

**Marston Planning Consultancy**  
23, Grange Park  
Foxrock  
Dublin 18

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

<b>Decision Order Number:</b> 0038	<b>Date of Decision:</b> 12-Jan-2023
<b>Register Reference:</b> SD22A/0420	<b>Registration Date:</b> 08-Nov-2022

**Applicant:** Vantage Data Centers DUB11 Ltd.

**Development:** Development on a 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 (348.36sq.m); and the construction of 1 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 two storey data center (Building 13) with a gross floor area of 12, 893sqm. It will include 13 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 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 Baldonnel 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 car

parking spaces (to include 12 EV spaces and 3 disabled spaces), and 34 cycle parking spaces; Signage (5.7sq.m) at first floor level at the northern end of the eastern elevation of the data center building; 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 Baldonnel Stream under SDCC Planning Ref. SD21 A/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; An Environmental Impact Assessment Report (EIAR) has been submitted with this application.

**Location:** Site within the townlands of Ballybane & Kilbride, Clondalkin, Dublin 22

**Application Type:** Permission

Dear Sir /Madam,

With reference to your planning application, received on 08-Nov-2022 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. (a) The applicant has not quantified the level of office space to be provided and is requested to provide this detail. The applicant should note that if the floor area is greater than 1, 000sq.m, compliance with EDE4 Objective 4 should be indicated.  
(b) the applicant is requested to set out how the proposal is compliant with EDE1 Objective 6.  
(c) In line with EDE7 objective 2, the applicant is requested to provide further information regarding renewable energy. The applicant should note that GNI proposals to introduce renewable into their network are not considered to satisfy the policy criteria. Therefore, the proposal should:
  - Show 100% renewable energy from the MFGP or other source at all times
  - Where this cannot be met, provide evidence of PPA in Ireland.  
(d) the applicant is requested to demonstrate compliance with EDE7 objective 3  
(e) The applicant is requested to provide a statement in accordance with Section 12.10.1.  
(f) The applicant is requested to provide a design statement that indicates compliance with QDP2 Objective 1, Policy QDP3 and objective 1, QDP4 Objective 2, QDP7 Objective 6, 7 and 8, QDP8 Objective 1, Policy QDP11 and section 12.5.2
2. (a) The applicant is requested to reconsider the elevational treatment and design along prominent frontages in terms of design and materials used.  
(b) The applicant is requested to provide details of fencing / boundary treatment.
3. The proposal is not acceptable to the Environmental Health Department until the following information has been submitted and assessed.  
An acoustic assessment must be undertaken by a suitably qualified acoustic consultant describing and assessing the impact of noise emissions from the proposed development to include accumulative noise

impacts. The investigation must include, but not be necessarily limited to, the following:

- (a) The identification of any neighbouring noise sensitive receivers who may be potentially impacted by the proposal
- (b) The identification of all operations conducted onsite as part of the development proposal that are likely to give rise to a public nuisance for the neighbouring noise sensitive receivers.
- (c) An assessment of the existing background (LA90, 15 min) and ambient (LAeq, 15 Min) acoustic environment at each receiver locations representative of the time periods that any noise impacts may occur. NOTE: For the purposes of the assessment background noise includes; noise of the surrounding environment excluding all noise sources currently located on-site.
- (d) Distances between the development and the nearest noise sensitive receiver and the predicted level of noise (Laeq, 15min) at each receiver for each development activity. These noise predictions must be conducted for all operational noise and the construction noise activities. The predicted level of noise should be assessed at the boundary of each receiver.
- (e) A statement outlining any recommended acoustic control measures that should be incorporated into the development to ensure the use will not create adverse noise impacts on the occupiers of any neighbouring noise sensitive properties
- (f) The applicant is required to demonstrate whether the proposed development can meet the standards set out by South Dublin County Council as detailed in Councils Standard condition below:

