

# **Unit 1 M50 Business Park, Ballymount, Dublin 12**

## **Planning Report**

December 2022



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# 1 Introduction

## 1.1 Background

MacCabe Durney Barnes has prepared this planning report for Creighton Properties LLC to accompany a planning application in respect of the change of use from warehouse to data repository facility at the existing facility located at Unit 1, M50 Business Park, Ballymount, Dublin 12.

The site totals 8,915 sqm in area and is currently vacant. The site is bound to the north-west by Calmount Road, to the north-east by an existing warehouse unit to the south-east by an internal estate road within the M50 Business Park and to the south-west by Ballymount Road Upper.

## 1.2 Proposed Development

The proposed development will consist of:

- the change of use from warehouse to data repository facility,
- alterations to external facades, provision of a new 1,100 mm parapet, reclad roof, internal alterations, refurbishment of the existing office space, solar panels at roof level
- external plant at ground and roof level and equipment to include 12 no. condenser modules, an emergency back-up generator and associated fuel storage tank, transformer,
- extension to the existing sub-station (c. 13 m<sup>2</sup>),
- 2 no. sprinkler tanks and pumphouse, bin store,
- 22 parking spaces including 2 electrical vehicle charging points, bicycle parking shelter, landscaping, planting, new security fence, external lighting, CCTV, altered vehicular gates, permeable hard surfaces,
- alterations to internal foul sewerage and water supply networks, provision of SuDS compliant surface water drainage system and
- all associated site works.

The proposed development has been prepared in accordance with the relevant provisions of the *South Dublin County Development Plan 2022-2028*. In addition, the proposal is supported by national and regional policy. This Planning Report together with all application documentation and drawings demonstrate how all relevant issues have been addressed.

## 1.3 Planning Application

The application is accompanied by a full set of reports and documents, which are in accordance with the requirements of the *South Dublin County Development Plan 2022-2028* and the relevant articles of the Planning and Development Regulations, 2001 (as amended). The following documents are submitted:

- Architectural & Engineering drawings, schedule of accommodation and drawing schedule
- Landscape drawings and planting schedules
- Engineering and Services Reports

- Air and Climate Impact Assessment
- Resource Waste Management Plan
- Noise Impact Assessment
- Lighting Plan and Report
- Environmental Impact Assessment Screening
- Energy Statement

#### 1.4 The Operator

The proposed building will be operated by Amazon Data Services Ireland Limited (ADSIL), the Irish entity of Amazon Web Services (AWS) which is part of the Amazon.com, Inc group of companies. The proposed development is to support AWS's customers in Ireland.

AWS offers customers access to more than 200 fully featured services from its data centres. This means that organisations of all sizes and in all industries – from the fastest-growing start-ups to the largest enterprises, government bodies, educational institutions or healthcare providers – can use cloud computing to lower costs and innovate faster. The AWS Region in Ireland was established in 2007, and since this time the company has invested significantly in the country. Between 2011-2020 alone, AWS investments in Ireland were found to be increasing economic output by almost €7.5 billion and investing over €4.4 billion in direct capital and operational spend in the same period. This level of investment generated growth in economic output of €1.45 billion per year. AWS support more than 8,700 jobs, including more than 3,000 direct AWS employees, almost 4,000 people working for contractors and sub-suppliers companies, and 1,700 jobs in induced employment from these activities. AWS enables over 550 local Irish suppliers to expand operations, enhance their skills and support local communities. The newly opened 630,000 square foot fulfilment centre, in Dublin's Baldonnell Business Park, has created 500 new jobs and will help provide faster delivery for customers across the country seven days a week, including one-day delivery on hundreds of thousands of items.

AWS is resolutely committed to sustainability. In 2019, Amazon co-founded The Climate Pledge, a commitment to reach net-zero carbon emissions by 2040—10 years ahead of the Paris Agreement. As part of this, Amazon is on a path to powering its global operations with 100% renewable energy by 2025 – five years ahead of its original target of 2030. Amazon is the largest corporate purchaser of renewable energy in the world, and has announced a total of 379 renewable energy projects across 21 countries globally, representing 18.5 gigawatts (GW) of renewable energy capacity. Once fully operational, Amazon's global renewable energy portfolio will generate 50,000 gigawatt hours (GWh) of clean energy, which is the equivalent amount of electricity needed to power 13.4 million European homes each year. Amazon was the first company in Ireland to deliver unsubsidised Corporate Power Purchase Agreements (CPPAs). This means Amazon is helping to add renewable energy to the grid without direct government support, thus reducing subsidy costs on other local energy users. In Ireland alone, Amazon has committed to offtake 100% of the power from renewable wind projects in Cork, Donegal, and Galway. Amazon does not own these projects, but their commitment to purchasing the power and environmental attributes from these projects enable them to be built. In total, these three wind projects are projected to add 229 megawatts of renewable energy to the Irish grid, reducing carbon emissions by 366,000 tonnes of CO<sub>2</sub> each year, and producing enough

renewable energy to power 185,000 Irish homes, per annum. These three wind projects will make Amazon the largest single corporate buyer of renewable energy in the country.

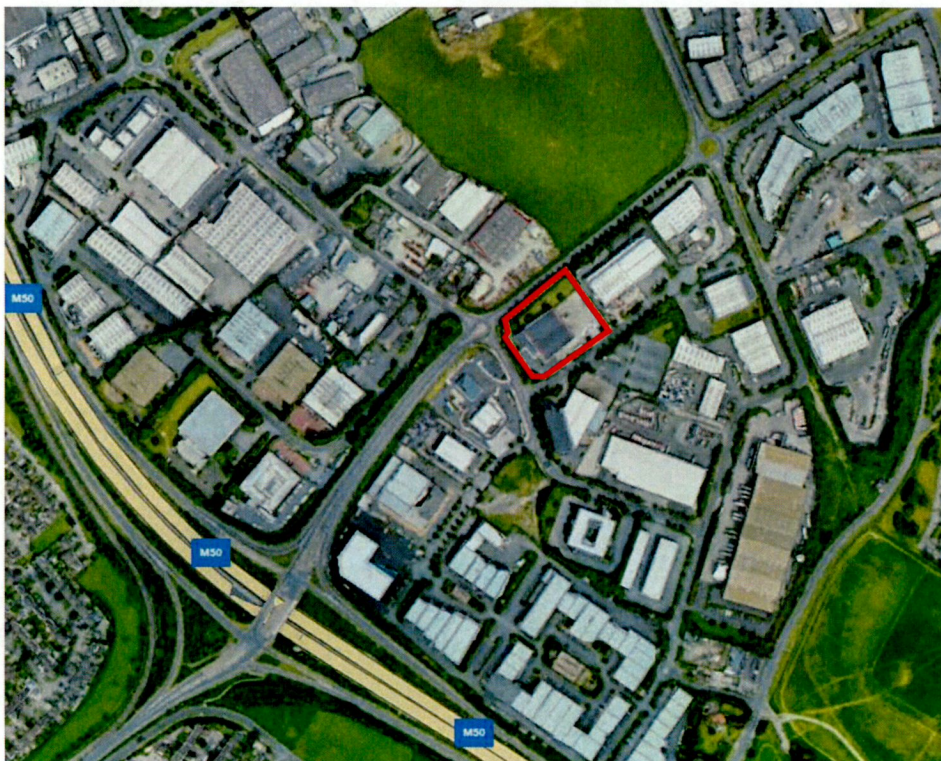
AWS's renewable strategy and climate focus – which is consistent with government's own climate goals of achieving 70% renewable energy usage by 2030 – is very much evident in its investment in Irish infrastructure. AWS has already announced three onshore wind projects here, one of which is now operational and is delivering clean energy to the country's electricity grid. AWS is also supporting the new district heating scheme in Tallaght, South Dublin, by providing heat from a nearby data centre. The system will initially heat 47,000 m<sup>2</sup> of public sector buildings – an area three times the size of the city's Croke Park stadium pitch – as well as 3,000m<sup>2</sup> of commercial space and 135 affordable rental apartments. This is projected to save 1,500 tonnes of carbon per annum during the first phase, the equivalent of a 60 per cent reduction in carbon emissions. These renewable wind and district heating projects have been achieved through collaboration and partnerships with government, renewable energy developers, and local utilities. They reflect the company's continued commitment to sustainability, both in Ireland and internationally.

## 2 Site and Surroundings

### 2.1 Site Location and Description

The application site has a total area of 8,915 sqm and is located in the M50 Business Park, Ballymount to the west of Dublin City. It falls under the jurisdiction of South Dublin County Council. The site is outlined in red in Figure 1 below.

Figure 1: Site Context



The site is bound to the north-west by Calmount Road, to the north-east by an existing warehouse unit to the south-east by an internal estate road within the M50 Business Park and to the south-west by Ballymount Road Upper.

