proposal

(b) The identification of all operations conducted onsite as part of the development proposal that are likely to give rise to a public nuisance for the neighbouring noise sensitive receivers.

(c) An assessment of the existing background (LA90,15 min) and ambient (LAeq,15 Min) acoustic environment at each receiver locations representative of the time periods that any noise impacts may occur. NOTE: For the purposes of the assessment background noise includes; noise of the surrounding environment excluding all noise sources currently located on-site.

(d) Distances between the development and the nearest noise sensitive receiver and the predicted level of noise (Laeq, 15min) at each receiver for each development activity. These noise predictions must be conducted for all operational noise and the construction noise activities. The predicted level of noise should be assessed at the boundary of each receiver.

(e) A statement outlining any recommended acoustic control measures that should be incorporated into the development to ensure the use will not create adverse noise impacts on the occupiers of any neighbouring noise sensitive properties

(f) The applicant is required to demonstrate whether the propose development can meet the standards set out by South Dublin County Council as detailed in Councils Standard condition below:

Noise due to the normal operation of the proposed development, expressed as Laeq over 15 minutes at the façade of a noise sensitive location, shall not exceed the daytime background level by more than 10 dB(A) and shall not exceed the background level for evening and night time. Clearly audible and impulsive tones at noise sensitive locations during evening and night shall be avoided irrespective of the noise level.

7. 1. Arboricultural Impact of the Proposed Development

The proposals involve the removal of all hedgerows on site including boundary hedgerow which is contrary to the objectives of the SDCC County Development Plan 2022-2028, in particular:

NCBH11 Objective 3: To protect and retain existing trees, hedgerows, and woodlands which are of amenity and / or biodiversity and / or carbon sequestration value and / or contribute to landscape character and ensure that proper provision is made for their protection and management taking into account Living with Trees: South Dublin County Council's Tree Management Policy (2015-2020) or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area.

NCBH11 Objective 4: To protect the hedgerows of the County, acknowledging their role as wildlife habitats, biodiversity corridors, links within the County's green infrastructure network, their visual amenity and landscape character value and their significance as demarcations of historic field patterns and townland boundaries. (Refer also to Chapter 4: Green Infrastructure).

GI1 Objective 4: To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.

GI2 Objective 1: To reduce fragmentation and enhance South Dublin County's GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.

GI2 Objective 2: To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.

GI2 Objective 4: To integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter.

GI2 Objective 5: To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.

- i. Revised proposals that include the western boundary hedgerow into the layout by moving the building proposals eastward.
- ii. Revised proposals to include an updated Arboricultural Impact Report and Plan, Tree Protection

Plan and Arboricultural Method Statement.

8. Impacts on bat commuting and foraging routes

The Environmental Impact Assessment Report (EIAR) identifies the hedgerow habitat proposed for removal as providing good commuting and foraging routes for bats, a protected species. The applicant is requested to demonstrate what mitigation is proposed for bats foraging along these routes which are to be kept dark.

9. The EIAR identifies the 'hedgerows located along field boundaries' forming 'part of a wider ecological corridor network which connects the site to the surrounding area...and beyond'. The submitted plans propose removal of these hedgerows, in conflict with the County's Green Infrastructure Strategy. Please refer to Chapter 4 of the County Development Plan: [chapter-4-green-infrastructure.pdf](#) (sdcc.ie).

GI1 Objective 4: To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.

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This development has not considered the impacts on Green Infrastructure and is in direct conflict with the above objectives. Additional Information is requested to address this.

