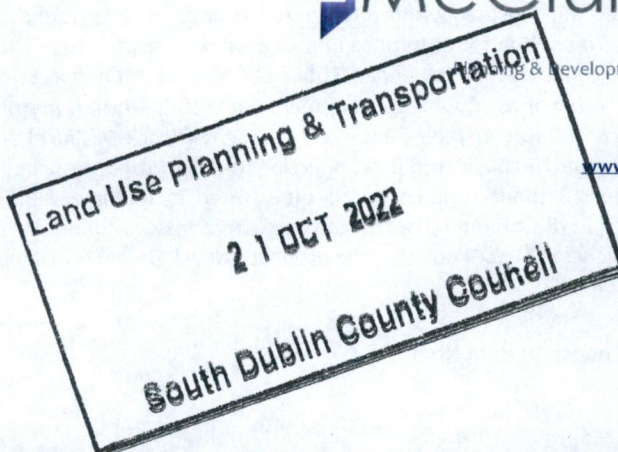


Senior Administrative Officer,
Planning Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24,
D24 A3XC.



21 October 2022

Request for Additional Information - SDCC Reg. Ref. SD22A/0156

Development at Plot 100, Profile Park,
Nangor Road, Clondalkin, Dublin 22

Dear Sir/Madam,

We, Brock McClure, Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have been instructed by the Applicant, **Equinix Ireland Limited, Unit 6/7 Kilcarbery Business Park, New Nangor Road, Dublin 22, D22FV12**, to lodge this Response to a Request for Additional Information to South Dublin County Council.

This response is made within 6 months from the date of the Request for Additional Information on the 25 July 2022.

We enclose the following documentation herewith for assessment as part of this application:

No	Items	Consultant	No. of Copies	Copy/Original
1.	Statement in response to OSPG including Appendices – FI Items 1, 2 and 4	RED	6	Copy
2.	Thermal Plume Modelling – FI Item 3	AWN	6	Copy
3.	Aviation Impact Assessment - FI Item 3	Windfarm Aviation Safeguarding Ltd.	6	Copy
4.	Letter from the Department of Defence to RKD Architects- FI Item 3	Department of Defence	6	Copy
5.	Revised Compound Elevation Drawing and document register – FI Item 6	RKD	6	Copy
6.	Revised Photomontages - FI Items 6	Digital Dimensions	6	Copy
7.	Drainage Drawings and Report - FI Item 7	Pinnacle	6	Copy
8.	Updated EIA Screening Statement - FI Item 8	Malone O'Regan	6	Copy
9.	Cumulative Air Quality Assessment- FI Item 8	AWN	6	Copy
10.	Cover Letter – FI Items 1-9	Brock McClure	6	Copy

A response to the Request for Additional Information is now set out below. We request that this cover letter is read in conjunction with all drawings and reports accompanying this response, as outlined in the table above.

Additional Information Response

1.0 Item No. 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.”

Applicant Response to Item No. 1

Overview

To date there has been no confirmation from EirGrid or ESBN regarding the technical and commercial details of power supply connection for the data centre development. In order to progress with the project without a national grid power supply, the Applicant proposes the construction of a privately owned and operated On-Site Power Generation Plant, at their own expense. The purpose of the plant is to generate power for the permitted data centre until such time that ESB can make a formal technical and commercial proposal. It is the intention to provide a power plant that can operate off grid on day one and in the future, be connected and embedded into the national grid.

The power plant will be supplied by energy provided by Gas Networks Ireland, as confirmed by their signed connection agreement (November 2021). Minister Ryan issued a direction to GNI that stated it would not be appropriate for GNI to sign any more contracts to connect Data Centres to the gas network. This direction is not relevant in this instance as the signed connection agreement is already in place between the Applicant and GNI.

The plant is compatible and can be operated using Hydrogen/Natural Gas mix or pure Hydrogen, in line with the GNI Plan. It is also equipped with Battery Energy Storage System (BESS) that can be used mainly for frequency regulation and spinning reserves as well as peak saving.

