

MARSTON

PLANNING CONSULTANCY

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

Our Ref: 21047

7th November 2022

Re : Planning and Development Act 2000-2022 and the statutory regulations (as amended). Application by Vantage Data Centers DUB11 Ltd. for development for the demolition of the two storey dwelling (207.35sqm) and associated outbuildings and farm structures (348.36sqm); and the construction of 1 no. two storey data center with plant at roof level and associated ancillary development that will have a gross floor area of 12,893sqm at this site of 3.79 hectares to the south of the New Nangor Road (R134); and on land within the townlands of Ballybane and Kilbride within Profile Park, Clondalkin, Dublin 22.

Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin, D18 T3Y4 are instructed by Vantage Data Centers DUB11 Ltd. to make the above application to South Dublin County Council. The application forms the second phase of this campus development following the applicant's recent purchase of the new part of the site.

The application is for a data center development with a gross floor area of 12,893sqm that will be located on land to the immediate east of the site that was subject of the permission for 2 no. two storey data centers and a Multi Fuel Generation Plant (MFGP) that was granted on the 19th July 2022 by South Dublin County Council under SDCC Planning Ref. SD21A/0241. The principles that were established under this permission on the adjacent site have been extended to the application site; and have been updated to reflect the new policies and objectives of the recently adopted South Dublin County Development Plan 2022-2028 that came into effect in August of this year.

In accordance with the new policies of the Plan the application has been made in accordance with the various policies and objectives of the new Plan, but particularly Policy EDE7, Objective 2; Green Infrastructure policies and objectives; good design principles as well as long established principles of visual screening of the development from the surrounding public domain. In accordance with these and other policies and objectives the application is informed by a Flood Risk Assessment; SUDs drainage; energy statement; GI plan and many more that provides the Planning Authority with a comprehensive response to its new policies as set out under its Plan.

Prior to outlining these in more detail and also policy at a National and Government level relating to data centres, energy and climate change; it is important to set out the nature and extent of this application. The description of the proposed development as set out within the public notices is as follows:

"We, Vantage Data Centers DUB11 Ltd. are applying for permission for development at this site that includes a two storey residential property on lands to the south of the New Nangor Road (R134), Dublin 22; and on land within the townlands of Ballybane and Kilbride within Profile Park, Clondalkin, Dublin 22 on an overall site of 3.79hectares.

The development will consist of the demolition of the two storey dwelling (207.35sqm) and associated outbuildings and farm structures (348.36sqm); and the construction of 1 no. two storey data center with plant at roof level and associated ancillary development that will have a gross floor area of 12,893sqm that will consist of the following:

- 1 no. two storey data center (Building 13) with a gross floor area of 12,893sqm. It will include 13 no. emergency back-up generators of which 12 will be double stacked and one will be single stacked within a compound to the south-western side of the data center with associated flues that each will be 22.316m in height and 7 no. hot-air exhaust cooling vents that each will be 20.016m in height;
- the data center will include data storage rooms, associated electrical and mechanical plant rooms, loading bays, maintenance and storage spaces, office administration areas, and plant including PV panels at roof level as well as a separate house generator that will provide emergency power to the admin and ancillary spaces. Each generator will include a diesel tank and there will be a refuelling area to serve the proposed emergency generators;
- The data center will have a primary parapet height of 14.246m above ground level, with plant and screen around plus a plant room above at roof level. The plant room has an overall height of 21.571m;
- Construction of an internal road network and circulation areas, with a staff entrance off Falcon Avenue to the east, as well as a secondary vehicular access for service and delivery vehicles only across a new bridge over the Baldonnell Stream from the permitted entrance as granted under SDCC Planning Ref. SD21A/0241 from the south-west, both from within Profile Park that contains an access from the New Nangor Road (R134);
- Provision of 60 no. car parking spaces (to include 12 EV spaces and 3 disabled spaces), and 34 no. cycle parking spaces;
- Signage (5.7sqm) at first floor level at the northern end of the eastern elevation of the data center building; and
- Ancillary site development works, will include footpaths, attenuation ponds that will include an amendment to the permitted attenuation pond as granted to the north of the Baldonnell Stream under SDCC Planning Ref. SD21A/0241, as well as green walls and green roof. The installation and connection to the underground foul and storm water drainage network, and installation of utility ducts and cables, that will include the drilling and laying of ducts and cables under the internal road network within Profile Park. Other ancillary site development works will include hard and soft landscaping that will include an amendment to the permitted landscaping as granted under SDCC Planning Ref. SD21A/0241, lighting, fencing, signage, services road, entrance gates, and sprinkler tanks."

1. Overview

This application forms the second phase of the development of this overall site, which has been expanded following the recent purchase of land, following the grant of permission made for data centres and the MFGP on the site to the immediate west of the Proposed Development site that was granted permission under SDCC Planning Ref. SD21A/0241.

Full detail of this permission is set out under section 5 of this report. It is important to note that the MFGP permitted under the 2021 application, as granted by SDCC, was sized to provide power to the Proposed Development. We can also confirm that the applicant has received and executed a grid connection agreement with Eirgrid that allows for the long-term primary supply of electricity to serve the Proposed Development, will come from the national grid with the on-site MFGP, feeding the national grid.

The need for the already permitted MFGP, is that Eirgrid have stipulated under the Data Centre Connection Offer Process and Policy 2019 (DCCOPP) that in order for a data center to receive a firm grid connection, it must install on-site generation to the requested firm capacity. This is the function of the MFGP in relation to the Proposed Development. Eirgrid have stipulated that the power generation from the already permitted MFGP must be capable of running continuously for an extended period of time not limited by fuel reserves.

This application is made following the making of the South Dublin County Development Plan 2022-2028 that came into effect on the 3rd August 2022. The zoning of the lands when the adjacent permission was made has not changed, and the site remains zoned for enterprise and employment purposes (EE).

However, for the first time data centres were identified as a specific land use under the County Development Plan. The status of data centres within the EE zoned lands, on which this application is located, has been subject to significant debate and consideration by both the Planning Authority and its members, and recently the Office of the Planning Regulator (OPR) and the Minister for Local Government and Planning (Minister).

At the time of making the County Development Plan, it identified data centres as not permitted on EE zoned lands. However, that is not the case at the time of making this application. The above designation of data centres under the EE zoning led to the Minister following a recommendation by the OPR issuing a draft

Direction to the Council on the 29th July 2022. This Draft Direction is currently subject to a public consultation process. In accordance with Section 31(4) of the Planning and Development Act 2000 (as amended), the implication of the Draft Direction is that those parts of the South Dublin County Development Plan 2022-2028 referred to in the notice (which in part relates to the status of applications for data centres within EE zoned lands) shall be taken to have not come into effect. The draft Direction is deemed to have immediate effect and its terms are considered incorporated into the plan (and so it removes the Council's zoning classification) under Section 31(6) of the PDA 2000.

The implications of this, is that the application for a data centre on these lands should be considered as being open for consideration under the EE zoning, which was their status under the Draft Plan. The details of this are set out clearly within section 6 of this report.

2. Summary of pre-application consultations

A pre-planning meeting (Ref. PP061/22) was undertaken on the 21st September 2022 with the Planning Authority prior to the lodgement of this application. The meeting included representatives of the Planning, and Roads/Transportation, Parks, Sanitary Services and Heritage Departments. The relevant issues discussed during the course of the pre-planning meeting are addressed within this report and the accompanying application documents.

In addition, the relevant environmental specialists have liaised directly and independently with statutory bodies (including the Water Services and Parks Departments of SDCC, Irish Water, Eirgrid, ESB, NPWS, and the Department of Defence etc.) by correspondence during the course of the preparation of the application and EIA Report. This has included consultation and the issuing of an Aviation Impact Assessment to the Property Management Branch of the Department of Defence. A similar assessment was requested under SDCC Planning Ref. SD21A/0241, and the current submission includes an air quality assessment, aviation wildlife impact assessment and a glint and glare assessment to inform the Department of Defence of the aviation impact of the proposed development. The Department requested that an Aviation Impact Report is undertaken at planning stage and this accompanies the application.

3. Compliance with Statutory Regulations

The plans and particulars which accompany this application have been screened by reference to the Planning and Development Regulations 2001 (as amended), as set out below.

- The Site Location Map has been prepared on an OS base to a scale of 1:2,500 for the application. An Ordnance Survey Datum local benchmark is indicated on the Map. The application site is outlined in red on this map. Other land in the control or ownership of the application is outlined in blue. The OS map indicates the location of all six site notice locations.
- The Proposed Site Layout Plan is to a scale of 1:500, and indicates the location of the application site in relation to the surrounding environment. Relevant features (such as buildings, trees and roads) adjoining or in the vicinity of the application site are all shown. The drawing indicates the roof plan of the proposed and adjacent permitted data centre as granted under Planning Ref. SD21A/0241, and other buildings.
- An Existing Site Layout Plan is to a scale of 1:500, indicates the existing site and the dwelling and outbuildings to be demolished.
- A Permitted Site Plan at a scale of 1:500 indicating the application site in the context of the Permitted Development also accompanies this application.
- As per article 22(2)(iv), the site notice positions (6 no.) are shown clearly on the Site Location Map. These positions are conspicuous and meet the requirements of article 19(1)(c) as they are located at the existing main vehicular and pedestrian entrance to the site from a public road, and at the site itself fully in accordance with Article 19 of the Regulations.
- All other statutory plans, elevations and sections, unless otherwise stated, are drawn to scales of not less than 1:200, in accordance with Article 23(1)(b) and (2) of the Regulations. This ensures that a detailed level of information is provided to the Planning Authority to enable their full assessment of the application.

- The proposed floor and roof plans and elevations for the buildings are indicated on drawings submitted with the application. These drawings show the levels pertaining to the site. Floor levels are shown on all plans, sections and elevations of the proposed development. All levels are relative to Ordnance Survey Datum.
- The principal dimensions including height of the different elements of the proposed development and the site are indicated on the plans, elevations and sections as lodged with this application in accordance with article 23(1)(f).
- All drawings are clearly coloured and marked to distinguish the proposal, in accordance with article 23(1)(e).
- The contiguous elevations (from Falcon Avenue and Nangor Road) are produced at a scale of 1:400 on A0 paper, which was agreed with Sarah Watson of the Planning Department prior to the making of the application (see Appendix B).
- All OS mapping is appropriately identified in accordance with article 23(1)(g).
- The north point is indicated on all relevant maps and plans in accordance with article 23(1)(h).
- The newspaper notice appeared in the Irish Daily Star, and which is recognised as an appropriate newspaper for a planning application in this area.

The legal interest of the applicant in making this application is fully set out in the application package. The planning application fee of €38,000 has been paid in advance and a receipt for its payment is included within Appendix D of this report.

