Comhairle Chontae Atha Cliath Theas

PR/0921/23

Record of Executive Business and Chief Executive's Order

Reg. Reference:	SD22A/0156	**Application Date:**	30-May-2022
Submission Type:	Significant Additional Information	**Registration Date:**	14-Jun-2023

Correspondence Name and Address: Brock McClure Planning and Development Consultants 63, York Road, Dun Laoghaire, Co. Dublin

Proposed Development: 10 year permission on a site is bounded to the east and south by Grange Castle Golf Club, to the north by Nangor Road (R134) and to the west by an estate road known as Falcon Avenue) for modifications to the permitted data centre granted under SDCC Reg. Ref. SD21A/0186 comprising the following, reconfiguration and alterations to the data centre building to include removal of front of house offices at third floor level, alterations to floor levels at second floor to provide consistency between front of house and data halls, parapet height increase of front of house to c.16.8m, provision of storage at second floor level in lieu of relocated internal generators to the external generator yard and associated elevational alterations; extension of loading dock at ground floor level by c.6osqm in area with minor height increase to c.5.3m; removal of 3 air plenums to the front (north) elevation and provision of screening to generator flues in lieu of omitted plenums; alterations at roof level to include removal of 2m high gantry screening; alterations to the permitted generator plant yard to the north of the data centre to include the removal of fuel tanks, reconfiguration of plant and generators, provision of 2 additional external generators (increase from 5 to 9 external generators), provision of 4 additional external plant rooms, provision of diesel pump tank cabinets and stepover, relocation of generator yard doors and enlarged generator yard to accommodate the proposed modifications; increase in plant areas by c.77sq.m; reconfiguration of plant within the permitted chiller plant yard to the south of the data centre; removal of 1 sprinkler/water tank and removal of stairs and door to the side of the waste compound; reconfiguration of car parking and motorcycle spaces and removal of 1 accessible space. 64 total number of car parking spaces; the proposal also includes provision of on-

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	site gas power generation compound (c.2, 604sq.m in area) in the area previously reserved for a future data centre; the compound comprises 7 modular plant rooms (totalling c.180sq.m in area), 10 gas fired generators and associated flues c.14.7m high, gas skid, associated modular plant, boundary treatment surrounding the compound c.6.5m high and 2 vehicular access points including general and emergency access; all associated site development works, services provision, drainage works, access, landscaping and boundary treatment works; no buildings are proposed above the existing ESB and SDCC wayleaves to the west and north of the site; the overall Gross Floor Area of the development is reduced by c.44sq.m to c.9, 795sq.m from previously permitted under SDCC Reg. Ref. SD21A/0186; the application is accompanied by a Natura Impact Statement.
Location:	Plot 100, Profile Park, Nangor Road, Clondalkin, Dublin 22
Applicant Name:	Equinix (Ireland) Ltd
Application Type:	Permission

(SW)

Description of Site and Surroundings:

Site Area

Stated as 2.65 hectares

Site Description

The site is located with Profile Park. The surrounding area is generally developed for employment, although Profile Park itself is largely undeveloped. The site is predominantly flat. A golf club lies to the east.

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Proposal
The application consists of the following proposal:

10 year permission on a site is bounded to the east and south by Grange Castle Golf Club, to the north by Nangor Road (R134) and to the west by an estate road known as Falcon Avenue) for