In the event that future grid connection is facilitated, Equinix will engage in a Power Purchase Agreement that promotes green energy. The OSPG will be used by EirGrid/ESBN to provide full flexibility to the grid. This will facilitate use of more green energy on the network.

The OSPG is intrinsically linked to the permitted data centre development and is considered an associated use. Data Centre is clearly defined under its own separate use under the Plan as:

“A data centre is a physical facility composed of networked computers and storage that business and other organisations use to organise, process, store and disseminate large amounts of data.”

The proposed development cannot therefore be considered a public service, as outlined further in the sections below.

Ministerial Direction

The Minister of State at the Department of Housing, Local Government and Heritage consequent to a recommendation made to him by the Office of the Planning Regulator under Section 31AM(8) of the Planning and Development Act 2000 (as amended), issued a Direction to the South Dublin County Development Plan

2022-2028 in relation to the data centre use on EE zoned lands. The Direction requested that Data Centre use be removed as ‘not permitted’ use under the EE zoning.

In accordance with Section 31(4) of the Planning and Development Act 2000, those parts of the South Dublin County Development Plan 2022-2028 referred to in the notice shall be taken to have not come into effect.

In this instance, the use class for data centre shall revert to ‘open for consideration’ under the EE zoning for the site. All applications should be considered on a case-by-case basis.

Public Service and Data Centre Use

Appendix 6 of the County Development Plan 2022-2028 defines a ‘Public Service’ as:

“A building or part thereof or land used for the provision of public services. Public services include all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, drainage and other statutory undertakers, it includes: public lavatories, public telephone boxes, bus shelters, bring centres, green waste and composting facilities.”

A data centre is defined under Appendix 6 of the Plan as:

“A data centre is a physical facility composed of networked computers and storage that business and other organisations use to organise, process, store and disseminate large amounts of data.”

It is noted that the proposed OSPG is ancillary to the permitted data centre (DB8) and will service DB8 only.

We draw the Planning Authority’s attention to Application Ref. SD21A/0167 by Greener Ideas Limited for a gas fired power plant at Profile Park. The plant will generate electricity which may export to the to the national electricity grid and facilitate fixed MIC requirement for data centres. The planning particulars note that *“The proposed power plant will regularise energy provision in the electricity grid.”* The Planner’s Report goes onto state:

“the proposed electrical connection considered in the EIAR is the underground 110 kV cable from the plant’s main transformers to the existing Castlebaggot 220 / 110 kV Substation which is operated by EirGrid or to a new proposed 110 kV substation in Profile Park. Planning permission is not sought for these connections as part of the current application. Either Greener Ideas Limited or EirGrid will be responsible in the future for securing the necessary planning permission for these electrical connections.”

The above power plant is undoubtedly linked to the national electricity grid with a strategic regional focus serving multiple data centre operators. As such it is considered a public service.

For comparative purposes, the subject proposal at Plot 100 Profile Park is a private development and is not connected to the electricity grid nor is it considered a public service but rather an ancillary development to a permitted data centre granted under SD21A/0186. On this basis, the unique merits of the proposal are consistent with the objective and vision for EE zoned lands and should be considered on a case-by-case basis.

We trust the above response adequately addresses Item No. 1.

2.0 Item No. 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.”*

Applicant Response to Item No. 2:

In response to Item No. 2, we refer to the accompanying Statement prepared by RED Engineering for more information.

The rationale for the OSPG is set out in the accompanying report, having regard to alternative power sources assessed by the Applicant. Details of the Applicant’s correspondence with key stakeholders is contained within RED’s response.

We trust the above response adequately addresses Item No. 2.

3.0 Item No. 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.”

Applicant Response to Item No. 3:

In response to Item No. 3, we note that the additional flues were discussed with various individuals at Baldonnell Airport and The Department of Defence – Property Management Section in August and September 2022. We refer to the accompanying correspondence received from the Department of Defence letter dated 4 October 2022.