4. Site analysis

The Proposed Development is to be located on a site of c. 3.79ha. on a primarily greenfield site within the Profile Park Business Park. The net site area when part of the application site that includes part of the Nangor Road and Falcon Avenue are removed is 3.2ha.. The site includes a two storey property that is located to the south of, and abounding the New Nangor Road, Dublin 22 (see below). There are three outbuildings and sheds that are located to the rear of this property and these are clearly shown on Drawing no. A100 prepared by Hyphen Archi Ireland Ltd.. The existing property and associated outbuildings are proposed to be demolished as part of the Proposed Development.

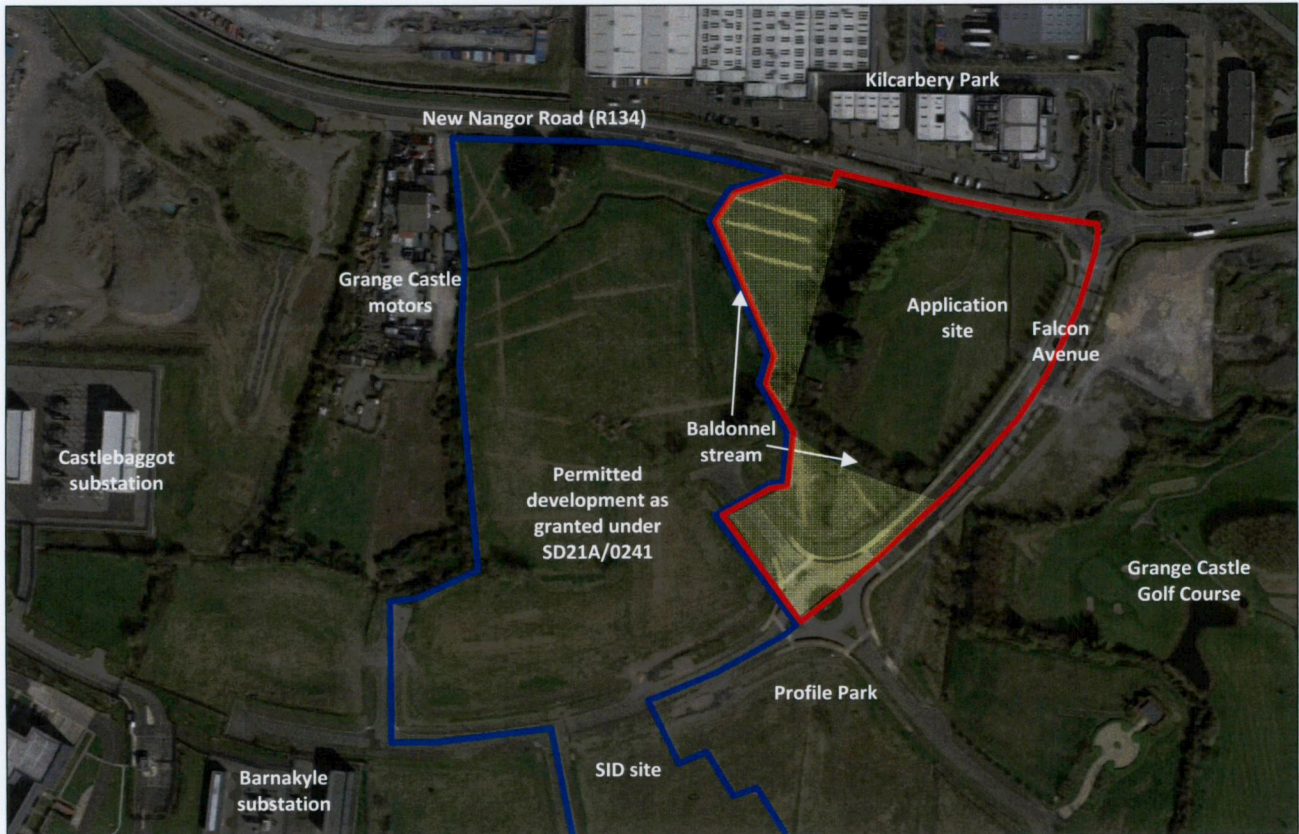


View to south from Nangor Road with two storey house to be demolished and boundary with site applied for under Planning Ref. SD21A/0241 on right, and substantive tree line to the east of the house on the left

The southern of the structures to be demolished is located to the immediate north of the Baldonnell Stream that passes across the southern part, and extends along part of the western boundary of the application site where the site of the current application overlaps with the site applied for under the permission as granted under Planning Ref. SD21A/0241. The Baldonnell stream flows in a south-east to north-west direction, across the site. It enters the site through a culvert under Falcon Avenue at the south-east corner of the site.

The northern boundary with the New Nangor Road remains semi-rural in form. The site is bound by the recently realigned New Nangor Road (R134) to the north with further industrial development (Kilcarbery Park and other developments) to its north that includes the Microsoft data centre campus; by Falcon Avenue and further lands within Profile Park to the east and south; and by the site of the permitted data centre development and MFGP as granted under Planning Ref. SD21A/0241, to the west.

The existing site has three access points that are to the existing house and a field entrance off the Nangor Road to the north, and another off Falcon Avenue to the east of the site. The site is relatively flat at generally between 72m and 74m Above Ordnance Datum (m AOD) with the lowest part of the site being towards the north-west of the application site. It is notable that the road levels along Falcon Avenue and Nangor Road are generally above the site at around 75m AOD.



Aerial view of Proposed Development site in context (source: Google Earth) with overlap with site subject to permission granted under Ref. SD21A/0241 shaded in cream

There is approximately 260m of hedgerow within the application site, and these are located along the western boundary of the residential property, and to the immediate north of the Baldonnel Stream, where it cuts across the southern part of the application site. There is a linear group of trees that defines the boundary between the existing house with the green field to its east. There are mature trees along the alignment of the Baldonnel Stream and the western boundary of the house. There are also a line of category A trees along the eastern boundary of the site alongside the estate road of Falcon Avenue within Profile Park.



View to south-west from the north-east corner of the site, with the two storey house in right background concealed by its associated tree line and further trees towards the south along the Baldonnel stream and east of the site along Falcon Avenue also shown

Large areas of the surrounding lands to the south and north within the Grange Castle Business Park and Profile Park have been developed in the past 10-15 years and are occupied by industrial campuses including pharmaceutical, data centres and food manufacturing uses. The closest occupied residential property is located c. 160m north-east of the north-east corner of the site along the New Nangor Road adjacent to the Circle K petrol filling station. The overall site is located between the N4 and N7 national primary roads and is served by a road network that has recently undergone an upgrade as well as Falcon Avenue within Profile Park that provides access into this part of the Business Park from the New Nangor Road.

Planning history of the adjacent site

The first phase of the development of this campus, prior to our clients acquiring the lands subject to the current application, was lodged on the 31st August 2021. The originally applied for application was described in the planning notices as follows:

The development will consist of the demolition of the abandoned single storey dwelling and associated outbuilding (206sqm); and the construction of 2 no. two storey data centers with plant at roof level of each facility and associated ancillary development that will have a gross floor area of 40,589sqm that will consist of the following:

- *1 no. two storey data center (Building 11) that will be located to the south of the site and will have a gross floor area of 24,667sqm. It will include 22 no. emergency generators located at ground floor level within a compound to the western side of the data center with associated flues that will be 22.3m in height;*
- *1 no. two storey data center (Building 12) that will be located to the north of the site, and to the immediate north of Building 11 and will have a gross floor area of 12,915sqm. It will include 11 no. emergency generators located at ground floor level within a compound to the western side of the data center with associated flues that will be 22.3m in height;*
- *Each of the two data centers will includes data storage rooms, associated electrical and mechanical plant rooms, loading bays, maintenance and storage spaces, office administration areas, and plant including PV panels at roof level as well as a separate house generator for each facility that will provide emergency power to the admin and ancillary spaces. Each generator will include a diesel tank and there will be a refuelling area to serve the proposed emergency generators;*
- *The overall height of each data center apart from the flues and plant at roof level is c. 14.23m above the finished floor level;*
- *Construction of internal road network and circulation areas, with main entrance off Falcon Avenue to the south, as well as a secondary vehicular access off Legacy Drive to the south-west, both from within Profile Park; footpaths, provision of 144 no. car parking spaces, and 66 no. cycle parking spaces;*
- *single storey step-up substation (38sqm) as well as 2 no. single storey switch substations (121sqm);*
- *AGI Gas Regulator compound that include 3 no. single storey buildings (134sqm)*
- *construction of a gas powered generation plant in the form of a 13m high single storey building with a gross floor area of 2,714sqm that will contain 10 gas generators with associated flues that will be 25m in height, and grouped in pairs and threes. The Gas Plant will be located to the west of Building 11;*
- *Ancillary site development works, that will include reorientation of the Baldonnell Stream, biodiversity management initiatives, attenuation ponds and the installation and connection to the underground foul and storm water drainage network, and installation of utility ducts and cables, that will include the drilling and laying of ducts and cables under the internal road network within Profile Park. Other ancillary site development works will include hard and soft landscaping, lighting, fencing, signage, services road, entrance gates, sprinkler tanks and pump room; and*
- *A temporary gas powered generation plant within a fenced yard containing 21 no. generator units in containers, each with associated flues (each 25m high), 12 transformers and 10 containers of controls to be located to the west of, and associated with the first phase of Building 11, and will be required for a period of up to 2 years if connection to the national grid is delayed. This temporary plant will not be built if the connection to the national grid is in place prior to the operation of Building 11.*