The site boundaries consist of a fence doubled with a row of trees and hedgerows. There is an existing footpath bounding the site to its south, west and north.

Access to the site is via the internal Business Park Road with two existing entrances providing access to the car park and to the delivery yard. There is car parking located at the southern corner of the site, south-west of the warehouse structure. The warehouse is approximately 10m in height and includes ancillary two storey offices at the southwestern corner end of the structure. The ancillary offices total 560sqm and the main warehouse building totals 2,040 sqm, including mezzanine. The figure below and plates 1-4 illustrate the site.

**Figure 2: Site**



**Plate 1 - Entrance from internal estate road**



**Plate 2 - Secondary entrance on estate road**



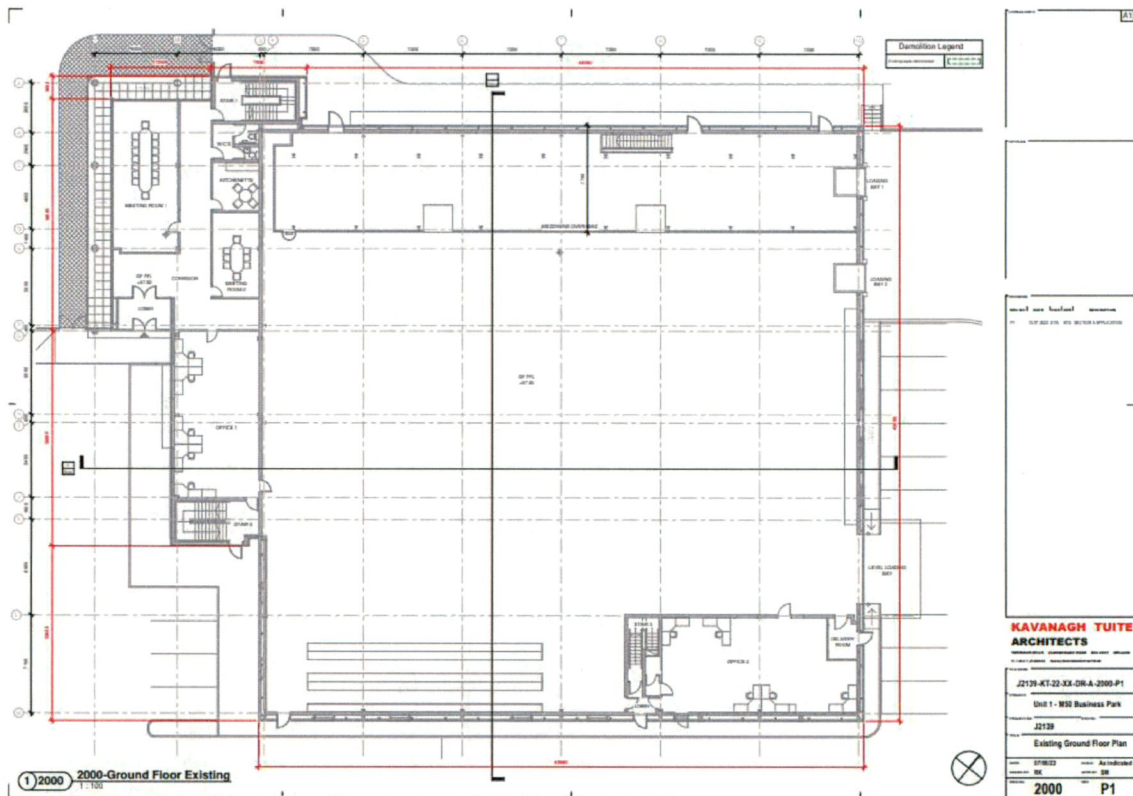
Plate 3 - Parking area to the front



Plate 4 - Ancillary offices

A mezzanine floor was inserted within the building. It is understood this was constructed in c1998. There is no planning history relating to this mezzanine and presumably it was constructed under exempted development under 4 (1) (g) of the 1963 Act. The warehouse building was modified following the grant of planning application Ref. SD13A/0207 on 14/01/2013. The ground floor plan is illustrated in the figure below.

Figure 3: Existing Ground Floor Plan





## 2.2 Surrounding Area

The general area is industrial and commercial in nature. To the north east of the site is a commercial block which houses a number of companies. A tire shop is located across the street to the south east of the site, a petrol station and fast food outlet are located to the south west, across the site on the Ballymount Upper Road, and an industrial equipment supplier is located to the north, across the Calmount Road. The site is located at the junction of the Calmount Road and the Ballymount Upper Road.

The site is serviced. It is located in the inner M50. A number of waste recycling facilities are located in the vicinity of the site. Business activities in the area include, but not are not limited to construction materials and plant hire, warehousing and storage, new and second-hand car sales and car parts resellers. The general area is generally characterized by large floor plates and impermeable surfaces.

Road widths are c.10m wide, in keeping with the industrial character of the area. The Ballymount Upper Road incorporates right turning lanes in both directions.

The closest European Site, the Wicklow Mountains SAC (Code: 002122) is located 8.2km south. The closest watercourse is located around 700m north of the site and flows in a west-east direction. Another one also flows in a west-east direction some 1.3 km south of the site.

## 3 Proposed Development

### 3.1 Overall Description

The proposed development will consist of:

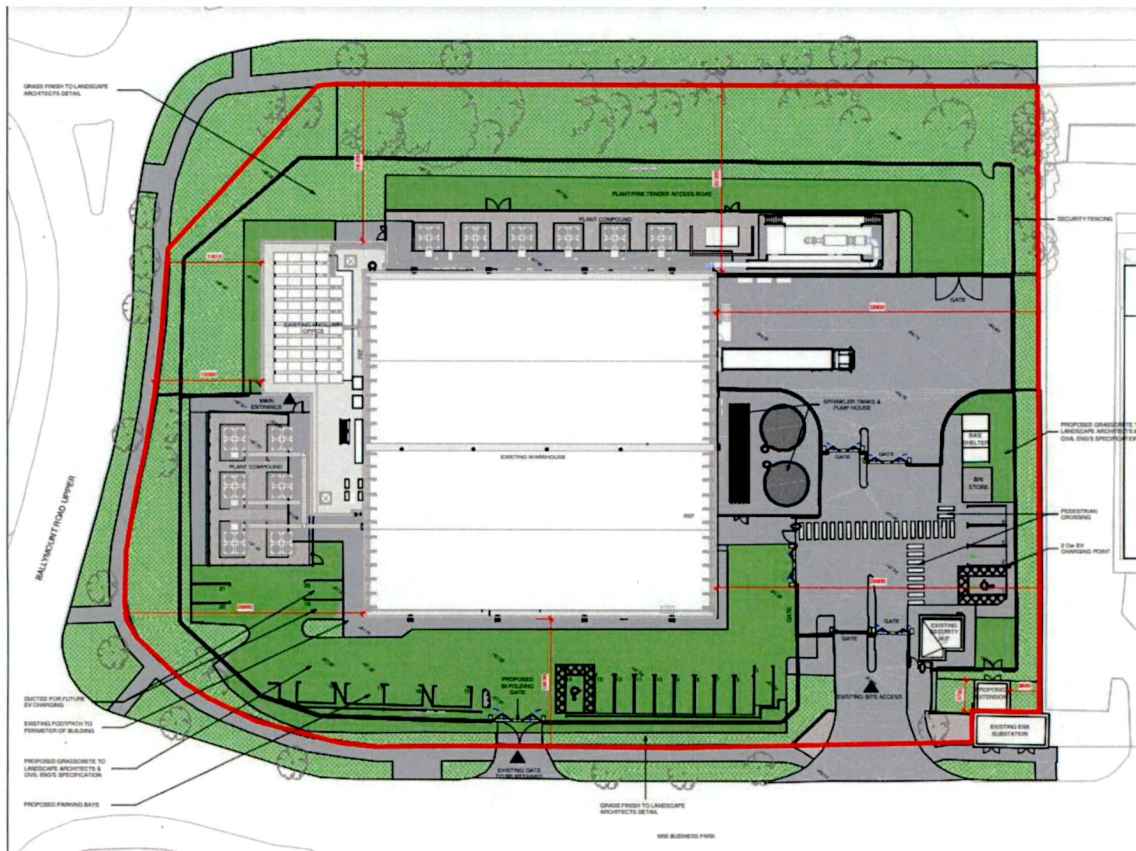
- the change of use from warehouse to data repository facility,
- alterations to external facades, provision of a new 1,100 mm parapet, re-clad roof, internal alterations, refurbishment of the existing office space, solar panels at roof level
- external plant at ground and roof level and equipment to include 12 no. condenser modules, an emergency back-up generator and associated fuel storage tank, transformer,
- extension to the existing sub-station (c. 13 m<sup>2</sup>),
- 2 no. sprinkler tanks and pumphouse, bin store,
- 22 parking spaces including 2 electrical vehicle charging points, bicycle parking shelter, landscaping, planting, new security fence, external lighting, CCTV, altered vehicular gates, permeable hard surfaces,
- alterations to internal foul sewerage and water supply networks, provision of SuDS compliant surface water drainage system and
- all associated site works.