- ### 10. The applicant is requested to demonstrate how they contribute to the protection or enhancement of Green Infrastructure in the County through the provision of green infrastructure elements as part of the application submission, having regard to the following:
- i. In the case of small-scale developments this may consist of a simple landscape plan which includes objectives to protect or restore existing on site GI assets, provides for connection to local or primary GI corridors or includes elements which allow the site to act as a local stepping stone;
 - ii. Where the development site is located within or close to a Core or Corridor the development should, at a minimum, protect any existing GI assets and enhance same (for example, not breaking a GI Corridor but enhancing same with a connecting piece of planting, retaining hedgerows or woodlands;

- iii. The characteristics and assets of the proximate GI Core, Corridor or Stepping Stone should be reflected within proposed development, for example continuation of hedgerows, tree planting, waterways;
 - iv. Development should seek to enhance or restore features that act as ecological corridors, particularly water features, hedgerows, tree lines, areas of un-cultivated land. These, or some element of them, should be incorporated into the proposed development to create pathways for wildlife and / or increase amenity value;
 - v. Development sites which are not located proximate to designated GI Cores or Corridors should identify the nearest designated GI Core, Corridor or Stepping Stone and make provision for GI interventions on the site which could eventually provide a link to local Stepping Stones, Cores or Corridors;
 - vi. Developers should be aware that ecological corridors can also act to quickly spread non-native invasive species. Therefore, identification and control of invasive species site should be included in planning applications and the GI Plan.
 - vii. All development proposals shall be accompanied by a Green Infrastructure Plan, which will normally be submitted as part of the suite of Landscape Plans that are required for a development. Plans shall include the following:
 - viii. Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County;
 - ix. Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;
 - x. Indicate how the development proposals link to and enhance the wider GI Network of the County;
 - xi. Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site; à Proposals for identification and control of invasive species.
11. The applicant has not submitted any information in relation to the Green Space Factor.
- GI5 Objective 4: To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).

The quantity and quality of green infrastructure provided by new development will be improved by the implementation of a Green Space Factor (GSF) for South Dublin. The GSF is a measurement that describes the quantity and quality of landscaping and GI across a defined spatial area. This measurement comprises a ratio that compares the amount of green space to the amount of impermeable 'grey' space in a subject site. As a planning tool, this ratio is used to assess both the existing green cover within a site and the impact of new development, based on the quantity and quality of new green space provided. Greening factors have been adopted and implemented across the UK, Europe and the United States to help ensure that new development makes a positive contribution to the local environment. By ensuring that new development meets minimum standards for the provision of GI the GSF aims to secure a positive contribution to biodiversity, amenity, air quality, stormwater management, temperature regulation and other ecosystem services. The GSF prioritises the retention of existing GI features within a subject site, in order to support the protection of the County's existing GI network. At the same time, the GSF will ensure that new development incorporates new landscaping and GI features, contributing to the enhancement of the overall GI network. Chapter 12, section 12.4.2 provides further detail on the requirements for the GSF as part of

planning applications.

12. Resolution of the variations between landscape architect's pond edge detail and planting plan indicating shallow planting and varied slopes and those shown in the engineer's drawings (steep section which doesn't allow for a stepped profile with varied habitat is required. The applicant is requested to submit pond proposals and details to demonstrate delivery of the four pillars of SuDS: amenity, biodiversity, water treatment and attenuation. Refer SDCC Sustainable Drainage Explanatory Design and Evaluation Guide 2022.
13. The proposed development in its current configuration would have a significant detrimental impact on hedgerows and biodiversity and lacks a green infrastructure strategy. The proposed development would materially contravene policies and objectives for green infrastructure, biodiversity, sustainable drainage, in SDCC County Development Plan (2022-2028).
The Public Realm Section is requesting that the applicant alter the layout of the proposed development providing:
 - i. Proposals that retain the western boundary hedgerow
 - ii. Proposals that mitigate the loss of commuting and foraging routes for bats
 - iii. a green infrastructure strategy
 - iv. green space factor
 - v. landscape architect and engineer proposals for pond profile and habitat proposals to be in accord - demonstrate all four pillars of SuDS can be achieved
14. a. The applicant is requested to submit a drawing in plan and cross sectional views clearly showing additional Sustainable Drainage Systems (SuDS) features for the development. SuDS features could include but are not limited to:
 - Swale
 - Tree pits
 - Permeable Paving
 - Grasscrete
 - Green roofs
 - Planter Boxes
 - Other such SuDSNote: Instead of using oil interceptors use swales and /or reed bed type biodiversity SuDS to replace oil interceptors. Refer to SuDS Guide [sdcc-suds-explanatorydesign-and-evaluation-guide.pdf](#)
Where practical replace pipe with Swales or other such SuDS systems.
- b. The applicant is requested to Submit a CFRAM Flood Risk Drawing showing the location of proposed site on flood map. The applicant is requested to outline the boundary of site with a red line on flood map
15. (a) Submit a Pre connection enquiry with Irish Water for both water supply and wastewater for the proposed development.
(b) The applicant is requested to submit a copy of the letter of confirmation from Irish Water as mentioned in the "Engineering Planning Report" which states the foul network on site is under the charge of SDCC.
16. The applicant is requested to submit:
 - A wildlife aviation impact assessment
 - Aviation impact assessment on all potential emissions