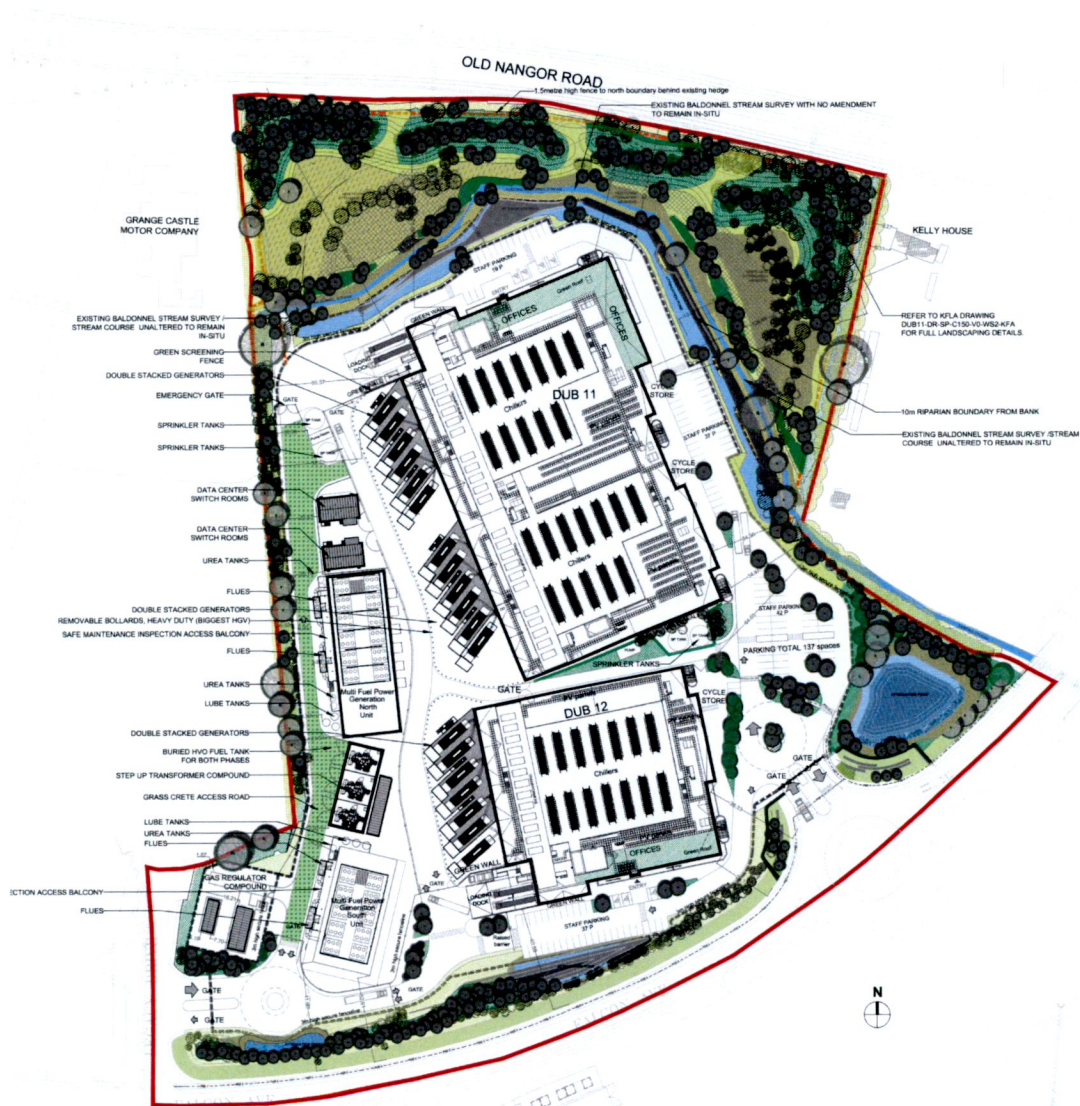
The development will be accessed from Falcon Avenue and Legacy Drive from within the Profile Park Business Park that contains an access from the New Nangor Road (R134)."

The application was subject to an extensive Additional Information (AI) request on the 28th October 2021. The AI request raised a number of issues relating to the power demand of data centers and their impact on

the national grid; as well as macro policies relating to Energy and Climate Action. A comprehensive response to the AI request was made to the Planning Authority on the 21st March 2022.

A number of changes were made to the layout of the proposed development as part of the AI response. The revised master planning layout for the site enabled the applicant to retain the stream in its current alignment with the data centers now being located to the south and west of the existing stream. The revised layout also repositioned the main buildings on the site.

This revised layout resulted in Building 11 being relocated to the north so that its further animated north and north-east elevation, that contains its office component, faces the New Nangor road (the same approach has been adopted under the current application); and that Building 12 was relocated to the south so that its southern and south-east elevation faces onto Falcon Avenue. This change also required a slight realignment of the data centers so that they do not sit in a north to south alignment. Building 11 was aligned in a north-west to south-east alignment; which aided the focussing of the animated elevations towards the New Nangor Road to the north when viewed from all directions; it also enabled the emergency generators (which were double stacked) to be hidden; and had a double height screen to the north.



Permitted Site Layout Plan under Planning Ref. SD21A/0241 as amended at AI stage (Drawing no. A105 under current application)

The changes pushed the most northern data center (Building 11) a significant distance away from the public road and enabled the retaining of a 10m riparian strip either side of the existing alignment of the Baldonnell stream.

These changes to the overall proposed site layout plan required additional flood and surface water attenuation that was incorporated within the wider design with a revised landscaping design ensuring that the

good principles of the screening and biodiversity gains proposed under the original application were further enhanced under the AI response (see above permitted layout).

SID application

A separate planning application has been lodged by our clients with An Bord Pleanála under the Strategic Infrastructure Development (SID) legislation for a 110kV GIS substation and 2 no. underground transmission lines on lands to the immediate south of the above application, and also within the Profile Park Business Park. The substation and connections into the national grid have already been agreed with Eirgrid. The SID application was lodged to An Bord Pleanála on the 17th February 2022, and its determination is currently delayed due to the backlog of cases with the Board (ABP Ref. ABP-312793-22).

5. Description of the Proposed Development

The Proposed Development is to develop one no. two-storey data centres and ancillary elements with a gross floor area of 12,893sqm. In order to facilitate the proposed development it is proposed to demolish the two storey dwelling (207.35sqm) along the New Nangor Road, Clondalkin, Dublin 22 and its associated 3 no. outbuildings (348.36sqm). The description under the statutory notices is provided on page 1 and 2 of this report.

The design and form of the data centre will utilise many of the changes undertaken, and accepted as part of the permission that was granted under Planning Ref. SD21A/0241 in terms of the DUB12 building, as well as the elevation treatment of the block that will be visible from the public domain that was introduced and accepted by the Planning Authority for DUB11 at its north-eastern elevation.

The two storey data center will be known as DUB13 and will have a gross floor area of 12,893sqm and will contain plant at roof level, and will include 13 no. emergency back-up generators of which 12 will be double stacked and one will be single stacked within a compound to the south-western side of the data center. Each of these emergency back-up generators will have associated flues that will be 22.316m in height that are aligned along the south-west elevation of the proposed data center. The generator compound also contains 7 no. hot air exhausts cooling vents that will screen the generator compound from the south-west, and each will be 20.016m in height.

The proposed data center will include data storage rooms, associated electrical and mechanical plant rooms, loading bays, maintenance and storage spaces, office administration areas, and plant including PV panels as well as a green roof above the admin block, at roof level as well as a separate house generator that will provide emergency power to the admin and ancillary spaces. The data center will have a primary parapet height of 14.246m above ground level, with plant that has a screen around it plus a plant room at roof level. The plant room has an overall height of 21.571m.

Vehicular access to the Proposed Development will be directly off the existing spur on Falcon Avenue from the east, via security gates, that will serve as the staff entrance and provide access to the 60 no. car parking spaces. The car parking provision is considered to be sufficient and is at an appropriate level of spaces based on the level of staffing along with maintenance contractors and visitors for the proposed data centres. The ratio of car parking is similar to that permitted under Planning Ref. SD21A/0241.

The Proposed Development will also be served by a secondary vehicular access for service and delivery vehicles, that will extend from an internal roundabout within the Permitted Development site as granted under Planning Ref. SD21A/0241 that will extend across the Baldonnell Stream to connect into the proposed new internal road network and circulation areas that will facilitate HGV and service access around the proposed data center.

Of the 60 car parking spaces, 12 spaces, 20% of the total parking spaces, will be dedicated Electric Vehicle (EV) charging point spaces in line with section 12.7.5 of the County Development Plan. The remainder of the spaces will be constructed to be capable of accommodating future charging points to allow the rapid future installation of additional EV charging points as adoption increases. Of the total number of car parking spaces, 5% of the spaces (3 no.) will be allocated as disabled spaces.

The proposed development includes a total of 34 no. covered bicycle parking spaces, located in 2 no.

clusters) to the north of the Proposed Development. The bicycle parking provision is considered appropriate and adequate to encourage the use of active transit modes by staff accessing the site.

The Proposed Development will also include a single sign (5.7sqm) to be located at first floor at the northern end of the eastern elevation of the data center building. The Proposed Development also includes ancillary site development works that will include footpaths as well as installation and connection to the underground foul and storm water drainage network, and installation of utility ducts and cables that will include the drilling and laying of ducts and cables under the internal road network within Profile Park.

The Proposed Development will include an amendment to the permitted attenuation pond as granted to the north of the Baldonnell Stream under SDCC Planning Ref. SD21A/0241 that is located to the immediate west of the application site; as well as a further attenuation pond and other SUDS measures, including the use of permeable paving measures wherever possible to ensure compliance with the *South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide, 2022* as required under section 12.11.1(ii) of the South Dublin County Development Plan 2022-2028. Further details in relation to such matters are provided in the Engineering Planning Report by Pinnacle, and Landscape report undertaken by Kevin Fitzpatrick Landscape Architecture, that accompanies this application.



Proposed Site Layout Plan (Excerpt from Drawing no. A106 under current application)

The Proposed Development will include hard and soft landscaping that will include an amendment to the permitted landscape plan as permitted under SDCC Planning Ref. SD21A/0214. This revision requires the remodelling of the landscape berm to the north-west of the site along the Nangor Road, to facilitate the creation of the attenuation pond to its immediate south. The revised berm will be 4.15m in height with a higher berm to the immediate north of the Proposed Development that will reach a height of 5.63m, with a gabion retaining structure to its south. Lower berms are proposed to the east of the Proposed Development that will be c. 2.5m in height. All bunds will be extensively planted with rows of mature planting that will be between 4.5m and 5.5m in height. To mitigate the loss of the 260m of hedgerow to the west and towards the south of the site, it is proposed to create a new hedgerow along the north, east, south and western boundaries of the site that will provide a strategic Green Infrastructure corridor that will link new habitats around the Proposed Development site as well as connecting to existing Green Infrastructure on adjacent sites.

The Proposed Development will be enclosed by a 3m high security fence on the inside of the landscape berming that will not be visible from the public domain. A lower 1.5m high fence will bound the site, to the rear of the new hedging to the north and around the southern attenuation pond.

The site will include lighting that has been designed and modelled to ensure no light spill to impact upon bat foraging routes, both existing and new, in accordance with:

- Guidance Notes for the Reduction of Obtrusive Light GN01 (Institute of Lighting Professionals, 2020);
- Bats & Lighting - Guidance Notes for Planners, Engineers, Architects and Developers (Bat Conservation Ireland, December 2010); and
- Bats and Lighting in the UK – Bats and the Built Environment Series (Bat Conservation Trust UK, January 2018).

The design of the buildings has been carefully considered by the Project Architects in order to complement the adjoining land uses. High quality, durable materials and finishes are proposed throughout, as illustrated within the Architectural Drawing pack and Design Statement. The massing of the buildings has been broken down through the use of vertical panel elements as well as the use of the external staircases for green walls in the form of vertical planting, as well as green walls along the eastern elevation.

Power

We can confirm that the applicant has received and executed a grid connection agreement with Eirgrid. The long-term primary supply of electricity will come from the national grid infrastructure with the on-site power plant, which is permitted as a Multi-Fuel Generation Plant (MFGP), feeding the national grid. The Permitted MFGP is sized to serve the Proposed Development as well as the data centers that were permitted under Planning Ref. SD21A/0241.

Eirgrid have stipulated under the Data Centre Connection Offer Process and Policy 2019 that in order for the Proposed and Permitted Development to receive a firm grid connection, it must install on-site generation to the requested firm capacity. This formed the basis for the scale and need for the MFGP under the permission as granted under Planning Ref. SD21A/0241.