The main single storey warehouse building is to be used to house tape media which will store and be a repository for data. Customer data is stored on tape media within a temperature and humidity-controlled environment, inside one of two tape libraries. The facility is specifically for data archiving and cold storage of information and retrieval by customers is typically occasional. This form of data storage requires significantly less power consumption than a typical data centre. There is no provision of associated new electricity grid connection infrastructure, as it will utilise existing ESB networks infrastructure. Electrical supply will not fall within the scope of

Eirgrid’s “Data Centre Connection Offer Process and Policy” owing to the existing infrastructure supplying the building being adequate.

There will be ancillary offices, staff welfare facility, toilets, security, mechanical and electrical plant in the building and outside on site. The existing ancillary office element at the western end of the building will be refurbished and used by employees of the data repository. It will accommodate 24 work stations. The site layout is illustrated in the figure below.

Figure 4: Site Layout



The proposed development will involve alterations to the existing façade of the warehouse. These are described below:

**Eastern Façade:**

Existing	Status
Profiled horizontal composite wall cladding sheets and of flat horizontal composite cladding sheets.	All warehouse cladding removed and replaced with new.
Flat horizontal composite cladding sheets on the office area	Replaced
Three doors as follows: <ul style="list-style-type: none"> <li>- 1 no. Roller shutter door with canopy above.</li> <li>- 2 no. sectional doors</li> </ul>	Roller shutter door with canopy and 1 no. sectional door removed. 1 no. sectional door retained.

Three no. windows	Removed
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**Western Façade:**

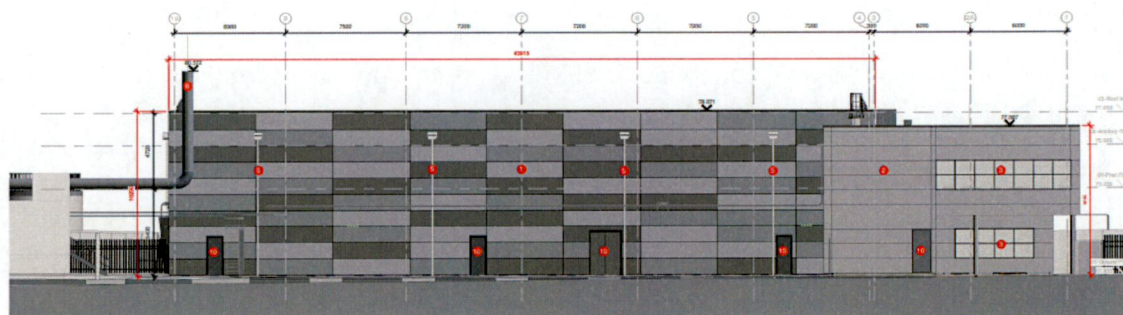
Existing	Status
Profiled horizontal composite wall cladding sheets and of flat horizontal composite cladding sheets.	Removed
Flat horizontal composite cladding sheets	Replaced
Two no. windows to warehouse	Removed
Full height glazed screens with entrance doors	Retained
Double glazed window units	Replaced

**Northern Façade:**

Existing	Status
Profiled horizontal composite wall cladding sheets and of flat horizontal composite cladding sheets.	All warehouse cladding removed and replaced with new.
Flat horizontal composite cladding sheets	Replaced
Full height glazed screens with entrance doors	Retained
Double glazed window units	Replaced
Canopy	Removed

In addition to the items above, 4 no. aluminium downpipes with hopper head are proposed and a new steel door.

Figure 5: Proposed north elevation (Source: dwg no. 6508 – Proposed elevations – sheet 01)



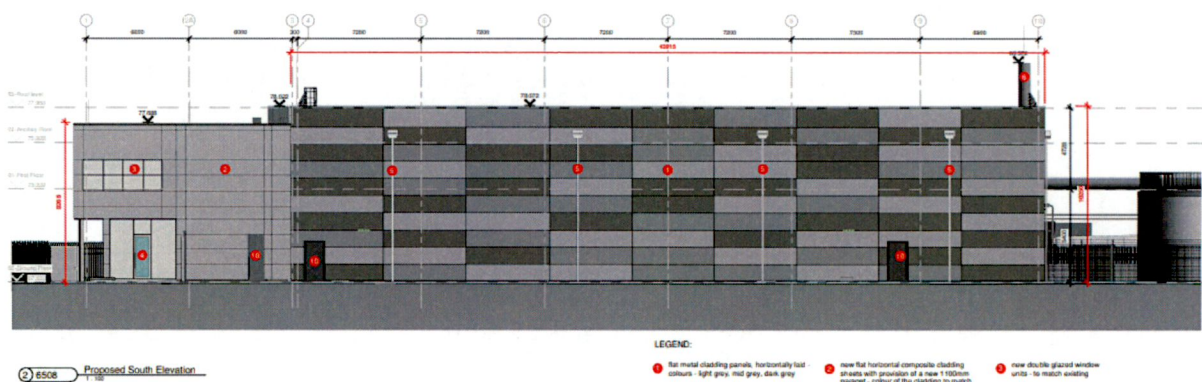
**Southern Façade:**

Existing	Status
Profiled horizontal composite wall cladding sheets and of flat horizontal composite cladding sheets.	All warehouse cladding removed and replaced with new.
Flat horizontal composite cladding sheets	Replaced

Existing	Status
Four no. windows	Removed
Full height glazed screens with entrance doors	Retained
Double glazed window units	Replaced
Canopy	Removed

In addition to the items above, 4 no. aluminium downpipes with hopper head are proposed.

Figure 6: Proposed south elevation (Source: dwg no. 6508 – Proposed elevations – sheet 01)



### 3.2 Other Buildings

The existing security hut will be retained and used as a security hut. A bin store and sheltered bike storage are also provided. It is also proposed to extend the existing substation by 13 sqm.

### 3.3 Landscaping

Existing woodland on the Calmount Road will be retained and bolstered, with new hedge plants to be added. This will maintain visual screening between the building and the road. Some trees located on the western side of the site will be removed. On the Ballymount Road boundary, a number of trees will be cut back to facilitate an 1m offset. This offset will allow for the erection of a site security fence. There will be grassland management with native grass and windflower meadows to boost biodiversity.

### 3.4 Site Services

A detailed report on site services, prepared by Clifton Scannell Emerson Associates (CSEA) accompanies the planning application.

#### Surface Water Drainage

The proposed surface water network for the development collects runoff from roofs, roads and other hard standing areas in a sealed system of pipes and gullies. In addition to this, discharge from humidifiers and air conditioning units are collected by pop-ups which connect to 150mmØ internal surface water pipework which discharge into a 225mmØ surface water pipe external to the building. The pipe network outfalls to 3 no. surface water attenuation systems located to

southwest, south and east of the main building. The proposed attenuation systems outfall via carrier drains which discharge attenuated flows to the existing M50 Business Park surface water drainage system.

#### *Foul and Process Wastewater Drainage*

The proposed wastewater drainage network collects domestic foul wastewater flows from the main building and the security hut, which are collected by pop-ups which connect to 100mmØ internal pipework which discharge into a 150mmØ foul sewer located externally to the main building and security hut. Foul wastewater accumulated in the southern proposed wastewater drainage network is pumped via the existing pumping station manhole to the foul sewer manhole located north of the main building before out falling in a north-easterly direction to the existing 225mmØ foul sewer network in Calmount Road.

#### *Water Supply*

It is proposed that the existing water supply be retained. A new 100mmØ connection is proposed to connect the existing fire flow mains on site to the fire flow tanks. Furthermore, a bulk meter is to be installed on the connection to the 100mmØ uPVC watermain.

#### *External plant and equipment*

A back up diesel generator will provide power to the building in the unlikely event of a loss of power supply. These diesel powered generators will be supplied from a bulk storage tank located underneath the generator enclosure. Generators will only be in operation during a loss of power supply or for maintenance testing.

12 no. condenser modules are also proposed on site which are part of the cooling system for tape media libraries. These will be located to the North and West of the main warehouse building, adjacent to the ancillary office.

2 No. sprinkler tanks and a pump house are proposed in the development, located to the East of the main warehouse building.

### **3.5 Access and Parking**

Access to the site will be via the existing access located to the east of the site, off the estate road.

22 parking spaces including 2 electrical vehicle charging points. 12 bicycle spaces are proposed in a shelter.

The existing loading bay shall be retained.