- **modifications to the permitted data centre** granted under SDCC Reg. Ref. SD21A/0186 comprising the following,
    - reconfiguration and alterations to the data centre building to include removal of front of house offices at third floor level,
    - alterations to floor levels at second floor to provide consistency between front of house and data halls,
    - parapet height increases of front of house to c.16.8m,
    - provision of storage at second floor level in lieu of relocated internal generators to the external generator yard and associated elevational alterations;
    - extension of loading dock at ground floor level by c.6osqm in area with minor height increase to c.5.3m;
    - removal of 3 air plenums to the front (north) elevation and provision of screening to generator flues in lieu of omitted plenums;
    - alterations at roof level to include removal of 2m high gantry screening;
    - alterations to the permitted generator plant yard to the north of the data centre to include the removal of fuel tanks, reconfiguration of plant and generators, provision of 2 additional external generators (increase from 5 to 9 external generators), provision of 4 additional external plant rooms, provision of diesel pump tank cabinets and stepover, relocation of generator yard doors and enlarged generator yard to accommodate the proposed modifications;
    - increase in plant areas by c.77sq.m;
    - reconfiguration of plant within the permitted chiller plant yard to the south of the data centre;
    - removal of 1 sprinkler/water tank and removal of stairs and door to the side of the waste compound;
    - reconfiguration of car parking and motorcycle spaces and removal of 1 accessible space. 64 total number of car parking spaces;

- the proposal also includes **provision of on-site gas power generation compound** (c.2,604sq.m in area) in the area previously reserved for a future data centre;
    - the compound comprises 7 modular plant rooms (totalling c.180sq.m in area), 10 gas fired generators and associated **flues c.14.7m** high, gas skid, associated modular plant, boundary treatment surrounding the compound c.6.5m high and 2 vehicular access points including general and emergency access;
- all associated site development works, services provision, drainage works, access, landscaping and boundary treatment works; no buildings are proposed above the existing ESB and SDCC wayleaves to the west and north of the site;
- the overall Gross Floor Area of the development is reduced by c.44sq.m to c.9,795sq.m from previously permitted under SDCC Reg. Ref. SD21A/0186; the application is accompanied by a Natura Impact Statement.

Zoning

The site is subject to zoning objective EE – 'To provide for enterprise and employment related uses.'

SEA: Indicates overlap with SFRA B. The Site is located within the Department of Defence Inner Zone.

Consultations

Water Services:	Request Additional Information.
Roads:	No objection, subject to conditions.
Heritage:	No report received at time of writing.
Parks:	No comments / objections.
EHO:	No objection, subject to conditions.
Irish Water:	No objection, subject to conditions.
Waste Management:	No report received at time of writing.
TII:	No observations.

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Submissions/Observations /Representations

A number of submissions were received:

- CRU has not been notified
- Proposal is premature in light of CRU policy
- No EIAR provided.
- No renewable energy included
- Limited provision of green roofs and green walls.
- Site notice was not yellow in accordance with Article 19(4)
- Proposal does not comply with Policy E2, objective 3 and E4 objective 1 or SDCC climate action plan or Climate Action and Low Carbon Development (Amendment) Act 2021
- Does not comply with EIA or Habitats directive – insufficient detail on grid connection provided.
- EIAR required
- Inadequate detail in NIS on impact on birds. AA screening does not provide sufficient reasons or findings. Zone of Influence in NIS is not reasoned or explained.
- No regard had to cumulative effects
- High electricity consumption will increase Ireland's carbon emissions at a time when we urgently need to reduce them
- Already a disproportionate number of data centres in SDCC
- Will impact water usage
- E2 objective 3 required green roofs.
- Government target of 70% electricity from renewable
- Ireland is one of EUs worst carbon emission offenders and faces fines. – data centre industry was responsible for 1.85% of electricity related carbon emissions