The permitted MFGP is required by Eirgrid as the applicant must install on-site dispatchable generation to get a connection to the national grid and Eirgrid have stipulated that this generation must be capable of running continuously for an extended period of time not limited by fuel reserves or the number of hours. It is notable that no other renewable or storage technology can provide this on a non-intermittent basis. This is the function of the already permitted Multi-Fuel Generation Plant.

The installation of the already permitted MFGP will support the resilience of the grid through the provision of flexible and dispatchable generation into the national grid thus meeting one of the key requirements of the CRU in their recently published document of the 23rd November 2021 "*Direction to the System Operators related to Data Centre grid connection processing*".

By already permitting a MFGP available at scale at the immediate point of demand, this actually reduces the requirement for future grid reinforcements and relieves constraints in the locality. The new Climate Action Plan 2021 also recognises the need for a diversified portfolio of generation up to 2030 and beyond in order to deliver grid stability and system services arising from increasing renewable energy penetration.

High efficiency multi-fuel power plants (such as has been permitted in this instance), along with storage and interconnection are recognised as contributing to this solution and facilitating greater levels of renewables as a manner in which to supplement the transition to renewables as the mainstay of Ireland's energy supply.

There has also been a lack of new conventional generation being added to the grid over the past decade. This is why the need for Gas plants / Multi-Fuel plants form part of the Government strategy in the short to medium term to bridge the gap to a more renewable energy supply in 2030. By bringing new flexible generation to the point of demand, not only does this ease grid constraints, it will also provide much needed flexible capacity on the grid to facilitate the increased level of renewables aspired to in the Climate Action Plan 2021.

6. Assessment of the application having regard to the policies and objectives of the South Dublin County Development Plan 2022-2028

The South Dublin County Development Plan is the statutory planning document that covers the entire South Dublin administrative area. The Plan was adopted in June 2022 and came into effect on the 3rd August 2022, prior to the making of this application.

The data center element of the Proposed Development is to be located within an area zoned EE (Enterprise and Employment) under the County Development Plan. The zoning Objective EE seeks: *"To provide for enterprise and employment related uses"*.

The status of data centres within the EE zoned lands has been subject to significant debate and consideration by both the Planning Authority, and recently the Office of the Planning Regulator and the Minister for Local Government and Planning.

The Office of the Planning Regulator recommended to the Minister in a letter dated the 19th July 2022, to issue a Direction under section 31 AM(8) of the Planning and Development Act 2000 (as amended) to reinstate the data centre use class as an 'open for consideration' use within the EE zoning. The Draft Direction from the Minister to South Dublin County Council was issued on the 29th July 2022.

This Draft section 31 Direction issued in late July is deemed to be included within the adopted Development Plan as per section 31AN (11) of the Planning and Development Act 2000 (as amended). This application is therefore made on the basis that a data centre is an open for consideration use under the EE zoning.

Open for consideration uses are defined as:

"Land uses that are listed as 'open for consideration' in the land use zoning tables may be acceptable to the Planning Authority subject to detailed assessment against the principles of proper planning and sustainable development, and the relevant policies, objectives and standards set out in this Plan.

Proposed uses in this category will be subject to full assessment on their own merits and particularly in relation to their impact on the development of the County at a strategic and a local level. Such uses may only be permitted where they do not materially conflict with other aspects of the County Development Plan."

It is pertinent as the use is now considered as being open for consideration under the EE zoning, to also consider it in relation to the other policies and objectives of the County Development that are relevant in this instance. These relate to compliance with Policy EDE7, and particularly Objective 2 under that Policy; employment policy; and green infrastructure policies as follows:

i. Compliance with Policy EDE7

The new Plan recognises the need for Space Extensive Land Uses, such as data centres, to be located at appropriate locations having regard to infrastructural, transport and environmental considerations as well as the need for orderly growth (Policy EDE7). These same principles are replicated as a requirement under section 12.9.4 of the Plan. The Proposed Development fully complies with Objective 1 of this Policy as it is located outside of the M50. Whilst the site is accessible by public transport the capacity of such services are not such that would warrant a higher density employment use on the site. We respectfully submit that the Proposed Development is therefore fully in accordance with Objective 1 of this Policy.

Objective 2 of this policy sets out a list of requirements that space extensive enterprises need to demonstrate, as follows:

“To require that space extensive enterprises demonstrate the following:

- *The appropriateness of the site for the proposed use having regard to EDE7 Objective 1;*
- *Strong energy efficiency measures to reduce their carbon footprint in support of national targets towards a net zero carbon economy, including renewable energy generation;*
- *Maximise onsite renewable energy generation to ensure as far as possible 100% powered by renewable energy, where on site demand cannot be met in this way provide evidence of engagement with power purchase agreements (PPA) in Ireland;*
- *Sufficient capacity within the relevant water and wastewater and electricity network to accommodate the use proposed;*
- *Measures to support the just transition to a circular economy;*
- *Measures to facilitate district heating or heat networks where excess heat is produced;*
- *A high-quality design approach to buildings which reduces the massing and visual impact;*
- *A comprehensive understanding of employment once operational;*
- *A comprehensive understanding of levels of traffic to and from the site at construction and operation stage;*
- *Provide evidence of sign up to the Climate Neutral Data Centre Pact.”*

We have already set out the reasons behind why and how the application is fully in accordance with the first objective. The following sets out how the applicant is meeting the requirements of Objective 2 of this Policy EDE7.

Strong energy efficiency measures to reduce carbon footprint

Energy efficient measures starts at site selection, where the applicant focuses on building orientation to maximise opportunities from the prevailing wind direction and reducing solar gain. This is followed by the design and construction of highly efficient data center campuses yielding industry leading Power Usage Effectiveness (PUE) and low water use - measured as Water Usage Effectiveness (WUE). We can confirm that the applicant has committed to achieving net zero carbon emissions by 2030 and are creating interim reduction targets that are in alignment with the Science Based Target Initiative (SBTi) methodology. The overall design has introduced energy efficiency measures that are detailed within the Energy Statement prepared by Burns and McDonnell Engineering Company Inc. that accompanies this application. Further details in terms of the applicants approach to climate change and energy efficiency is provided in Appendix C of this document. We can confirm that the applicant is committed to driving emission reductions across all of its activities through investment in technology; sourcing renewable energy, wherever possible; and in funding carbon removal projects. At the Dublin campus, energy efficiency measures have been integrated into the design as outlined in the attached energy statement.

The MFGP is designed to be able to run on up to 20% hydrogen mix from the gas grid once it becomes available. This is so the applicant can future proof the site and take advantage of cleaner fuels as they become available. Sourcing renewable energy is a key enabling strategy to meeting the applicant’s global net zero goals.

Maximise onsite renewable energy generation

The application cannot, due to the unreliability and intermittency of renewables as a permanent source of power, be permanently powered by renewable energy generation. There is also insufficient land on the site to accommodate sufficient onsite renewable energy generation, for example a 1MW solar farm, which would provide less than 2% of the energy consumption of the facility would require 1.2 hectares. In order to maximise onsite renewable energy generation, the already permitted MFGP, which is scaled to serve the Proposed Development, has capacity to be fuelled by either HVO (Hydrotreated Vegetable Oil) or natural gas.

The MFGP is sized in accordance with the new policy of the CRU and DCCOPP, to provide onsite energy production that will supply and reinforce the national grid that will ensure the security of supply of electricity to the wider national grid if and when required; irrespective of the demand on power of the permitted and proposed data centers of this campus. The permitted Plant is scaled to ensure that it has capacity to dispatch energy equivalent to, or greater than the data centers demand into the national grid.

The permitted MFGP is designed to enable it to utilise a wholly renewable fuel source in operating continuously and solely on Hydrotreated Vegetable Oil (HVO), a second generation biofuel, in the short-term; and also enables HVO to provide a back up to the MFGP to be fuelled by a wholly renewable fuel source in the longer term.

By providing the already permitted MFGP available at scale at the immediate point of demand, this actually reduces the requirement for future grid reinforcements and relieves constraints in the locality. This is fully in accordance with the Climate Action Plan 2021 that recognises the need for a diversified portfolio of generation up to 2030 and beyond in order to deliver grid stability and system services arising from increasing renewable energy penetration.

High efficiency multi-fuel power plants (such as has been permitted in this instance), along with storage and interconnection are recognised as contributing to this solution and facilitating greater levels of renewables as a manner in which to supplement the transition to renewables as the mainstay of Ireland’s energy supply.

By bringing new flexible generation to the point of demand, not only does this ease grid constraints, it will also provide much needed flexible capacity on the grid to facilitate the increased level of renewables aspired to in the Climate Action Plan 2021. In addition the Proposed Development contains a number of PV panels at roof level to generate on site renewable electricity to be compliant with nZEB “Nearly Zero – Energy Buildings” requirements and Part L of the Building Regulation in accordance with the requirements of section 12.10.1 of the County Development Plan.

The applicant will be the final operator of the data center, and therefore they will procure energy that is 100% certified as being Renewable Energy Guarantees of Origin (REGO) from the selected utility. Additionally, most customers will procure renewable energy through corporate PPA’s to cover their energy use within the facility. The applicant is committed to reducing carbon emissions and procuring carbon-free energy whenever possible.

The applicant conducted an assessment of various technologies for on-site generation under the previous application, with the results below:

	INPUT	LAND	TECHNOLOGY	OUTPUT	DCCOPP	Rank
	Fuel	Power Density	Maturity	Intermittency	Compliance	
Solar Farm	Yellow	Yellow	Green	Yellow	Red	4=
Solar Roof	Yellow	Red	Green	Yellow	Red	5
Onshore Wind	Green	Red	Green	Yellow	Red	4=
Energy from Waste	Red	Yellow	Yellow	Green	Green	3
HVO	Yellow	Green	Green	Green	Green	1
Hydrogen	Red	Yellow	Red	Green	Green	4=
Fuel Cell	Yellow	Yellow	Yellow	Green	Green	2

The different technologies were assessed against the following five criteria, in terms of Green (High) to Red (Low) as follows:

1. Input (Fuel Risk) – is the source of the fuel / no. of hours of sun / wind sufficient to generate power for 8,760 hours a year? Is there potential supply chain risks?
2. Land (Power Density) – what is the m² / MWp of the technology? Is a large amount of land required to generate sufficient power?
3. Technology (Maturity) – can the technology be considered bankable and reliable? Has there been sufficient operational hours of the installed base?
4. Output (Intermittency) – can the technology generate 24 / 7?
5. DCCOPP (Compliance) – would the technology be considered intermittent by Eirgrid?

This assessment indicated that the three most viable technologies were:

- Hydrotreated Vegetable Oil (HVO) – a second generation biofuel
- Fuel Cells: powered by natural gas – a solid oxide based technology
- Energy from Waste – technologies such as Pyrolysis or Gasification

The ability to utilise energy from waste was rejected due to the risk of sourcing sufficient tonnage of black bag waste, which was considered to be significant in the medium to long-term.