### **3.6 Security and Lighting**

The existing perimeter fence will be retained to present a similar perimeter treatment as other existing units in industrial estate. Behind this fence, a new 2.4m high, anti-climb security fence will be built to provide additional security. CCTV and associated lighting will be installed throughout the site in accordance with the details accompanying the application.

### **3.7 Power Connection**

There is an existing connection agreement in place with ESB to supply power for the proposed development, which has a total peak power demand of 1.3 MW. Power will be supplied via 1 x

Medium Voltage (MV) cable connection from the existing ESB substation (permitted and constructed under an existing permission) which is located immediately adjacent to the development site to the West. The proposed development includes the provision of a single-story client control switchgear room which will adjoin the existing ESB substation.

In 2019 the Government published its first Climate Action Plan setting out its climate objectives. The National Development Plan 2021-2030 developed this ambition further, including setting goals of achieving at least 80% of electricity from renewables by 2030 and an energy wide net zero target by 2050.

Amazon has signed three CPPAs in Ireland which will add 229MW of renewable energy capacity to the Irish grid and is currently searching for new projects to add to this portfolio. These existing projects are projected to reduce carbon emissions by 366,000 tonnes of CO<sub>2</sub> each year, and will produce enough renewable energy to power 185,000 Irish homes, per year (please see Section 5.1 for more on Amazon's renewable energy projects).

## 4 Planning History

The recent relevant planning pertaining to the site is detailed below.

**S96A/0491:** Permission was granted 7 January 1997 for development described as the *'construction of a 2,444sqm development comprising single storey warehouse, two-storey offices and showroom and an E.S.B. substation'*. Permission was granted subject to 12 no. conditions.

Condition 10 provides that the area open to the public be limited the areas shown as reception, showroom and sales. The warehouse must not be used for display or other sales purposes.

**SD13A/0207:** Permission was granted 14 January 2014 for development described as *'elevation changes including the installation of new high level windows to the south-western, south-eastern and north-eastern elevations of the warehouse building and the installation of an external fire escape door to the north-western elevation of the warehouse building; the works are to include all necessary building and site works'*. Permission was granted subject to 5 no. conditions.

It is noted that the gross floor space of the existing building was stated as 2,640sqm in the Application Form associated with SD13A/0207.

**SD16A/0379:** Permission was granted on 6 March 2017 for development described as *'Construction of a new single storey security building, relocation of vehicular entrance gates and all associated site services'*. Permission was granted subject to 5 no. Conditions.

**SD21A/0008:** Permission was granted on 26 April 2021 for *'change of use of c.12.25sq.m of floorspace within the existing warehouse building on site, from warehouse use to use for the temporary storage of shredded electrical & electronic equipment and components'*. The statutory description also noted that noted the application *'relates to a development which comprises or is for the purposes of an activity requiring a waste facility permit'*. Permission was granted subject to 5 no. conditions.

**Section 5 Reference ED22/0028:** Whether the use of the building as a data repository facility with associated internal alterations is, or is not exempted development.

*Status:* Request Additional Information

## 5 Planning Policy

### 5.1 National Policy

#### ***Ireland 2040 – Our Plan National Planning Framework (NPF) 2017***

The role which data centres have to play in the national economy is now specifically recognised. The NPF states:

*“Ireland is deemed 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 centres. 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.”*

It is an objective to seek the *“Promotion of Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities.”* The NPF therefore clearly recognises the important national role which data centres play and the investments and activities associated with the location of such facilities in Ireland.

#### ***Government Statement on The Role of Data Centres in Ireland’s Enterprise Strategy 2022***

In July 2022, the Department of Enterprise, Trade and Employment (DETE) published the ‘Government Statement on the Role of Data Centres in Ireland’s Enterprise Strategy’ (the Statement). This new and updated strategy seeks to *“set out the principles that will ensure that the data infrastructure that can be accommodated [within Ireland] contributes positively to our climate and digital ambitions”*. It states that *“these principles will be reflected in energy, enterprise and planning policy, regulatory and other decisions across Government Departments, local authorities, enterprise development agencies and other public bodies.”*

The Statement emphasises the importance and value of data centre development as part of the Irish economy, stating the following: *“Data centres are core digital infrastructure and play an indispensable role in our economy and society. Data centres provide the foundation for all 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.”* Data centres are also described as *“critical to Ireland’s economic future, and the success of our businesses”*.

Notwithstanding this, the Statement notes that there are currently limits on further data centre development, given the need to complete work to *“upgrade our infrastructure, connect more renewable energy and ensure security of supply”*. As capacity is not available to support all new data centre projects, the Statement describes *“the Government’s clear preference for [those] data centre developments that are associated with strong economic activity and employment; make efficient use of our electricity grid, deliver renewable energy in Ireland”*. As noted above, the Government expands on the nature of its preference in a series of six *“Principles for Sustainable Data Centre Development”* that *“should inform and guide decisions [by public bodies] on future data centre development”*.

The following section of this report now sets out how the proposed development is fully compliant with each of the individual principles described in the Statement and should therefore be considered as a data centre development for which the Government has a clear preference.



## Economic Impact

***“The Government has a preference for data centre development associated with strong economic activity and employment.*** In particular, it favours developments in regional locations, aligned with the NPF and Regional Spatial and Economic Strategies, which will embed the technology sector in locations and communities that can benefit from this investment, employment and spillover effects. In assessing economic impact, the totality of the Irish-based economic impact should be considered and factors such as associated total corporate employment, exports, wage levels, Irish materials/services purchased taken into account. The availability of digital infrastructure should serve our national digitalisation objectives, drive innovation, productivity and skills across our economy aligned to the National Digital Strategy.”

It is important to first note that the Statement itself highlights the positive national economic impact that data centre development has had in Ireland. It states the following:

*“Digital Infrastructure such as data centres underpins our technology sector, which is increasingly cloud based. Ireland’s technology sector accounts for €52 billion (16%) of gross value added and employs 140,000 people – equivalent to 6 per cent of total national employment with 40 per cent growth over the last five years.*

*A CSO publication, Information and Communications Technology: A Value Chain Analysis 2019, highlights the economic contribution of the ICT sector. In 2019, output for the ICT sector amounted to €128bn. Total exports of services from the sector were some €121.4bn from both foreign and domestic firms, with domestic ICT companies exporting 37 per cent of their output. Technology companies invested €46bn in fixed capital assets in 2019, with R&D investment of €1.392 bn.”*

The Statement goes on to recognise that data centres do not represent ‘optional economic infrastructure’, stating the following:

*“Data centres are not a separate or optional economic infrastructure – they are integrated into our data-driven knowledge economy and information society. Digital infrastructure should be assessed in the context of the total economic value it gives rise to, including employment across the value chain, as well as its role in underpinning the evolving data economy. Our data-driven technology sector drives innovation, productivity, and overall economic activity. The data stored in Irish data centres underpins an increasing base of employment intensive businesses. Much like transport or energy infrastructure, data infrastructure facilitates activity and the commercial ecosystem around it.*

*According to IDA Ireland, companies that operate data centres in Ireland, including hyperscale data centres and smaller colocation providers, account for approx. 16,000 direct employees. However, when contractor numbers are factored in, that number reaches 27,000. Between hyperscale and colocation data centre providers, they provide hosting capability to a range of software, services and consumer companies that create tens of thousands of additional jobs here. In many cases, the ability to host data here and use Irish data centres to sell product or services is a critical part of their presence in Ireland.*

*These companies are responsible for very substantial economic value through payroll taxes, exports, corporation taxes and other expenditures such as capital expenditure, materials and services’ inputs sourced in the Irish economy. In addition, the tech company presence here enables a substantially greater number of companies that require hosting infrastructure in Europe. Data centre investment and the wider technology multinational company base in Ireland has had a positive and supportive influence on the development*

*of the indigenous technology sector. The strong presence of these companies in Ireland has had the effect of developing a cadre of senior technology executives in Ireland, some of whom have gone on to start or work in early-stage indigenous companies. A strong brand of Ireland as a technology-led economy gives indigenous companies credibility as they engage in international business opportunities. This includes high tech construction companies that build data centres in Ireland and have now grown into large export-oriented businesses constructing data centres across Europe”*

#### Response

It is submitted that AWS' operations in Ireland clearly provide a high level of positive economic impact, as envisaged by the Statement. For a start, the services AWS provides from its Irish data centres enable some of Ireland's best-known businesses to reduce costs, innovate faster, and scale and grow their operations. They also help tens of thousands of small Irish businesses to access the kinds of sophisticated enterprise IT capabilities that historically were only available to the biggest companies. AWS's services also enable public sector organisations to improve citizen services, and support international institutions and not-for-profits. AWS helped to support organisations of all sizes during the Covid 19 pandemic, for example, by enabling cloud-based telehealth services that helped Irish patients in hard-to-reach areas and those with mobility issues to connect with their healthcare providers, and also by providing the underlying cloud infrastructure for the Health Service Executive (HSE)'s 'Pandemic Response' smartphone app, which aims to help reduce the spread of COVID-19 in the country.

