

## REQUEST FOR FURTHER INFORMATION

**Date:** 7<sup>th</sup> of October 2022

**Register Reference:** SD22A/0333

**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  
**Applicant:** EdgeConneX Ireland Limited  
**App. Type:** Permission  
**Planning Officer:** SARAH WATSON  
**EHO:** Kieran Groarke  
**Date Received:** 16-Aug-2022  
**Decision Due Date:** 10-Oct-2022

## **REQUEST FOR FURTHER INFORMATION**

### **Background**

The subject application is for the proposed construction of 2 adjoined single storey data centres. The data centres will include plant at roof level and 24 standby diesel generators with associated flues.

### **Noise Impact Concerns**

It is noted the noise impact assessment has been prepared by Awn Consulting Ltd and forms part of the Marston Planning Consultancy EIAR submission which is dated August 2022. The main concern raised by Environmental Health relates to noise impact from both the operational and construction phases of the development.

On review of the surrounding environment it is noted there are a number of nearby residential receivers the closest of which is located approximately 30-50 meters from the proposed data centre development.

This receiver is identified as “NP22” under “figure A” of the Noise Impact assessment.

### **Noise Impact Assessment Review**

On review of the noise impact assessment by Environmental Health it is noted the Noise impact assessment fails to outline and predict the impact of the proposed development on the surrounding environment. The key issues from the report have been summarised below.

- The report does not outline a review of the predicted changes in existing background noise levels for each of the nearby receivers across day and night time as a result of the proposed development. This component of a noise impact assessment is essential when ascertaining the potential impact.
- An acoustic report must include a detailed breakdown of the predicted change or increase in background noise levels across each of the nearest residential receivers. This would generally include the receiver’s location, the predicted construction/operational noise at this receiver and confirmation as to whether the predicted noise level complies with the relevant criteria. This should also be calculations based on various different scenarios such as emergency operations, day and night time noise level predictions.

- The report only appears to include information around methodology and fails to provide key predictions for both operational noise and construction noise. It is understood the construction phase is due to last approximately 3.5 years.
- The report does not provide any cumulative noise impact calculations to account for the existing and future developments in this area. The assessment of cumulative noise impacts is important when trying to manage the incremental increase of background noise in a relatively quiet area, which is referred to as “background creep”.
- The non-technical summary confirms the nearest occupied residential property is located “immediately adjoining the north-east corner” however this receiver has not been acknowledged or included in any noise prediction within chapter 9 of the EIA.
- Some detail on the acoustic louvres proposed for the diesel generators has been provided however no further information has been provided regarding the predicted impact of the diesel generators or with regards to proposed frequency for use or testing of these generators.
- Under table D of the report, page 110 the noise monitoring results are set out however the assessment does not provide an overall background La90 noise level for each of the noise measurement locations. The report provides each individual 15minute reading which was obtained. This section of the report appears to be incomplete.

The noise report largely consists of methodology information such as noise modelling parameters however the key components around predicted noise impact from the proposed development has not been provided. The Environmental Health Department would raise strong concern over the potential noise impact given the scale of the proposed development and close proximity to residential receivers located adjacent to this site.

### **Request for Further information**

**The proposal is not acceptable to the Environmental Health Department until the following information has been submitted and assessed.**

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.*



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Kieran Groarke  
Environmental Health Officer  
7<sup>th</sup> of October 2022

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Patricia Doonan  
Principal Environmental Health Officer