The applicant also considered the potential of fuel cells, but these were rejected on the basis that the technology was not sufficiently mature to be considered bankable. Additionally, they run on natural gas and selecting this technology would have limited future flexibility to run on increasing levels of biomethane / hydrogen supplied by GNI.

HVO fuel is more expensive than red diesel but has a much lower carbon footprint and emissions are significantly reduced. It can also be used in existing generator technology without modification. The applicant will use HVO as the secondary fuel requirement for the MFGP with 3 days of on site storage and will also look to move the back-up generators from diesel to HVO as well.

The applicant is currently actively pursuing the possibility of virtual PPA's where they work with a renewable energy developer to commit to buying a portion of power that has been generated from a renewable source that is located in another region (i.e. offsite). Where they are able to source suitable renewable energy, due to the volatile nature of green energy supply, the applicant targets a maximum of 20% green energy penetration if possible. The applicant is also investigating how the MFGP plant and the need for HVO supply can encourage the investment of an HVO depot in Ireland to supply not just the permitted facilities but the wider data center sector as a whole. All these measures ensure that the maximum onsite renewable energy generation is achieved, and that PPA are sought and encouraged wherever possible.

Sufficient capacity

We can confirm that the applicant has received and executed a grid connection agreement with Eirgrid. The long-term primary supply of electricity will come from the national grid infrastructure with the on-site MFGP feeding the national grid. Eirgrid have stipulated under the Data Centre Connection Offer Process and Policy 2019 that in order for the data centre to receive a firm grid connection, it must install on-site generation to the requested firm capacity, which the permitted MFGP achieves. The Proposed Development therefore obtains sufficient capacity by means of its grid connection and the MFGP.

The applicant also has a gas connection agreement from Gas Networks Ireland (GNI) to supply the permitted MFGP.

We can also confirm that the applicant has a Confirmation of Feasibility from Irish Water in respect of connecting into both the foul sewer and for water supply (Ref. no. CDS22006869) (Please refer to Appendix D of the Engineering Planning Report by Pinnacle Consulting for further details).

Measures to support the just transition to a circular economy

A technical note undertaken by Ramboll, on how the Proposed Development seeks to support the transition to a Circular Economy, accompanies this application. It sets out the key aims and objectives for both the applicant and other stakeholders of lowering embodied carbon; conserving resources; sustainable material sourcing; designing to eliminate waste; and the design for disassembly.

Measures to facilitate district heating

In accordance with section 12.10.3 of the South Dublin County Development Plan 2022-2028, the design re-uses the heat produced by the systems in the building. The waste heat from the data modules will be used to heat the administration office areas, assisted by heat pump technology. The return water from the data modules cooling process will be used to maximize the efficiency of the water sourced heat pump used for the admin block heating system.

However, the heat load of the site's integrated office areas is a very small percentage of the energy that is available from the Data Centre's cooling process heat rejection systems, and thus the chilled water system

can also offer the potential to reject heat into a local heat network should there be a local demand in the future.

To ensure that the system has the flexibility to connect into such a system whilst also maintaining a live data centre, valved and capped off connections will be provided on return water risers, ready for future connection to a district heating network.

Space has been allocated for a dedicated plantroom for the provision of plate heat exchangers. This would facilitate the future connection of flow and return district heating pipework from outside the site. The source side would be connected to the return line of the chilled water circuit serving data hall spaces. The user side would connect into the district heating network.

There is adequate space below ground to route the future pipework from outside the site to the site boundary, from where it will be routed to the district heating plantroom. It is intended to install pipework in the ground from the site boundary to the site plantroom to facilitate the connection to the critical chilled water loop on the roof and eliminate the risk of intrusive works in the future to allow the heat recovery connection.

The above provisions would allow the supply of heat energy to a future district heating scheme developed by others, external to the site boundary. At present there are no available projects within reasonable proximity to the site location for connecting this potential low grade heat energy, however, provision is made only in design and would need to be installed later should this become a requirement in the future. This ensures that the Proposed Development is fully in accordance with section 12.10.2 Low Carbon District Heating Networks and section 12.10.3, Energy from Waste of the County Development Plan. Further details are provided in the Energy Statement that accompanies this application.

High quality design

The design of the data center is predicated on the experience and precedent that was accepted under Planning Ref. SD21A/0241. The administrative element, and an increased level of fenestration is located at the northern end of the eastern elevation and along the eastern end of the northern elevation to reflect its visibility from the roundabout along the Nangor Road at the entrance into Profile Park. The highest element of the Proposed Development are the flues that are associated with the back-up generators that are located to the south-west of the data center, and will therefore only be visible from distant views. The plant at roof level is also significantly set-back by 12m from the western elevation; by over 10m from the northern elevation; and 17m from the eastern elevation (to the rear of a green roof). These significant set-backs help to reduce the visual scale and massing of the building. In addition vertical shaded cladding elements are provided to the north and east elevation (that face Nangor Road and Falcon Avenue that help to create a higher end finish to the data center.

In addition, it is proposed to provide vertical planting to each of the mesh rain screens around the external staircases at the north-west corner, and eastern end of the northern elevation; as well as in front of the delivery bay to the east of the generator yard. In addition a green wall is proposed in front of part of the eastern elevation.

The high quality design and plan approach is reflected and outlined in the Design and Access Statement that accompanies this application. This outlines the context of the area, and how the Proposed Development will connect into the existing public realm, and is being undertaken at an appropriate building height (similar to that already granted permission under Planning Ref. SD21A/0241), as well as including detail on materials, colours and textures that were accepted by the Planning Authority under the 2021 application fully in accordance with section 12.5.2 of the County Development Plan.

The architects have also taken a universal design approach as required under section 12.5.1 of the County Development Plan. This ensures adequate disabled car parking spaces, and a level of access into the site, and the Proposed Development that caters for all.

The Proposed Development includes contiguous elevations and photomontages of the proposed development in the context of the adjoining permitted development as granted under Planning Ref. SD21A/0241.

The Proposed Development has had full regard to the density and building height of the adjacent permitted development and other surrounding developments in formulating its design in accordance with section 12.5.3 of the County Development Plan. These are further detailed in the accompanying Design and Access Statement undertaken by Hyphen Architects that accompanies this application.

We note the provision of section 12.8.6 of the County Development Plan in which non-residential development proposals greater than 5,000sqm are required to incorporate a physical artistic feature into the scheme to improve the built environment / public realm. We respectfully submit that the application includes high quality features and landscaping that will significantly enhance the public realm and the Green Infrastructure of the site. Given the quality of the scheme, and its location, we would question the appropriateness to provide a work of public art at the only public boundary of this site along the northern boundary of the site. Irrespective of the quality of that it would, in our considered opinion, lead to an ad-hoc feature that would detract from the quality of the landscaping along this boundary.

The applicant is willing to contribute towards the commissioning of a public piece of art that could enhance a public amenity such as the Grand Canal, or a public amenity within the Clonburris SDZ. The applicant is willing to contribute €10,000 towards this artwork above the significant development contribution that would be applicable if permission is granted.

The application through its massing and design, and use of materials has provided a scheme that complies with the objectives of the Plan under its various QDP policies and objectives. These are again addressed under the Design and Access Statement submitted with the application as well as the various photomontages that are provided within Volume 2 of the EIAR.

Employment once operational

The data center, once operational will generate the equivalent of 45 full time jobs as well as support services, with the overall campus, with that permitted under Planning Ref. SD21A/0241 providing employment for c. 180 employees across a range of employment activities, as well as sustaining a range of support services in the data center industry. The colocation nature of the applicant means that it provides further incentive to IT companies to establish in Ireland in accordance with national government policy.

Levels of traffic during construction and operational phases of the development

The details in relation to the level of traffic that the construction and operational phase of the Proposed Development are fully set out within Chapter 7 of the EIAR undertaken by Ramboll that accompanies this application. This concludes that the peak demolition and construction period would be in 2024 with a maximum of 156 demolition and construction vehicle movements per day. The effects of the demolition and construction traffic would be temporary, medium, negative and not significant. The proposed development would be fully operational in 2025 and is anticipated to generate a maximum of 59 vehicle trips per day, and its impact is not considered to be significant on the surrounding road network.

Climate Neutral Data Centre Pact

We can confirm that Vantage Data Centers are signatories of the Climate Neutral Data Centre Pact. We refer the Planning Authority to www.climateneutraldatacentrepact.net that identifies that Vantage Data Centers are a signatory fully in accordance with this element of this objective.

Compliance with Policy EDE7 Objective 3

In accordance with Objective 3, the landscape design has focused on protection and enhancement of the existing biodiversity value on site. The stream corridor is protected and strengthened with new ecological corridor connections consisting of woodland, wetland, meadow and hedgerow habitats. (Refer to drawings 0462_101_Landscape Masterplan, 0462_103_Planting Plan and 0462_105_GI diagram) These indicate how the proposed and retained biodiversity and landscape features will integrate into the green infrastructure network in accordance with the Green Infrastructure Strategy as set out under Chapter 4 of this Plan. Further details are provided within the Biodiversity Management Plan and landscape details submitted as part of this application.

ii. Compliance with employment policies

In accordance with Policy EDE1, Objective 6 the proposal will undertake the following to ensure compliance with the four objectives of this policy as follows:

- The Proposed Development will result in an increase in employment densities at an appropriate level that reflects the location and access to public transport services. The application site would not be an appropriate location currently to absorb higher density of employment as it would encourage car based traffic as opposed to travel to the site via public transport;
- A Workplace Travel Plan undertaken by Ramboll in consultation with the applicant and in accordance with section 12.7.3 of the County Development Plan, accompanies this application. The Plan sets out a set of objectives, targets and measures that promote walking, cycling and use of public transport. This would include the creation of a Travel Plan co-ordinator with the Proposed Development once it is operational, to reduce car usage and maximise more sustainable methods, including car sharing, of workers getting to the Proposed Development. It would generate a full Mobility Management Plan to be implemented within 6 months of the commencement of the operation of the Proposed Development;
- As outlined the Proposed Development will source power from renewables, wherever possible, and is designed so that it is future proofed to facilitate connection to a district heating system, if one becomes available; and
- The Proposed Development will include significant native tree planting and creation of new hedgerows around the perimeter of the Proposed Development site. This will result in a net green infrastructure gain within the site, and will significantly improve and contribute to the established and permitted green infrastructure network in this party of the County.

The Proposed Development with its positive approach to green walls, and landscape treatment throughout the site, will deliver a high quality development at the entrance to Profile Park that will encourage employers and workers alike to work in this location, and deliver a significant improvement to the public domain. The implementation of a Travel Plan, to become a Mobility Management Plan, will also promote workers to use more sustainable travel modes creating safer roads and an improved local environment fully in accordance with Policy EDE3, Objective 5.

The Proposed Development is located on lands that are appropriately zoned, and are located adjacent to bus services that are located within 150-300m of the proposed staff entrance into the Proposed Development site. The most frequent bus service along this route is the no. 13 bus that operates at a frequency of circa every 15 minutes, and its position to such a good quality bus service must lead the Council to conclude that the Proposed Development is fully in accordance with Policy EDE4, Objective 4 of the County Development Plan.