In statistical economic terms, the value of AWS' operations in Ireland is very clear. A study undertaken by independent research organisation, Indecon International Economic Consultants (Indecon), found that in the period 2011-2020:

- AWS has directly invested €4.4 billion in Ireland with an economic output effect of €7.5 billion;
- In 2020, AWS generated growth in economic output of €1.45 billion and is forecast to exceed €1.5 billion in 2021, 2022 and 2023;
- AWS support more than 8,700 jobs, including more than 3,000 direct AWS employees, almost 4,000 in contractor and supplier companies linked to their data centres and 1,700 jobs linked to their Irish investment. AWS enables 550 Irish supplier and contractor companies, creating increased business and export opportunities. In July 2020 AWS announced an additional 1,000 jobs, bringing Amazon's total permanent workforce in the country to 5,000 people over two years. The newly opened 630,000 square foot fulfilment centre, in Dublin's Baldonnell Business Park, has created 500 new jobs and will help provide faster delivery for customers across the country seven days a week, including one-day delivery on hundreds of thousands of items.
- AWS presence in Ireland has generated business for over 550 Irish supplier and sub-supplier businesses across the economy, including major construction contractors, mechanical and electrical suppliers, professional services, and a wide range of services provided by local businesses.
- AWS is creating increased export opportunities for Irish contractors, and enabling AWS contractors export to 20 countries worldwide. In 2020, AWS's spend with Irish contractors on their data centres abroad had increased 14-fold since 2015, to €228 million.

The Indecon analysis is further broken down by local authority area. AWS's investments in the period 2011-2020 have delivered the following positive impact to the South Dublin County Council area:

- In 2020, the Operator's DCs in South Dublin directly and indirectly supported nearly 2,500 jobs. This represents a seven-fold increase on the equivalent statistics for 2011, demonstrating the upward positive trend in terms of employment generated by DC infrastructure.
- For that same year, the Operator's investment in the South Dublin area led to an increase in economic output of over €280 million, including direct, indirect and induced effects.
- The Operator's investment over the last decade in South Dublin totalled over €1 billion in the form of capital and operational expenditure. In 2020 alone, the Operator invested nearly €70 million in capital expenditure in South Dublin.

The proposed development represents a significant investment that will create additional direct, indirect and induced economic and employment benefits, in addition to those that have already been generated by AWS as outlined above. As such, it is fully consistent with the Government's preference, as set out in the Statement, for data centre developments "associated with strong economic activity and employment".

#### **Grid Capacity and Efficiency**

***"The Government has a preference for data centre developments that make efficient use of our electricity grid, using available capacity and alleviating constraints."***

*Data centres should engage collaboratively with the respective system operators to understand capacity availability and required grid services across geographic locations, and where connection can be facilitated, provide grid services such as to best utilise available infrastructure to the benefit all electricity customers. This is in line with the CRU Direction to the System Operators related to Data Centre grid connection processing (CRU/21/124)."*

#### **Response**

In relation to this principle, as discussed in Section 3.7, the proposed development benefits from an existing power connection agreement with ESB to serve the subject site.

During operation, the power requirements will be provided from an existing ESB substation (permitted and constructed under extant permission) located adjacent to the site, to the south east. Full details on power supply, energy efficiency and sustainability are provided in the Energy Statement, which is included as part of this planning application.

The proposed development and the actions of AWS in collaboratively working with ESB aligns with the principles of the Government Statement by making "efficient use of our electricity grid, using available capacity and alleviating constraints".

#### **Additional Renewables**

***"The Government has a preference for data centre developments that can demonstrate the additionality of their renewable energy use in Ireland."***

*Developments should provide clear additionality in renewable energy delivery in Ireland, whether through new generation, repowering or otherwise increasing in-country renewable energy capacity – proportionate to the impact of their energy demand."*

#### **Response**

AWS is committed to building a sustainable business for its customers and the planet. In 2019, Amazon co-founded The Climate Pledge, a commitment to reach net zero carbon emissions by 2040, 10 years ahead of the Paris Agreement. As part of that commitment, the company is on a path to powering its operations by 100% renewable energy by 2025, five years ahead of its original 2030 target.

Amazon is committed to, and invested in, sustainability because everybody benefits—it's good for the planet, for business, for customers, and for the communities where it operates. Amazon is continuing to scale its renewable energy investments with a current total of 379 renewable energy projects around the world, marking significant progress on its path to powering 100% of its operations with renewable energy by 2025. Once fully operational, Amazon's current global renewable energy portfolio will generate 50,000 gigawatt hours (GWh) of clean energy, which is the equivalent amount of electricity needed to power 13.4 million European homes each year.

Amazon was the first company in Ireland to deliver unsubsidised Corporate Power Purchase Agreements (CPPAs). This means Amazon is helping to add renewable energy to the grid without direct government support, thus reducing subsidy costs on other local energy users. Amazon has committed to offtake 100% of the power from renewable wind projects in Cork, Donegal, and Galway. In total, these three wind projects are projected to add 229 megawatts of renewable energy to the Irish grid, producing enough renewable energy to power 185,000 Irish homes, per annum. These three wind projects will make Amazon the largest single corporate buyer of renewable energy in the country. Our first operational wind farm in Ireland is online in County Cork and is delivering clean energy to the country's electricity grid. The wind farm project is expected to deliver 68,000 megawatt hours (MWh) of clean energy annually – producing enough renewable energy to power 17,000 Irish homes per year.

The proposed development and the actions of AWS through The Climate Pledge aligns with the Government Statement as they can “*demonstrate the additionality of their renewable energy use in Ireland*” and further afield.

#### **Co-Location or Proximity with Future-Proof Energy Supply**

***“The Government has a preference for data centre developments in locations where there is the potential to co-locate a renewable generation facility or advanced storage with the data centre, supported by a CPPA, private wire or other arrangement.*”**

*Where the combination of technologies at a generation facility is built to match the demand capacity factor (e.g. endeavouring to match the maximum import capacity with export capacity), the same infrastructure may be able to assist both demand customers and generation facilities (wind/solar/battery farm). This would make efficient use of grid investments, reduce curtailment and potentially enable significant decarbonisation of the data centre. The Government also encourages the co-location of downstream value-adding activities that can make use of carbon, excess heat and other outputs from the data centre activity, such as for horticultural activities or district heating schemes.”*

#### **Response**

It is important to first acknowledge that the urban context of the proposed development makes the location inappropriate for large scale renewable generation (e.g. windfarms) on site. However, the proposed development, as well as AWS's wider operations in Ireland, is still consistent with this principle in a number of different ways.

As noted above, AWS is helping Ireland meet its renewable energy targets. It has committed to offtake 100% of the power from its renewable energy projects in the country without relying on additional public funding (e.g. the Public Service Obligation (PSO)). As a result, AWS was the first organisation in Ireland to sign unsubsidised Corporate Power Purchase Agreements (CPPAs).

AWS will provide recycled heat from one of its recently constructed Data Centres to support a District Heating Network (DHN) developed by South Dublin County Council (SDCC) through a publicly owned, not-for-profit energy company SDCC has established in collaboration with Codema – Dublin’s Energy Agency. AWS will provide recycled heat free of charge which, when combined with additional heat pump technology operated by the energy company, will be sold by the district heating company to end users at low cost. The system will initially heat 47,000m<sup>2</sup> of public sector buildings – an area three times the size of the city’s Croke Park stadium pitch – as well as 3,000m<sup>2</sup> of commercial space and 135 affordable rental apartments. This is projected to save 1,500 tonnes of carbon per annum during the first phase, the equivalent of a 60 per cent reduction in carbon emissions.

A PV solar array of 22kWp (peak) will be installed at roof level to boost the energy efficiency of the building. The on-site renewable electricity generation will be serving lighting as appropriate, office area general services and office IT equipment.

The measures included with the proposed development when considered in combination with the macro renewable energy projects aligns with the Government Statement “to co-locate a renewable generation facility or advanced storage with the data centre”.

### **Decarbonised Data Centres by Design**

***“The Government has a preference for data centres developments that can demonstrate a clear pathway to decarbonise and ultimately provide net zero data services.***

*It is expected that data centres will align with the EU Climate Neutral Data Centre Pact energy efficiency and water use targets and set themselves targets to achieve zero carbon electricity use at all hours. System operators will work with large energy users to facilitate accurate hourly emissions reporting, grid carbon-intensity transparency, and allow data centre to optimise computing loads to maximise use of renewables and minimise carbon emissions (as per Action 99 of Climate Action Plan 2021).”*

### **Response**

AWS is committed to building a sustainable business for its customers and the planet. In 2019, Amazon co-founded The Climate Pledge, a commitment to reach net zero carbon emissions by 2040, 10 years ahead of the Paris Agreement. As part of that commitment, the company is on a path to powering its operations by 100% renewable energy by 2025, five years ahead of its original 2030 target.