Having regard to the recommendations of the Department of Defence, Thermal Plume Modelling was undertaken to determine the potential impact of the plumes associated with the OSPG on aircraft in the vicinity of Casement Aerodrome.

We refer to the full study prepared by AWN Consulting, accompanying this response and summarise the results of the analysis as follows:

- *“Oxygen Content – within 1 metre of the stack top the oxygen concentration will increase above the 12% risk level for oxygen for both gas engines (90 m OD) and diesel generators (96.2 m OD).*

- *Temperature* – the temperature of the plume will drop to less than 50°C beyond 10 metres (99 m OD) of the stack top for the gas engines and beyond 9 metres (104.2 m OD) of the stack top for the diesel generators.
- *Vertical Velocity* – the critical vertical velocity of 4.3 m/s will not be exceeded beyond 14 metres (103 m OD) from the stack top of the gas engines and beyond 1 metre (96.2 m OD) from the stack top of the diesel generators.

Thus, the maximum extent of the risk zone of the plume for each parameter is shown below based on a full year of meteorological data covering all meteorological conditions including pressure/temperature inversions:

- Risk Zone for Oxygen – < 1 metre (96.2 m OD)
- Risk Zone for Temperature – 9 metres (104.2 m OD)
- Risk Zone for Vertical Velocity – 14 metres (103 m OD)
- COMBINED RISK ZONE – within 9 metres above stack top and 104.2 m OD.

In summary, beyond 9 m above the stack top (104.2 m OD), the levels of oxygen, temperature and vertical velocity will have returned to accepted/ambient levels.”

We refer to the full Aviation Impact Assessment prepared by Windfarm Aviation Safeguarding Ltd and summarise the findings of the assessment below:

“In respect of the plumes the AWN Consulting research has concluded that any effects will have completely dissipated within 9m from the flue stack top. In an aviation sense, the implications are clear; any plume will not affect any OLS nor would any aircraft be flown within 9m of the building/stack top. To do so would create an inexplicable flight safety hazard to the aircrew and people on the ground. There should be no impact on operations at Casement Aerodrome based on the 9m plume.

To put these considerations in perspective there are developments in the immediate vicinity of the proposed development which are comparable in terms of building height and with similar flue stacks and which are similarly below the IHS and which do not appear to have affected operations at Casement Aerodrome. 23

Security of the aerodrome, and the methods and measures enforced to meet that security requirement, is a matter solely for DoD and GoC IAC.”

All construction and operation phases of development and potential impact on flight procedures and communication, navigation and surveillance equipment have been assessed and are considered acceptable.

We trust the above response adequately addresses Item No. 3.

4.0 Item No. 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.”

Applicant Response to Item No. 4:

In response to Item No. 4, we refer to the accompanying correspondence from the CRU and EirGrid, as outlined in RED’S statement accompanying this response for more information.

Commission of Regulation of Utilities (CRU)

The Applicant and Consultant Team met with the Commission for Regulation of Utilities (CRU) and presented the case for consideration. The CRU advised that due to the fact the development does not have a utility power connection they are unable to assess compliance with the CRU Directives for Data Centres, but they advised that if the site does not have a power supply, then the Applicant can apply for a license authorising the power plant to be constructed and to generate power. In order to obtain these licenses and this CRU approval, planning approval from SDCC is required.

EirGrid/ESBN

Please find below a summary of discussions and correspondence issued to date with EirGrid and ESBN:

October 2020 – Preliminary discussions held with ESB Distribution Engineers which led to the following Energy Concept being prepared for the development which shows direct 10kV feeders terminating into a metering station located on the site.

4 November 2020 – Power supply application lodged with ESB.

15 February 2021 – Email received from ESB that application for supply was now live in their system and that they would seek approval from EirGrid for this application and the process would likely exceed 90 days.