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

4. The applicant is requested to submit a revised layout not less than 1:500 scale showing a footpath and cycle lane along the northern boundary to match the existing further west along the R134. The footpath and cycle lane shall be constructed to SDCC standards for public roads. The works on the public road will be undertaken by the applicant as part of the overall planning permission. The applicant is requested to secure the relevant letter of consent from SDCC.
5. The applicant is requested to submit a revised landscape strategy for the subject site which meets the requirement of the Public Realm Section in terms of Green Infrastructure as required under the CDP 2022-2028. The applicant shall demonstrate how they contribute to the protection or enhancement of Green Infrastructure in the County through the provision of green infrastructure elements as part of the application submission. As part of the revised landscape proposals The applicant shall provide the following additional information:
  - i. The applicant is requested to submit a fully detailed Planting Plan to accompany the landscape proposals for the entire development. The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape.
  - ii. The revised proposals shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated/bio-retention tree pits.
  - iii. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site
  - iv. Demonstrate how natural SUDS features can be incorporated into the design of the proposed Development
  - v. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on this existing site and show connections to

the wider GI Network. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population.

6. The proposed development would result in the removal of a centrally located hedgerow and associated mature trees of significant biodiversity and ecology value. The applicant is requested to submit revised proposals in order to ensure that this central hedgerow and trees are retained and protected. Additional information is required to demonstrate how the plans contribute to the protection or enhancement of existing Green Infrastructure (which included the trees and hedgerows) within and adjacent to the subject site through the provision of green infrastructure elements as part of the application submission, having regard to the following:
  - i. Where the development site is located close to Corridor the development should, at a minimum, protect any existing GI assets and enhance same (for example, not breaking a GI Corridor but enhancing same with a connecting piece of planting, retaining hedgerows or woodlands);
  - ii. The characteristics and assets of the Corridor should be reflected within proposed development, for example continuation of hedgerows, tree planting, waterways;
  - iii. Development should seek to enhance or restore features that act as ecological corridors, particularly water features, hedgerows, tree lines, areas of un-cultivated land. These, or some element of them, should be incorporated into the proposed development to create pathways for wildlife and / or increase amenity value;
  - iv. Developers should be aware that ecological corridors can also act to quickly spread non-native invasive species. Therefore, identification and control of invasive species site should be included in planning applications and the GI Plan.
7. The applicant is requested to submit a revised layout plan which ensures the retention and enhancement of the existing central hedgerow located in the northern portion of the site. The current proposals and design layout for the development which requires the removal of this important hedgerow and GI asset is not acceptable to the Public Realm Section and its removal contravenes the following policies and objectives which the CDP 2022-2028.
  - NCBH11 Objective 3
  - GI1 Objective 4
  - GI2 Objective 2
8. Additional Tree planting is requested as part of the landscape proposals in order to ensure that there is a positive net gain in terms of new trees proposed compared to those being removed. As a minimum existing trees lost should be replaced on a 3:1 ratio basis. Full details of all proposed tree planting shall be provided on a detailed planting plan. This planting plan will include planting and maintenance specifications, including cross-section drawings, use of guards or other protective measures and confirmation of location, species and sizes, nursery stock type, supplier and defect period. Any trees that are found to be dead, dying, severely damaged or diseased within three years of the completion of the building works shall be replaced in the next planting season by specimens of similar size and species in the first suitable planting season.
9. The applicant is requested to submit a scheme for the maintenance and management of the landscape scheme for the lifetime of the development. The scheme shall include the following:
  - i) methods for the proposed maintenance regime;
  - ii) detailed schedule;
  - iii) details of who will be responsible for the continuing implementation
  - iv) details of any phasing arrangements