Relevant Planning History

SD21A/0186 Construction of a 3 storey (part 4 storey) data centre known as 'DB8' to include data halls, electrical/plant rooms including internal generators, offices, lobbies, ancillary staff areas including break rooms and toilets, stores, stair/lift cores throughout and photovoltaic panels at roof level; the total gross floor area excluding hot air plenums and external staircase is c.9,601sq.m and the overall height of the data centre ranges from c.16m to c.20m to roof parapet level and up to c.24.48m including roof top plant, flues and lift overrun; provision of 5 external generators, 8 fuel tanks and ancillary plant contained within a plant yard to the north of DB8; provision of a water tank plant room, air cooled chillers and ancillary plant contained within a chiller plant yard to the south of DB8; provision of a water sprinkler pump room (c.23sqm), 2 sprinkler tanks (c.12m high each), heat recovery plant room (c.17sqm), ESB substation (c.44sqm), waste/bin stores (c.52sqm); total floor area of ancillary structures and plant (c.303sqm); provision of a delivery yard and loading bays, 64 car parking spaces, 5 motorcycle spaces, bicycle shelter serving 14 spaces, smoke shelter, internal access roads and footpaths, vehicular and pedestrian access to the west from Falcon Avenue and closure of an existing vehicular entrance from Falcon Avenue; all

associated site development works, services provision, drainage works including attenuation, landscape and boundary treatment works including berming, hedgerow protection areas and security fencing; no buildings are proposed above the existing ESB wayleave and SDCC watermain wayleave to the west and north of the site; the area to the southwest of the site (temporary meadow) is reserved for a future data centre, subject of a separate application to South Dublin County Council on a site bounded to the east and south by Grange Castle Golf Club, to the north by Nangor Road (R134) and to the west by an estate road known as Falcon Avenue. This application is accompanied by a Natura Impact Statement. **Permission Granted**

SD12A/0150 Erection of a 2.4m high perimeter fence along Nangor Road boundary (approximately 250m long) with separate entrance gates for vehicular, bicycle and pedestrian access; construction of a single storey security hut with security barriers. **Permission Granted**

SD07A/1059 Block A comprises a five storey office building of 3,019.6sq.m. gross floor area which fronts onto the Nangor Road and which will accommodate 18 no. own door office units and 1 no. ESB substation; (2) Block B comprises a five storey office building of 2,905.1sq.m gross floor area which fronts onto the Nangor Road and is located adjacent to the boundary with Grange Castle Golf Course - this block will accommodate 26 no. own door office units; (3) Block C comprises a four storey office building of 2,684.8 sq. m. gross floor area located adjacent to the boundary with Grange Castle Golf Course which will accommodate 24 no. own door office units. The proposed blocks are arranged in a u-shaped configuration around a central landscaped square. Vehicular access to the site is proposed via a left-turning entry and exit slip lane from the Nangor Road and also via the internal Spine Road permitted under application Reg. Ref. SD06A/0568. The proposed development includes 30 no. surface level car parking spaces and one level of underground car parking which will accommodate 200 no. car spaces. The development also includes all ancillary services, landscaping and site works on a site of 1.3163 hectares. This application is being lodged pursuant to application Reg. Ref: SD06A/0568 under which planning permission was granted for the development of roads and services to facilitate the 'Profile Park' Business Park. **Permission Granted**

SD06A/0568 Provision of roads and services infrastructure to facilitate the future development of a business park, to be known as 'Profile Park' on these lands. The development includes the provision of 1,675 metres of internal distributor roads consisting of 267 metres to dual carriageway standard (at the main entrance) with a further 1,408 metres to single carriageway standard and one internal roundabout. The development also includes surface water drainage, foul drainage and water supply infrastructure, associated landscaping and all ancillary works, on a site of 39.84 hectares. Access to the site will be provided at the northern boundary off the existing roundabout to Kilcarbery Business Park. This application is accompanied by an Environmental Impact Statement. **Permission Granted.**

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SD06A/0568/EP Provision of roads and services infrastructure to facilitate the future development of a business park, to be known as 'Profile Park' on these lands…
Granted

Relevant Enforcement History
None recorded for subject site.

Pre-Planning Consultation
PP032/22 Proposed on-site power generation building and compound (c.2,552sq.m in area) with associated plant rooms (c. 196sq.m) and associated works to serve the concurrent application Ref. SD21A/0186.

PP013/21 Proposed 3 storey Data Centre (c.9562m2) with ESB Substation, District Heat Exchange Building, ancillary car parking, bike parking, landscaping and boundary treatment with vehicular access via Falcon Avenue.