17 May 2021 – Following the 90 day period we contacted ESB for an update and were advised that EirGrid would need to undertake a network study and this could take several more months.

26 May 2022 – Received update from ESB advising all applications are paused and ESB will advise all applicants how to move forward with applications once direction has been received from EirGrid and CRU.

3 August 2022 - Received email from ESB confirming that discussions with CRU have concluded but they need to finalise some further points with EirGrid and CRU. On this basis, a more detailed update will be provided in a few weeks

20 September 2022 – No further updates or information received from ESB regarding the application for power.

Environmental Protection Agency (EPA)

The Applicant has had no direct discussions with EPA at this time. We refer to the Air Quality and Climate Assessment Report included within this response for further information regarding the Emissions Trading scheme and approach to achieving EPA compliance.

We trust the above response adequately addresses Item No. 4.

5.0 Item No. 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.”

Applicant Response to Item No. 5:

In response to Item No. 5, we note that a 10 year permission is required to allow the OSPG equipment to be installed in phases to match the power load increase of the permitted data centre, once operational. All site infrastructure works, including roads, drainage, facades and screening of the proposed OSPG development will be completed as part of the initial phase of the works which is anticipated to be completed within three (3) years of the development being permitted by SDCC. The only element that will be deferred from the initial installation phase will be a number of the OSPG equipment units (gas engines and associated ancillary electrical equipment).

We trust the above response adequately addresses Item No. 5 and we invite a suitably worded condition relating to same.

6.0 Item No. 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

*- 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.”*

Applicant Response to Item No. 6:

In response to Item No. 6, we refer to the accompanying photomontages prepared by Digital Dimensions. Additional views of the northern, western and southern elevations of the OSPG and Data Centre from the entrance to Profile Park and the internal estate road have been prepared and demonstrate the proposal will have a nominal visual impact on the surrounding built environment.

We refer to Pages 33-35 of the Architect’s design statement submitted as part of the original application enclosures and note the type of materials proposed for the built structures.

VIEW 11



Figure 1 – View 11

View 11 taken from the roundabout on the Nangor Road looking south east towards the subject site, shows the north and western elevation of DB8. The proposed changes to the loading dock will have a minimal visual impact at this location. The OSPG compound is partially visible at this location due to the extensive planting along the western boundary. Some intermittent views of the proposed flues are visible behind the row of trees along the internal estate road and heavy screening within the site boundary. The visual impact from this viewpoint is significant and positive.

VIEW 12



Figure 2 – View 12

View 12 is taken from the internal estate road looking north east towards the site. The permitted data centre building and OSPG compound are partially visible in the centre right of the image to the tree and shrub planting. The western elevation of the OSPG compound is planting with a live wall, enhancing the screening effect from this viewpoint. The visual impact from this view is moderate and positive.

VIEW 13



Figure 3 – View 13

View 13 – View of the western elevation of DB8 Data Centre with shrubbery, tree planting and parking areas in the centre foreground.

VIEW 14



Figure 4 – View 14

View 14 – View of the western elevation of DB8 Data Centre and northern/western elevation of the OSPG Compound with shrubbery, tree planting and parking areas in the centre foreground. The OSPG Compound is dressed in a verdant live wall.