In 2022 AWS announced its goal to be water positive (Water+) by 2030, returning more water to communities than it uses in its direct operations. AWS will meet water positive using four strategies: 1) Water efficiency, 2) Sustainable sources, 3) Community water reuse, and 4) Water replenishment. For AWS, running their operations sustainably means reducing the amount of water used to cool their data centres. Their holistic approach minimizes both energy and water consumption in their data centre operations and guides the development of their water use strategy for each AWS Region. It starts with evaluating climate patterns, local water management and availability, and opportunities to use sustainable water sources. AWS is already well on the path to becoming Water+ and is innovating to lower water use across

facilities by using cloud technologies to continually improve water efficiency and investing in projects that deliver water back to communities. AWS will report annually on new innovations in water efficiency, community reuse, water replenishment projects, and other activities on its path to achieving its water+ commitment.

Additionally, AWS is a founding member and signatory of the Climate Neutral Data Centre Pact. The Pact was launched in January 2021. It now includes 78 companies and 22 associations committed to ensuring the design and operation of data centres across Europe meet ambitious sustainability criteria. The Climate Neutral Data Centre Pact establishes a Self-Regulatory Initiative which has been developed in co-operation with the European Commission. It supports the European Green Deal, which aims to make Europe the world's first climate neutral continent by 2050. The Self-Regulatory Initiative sets ambitious goals that will facilitate Europe's essential transition to a greener economy. It commits signatories to ensuring their data centres are climate neutral by setting ambitious measurable targets for 2025 and 2030 in the following areas:

- Prove energy efficiency with measurable targets
- Purchase 100% carbon-free energy
- Prioritise water conservation
- Reuse and repair servers
- Look for ways to recycle heat

The proposed development fully complies with the Climate Neutral Data Centre Pact. To reduce both the energy and water use in their Irish data centres, AWS uses direct evaporative cooling systems, which predominately utilizes outside air to cool the servers. This means that for more than 95% of the year AWS uses no water to cool its data centres in Ireland. For the few hot days Ireland does see, AWS uses a minimal amount of water to cool the air that removes heat from their servers. Utilizing this highly efficient cooling solution, its newest data centre designs use as little as 1,000m<sup>3</sup> of water for cooling annually, per data centre - that is equivalent to the yearly water usage of just eight average Irish households. The proposed facility is designed to use humidifiers and air conditioning systems to maintain the relative humidity and temperature inside the tape media storage libraries. It is expected that less than 4000 hours of humidification will be provided annually to this system. The annual water usage is estimated at less than 100m<sup>3</sup> annually.

The proposed development has been designed to the highest energy efficiency standards. Building Energy Rating BER - A3 or higher is targeted with the utilization of high efficiency VRF Air Conditioning. Available roof space has been utilised for roof mounted PV Panels to generate on site renewable electricity, even though this is not required for compliance with "Nearly Zero Energy Buildings" (nZEB).

The proposed development and the actions of AWS through their net zero carbon by 2040 goals fully aligns with the Government Statement as they can "*clear pathway to decarbonise and ultimately provide net zero data services*", 10 years ahead of the Paris agreement.

#### **SME Access and Community Benefits**

***"The Government has a preference for data centre developments that provide opportunities for community engagement and assist SMEs, both at the construction phase and throughout the data centre lifecycle.***

*Data centres should provide benefits for regional locations and their surrounding areas through place-making, community engagement and collaboration with local and regional stakeholders to ensure they offer value to the communities in which they locate. Data centres are also construction projects, built environment and physical investments of scale. By necessity, they have an impact on the geography and communities in their vicinity. Data centre developers should make every effort to minimise the disruption of their construction on these communities.”*

#### Response

AWS operates a programme called AWS InCommunities in regions, such as South Dublin, where AWS builds and operates infrastructure. This initiative launches long-term, innovative programmes, such as Science, Technology, Engineering, Arts, Mathematics (STEAM) education, tech upskilling, environmental stewardship and employee engagement initiatives that have a lasting impact in communities such as South Dublin.

STEAM Education, Equity and Access: AWS invests in developing people in the community to help build a diverse pipeline of talent skilled in cloud computing. One such programme is AWS GetIT, a fully funded education programme and competition designed to inspire 12-14 year old students, especially girls, to consider a future in STEAM. The free programme helps schools and educators bring tech role models to their classrooms and gives them access to curriculum designed to help students build foundational skills, learn about cloud tech, and design app ideas to solve problems in their communities.

In May 2022, AWS launched its first AWS Think Big Space which is a new educational lab located beside the Tallaght Luas stop. The AWS Think Big Space was created together with South Dublin County Council (SDCC) and South Dublin Libraries to provide a place beyond the classroom for students to explore and cultivate an interest in Science, Technology, Engineering, Arts and Maths and STEAM-related careers. AWS aims to provide students, educators and the broader community in Tallaght with access to high-quality resources for learning about cloud computing and technology.

Local Tech Upskilling: The AWS community engagement team provides students and families with innovative and engaging STEAM learning opportunities and pathways. AWS has close links with Technological University Dublin (TU Dublin) in both Blanchardstown and Tallaght. For the last 5 years AWS has worked with TU Dublin to offer fully funded scholarships to selected students taking on the TU Dublin Tallaght Data Centre Technician Certificate (FETAC Level 6). The certificate course focuses on the fundamental skills needed to work in a data centre, training students in subjects such as Software Development, Network Fundamentals and Operating Systems Fundamentals. Students learn all the skills they'll need to begin a career in cloud computing, and the course offers the chance to put those skills to the test with paid work placements on offer with AWS.

Environmental Stewardship: The AWS community engagement team fully supports AWS Sustainability goals, which focuses on achieving 100 percent renewable usage for the global AWS infrastructure footprint. Since 2021 AWS have collaborated with the Stepping Stones Forests initiative. Stepping Stones Forests are small, urban, densely planted woodland using native species of trees and shrubs. AWS volunteers have supported and planted forests which also act as outdoor classrooms at schools predominantly in the South Dublin County area. Recent events include Killinarden Community College, St Kevin's Kilnamanagh and Colaiste Chillian Clondalkin. The initiative aims to promote biodiversity and environmental education in the South Dublin County area. AWS have also installed beehives at their data centre campus in the Tallaght area.

Employee Engagement: AWS employees are integral to the success of our community programmes. AWS employees are dedicated to their communities, and this is reflected in the thousands of hours of service they have committed to local communities. AWS volunteers have contributed to local initiatives such as the re-painting of schools and the development of sensory rooms. They have helped too with the installation of the Innovation Centre in Tallaght University Hospital, creating both a welcoming space for patients and a creative working area for university staff. In 2022 AWS sponsored the Health Hackathon in collaboration with TU Dublin and Tallaght University Hospital. AWS volunteers provided expertise to students competing to develop innovative healthcare solutions. AWS was proud as well to sponsor an Irish Homeless Street chapter in Tallaght and to bring the All-Ireland finals of the Home Street League to Old Bawn in 2019 and again in April 2022.

Beyond the work of AWS InCommunities, as highlighted earlier, AWS's presence in Ireland has enabled business for over 550 Irish supplier and sub-supplier businesses across the economy, including major construction contractors, mechanical and electrical suppliers, professional services, and a wide range of services provided by local businesses. AWS is creating increased export opportunities for Irish contractors; AWS's contractors now export to 20 countries worldwide. In 2020, AWS's spend with Irish contractors on their data centres abroad had increased 14-fold since 2015, to €228 million.

When AWS commits investment to infrastructure, they also commit to the community in which it's located. This has been their approach since AWS first established a presence in South Dublin. As such, the proposed development fully aligns with the Government Statement as AWS have a long history of providing "opportunities for community engagement" and assisting "SMEs, both at the construction phase and throughout the data centre lifecycle."

### **Guidelines**

The following ministerial guidelines are also of relevance to the subject development.

*Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)* – These guidelines set out procedures for undertaking relevant appropriate assessments (AA) of plans and projects, having regard to the provisions Birds and Habitats Directives. Due regard has been had to these guidelines in the preparation of the AA screening report which can assist the planning authority in making its screening determination.

*Guidelines on the Information to be contained in Environmental Impact Assessment Reports (2017), Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment" (2013) and the Draft Advice Notes for Preparing Environmental Impact Statements (2015)* - These documents provide advice in relation to EIA processes and reports.