The Proposed Development has also had regard to Table 12.27 as set out in section 12.9.2 of the County Development Plan.

<p>Access and Movement</p>	<p>The proposed staff parking is located to the north-east and east of the proposed data center that with the landscaping berms and planting will ensure that it is not visible from the public realm or from within Profile Park. The parking is also sub-divided into three areas to aid its integration into the site. The proposed development also includes 34 covered cycling spaces towards the north-east of the site, and includes a pedestrian link to the already permitted development site to the west. The location of the Proposed Development is positioned to maximise accessibility to public transport and use of cycling infrastructure due to the closeness of the nearest bus stop and excellent off-road cycling infrastructure in the area.</p>
<p>Open Space and Landscape</p>	<p>A detailed Landscape Plan accompanies the application that sets out that important natural features, wherever possible will be retained and reinforced, and that new planting will be of native species that link into existing and permitted GI assets. The 3m high security fencing is located to the rear of the landscape screening of the site, with a 1.5m fence located to the rear of the new hedgerow along the single public domain to the north of the site along the Nangor Road. The fencing will not be visible from the public domain. The landscape design will maintain the parkland like setting established on adjacent sites that will provide a high quality landscape setting along Nangor Road.</p>
<p>Green Infrastructure</p>	<p>As outlined in the following section of this report, the application includes full details in relation to Green Infrastructure provision and how it will connect into the GI network in accordance with</p>

	section 12.4.2 of the Plan.
Built Form and Corporate Identity	The scale of the Proposed Development is reflective of the southern data center granted permission under the adjacent site to the west under Planning Ref. SD21A/0241, and with landscaping proposed so that it fully integrates with the already permitted landscaping on the site to the west. The finishes and materials as well as the approach to incorporating the most aesthetically pleasing elevation to the north-east of the site, is the same that was proposed and accepted under the above permission on the site to the west. The proposed single signage is positioned to be visible but is simple in design form that does not detract from this animated elevation.

iii. Compliance with Green Infrastructure and Development Management policies and objectives

The Proposed Development has sought to demonstrate under this application how it will positively contribute to the protection and enhancement of Green Infrastructure (GI) in the County. In accordance with this a green infrastructure plan (Drawing no. 105 prepared by Kevin Fitzpatrick Landscape Architecture) indicates how the green infrastructure of the proposal will integrate with surrounding Green Infrastructure. Section 3 of their Landscape Report sets out in detail how the proposed development complies with the various Green Infrastructure objectives of the new County Development Plan.

It is notable that the site is not located within a defined riparian corridor as identified under Map 13 of the County Development Plan. It is also notable that the stream is not identified on Figure A 4.1 Green Infrastructure Strategy Map for the County. Irrespective of this, the approach of the design team is to protect and enhance the stream as a GI asset, and to connect it into other surrounding GI corridors in accordance with the principles of section 12.4.2 of the County Development Plan.

The approach of the design team has been to protect and strengthen the stream and its riparian corridor under the proposed landscape scheme by upholding the 10m corridor on either side of the stream. This enables the existing narrow corridor to be widened with the planting of additional native trees, hedgerow and meadow along its length. The Proposed Development will therefore create enhanced ecological corridors that will create pathways for wildlife into the nearest designated GI corridors to the west and east, as well as adding an amenity to the setting of the Proposed Development within Profile Park.

In accordance with the requirements of section 12.4.2 of the Development Plan a Green Infrastructure Plan and Landscape Master Plan drawings are submitted with this application by Kevin Fitzpatrick Landscape Architecture (Drawings 101 and 105). The GI Plan indicates how the Proposed Development will link into the surrounding GI network.

The following table provides a breakdown of existing hedgerow, length of hedgerow to be removed, and length of new hedgerow; and therefore the net hedgerow and net tree gain on the Proposed Development site.

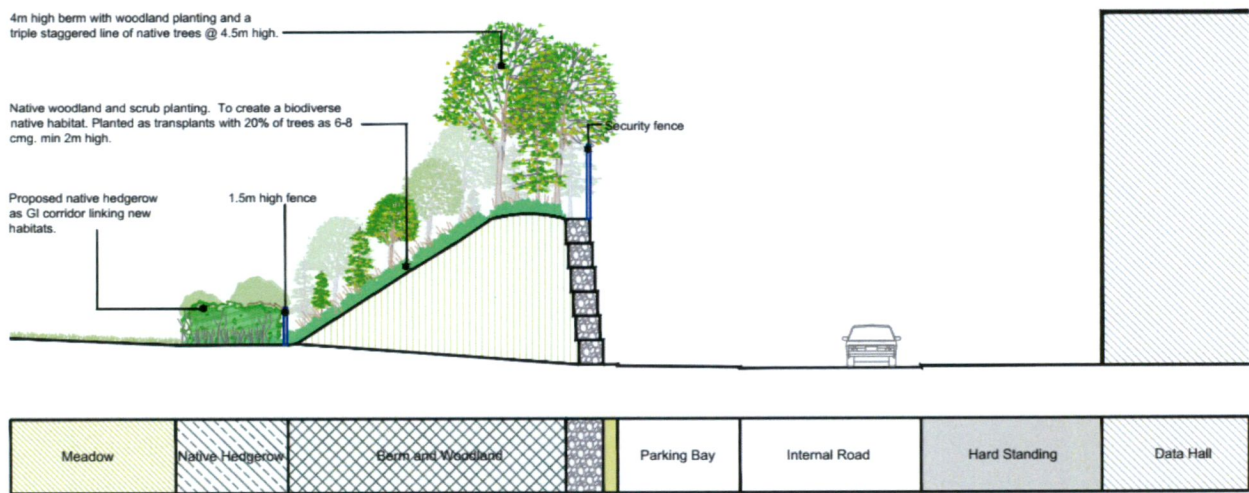
	Existing	To be removed	New planting	Net gain
Hedgerow	260m	162m	470m	308m
Trees	130 trees	72 trees	897 trees	825 trees

In addition, there will be c. 4,449 transplant young trees that will be planted that will be at a height of 100-120mm throughout the site, and it is clear that there will be a significant net hedgerow and tree cover gain as a result of the Proposed Development.

The GI Plan is informed by an Arboricultural Impact Assessment by TreeSpace of the quality of the existing hedgerow and trees. Whilst 162m of the 260m of hedgerows on site are to be removed some of these contain non-native species and are of low quality, and will be replaced with 470m of native hedgerows along the northern New Nangor Road; eastern boundary along Falcon Avenue, and to the north of the Baldonnel stream. Full details of the new planting are provided as part of the landscape package provided by Kevin Fitzpatrick Landscape Architecture (KFLA). This provides a fully detailed Planting Plan of all trees and hedgerows within the Proposed Development site (Drawing no. 103 by KFLA)

The approach to Green Infrastructure within the site will ensure that the highest possible biodiversity provision is secured for the overall development of the site in accordance with Policy NCBH11, Objective 3. The GI Plan (Drawing no. 105) indicates the key links that the proposed new planting will provide in linking the green infrastructure proposed with the surrounding green infrastructure that contribute positively to the biodiversity and landscape character as well as the overall amenity of the area in accordance with Policy NCBH11, Objective 4 of the County Development Plan. We refer the Planning Authority to section 4.0 of the Landscape Report that outlines how the Proposed Development complies with the various objectives under Policy GI2 of the County Development Plan.

The landscape approach in providing berms, mature native planting of new hedgerows and planting, are aimed at both providing wildlife and biodiversity corridors around the site that will connect with existing planting and hedgerows that form surrounding green infrastructure, but also will provide a natural screen to the Proposed Development, even at year 1 of operations. The berm to the north of the data center will include a retaining wall that enhances the screening of the development (see below).



The landscape plan accompanying this application proposes heavy landscaping throughout with initial tree planting being in rows of three at c. 4.5m height across the landscape berms. The maturity of the trees within a short timeline will aid the visual integration of the Proposed Development within this commercial area. The following are excerpts from View 7 and 8, with additional growth to the mature landscape planting shown to indicate the further visual screening of the site within 5 years of planting.



View 7 from north of Nangor Road to the north-west, with additional 5 years of growth beyond that indicated in the photomontages



View 8 from Nangor Road to the north-east, with additional 5 years of growth beyond that indicated in the photomontages

Existing hedgerows and other vegetation will be retained wherever possible and strengthened with native planting. This will create commuting and foraging corridors within the Proposed Development site for a range of fauna species that will connect into existing GI surrounding the site. This will be further aided by proposed bat boxes and bird boxes. All of these measures, will ensure that the Proposed Development fully accords with green infrastructure of the County Development Plan and provide a net biodiversity gain for the site.

Green space factor

A green space factor assessment of the Proposed Development was undertaken by the design team to ensure that it meets the minimum Green Space Factor for development on EE zoned land, which is 0.5. We can confirm as set out at the rear of this report that the net site of the Proposed Development site achieves a Green Space Factor of 0.6 fully in accordance with the requirements of the County Development Plan, and reflective of the appropriate and correct approach to the development of the site.

7. National and Regional Planning context

Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA) includes Regional Policy Objective (RPO) 8.25 which states the following:

“Local Authorities shall:

- *Support and facilitate delivery of the National Broadband Plan.*
- *Facilitate enhanced international fibre communications links, including full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland.*
- *Promote and facilitate the sustainable development of a high-quality ICT network throughout the Region in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.*
- *Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data storage facilities and associated economic activities at appropriate locations.*
- *Promote Dublin as a demonstrator of 5G information and communication technology.”*

The site is therefore considered to be an appropriate location for the development of data centres under this Strategy.

National Planning Framework

The National Planning Framework (NPF) was published in February 2018 setting out a vision for Ireland in land use and planning terms to 2040. The NPF replaced the National Spatial Strategy once it was adopted as the long term land use and planning vision for Ireland.

National Strategic Outcome 5 of the NPF relates to the creation of *“A Strong Economy Supported by Enterprise, Innovation and Skills”*. This strategic outcome is underpinned by a range of objectives relating to

job creation and the fostering of enterprise and innovation, and is reflected in the recent new Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy, as outlined below.

The following objective, relating to Information and Communications Technology (ICT) infrastructure (including data centres) is included under National Strategic Outcome 5:

"Promotion of Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities."

The NPF also states under National Strategic Outcome 5:

"Ireland is very attractive in terms of international digital connectivity, climatic factors and current and future renewable energy sources for the development of international digital infrastructures, such as data storage facilities. This sector underpins Ireland's international position as a location for ICT and creates added benefits in relation to establishing a threshold of demand for sustained development of renewable energy sources."

The NPF is favourably disposed to the location of ICT infrastructure in Ireland, and the Proposed Development, which comprises of such ICT infrastructure, is therefore considered to be wholly in accordance with this key body of national planning policy.