VIEW 15

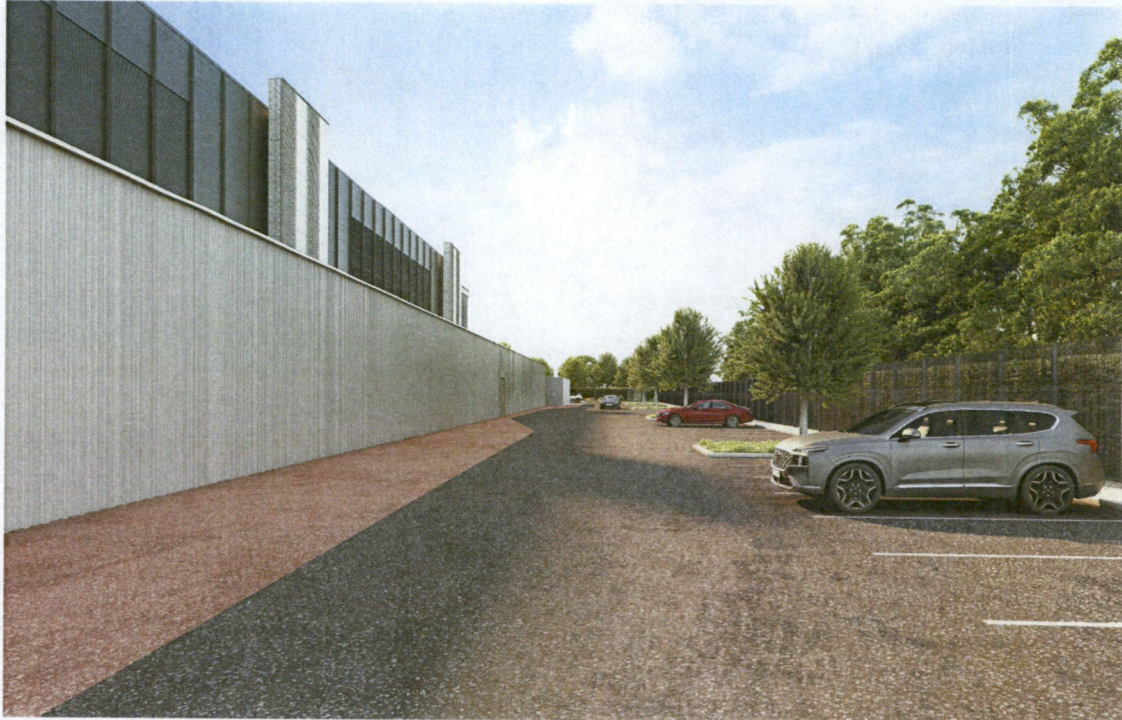


Figure 5 – View 15

View 15 – View of the area north of the DB8 Building with the wall to Emergency generators compound visible on the left, visitors car parking area in the centre and green hedge and row of trees screening the DC site from the Nangor Road.

VIEW 16



Figure 6 – View 16

View 16 – View of the OSPG compound from the south east.

VIEW 17



Figure 7 – View 17

View 17 – View of the southern elevation of the OSPG and substation within the compound. Substation and heat recovery plant in the centre foreground (dark grey). Vibrant shrubbery flanking the internal road.

In response to Item No. 6b, we refer to the Revised Compound Elevation Drawing No. DB080-RKD-ZZ-DR-A-ZZZZ-4242 prepared by RKD Architects. The correct orientation is now updated on the accompanying drawing.

We trust the above response adequately addresses Item No. 6.

7.0 Item No. 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.*

Applicant Response to Item No. 7:

In response to Item No. 7a, we refer to the accompanying report and Drawing No. DB080-PIN-00-ZZ-DR-C-PLAN-1295 Rev P04, prepared by Pinnacle Engineers. The report details the greenfield run-off rate calculations for each surface water catchments associated with the proposed development. We note that the OSPG falls under 2 no. catchments (Catchments 08 and 09) which form part of the wider network comprising a total of 11 catchments, granted under SDCC Ref. SD21A/0186. Perimeter planting will contribute

to surface water drainage also. We can confirm that the rates were calculated in accordance with the IH124 method.

The catchment area measures 1.96ha. The Standard Average Annual Rainfall (SAAR) equates to 754mm at this location. The soil value is indicated as 0.30 for each of the catchment areas. We refer to Pinnacle's response (Appendix A – CFI Response Letter Dated 24th February 2022) for more information relating to the Greenfield Run-Off Calculations, Hydraulic Network Calculations and Met Eireann Rainfall Data.

We refer to the greenfield run off rate calculations contained in the accompanying Drawing No. DB080-PIN-00-ZZ-DR-C-PLAN-1295 Rev. P03 prepared by Pinnacle Engineers.