Planning Policy and Guidance
Relevant Policy in South Dublin County Council Development Plan (2016-2022)
Section 1.12.0 Employment Lands

Section 4.2.0 Strategic Policy For Employment
Policy ET1 Economic and Tourism Overarching Policies and Objectives
It is the policy of the Council to support sustainable enterprise and employment growth in South Dublin County and in the Greater Dublin Area, whilst maintaining environmental quality.

Policy ET3 Enterprise and Employment (EE)
It is the policy of the Council to support and facilitate enterprise and employment uses (hightech manufacturing, light industry, research and development, food science and associated uses) in business parks and industrial areas.

ET3 Objective 2
To prioritise high tech manufacturing, research and development and associated uses in the established Business and Technology Cluster to the west of the County (Grange Castle and Citywest areas) to maximise the value of higher order infrastructure and services that are required to support large scale strategic investment.

ET3 Objective 5
To ensure that all business parks and industrial areas are designed to the highest architectural and landscaping standards and that natural site features, such as watercourses, trees and hedgerows are retained and enhanced as an integral part of the scheme.

ET3 Objective 6
To ensure that business parks and industrial areas are designed to promote walking, cycling and public transport.

Section 6.4.4 Car Parking
Policy TM7 Car Parking

Section 7.1.0 Water Supply & Wastewater
Policy IE1 Water & Wastewater

Section 7.2.0 Surface Water & Groundwater
Policy IE2 Surface Water & Groundwater

Section 7.3.0 Flood Risk Management
Policy IE3 Flood Risk

Section 7.5.1 Waste and Resource Policy and Legislation
Policy IE5 Waste Management

Section 7.6.0 Major Accidents Directive
Policy IE6 Major Accidents

7.7.0 Environmental Quality
Policy IE6 Environmental Quality

Policy IE8 Casement Aerodrome

Section 8.0 Green Infrastructure
Policy G5 Sustainable Urban Drainage Systems
Policy G6 New Development in Urban Areas

Section 9.3.1 Natura 2000 Sites
Policy HCL12 Natura 2000 Sites
Section 10.0 Energy
Policy E1 Responding to European and National Energy Policy & Legislation
Policy E2 South Dublin Spatial Energy Demand Analysis
Policy E3 Energy Performance in Existing Buildings
Policy E4 Energy Performance in New Buildings

Policy E5 Waste Heat Recovery & Utilisation
It is the policy of the Council to promote the development of waste heat technologies and the utilisation and sharing of waste heat in new or extended industrial and commercial developments, where the processes associated with the primary operation on site generates waste heat.

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E5 Objective 1
To promote the development of waste heat technologies and the utilisation and sharing of waste heat, in new or extended industrial and commercial developments, where the processes associated with the primary operation on site generates waste heat.

Section 11.7.6 Waste Heat Recovery & Utilisation

Table 11.18: Key Principles for Development within Enterprise and Employment Zones

Section 11.2.1 Design Statements
Section 11.2.5 Enterprise and Employment Areas
Section 11.2.7 Building Height
Section 11.2.8 Signage – Advertising, Corporate and Public Information
Schedule 6: Outdoor Advertising Strategy

Section 11.4.1 Bicycle Parking Standards
Table 11.22: Minimum Bicycle Parking Rates

Section 11.4.2 Car Parking Standards
Table 11.23: Maximum Parking Rates (Non Residential)
Section 11.4.4 Car Parking Design and Layout
Section 11.4.6 Travel Plans

Section 11.6.1 (i) Flood Risk Assessment
Section 11.6.1 (ii) Surface Water
Section 11.6.1 (iii) Sustainable Urban Drainage System (SUDS)
Section 11.6.1 (iv) Groundwater
Section 11.6.1 (v) Rainwater Harvesting
Section 11.6.1 (vi) Water Services
Section 11.6.3 Environmental Hazard Management
Section 11.6.3 (i) Air Quality
Section 11.6.3 (ii) Noise
Section 11.6.3 (iii) Lighting
Section 11.6.4 Major Accidents – Seveso Sites
Section 11.6.5 Waste Management