## **5.2 Regional Spatial and Economic Strategy for Eastern and Midlands Region**

The *Regional Spatial and Economic Strategy for the Eastern and Midlands Region* was formally adopted on the 3<sup>rd</sup> May 2019. They replace the *Regional Planning Guidelines for the Greater Dublin Area*. Regional Policy Objective (RPO) 8.25 states that:

*"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 centres and associated economic activities at appropriate locations.*
- *Promote Dublin as a demonstrator of 5G information and communication technology.”*

The proposed development is an appropriate location for a data centre facility having regard to the site’s planning history, its strategic location, the serviced nature of the lands benefitting from existing and permitted access and infrastructure (including existing power connection) and the pattern of development in the surrounding area.

### 5.3 South Dublin County Development Plan 2022 – 2028

#### *Zoning Objective*

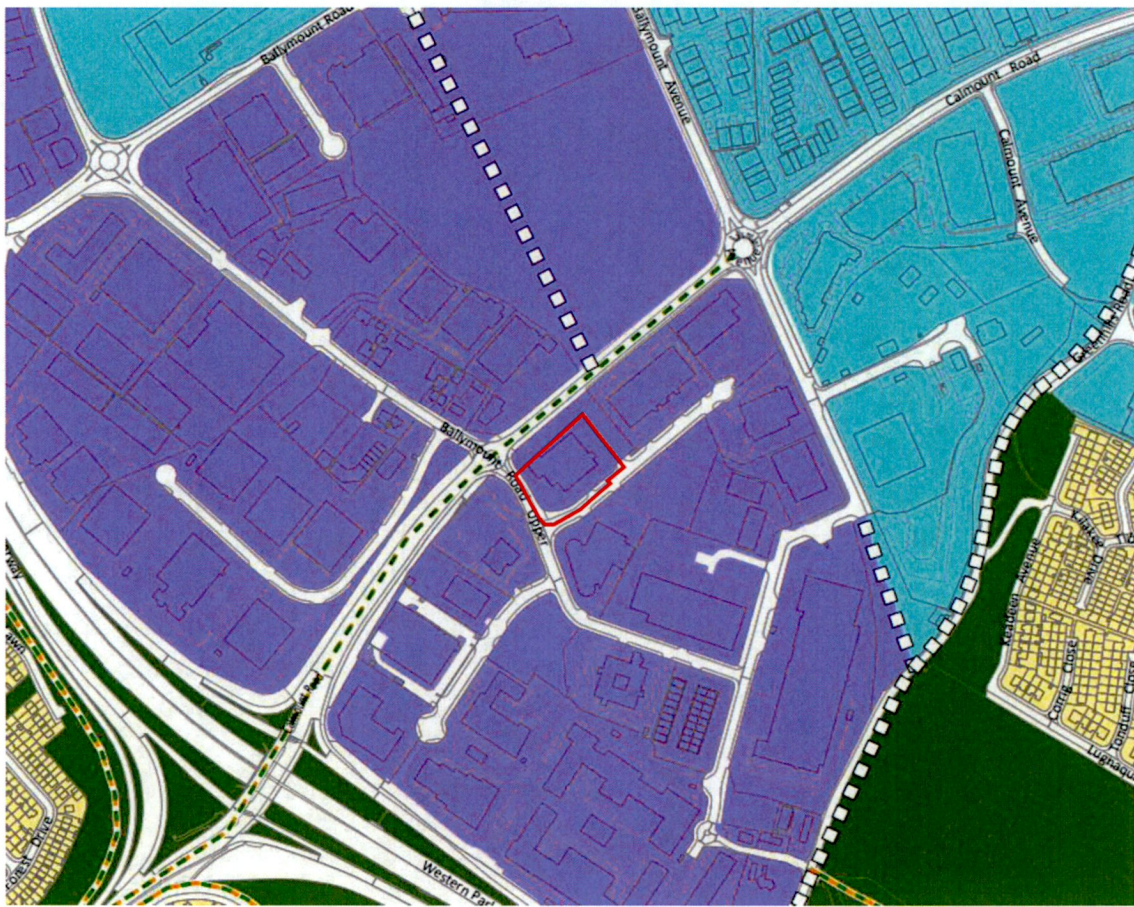
The South Dublin County Development Plan was made on the 22<sup>nd</sup> June 2022 and came into effect in August 2022. Following a ministerial direction was issued and reinstated data centre use class as an ‘open for consideration’ use class in the EE ‘Enterprise and Employment zoning’.. The following uses are permissible in principle:

*“Agriculture, Allotments, Car Park, Childcare Facilities, Concrete / Asphalt Plant in or adjacent to a Quarry, Garden Centre, Hotel / Hostel, Industry-Extractive, Motor Sales Outlet, Nightclub, Offices 100 sq m-1,000 sq m, Offices over 1,000 sq m, Public House, Refuse Landfill / Tip, Restaurant / Café, Retail Warehouse, Social Club, Sports Club / Facility, Stadium, Veterinary Surgery.”*

‘Data centre’ has now been added.

The use relates to data storage and archiving. It is affiliated to industry-light. An extract of the zoning map is presented below.

**Figure 7: Extract from Map Sheet 5 (Source: South Dublin County Development Plan)**



### *Economic Development Strategy*

Chapter 9 sets out the strategy for the economic development of the County. Policies of relevance include:

#### *EDE1 – Objective 4:*

*“To support the implementation of the RSES Economic Strategy to create economic opportunity to diversify local and rural economies and create quality jobs, to achieve a sustainable, competitive, inclusive, and resilient region, through the promotion of;*

- *Smart Specialisation for industry, enterprise agencies, Higher Institutes of Education, communities, and stakeholders;*
- *Clustering: Create, maintain, or upgrade economic strongholds in a favourable business ecosystem;*
- ***Orderly Growth reflecting the identified strategic employment locations within the County;***
- *A broad, resilient, economic base.”*

(bold our emphasis)

The site is located in the M50 Business Park, which is located in Ballymount. Ballymount is an older industrial park, which has been recognised as being in need of-intensification in the Core Strategy. It is important to note that the lands are not part of the strategic growth area as identified in the Metropolitan Area Strategic Plan. Such lands are zoned ‘REGEN’.

The proposed development includes an office fit-out with provision of 22 No. work stations. This will positively contribute to ED1E1 Objective 4 by providing employment opportunities in the area.

Other objectives are noted as follows:

*"EDE4 Objective 1:*

*To ensure that economic and employment development is located to optimise existing infrastructure and to support development and investment in the County's urban centres supporting orderly growth and placemaking."*

*"EDE4 Objective 3:*

*To ensure a synergy between economic growth and investment and the development of urban centres, supporting consolidation and re-intensification of infill, brownfield and underutilised lands within the County."*

In relation to the policy objectives listed above, it should be highlighted that the proposed development consists of the change of use of an existing structure. It makes optimum use of existing infrastructure, avoids excessive demolition, and would cater for a new landscaping scheme which includes tree planting.

It is located in the M50 Business Park in Ballymount, an area which the County Development Plan considers to be in need of consolidation. By using an existing vacant structure, the proposed development contributes to this objective.

The applicants are cognisant of section 9.3 on space extensive land use. This section does not apply to the proposed development, as it does not require the construction of new facilities on a large site. The application involves the change of use from an existing low intensity warehouse use to a data repository facility. The building and the site are effectively contained and modest in size (total building footprint: 2,600 sqm) and are not space extensive. It should be emphasised that the proposed development provides for 22 work stations which will be used by full-time employees. This positively contributes toward the re-intensification of '*infill, brownfield and underutilised lands*'. The Ballymount Industrial Estate is indicated in the Core Strategy as being one such estate and has been identified as being in need of re-intensification.

## Parking

### Cycle Parking

Table 12.23 sets out the minimum bicycle parking and storage rates for development in the County.

The development would qualify as falling under the enterprise and employment category as a warehouse, the office being ancillary to the warehouse use. The applicable standard is 1 space per 200 sqm for both warehousing and manufacturing. The requirement is translated as follows:

The data repository size is 2,445 sqm, the office being ancillary and would generate 13 spaces.

The total requirement is for 13 spaces. The proposed provision is for 12 spaces. Bicycle parking is located in shelters which are covered, safe and secure.

### Car Parking

Tables 12.25 sets out the **maximum** parking rates for non-residential car parking. The development site is located in Zone 1 ('throughout the county'). The applicable standard is 1

space for 100 sqm GFA for warehousing (there are no specified requirement for industrial). The development would qualify as falling under the enterprise and employment category. The parking demand profile is aligned with a warehouse use. The requirement is translated as follows:

The data repository size is 2,445 sqm , the office being ancillary, and would generate a maximum requirement for 26 spaces.

The proposed provision is for 22 spaces, including two disabled parking spaces. A reduced parking provision is justified having regard to the following:

- The employment intensity of the proposed development is comparable to the existing warehousing use intensity
- The reuse of an existing building
- The fact that the development plan specifies the rates are maximum

It is therefore considered that the proposal to include 22 spaces is appropriate. It is also noted that the bus stop no. 2767 for line 56 is located 260m north of the entrance of the site and the bus stop no. 2372 for lines 27, 77A and 77X is located 750m south east of the site, making the development accessible by public transport. In addition, the site is located directly across from an Applegreen petrol station which includes a number of food options for lunch and dinner for prospective employees.