Qbar Calculation
Using IOH Report 124 for Sites < 25 km²

Catchment Name
DB8 - PLOT 100 PROFILE PARK, DUBLIN

Estimation of QBAR from IOH Report 124 for catchments less than 25 km² using the 3 variable equation

$Q_{bar} = 0.00108 \cdot (AREA)^{0.85} (SAAR)^{1.17} (SOIL)^{2.17}$

SITE AREA =	2.68	Ha	Overall Redline Area
CATCHMENT AREA =	1.96	Ha (excl. Public Open Space)	Overall Catchment Area (Hectares) For catchments < 50 hectares in area, flow rates are linearly interpolated for smaller areas.
AREA =	0.020	km ²	Area of the Catchment (km ²)
SAAR =	754	mm	Standard Annual Average Rainfall (mm)
SOIL =	0.30		
M5 ₅₀ =	16.8	mm	Soil index value (SPR) calculated from Flood Studies Report Vol V Fig 1.4.1B(1) - The Classification of Soils from Winter Rainfall Acceptance Rate.
M5 _{2DAY} =	61.9	mm	
R=(M5 ₅₀ /M5 _{2d}) =	0.27		

Soil Type Expressed as a Percentage	Soil 1	Soil 2	Soil 3	Soil 4	Soil 5
	0	100	0	0	0
SOIL Value	0.15	0.30	0.40	0.45	0.50

Flood Return Event	Growth Factor	Permitted Flow (l/s)
1	0.85	3.3
QBAR	1	3.9
10	1.67	6.5
30	2.1	8.2
50	2.33	9.1
100	2.6	10.1
200	2.85	11.1
1000	3.5	13.6

QBAR from Site with Factorial Error Allowance

r ² =	0.847
n =	71
fse =	1.651
Q _{bar} =	6.42 l/s

(With Allowance for the standard factorial error)

Pro-rata based on 50 Ha Site area to calculate Qbar

Q _{bar} =	0.00004	cumecs/Ha	Q _{bar} =	2.0	l/s/Ha
Q _{bar(rural)} =	3.9	l/s			

Catchment Characteristics			
DB8 - PLOT 100 PROFILE PARK, DUBLIN	Area (m ²)	Runoff Coeff.	Effective Area (m ²)
Roofs & Balconies - Type 1 (Draining to gullies)	-	1.00	0.0
Roofs - Type 2 (Draining to SUDS Soakaway features)	3,072	0.90	2764.8
Green Roofs	-	0.85	0.0
Roads and Footpaths - Type 1 (Draining to gullies)	-	0.80	0.0
Roads and Footpaths - Type 2 (Draining to Suds features)	8,845	0.70	6191.5
Paved Areas	-	0.80	0.0
Permeable Paving	9,790	0.70	6853.0
Grass over Basement	-	0.70	0.0
Parks (contributing)	-	0.30	0.0
Public Open Space (non-contributing)	-	0.00	0.0

Include Public Open Space in Effective Catchment Area? NO Assumed open space area does not drain to surface water network.

Effective Catchment Area 15809.3 m²

Effective Catchment Runoff Coefficient 0.81

Figure 8 – Extract of Qbar Calculations

We refer to Drawing No. DB080-PIN-00-ZZ-DR-C-PLAN-1207 Rev P04 and DB080-PIN-00-ZZ-DR-C-PLAN-1295 Rev. P04 prepared by Pinnacle Engineers. In total, there are 5 No. flow control devices and for clarity, these are located at Manhole Ref. No.'s SWMH 3.1, 5.1, 6.2, 13.2, and 14.1. Table 1 below is provided for ease of reference.