10. The applicant is requested to demonstrate compliance with the SDCC SUDS Design Guide 2022, and Policies GI3, GI4, GI5, IE3, SM2, SM7, and sections 4.3.1, 12.7.6, 12.11.1, and 12.11.3. of the South Dublin County Development Plan 2022 - 2028 in relation to sustainable drainage systems.
  - (B) In relation to SUDS, the applicant is requested to submit plans showing how surface water shall be attenuated to greenfield run off rates and showing what SuDS (Sustainable Drainage Systems) are proposed.
  - (C) SUDS Management - The applicant is requested to submit a comprehensive SUDS Management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan should also be included as a demonstration of how the system will function following implementation.
  - (D) Natural SUDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits, permeable paving, green roofs, filtration planting, filter strip etc. In addition, the applicant should demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details.
    - (E) The applicant is requested to submit a report to show surface water attenuation calculations for proposed development. Show on a report and drawing what surface water attenuation capacity each SuDS (Sustainable Drainage System) system has in m<sup>3</sup> . Show in report what surface water attenuation capacity is required for proposed development. Show what different surface types, areas in m<sup>2</sup> are proposed such as, green roofs, permeable paving, buildings, roads and their respective run off coefficients. Submit a drawing
11. The applicant is requested to provide additional information as follows and in accordance with the quoted policies and sections of the South Dublin County Development Plan 2022 - 2028:
  - a) To demonstrate how they intend to reduce fragmentation of existing green infrastructure
12. The applicant is requested to submit a scheme to provide bird boxes and bat boxes/tubes/ hedgehog passes on the site.
13. (a) The sub catchment areas in the site do not add up to the total site area in surface water attenuation calculations submitted. Based on limited information submitted in terms of surface types and areas of same the surface water attenuation proposed of 970m<sup>3</sup> or 1, 084m<sup>3</sup> is undersized by approximately 2% to 11%. The applicant is requested to submit a report to show the areas in m<sup>2</sup> of each surface type and their respective run off coefficients. Include the areas grasslands and explain why this has 0% run off if that is the case. Note that the areas of all surface types should equal the total site area.
  - (b) The applicant is requested to examine if any surface water pipes can be replaced with swales or filter drains at any location of the site. Submit a drawing showing what if any additional SuDS (Sustainable Drainage Systems) can be provided on site.
14. (a) where possible, the applicant is requested to replace proposed overflow pipe with and open swale or natural open channel.
  - (b) the applicant is requested to contact water services in South Dublin County Council to discuss the issue of blockages in a culvert downstream of site and examine what solutions there are to unblock the culvert.
  - (c) Significant concerns are maintained in relation to the proposed culverting of the stream and it is considered that alternative design solutions should be explored to avoid the proposed culverting.

15. (a) Whilst the Planning Authority consider that the applicant has considered alternatives, it is noted that there are concerns regarding compliance with policy in relation to space extensive uses and also Green Infrastructure. It is therefore considered that further assessment of alternatives is required, once overall policy considerations have been incorporated.
- (b) Further consideration in the EIAR of the cumulative impact of the development on Material Assets during the Operational Phase is needed, in relation to the Electricity grid and Gas networks, as well as more detail on what the energy demand for the proposed data centre is and how precisely it will be met with reference to the electricity grid connection agreement, the permitted Multi-Fuel Generation Plant, the proposed diesel generators and the interplay between these power sources. A emergency scenario in which the proposed data centre's grid connection is temporarily suspended should also be provided for. Verification documentation around the grid connection and MFGP connection are also requested.
- (c) It is considered that the information contained within the EIAR requires amending following any changes in the scheme following additional information to ensure the proposed development allows for adequate assessment of the potential impacts of the proposed development on the receiving environment and complies with the requirements of Article 94 of the Planning and Development Regulations 2001 (as amended).

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

**NOTE:** The applicant should note that any submission made in response to requests for additional information will be examined by the Planning Authority and may be deemed to be significant additional information. The applicant will be contacted by the Planning Authority if the additional information submission is deemed significant. In this event the applicant(s) will be requested to publish a notice in an approved newspaper and erect or fix a site notice on the land or structure to which the further information relates and to submit copies of the both the newspaper and site notices to the Planning Authority in accordance with Article 35 (1) (a) and (b) of the Planning and Development Regulations 2001 (as amended).

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

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

Signed on behalf of South Dublin County Council

**Register Reference:** SD22A/0420

**Date:** 13-Jan-2023

Yours faithfully,

*Pamela Hughes*  
for **Senior Planner**