17. EIAR.

(a) Whilst the Planning Authority consider that the applicant has considered alternatives, it is noted that there are concerns regarding compliance with policy in relation to space extensive uses and also Green Infrastructure. It is therefore considered that further assessment of alternatives is required, once overall policy considerations have been incorporated.

(b) It is considered that the information contained within the EIAR requires amending following any changes in the scheme following additional information to ensure the proposed development allows for adequate assessment of the potential impacts of the proposed development on the receiving environment and complies with the requirements of Article 94 of the Planning and Development Regulations 2001 (as amended).

In particular, amendments should include update to the noise assessment, updates to GI plan and layout of the scheme / siting design, changes following assessment against spaces extensive policies and other policies that require further consideration. Further assessment of cumulative impacts in terms of data centres permitted close to the site should also be undertaken.

(c) Also, additional data and more comprehensive analysis is requested in the EIAR in relation to the impact of the development (i) by itself and (ii) in combination with other data centres - permitted and existing; locally and nationally - on the power generation and supply network (Material Assets) during the operational phase of the development. In particular, the powering of the proposed data centres by the national grid in the medium term (unspecified time horizon) should be considered. Existing off grid material assets that are to be used in the short-term should also be included in the assessment report. Additional consideration should focus on available technology in the first instance, before any consideration is given to emerging/potential future technologies. Justification for the absence of renewable energy generation on-site or other measures in operation elsewhere, such as the use of waste heat from data centres should be provided. Energy consumption off-setting within the national grid may also be considered where related proposals have been fully conceived, can be inextricably linked to these proposals and are readily deliverable.

(d) The applicant is requested to assess the development in light of July 2022 Department of Enterprise, Trade and Employment 'Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy'.

18. The applicant is requested to provide justification for the proposed 10 year permission duration.

NOTE: The applicant should note that any submission made in response to the above will be examined and MAY be deemed to be SIGNIFICANT ADDITIONAL INFORMATION by the Planning Authority. In this event the applicant(s) will be subsequently notified and requested to publish a notice in an approved newspaper and erect or fix a site notice on the land or structure to which the further information relates and to submit copies of the both the newspaper and site notices to the Planning Authority in accordance with Article 35 (1) (a) and (b) of the Planning and Development Regulations 2001 (as amended).

Note: The applicant must submit the Further Information within **6 months** of the **date of decision**. If the information is not received within this period, the planning authority shall declare the application to be withdrawn.

Please ensure that your reply to this Request for Additional Information is accompanied by a covering letter marked "ADDITIONAL INFORMATION" and that the Planning Register Reference Number given above is quoted on the covering letter.

Signed on behalf of South Dublin County Council

Register Reference: SD22A/0333

Date: 11-Oct-2022

Yours faithfully,

Pamela Hughes
for **Senior Planner**