Surface Water Manhole	Run-off Rates and Levels		Surface Water Manhole	Run-off Rates and Levels
SWMH3.1	HYDROBREAKSET AT MAX 0.6 l/s CL 74.530 IL 73.010		SWMH13.2	HYDROBREAK SET AT MAX 1.9 l/s CL 74.530 IL 73.010
SWMH 5.1	HYDROBREAKSET AT MAX 0.2 l/s CL 75.050 IL 72.900		SWMH14.1	HYDROBREAKSET AT MAX 1.0 l/s CL 73.400 IL in 72.800 IL out 72.000
SWMH 6.2	HYDROBREAKSET AT MAX 0.2 l/s CL 74.40 IL 72.670			

Table 1 –Run-Off Rates for each Flow Control Device

The overall Qbar calculation, including for the Qbar calculations of each individual catchment, have been included within Appendix A of Pinnacles FI Response Letter. The overall site QBar is 3.9l/s (greenfield run-off rate 2l/s/Ha) and the total site surface water drainage will be restricted to this discharge rate. Please also refer to the CFI Response letter dated 24 February 2022, as contained within Appendix A, which describes the overall sites hydraulic, drainage, SUDS features and storage requirements.

No additional attenuation storage elements are required for the proposed OSPG development as they have already been incorporated into the drainage system and attenuation pond permitted under parent permission SDCC Ref. SD21A/0186.

The OSPG will drain by pipes, gully’s and channels towards the central pond where storage capacity for a 1:100yr storm event + 20% climate change has already been catered for. The central pond provides a storage volume of circa 756m3 and is adequately sized to cater for this development, particularly as this application area was considered as being 100% hardstanding under the aforementioned granted application and now, as can be seen, this area consists largely of concrete plinths and gravel type surfaces - refer to Drawing. Nos DB080-PIN-00-ZZ-DR-C-PLAN-1207 Rev. P04 & DB080-PIN-00-ZZ-DR-C-PLAN- 1295 Rev. P04.

We note that the FI response was discussed between Pinnacle Engineers and SDCC Water Services Section on 1 September 2022.

In response to Item No. 7b, we note that a Flood Risk Assessment was prepared by Pinnacle Engineers in respect of the parent permission SDCC Ref. SD21A/0186 which included the OSPG proposal. Please find attached flood risk assessment included in Appendix B of Pinnacle’s FI Response Letter. The assessment concludes the site has a low level of coastal or fluvial flood risk.

The site is located in excess of 15km from the nearest point on the Irish coast. In terms of the potential for fluvial flooding, no rivers run through the site. A dry ditch is located along the southern site boundary. The peak water level (as taken from CFRAMS mapping) is between 72m and 74.5m. The lowest finished floor level of the OSPG is set 75m, in excess of the highest known 1:1000 year floor level.

On the basis of the above, the level of flood risk on site is extremely low. Increased finished floor levels, SUDs measures including swales, attenuation ponds, permeable paving and hydrobrake mechanisms mitigate against potential flood risk.

We conclude that permission was granted for the parent permission under SDCC Ref. SD21A/0186 and all flood risk considerations have been assessed as part of the parent and subject application.

We trust the above response adequately addresses Item No. 7.

8.0 Item No. 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 subthreshold 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.

Applicant Response to Item No. 8:

In response to Item No. 8, we refer to the updated EIAR Screening Statement prepared by Malone O'Regan and Cumulative Air Quality Assessment prepared by Awn Consulting for more information.

Summary of Findings from the Updated EIAR Screening Report

The EIA Screening Assessment report includes a review of the potential for the Proposed Data Centre Equinix DB8, Power Generator and associated works at Profile Park, Co, Dublin to be considered as an EIA development.

All proposed and permitted development within Profile Park have been assessed and the proposed development when considered cumulatively, would not result in significant effects on the environment. We refer to the Summary of Findings from the Cumulative Air Quality Assessment below for more information.

Based on the findings of the EIA screening assessment, the Proposed Development does not require a mandatory EIAR, nor does it meet the criteria where a sub-threshold EIA would be warranted. There is no requirement to submit an EIAR in support of the planning application for the proposed development.