Government policy

We note that the Government issued a revised Statement on the Role of Data Centres in Ireland's Enterprise Strategy on the 27th July 2022. This document sets out "Principles for Sustainable Data Centre Development" which will inform applications for future data centre development over the coming years.

The Statement acknowledged that all demand for such development will not be capable of being accommodated, however, it also stated that:

"Data centres are core digital infrastructure and play an indispensable role in our economy and society. Data centres provide the foundation for almost all online aspects of our social and work lives, including video calling, messaging and apps, retail, banking, travel, media, and public service delivery such as healthcare and welfare."

The Government Statement provides a pathway towards new data centre development subject to the following considerations:

"Within the constraints of sectoral emissions obligations, these principles set out the positive role that data centres can play, subject to meeting the requirements set out under the applicable planning and grid connection processes."

The Proposed Development fully conforms to this objective of Government policy.

Climate Action Plan 2021

The applicant recognises the need to balance the demand for development with climate action and resilience that is reflected in both the Council's own Climate Action Plan 2019; as well as the recently published national Climate Action Plan 2021. This more recent Climate Action Plan has replaced the Climate Action Plan 2019, that contained Action 20 relating to data centers. A far broader policy approach now applies to data centers under Climate Action Plan 2021.

The policies and long term aims of Climate Action Plan 2021 are based on continuing to facilitate data centre development, subject to certain criteria, and future reviews, up to 2030. The Plan recognises, and takes account of the changes in demand for electricity over the next 10 years; and that this will alter the profile for demand and recognises that the forecast growth in data centers will represent a challenge to Ireland's emissions targets.

Government policy set out under the Climate Action Plan 2021, states that the strategy on data centers will be reviewed (section 11.1 – July 2022 document) to ensure that growth of such users can only happen in alignment with sectoral emission ceilings and renewable energy targets. Whilst the 2021 Plan identifies the potential for further regulatory measures to manage demand from data centers, in the context of climate

targets and future network needs; these do not currently exist. We respectfully submit that the County Development Plan, following the Ministerial Direction reflect this and requires data centre applications, such as this, to be considered on their individual merits having regard to Eirgrid and CRU policy but also the criteria set out under Policy EDE7 Objective 2 of the Plan. How the application has addressed this is set out on page 11 of this report.

8. What is Eirgrid's and the Commission for Regulation of Utilities (CRU) role in data centre development?

It is important that the Planning Authority are fully aware of all policy that are set out on a national basis for data centers. This already sets out significant restrictions and constraints, outside of the planning process, that govern the ability of a data centre to operate, with the main one relating to connections to the national grid.

Currently all Data Centre connections being offered by Eirgrid in the Dublin region are being offered on a flexible demand basis. Flexible demand is where the electrical load for a data centre must be reduced on instruction from Eirgrid under the Data Centre Connection Offer Process and Policy) DCCOPP, via the National Control Centre (NCC).

Eirgrid have also noted the following in relation to Data Centre Connections:

1. Flexible demand will be available to customers seeking to connect in constrained areas.
2. Capacity review to be performed following the annual T-4 capacity auction to determine if additional firm access can be made available.
3. Firm capacity will be provided for data centers where on-site dispatchable generation is made available to Eirgrid.
4. Connection offers are based on planning permission for a site and must line up with the capacity sought.
5. Flexibility will be allowed for MIC ramping in constrained areas.

These policies of Eirgrid are driving the need for on-site dispatchable generation on all data centre sites to ensure security of supply for the grid as a whole, until such time as transmission and generation capacity short-falls are addressed. This is provided to the Proposed Development by the permitted MFGP granted under Planning Ref. SD21A/0241.

Eirgrid have published plans to increase the available capacity on the grid by 50% by 2030 that takes into consideration both the existing number and expected future data centers that will come on stream during this period as well as the aim to move significantly towards more renewable sources of energy generation during the period to 2030.

Eirgrid have stipulated under the Data Centre Connection Policy 2019 that in order for a data centre to receive a firm grid connection, it must install on-site dispatchable generation to match its requested firm capacity. This is a critical point to consider when assessing any new application for a data centre. It means that the grid will not be negatively impacted by a proposed development.

Therefore, to get a connection to the national grid, the data centre must install on-site generation and Eirgrid have stipulated that this generation must be capable of running continuously for an extended period of time and not limited by fuel reserves. This is provided for the Proposed Development by the already permitted MFGP on the adjacent site.

Eirgrid offer to Vantage

We respectfully submit that in this instance the applicant is already in receipt of a connection offer from Eirgrid to connect the proposed development with the proposed substation (known as Kilcarbery) that is subject to a separate SID application by the same applicant, as is required under legislation, into the national grid. This offer was executed with Eirgrid on the 1st April 2021 in the full knowledge of the constraints within the Greater Dublin Area. This delivers a ramped connection that is planned to start in Q4, 2023 when it is intended that the first data center is expected to be in operation as permitted under Planning Ref. SD21A/0241. This current connection agreement provides an initial low import of power and then is ramped up to the final Maximum Import Capacity (MIC) over a number of years that covers the Proposed Development.

Given this was made following both the 'Data Centre Connection Offer Process and Policy' Document published in July 2019 by Eirgrid and the National Climate Action Plan 2019; it is only reasonable to conclude that the locational requirements and other criteria in place at the time, were considered to have been met, and remain in place for the positive consideration of this application.

Changing policy

It is without doubt that policy in terms of both climate change and data centers has significantly altered over the last few years. This has been incorporated within the publication of the National 'Climate Action Plan 2021' at the start of November 2021; and the publication on the 23rd November 2021 by the Commission for Regulation of Utilities (CRU) of their "Direction to the System Operators related to Data Centre grid connection processing (CRU/21/124)". This followed a period of uncertainty and press speculation in relation to the long term development of data centers in Ireland.

This was addressed in 2021 and 2022 by various Government policy statements. Government Policy on the security of electricity supply was issued in the Policy Statement on Security of Electricity Supply that is dated November 2021. This stated that it is a national priority to construct gas fired power plants to combat the squeeze on electricity supplies in the short to medium term. The Government Policy statement to Planning Authorities issued on the 10th December 2021 also highlights this and states that "the connection of large energy users to the electricity grid should take into account the potential impact on security of electricity supply and on the need to decarbonise the electricity grid".

These documents, with the July 2022 policy document, are the most up to date policy documents governing climate action and grid connections for data centers and power plants. Despite these Government Policy statements there remained uncertainty following statements by the Chief Executive of Eirgrid that it would not provide connection agreements for new data centre facilities in the Dublin Region until 2028.

However, this position was clarified just prior to Christmas 2021, in which Eirgrid stated that it would assess each data centre application to be located in the Dublin Region on a case by case basis, meaning it could be possible for new facilities to get Eirgrid approval in the years ahead. It should be noted that our client has a connection agreement with Eirgrid. This ties in with the CRU policy paper published in November 2021 – "CRU Direction to the System Operators related to Data Centre grid connection processing" that outlined it would be inappropriate to impose a moratorium on the construction of new data centre facilities. This position was validated by the July 2022 Policy Document.

There has been an investment in data centers by a wide range of companies since the 2000's within the South Dublin administrative area. Since then, these companies and others have grown their infrastructure, investment, and technical employee base here, making the cloud industry a leading employer and contributor to the Irish economy now and into the future. In 2018, an IDA study found that data centers contributed a total of €7bn in economic activity over the previous seven years and that there are more than 20,000 jobs (Cloud Infrastructure Ireland submission to the CRU) in the computer, electronics, and optical equipment sectors, which are largely supported by those operating data centre infrastructure here.

Our clients and other data centre operators have invested significantly in terms of cloud infrastructure that has enabled industries, governments, universities, and schools to seamlessly make the shift to the cloud in the past 2 years. Our client wishes to work with the Council, and the CRU, Eirgrid and ESB Networks in contributing positively to Ireland's renewable energy goal of 80% by 2030.

What is the CRU's role in energy policy and data centre connections?

The Commission for Regulation of Utilities (CRU) mission is to protect the public interest in Water, Energy and Energy Safety and one of their four strategic objectives is to deliver sustainable low-carbon solutions with well-regulated markets and networks. In their decision paper of the 22nd November, the CRU have confirmed that it will work with Eirgrid and ESB Networks, government and wider industry to facilitate the delivery of an electricity generation fleet that can meet Ireland's Climate Action Plan 2021 (CAP) target of up to 80% of electricity demand from renewable energy sources by 2030, whilst ensuring Ireland's energy needs are met. These targets align with the *National Development Plan 2021 – 2030* which commits to increasing the share of renewable electricity up to 80% by 2030.

The CRU in their decision paper have outlined criteria that both Eirgrid and ESB Networks will need to consider in assessing data centre connection applications to determine whether to make a connection offer. In this regard we note that the applicant already has an accepted Flexible Demand Connection Agreement with Eirgrid.

The Greater Dublin Area has been identified as a constrained region in terms of the national grid following the publication by Eirgrid of the '*Data Centre Connection Offer Process and Policy*' Document published in July 2019. However, as the fact that our client has an Eirgrid offer illustrates, there are projects that already have an offer from Eirgrid but have not as yet attained full planning permission.

Furthermore, it is clear that the objective is to ensure that any data centre development is scaled to ensure that it has capacity to dispatch energy equivalent to, or greater than the data centers capacity agreement with Eirgrid into the national grid, as the Proposed Development and Permitted Development achieve. This will provide security of power within the local and wider area that will have significant benefits in facilitating other developments in the local area with significant benefits to the local economy. In essence this policy ensures that any new data centre does not impact upon the national grid. This is the case under the current application and the already permitted MFGP.

These objectives also seek to ensure that a data centre operator has the ability to reduce its net consumption of energy from the national grid when requested to do so in times of systems constraint when power will be dispatched from the plant into the national grid. The objective will ensure that the Proposed Development with the permitted MFGP reinforces the national grid that will ensure the security of supply of electricity to the wider national grid if and when required.

9. Importance of data centers to the modern economy

It is not in contention that there are a number of data centre operators within the South Dublin administrative area. However, it is notable that the campuses are in a various state of completion in terms of the planning and development process. It is also notable that the data centers operate on different models, with some operating as co-location operators; managed serviced data centers; enterprise data centers; and cloud data centers. They provide, and are increasingly providing an important role within the wider economy.

Modern society means that everyone uses data in some form or another whether they are sending an email; shopping online, playing video games or just casually browsing social media. Every single aspect of that activity is saved online and stored in a data centre. Put simply the shift to working from home during the 2020 and 2021 pandemic, which is likely to continue post pandemic, could not have occurred without the availability of data centers. In essence they are the lifeline that keeps the modern economy working and the world connected.

10. Environmental Impact Assessment Report

The requirement for EIA for certain types and scales of development is set out in the EIA Directives (2011/92/EU and 2014/52/EU), European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (the bulk of which came into operation in September 2018), the European Communities (Environmental Impact Assessment) Regulations 1989-2006, Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001-2021. It should be noted that the EIA Report is prepared by Ramboll in accordance with the 2011 EIA Directive (2011/92/EU), as amended by the 2014 EIA Directive.