Section 13.8.3 of the development plan requires that developments should comprise 15-20% of EV charging spaces. It is proposed to include 2 no. EV spaces.

### *Traffic and Transportation*

Table 12.27 of the development plan sets out the thresholds for submission of a Workplace Travel Plan. The proposed data repository size is 2,445 sqm, which is below the 2,500 sqm threshold, a Workplace travel plan is not required. A traffic impact assessment is not required with reference to the thresholds set out in the *Traffic and Transport Assessment Guidelines* (TII, 2014). The development is of a low intensity use, and the traffic generation resulting from the data repository use is comparable to that of the existing warehouse use.

### *Infrastructure and Environmental Services*

#### Flood Risk

A Site Specific Flood Risk Assessment accompanies this application. It concludes:

*“it was determined that the site is within Flood Zone C as defined by the Guidelines and based on the CFRAMS mapping. Therefore, the development on the subject site is appropriate for the site’s flood zone category and a justification test as outlined in the Guidelines is not required. The Guidelines sequential approach is met with the ‘Justify’ & ‘Mitigate’ principals being achieved. A regularly maintained drainage system would ensure that the network remains effective and in good working order should a large pluvial storm occur.”*

#### Surface Water

Section 13.9.1 of the County Development Plan on Water Management sets out the requirement for surface water. It should be noted that this section focuses on ‘new development’. It should

be reiterated that the proposed development is for a change of use of an existing structure and does not consist of 'new development'. Notwithstanding this, this application is accompanied by an Engineering Services Report Drainage and Water Services prepared by CSEA. This report demonstrates how the development will provide attenuation in compliance with the Greater Dublin Strategic Drainage Study and with the South Dublin County Council Sustainable Drainage Explanatory Design and Evaluation Guide as required by the development plan.

#### Cooling Water Discharge

As noted in the aforementioned engineering report, it is expected that the annual water usage would be less than 100 m<sup>3</sup> / annum and will result in a discharge less than 50 sqm<sup>3</sup> / annum.

#### Sustainable Urban Drainage System (SuDS)

The development includes a series of SuDS measures. These include inter alia:

- Permeable paving
- Attenuation storage with flow control device

### *Environmental Management*

#### Noise

In accordance with section 12.11.4 of the County Development Plan, a Noise Impact Assessment report is submitted as part of this application. It concludes:

*"The construction noise assessment has shown that in accordance with the 'significance' thresholds presented in the British Standard BS 5228 – 1: 2009+A1:2014: Code of practice for noise and vibration control on construction and open sites – Noise impacts during construction will be moderate to major at residential locations and will be controlled to operate within the relevant noise criteria.*

*The robust operational noise assessment of fixed plant associated with the proposed **development** has shown that the predicted change in background noise level **is in** the order of 2 to 3dB during the quietest night-time periods resulting in a not significant to slight noise impact. Ambient noise levels are and will continue to be dictated by road traffic noise in the area while a low level of plant noise is expected to be audible during lulls in other sources (e.g. distant traffic noise).*

*The operational noise assessment of vehicle movements associated with the site has shown that in accordance with the scale in the 'Guidelines on the Information to be contained in Environmental Impact Statements' there will be an imperceptible impact off site noise sensitive locations considering existing traffic volumes on the local road network."*

#### Air and Climate

An Air and Climate Impact Assessment report is submitted as part of this application. It concludes:

*"The results indicate that the ambient ground level concentrations are in compliance with the relevant air quality standards for NO<sub>2</sub>. For the worst-case year, emissions from the site lead to an ambient NO<sub>2</sub> concentration (including background) which is 36% of the maximum ambient 1-hour limit value (measured as a 99.8th percentile) and 45% of the annual limit value at the worst-case off-site receptor.*

*The UK EA assessment methodology determined that in any year, the diesel generator can run for 8760 hours before there is a likelihood of an exceedance at the nearest residential receptor (at a 98th percentile confidence level).*

*In summary, emissions to atmosphere of NO<sub>2</sub>, as the main polluting substance (as defined in the Schedule of EPA (Industrial Emissions) (Licensing) Regulations 2013, S.I. No. 137 of 2013) from the standby generator, will be in compliance with the ambient air quality standards which are based on the protection of the environment and human health. Therefore, no significant impacts to the ambient air quality environment are predicted.*

*In terms of impacts at nearby ecologically sensitive areas, the closest sensitive ecological area is the Grand Canal Proposed Natural Heritage Area (pNHA) (site code 002104) which is located c. 1.3 km north of the subject site. Dispersion modelling of NO<sub>x</sub> emissions from the installation at this distance is not required as there is no potential for significant impacts to vegetation as a result of emissions from the installation at such a distance. Emissions from the back-up generator on site peak at the site boundary and fall off rapidly with increasing distance from the installation.*

*Once the mitigation measures outlined in this report are implemented, the residual impacts on air quality or climate from the construction of the proposed development will be short-term and imperceptible and for the operational phases of the proposed development will be long-term, negative and ranging from imperceptible to slight.*

*In relation to cumulative impacts, given the distance from the proposed development to nearby facilities and given that the operational impact of emissions from the proposed development will be long-term, localised, negative and slight, no significant cumulative impacts will occur."*

### Energy

Policies in the development plan generally pertain to new developments and to 'space extensive land uses'. It should be reiterated that the development is neither a new development as it consists of the change of use of an existing low intensity warehouse building use, nor a space extensive land use as it is modest in size (total building footprint 2,600 sqm).

An energy statement forms part of this application. It states:

*"The development will be used to house tape media which will store and be a repository for data. Customer data is stored on tape media within a temperature and humidity controlled environment inside one of two tape libraries. This building is specifically for data archiving and cold storage of information and retrieval by customers is typically occasional. This form of data storage requires significantly less power consumption than a typical data centre."*

In relation to utility supply, it states:

*"The power requirements for the proposed development will be provided via 1 x Medium Voltage (MV) cable connections from the existing ESB substation (permitted and constructed under an existing permission) located immediately adjacent to the development site to the West. The proposed development includes the provision of a single-story client control switchgear room which will adjoin the existing ESB substation. There is an existing connection agreement in place with ESB to supply power for the proposed development.*

*The site distribution system supplies all electrical rooms where stepdown transformers are deployed to provide 415V electricity to all loads. The distribution system described above is*

*chosen as it represents the safest, most efficient and most economical method for site wide electricity distribution.”*

It is important to note as well that part of the roof space will be mounted with solar PV panels, which will contribute to improving energy efficiency of the building during operation.

## 6 Landscape and Visual Impact Assessment

A landscape and visual impact assessment (LVIA) accompanies this application. It assesses the impact of the development on six visual receptors noted as VP1 to VP6. Vp1 to VP5 are deemed to be of low sensitivity whereas VP6 is deemed to be medium. In summary, the LVIA considered:

- Impacts on VP1, located as site entrance at M50 Business Park are slight – imperceptible, positive and permanent;
- Impacts on VP2, located at Ballymount Road Upper by Applegreen Station are slight – imperceptible, positive and permanent;
- Impacts on VP3, located at Claremont Road by Junction 10 of the M50 are slight – imperceptible, positive and permanent;
- Impacts on VP4, located at Ballymount Road Upper, are slight – imperceptible, neutral and permanent;
- Impacts on VP5, located at Ballymount Avenue, are imperceptible, neutral and permanent;
- Impacts on VP6, located at Greenhills Park, are imperceptible, neutral and permanent.

## 7 Environmental Impact Assessment

An EIA Screening Report accompanies this application. It concludes:

*“On the basis of the evaluation set out in Section 2.0 of this document, an EIA for the Proposed Development is not mandatory.*

*[...]*

*It is concluded having regard to the nature, scale and location of the subject site, there is no likelihood of significant effects on the environment arising from the Proposed Development on the environment (direct, indirect or cumulatively with other development) and therefore it is considered that the requirement for sub-threshold EIA does not arise.”*

## 8 Appropriate Assessment

An Appropriate Assessment Screening Report has been prepared assist the Planning Authority in undertaking its assessment. The report concludes:

*“it can be excluded, on the basis of objective information, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on a European site.*

*An appropriate assessment is not, therefore, required.”*



## 9 Conclusions

The proposed development has been formulated in the context of national, regional and local planning policy. The scheme fully accords with the provisions of the South Dublin County Development Plan 2022-2028.

It has been demonstrated within this report, as well as within the accompanying drawings, documents that the proposal provides a suitable use of the subject lands. The proposed development which consists of the change of use of an existing warehouse unit is modest in scale and intensity.