Summary of Findings from the Cumulative Air Quality Assessment

We refer to the Cumulative Air Quality Assessment prepared by Awn Consulting. The results indicate that ambient ground level concentrations are in compliance with the relevant air quality standards for NO₂ for all scenarios modelled.

“Under the USEPA methodology NO₂ emissions associated with the cumulative assessment of the DB8 gas generators, standby diesel generators, as well as the existing IED licenced sites, and other neighbouring proposed and operational data storage and energy centre facilities in the vicinity of the site are in compliance with the air quality standards. Emissions under this scenario lead to an ambient NO₂ concentration that is 73% of the ambient 1-hour limit value (measured as a 99.8th percentile) and 89% of the ambient annual mean limit value at the worst case off-site receptor for the worst case year.

The UK Environment Agency assessment methodology determined that in the worst-case year, the DB8 gas generators, standby diesel generators, as well as the existing IED licenced sites, and other neighbouring proposed and operational data storage and energy centre facilities in the vicinity of the site, could operate for a maximum of 3,500 hours before there is a likelihood of an exceedance of the ambient air quality standard (at a 98th percentile confidence level). In addition, the UK guidance recommends that there should be no running time restrictions placed on standby generators which provide power on site only during an emergency power outage.

In summary, impacts on ambient air quality associated with both the gas generators and the standby diesel generators at the site will be in compliance with the ambient air quality standards which are based on the protection of the environment and human health.”

We trust the above response adequately addresses Item No. 8.

9.0 Item No. 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.

Applicant Response to Item No. 9:

In response to Item No. 9, we refer to the Draft Ministerial Direction issued by the Minister of State at the Department of Housing, Local Government and Heritage. The Minister's recommendation made to him by the Office of the Planning Regulator under Section 31AM(8) of the Planning and Development Act 2000 (as amended), has notified South Dublin County Council of his intention to issue a Draft Direction to the South Dublin County Development Plan 2022-2028.

Section 31(4)(c) of the Planning and Development Act 2000, states:

*“(c) those parts of the plan that by virtue of the issuing of the notice under this subsection **shall be taken not to have come into effect**, been made or amended under subsection (6)”*

In this instance, the use class for data centre shall revert to ‘open for consideration’ under the EE zoning for the site. All applications should be considered on a case-by-case basis.

We reiterate that permission already exists on the site for a data centre development – SDCC Ref. SD21A/0186 refers. In the absence of a grid connection from EirGrid, an alternative on-site gas powered generator is required to power the permitted facility.

We note that our client, the Applicant, has made a submission on the draft ministerial direction 23 August 2022.

In accordance with Section 31(8) of the Act:

“No later than 4 weeks after the expiry of the period referred to in subsection (7)(b), the chief executive shall prepare a report on any submissions or observations received under subsection (7)(c) which shall be furnished to the elected members of the planning authority, the Office of the Planning Regulator and the Minister.”

We understand the Chief Executive of SDCC made a recommendation to Councillors on the 20 September 2022 on the Ministerial Direction, eliminating any possibility of the Council bringing a high court challenge.

The Chief Executive's report will be submitted to the OPR for consideration and it is likely that data centre use will revert to being ‘open for consideration’.

We trust the above response adequately addresses Item No. 9.

7.0 Conclusion

The Applicant has made every attempt to address all items raised as part of the Request for Further Information and we trust that the Planning Authority will duly consider this submission in full in their assessment of the revised scheme.

Overall, the subject proposal delivers a high quality development on this commercially zoned site located at the entrance to Profile Park.

It is our considered opinion that the proposal now submitted addresses all concerns raised by the Planning Authority and we are of the view that any potential issues that may arise following consideration of this submission can be appropriately addressed by condition.

We request that this cover letter is read in conjunction with all drawings and reports accompanying this response, as outlined in the table above.

We trust that the Planning Authority will look favourably on the proposed development and grant permission for the proposal as appropriate.