The EIA Directives list those projects for which an EIA is mandatory (Annex I) and those projects for which an EIA may be required (Annex II). With regard to Annex II projects, Member States can choose to apply thresholds or use case by case examination or a combination of both to assess where EIA is required. In Ireland, a combination of both has been applied.

The project proposed is not listed under Annex I EIA Directives and it is not above the relevant threshold as set out in the Planning and Development Regulations 2001-2022 for Annex II projects. The threshold for "*industrial estate development projects, where the area would exceed 15 hectares*" as set out in Part 2 of Schedule 5 of the Regulations was considered to be most relevant threshold in the context of the Proposed Development in the subject location. The Proposed Development site area does not meet this threshold and therefore an EIA Report is not statutorily required for the Proposed Development.

However, the scale and nature of the proposed development provides the potential for significant effects on the environment and the Applicant has therefore decided to undertake an EIA on this basis. We note that this has been the case for all data centers within the area. Accordingly, a formal EIA Screening exercise with SDCC was not deemed necessary.

The main objective of an EIA, as set out in Article 3(1) of the 2014 EIA Directive, is to identify, describe and assess the direct and indirect significant impacts of a project on population and human health, biodiversity, land, soils, water, air & climate (including noise), material assets, cultural heritage and the landscape and the interaction between the aforementioned factors. The EIA Report reports on the findings of the EIA process and informs the Planning Authority, statutory consultees, other interested parties and the public in general about the likely effects of the project on the environment.

11. Appropriate Assessment

A screening report has been completed for the Proposed Development, as required under the Habitats and Birds Directive (92/43/EEC and 79/409/EEC) and is included as a stand-alone report undertaken by Scott Cawley, Consulting Ecologists. This document forms part of the application. The AA screening process has identified that seven European sites lie within 15km of the Proposed Development; with another two hydrologically connected to the Proposed Development site via the River Liffey.

Following an examination, analysis and evaluation of the relevant information, including in particular, the nature of the project and its potential relationship with European sites and their conservation objectives, as well as considering other plans and projects, and applying the precautionary principle, it is the professional opinion of the AA authors of the report that there is no potential for likely significant effects on any European sites.

12. Flood Risk Assessment

A site specific Flood Risk Assessment has been undertaken for the site and forms a stand-alone report that forms part of this application. The assessment concluded that the development is not at risk of flooding. The assessment indicates that the Proposed Development would not adversely impact on the flood risk for other neighbouring properties. Further detail is provided in Chapter 8 – Hydrology of the EIA Report and the accompanying site specific Flood Risk Assessment undertaken by Kilgallen Consulting with Pinnacle Consulting Engineers that forms a stand-alone document as part of the planning application. Given the inland location of the site, it is not at risk from sea level rise.

13. Conclusion

The Proposed Development is fully in accordance with the policies and objectives of the National Planning Framework, Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly, and the South Dublin County Development Plan 2022-2028. It is also fully in accordance with current Government, Eirgrid and CRU policy having regard to data center development.

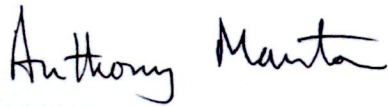
The applicant has received and executed a grid connection agreement with Eirgrid that allows for the long-term primary supply of electricity to serve the Proposed Development, will come from the national grid with the on-site MFGP, feeding the national grid.

We respectfully submit that the Proposed Development is fully in accordance with the policies and objectives of the new Plan. The proposal is made indicating full compliance with Policy EDE7, Objective 2 having regard to the open for consideration status of the use under the EE zoning. The overall design is also made having full regard to the Green Infrastructure policies and objectives; good design principles as well as long established principles of visual screening of the development from the surrounding public domain. In accordance with these and other policies and objectives the application is informed by a Flood Risk Assessment; SUDs drainage; energy statement; GI plan and many more that provides the Planning Authority with a comprehensive response to its new policies as set out under its Plan.

In conclusion, for all of the foregoing arguments, reason and considerations, we respectfully request South Dublin County Council to accept the contents of the application, and to assess the subject development 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

Appendix A

Green Space Factor Tool
South Dublin County Council



Comhairle Contae
Átha Cliath Theas
South Dublin County Council

User input indicated by Orange fields

User Input	
Zoning lookup	Minimum GI Score
EE	0.5

1. Enter Development Site Area m ² HERE▶	32000		
Surface Type (see tab for detailed descriptions)	Factor	Proposed Surface Area m ²	Factor Values
1. Short Lawn	0.3	1075	322.5
2. Tall Lawn (wild, not mown)	0.5	6910	3455
Permeable Paving	0.3	1626	487.8
Vegetation		0	0
4a. Vegetation-Shrub below 3m	0.4	413	165.2
4b. Vegetation-Shrub / Hedgerow above 3m	0.5	6296	3148
4c. Vegetation-Pollinator friendly perennial planting	0.5	413	206.5
4d. Vegetation-Preserved hedgerow	1.2	245	294
Trees			0
5a. New trees	0.6	5380	3228
5b. Preserved trees	1.2	2346	2815.2
7. SuDS intervention (rain garden, bioswale)	0.6	2348	1408.8
Green Roof		0	0
9a. Green Roofs - Intensive green roof (substrate is 200-1200mm in depth)	0.7	0	0
9b. Green Roofs - Extensive green roof (substrate is 80-200mm in depth)	0.6	451	270.6
10. Green wall	0.4	671	268.4
11. Retained Open Water	2	217	434
12. New open water	1.5	1903	2854.5
Total Equivalent Surface Area of Greening Factors		30,294.00	

Green Factor Numerator	19358.50
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Minimum Required GI score	Final GI score	Result
0.5	0.60	Pass

Appendix B

From: Sarah Watson [mailto:swatson@SDUBLINCOCO.ie]
Sent: Tuesday 1 November 2022 15:33
To: Anthony Marston <anthony@marstonplanning.ie>
Cc: Colm Harte - Planning <colmharte@SDUBLINCOCO.ie>; Eoin Burke <eburke@SDUBLINCOCO.ie>
Subject: RE: Vantage Data Centers

Hi Anthony,

Given the context, a scale of 1:400 is acceptable. Please include this email with your submission for validation purposes.

Many thanks,

Sarah

From: Anthony Marston <anthony@marstonplanning.ie>
Sent: Friday 28 October 2022 14:43
To: Sarah Watson <swatson@SDUBLINCOCO.ie>
Cc: Colm Harte - Planning <colmharte@SDUBLINCOCO.ie>; Eoin Burke <eburke@SDUBLINCOCO.ie>
Subject: Vantage Data Centers

CAUTION: [EXTERNAL EMAIL] Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Sarah

I trust you are well. I am contacting you in relation to the pre-planning that was undertaken under PP061/22. We are about to lodge the application. Due to the size of the site in the context of the applicants adjoining site to the west, the contiguous elevations are only possible at 1:400 on an A0 sheet (see attached).

Can confirm that this is acceptable to the Council.

The main elevations will be at 1:200 as per the Regulations.

I would be grateful if you could revert at your earliest convenience.

Many thanks in advance.

Regards

Anthony Marston
Marston Planning Consultancy

m:086-3837100

23 Grange Park, Foxrock, Dublin, D18 T3Y4.

www.marstonplanning.ie

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Appendix C

SOUTH DUBLIN COUNTY COUNCIL EUR 38,000.00

✓ Expand/Collapse All

✓ Transaction Information

Ordering/Originating Account Number
79609587

Bank Name
J.P. MORGAN SE

Bank to Bank Transfer
NO

Status
Completed

Ordering/Originating Account Name
VDC DUB11 Limited General

Bank ID
CHASIE4L

Beneficiary Bank Country
IRELAND - IE

✓ Routing/Reference Information

BENEFICIARY

Beneficiary ID Type
IBAN

IBAN
IE14AIBK93331731000029

Beneficiary Name
SOUTH DUBLIN COUNTY COUNCIL

Beneficiary Email
eftremittances@sdublincoco.ie

BENEFICIARY BANK

Bank ID Type
SWIFT ID

SWIFT ID
AIBKIE2DXXX

Bank Name
AIB

Address Line 1
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Vantage Data Centers Corporate Commitment to Sustainability

Vantage Data Centers has committed to achieving net zero carbon emissions by 2030 across our global portfolio. This has been agreed to by our executive team and shareholders alike. As such, we are actively pursuing reduced energy use and emissions at all our facilities.

To date, we have successfully completed our first greenhouse gas inventory and created programs to strategically drive reductions across all three scope emissions. Additionally, we are creating interim reduction targets that are in alignment with the Science Based Target initiative (SBTi) methodology, informed by the latest climate science, focusing on three areas:

- Reducing Emissions through Investments in Technology: Examples of which include:
 - Microgrid-enabling technologies to improve the energy efficiency of our facilities
 - Lowering emissions from on-site generators with by switching to second generation biofuels
- Sourcing Renewable Energy: Wherever possible, Vantage customers are offered renewable energy options for their power. We also always:
 - Procure REGO certified energy (or local equivalent) from the grid supplied energy
 - Investigate possible vPPA (virtual PPA) opportunities where we work with a local renewable energy developer to commit to buying a portion of the green power generated from their renewable plant
 - Provide infrastructure to contribute our waste heat to a local district heat networking scheme or other heat off-takers
- Funding Carbon Removal Projects: Starting in 2030, Vantage will purchase offsets that fund carbon removal projects for unavoidable emissions. Priority will be given to opportunities that directly benefit the communities where we operate.

As signatories of the Climate Neutral Data Centre Pact, Vantage is committed to the sustainable development and operation of our data centers. The pact is an EU wide self-regulatory initiative that sets ambitious targets to put our industry on a path to meet the European Commission's goal for climate neutral data centres by 2030, and supporting the wider goal of the European Green Deal to make Europe the first climate neutral continent by 2050.



We take an integrated approach to building data centers for maximum efficiency and resiliency. It starts with careful site selection, followed by the design and construction of highly efficient data center campuses yielding both industry-leading Power Usage Effectiveness (PUE) and low water use (measured as Water Usage Effectiveness, or WUE), and extends through our constantly evolving operations.

Sourcing renewable energy is a key enabling strategy to meeting our global net zero goals. However, we take a pragmatic approach to renewable development and on-site renewable energy is not always a feasible solution due to the density of the development and regulatory or utility grid challenges.

At Vantage, one of our primary objectives is to partner with our customers and communities to achieve our shared sustainability goals. We look to integrate features to our campus that enhance the environmental context ranging from green walls and roofs to sustainable urban drainage systems to contributing to community climate funds allowing the deployment of sustainable interventions in the wider area.

We are committed to being a responsible corporate citizen, a good community neighbor and a company that supports a thriving business environment in sustainable ways – all while having a positive impact on the industry and the communities where we operate.

Please let us know if you have any additional questions.

Amanda Abell

Global Senior Director of Sustainability, Vantage Data Centers

aabell@vantage-dc.com