Section 11.7.2 Energy Performance In New Buildings

Section 11.8.1 Environmental Impact Assessment
Section 11.8.2 Appropriate Assessment

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National and Regional Policy
Government Policy Statement on Security of Electricity Supply (November 2021)
Climate Action Plan 2021

Project Ireland 2040 National Planning Framework, Government of Ireland, 2018.

Regional Spatial & Economic Strategy 2019-2031, Eastern & Midland Regional Assembly (2019)

Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government, (2009)

Smarter Travel – A Sustainable Transport Future. A New Transport Policy for Ireland 2009 – 2020, Department of Transport, (2009)

Assessment
The main areas for consideration are the following:

- Zoning and Policy
- Residential Amenity
- Design and Visual Amenity
- Parking, Transport and Access
- Services and Drainage
- Archaeology
- Landscaping
- Energy Analysis
- Ecology / Heritage
- Aviation safety
- Environmental Impact Assessment
- Appropriate Assessment

Zoning and Policy
The application site is located within an area that is zoned 'Enterprise and Employment' and is subject to zoning objective 'EE - To provide for enterprise and employment related uses.' In terms of the use class proposed, a power plant is considered to fall under 'Public Services' as defined in Schedule 5: Definition of Use Classes & Zoning Matrix Table of the County Development Plan (CDP) which is permitted in principle within lands zoned EE. The applicant states in their Planning Statement (Brock McClure) that it will be 6-8 years before the development would be considered for connection to the grid and the proposal to provide the onsite generation plant will proceed without a grid connection. It is stated 'it can therefore be assumed that this proposal is not a 'public services' until such time that ESB can confirm terms and conditions for a grid connection.'
The applicant is, therefore requested, via **additional information** to set out how the proposed development is in keeping with the Land Use Matrix of the CDP.

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Power Supply & Climate Action

Project Ireland 2040 (National Planning Framework and National Development Plan 2018-2027) includes an objective for the promotion of Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities. The strategic importance of data centres is reflected in the thematic infrastructure priorities in Project Ireland 2040, which embeds policy support for data centres into the planning policy hierarchy. The 2018 Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy sets out that data centre development is supported.

It is noted that there is support for data centres in national planning policy and planning permission has been granted for a data centre on this site, however, this application also includes a significant element of on-site power generation.

National Strategic Outcome 8 of the NPF seeks to transition to a low carbon and climate resilient society. Whilst at a regional level Chapter 7 of the Eastern & Midland Regional Assembly RSES seeks to decarbonise the energy sector with a shift from its reliance on using fossil fuels and natural gas as its main energy source to a more diverse range of low and zero-carbon sources.

In terms of local policy, the South Dublin County Development Plan (2016-2022) set out Energy policies in Chapter 10 – Energy of the County Development Plan (2016-2022). E1 states "*It is the policy of the Council to respond to the European and National Energy Programme through the County Development Plan – with policies and objectives that promote energy conservation, increased efficiency and the growth of locally based renewable energy alternatives, in an environmentally acceptable and sustainable manner*" and E4 states "*It is the policy of the Council to ensure that new development is designed to take account of the impacts of climate change, and that energy efficiency and renewable energy measures are considered in accordance with national building regulations, policy and guidelines*".

E5 relates to Waste Heat Recovery & Utilisation and states "*It is the policy of the Council to promote the development of waste heat technologies and the utilisation and sharing of waste heat in new or extended industrial and commercial developments, where the processes associated with the primary operation on site generates waste heat*".

Policy E11 states "*It is the policy of the Council to ensure that the provision of energy facilities is undertaken in association with the appropriate service providers and operators, including ESB Networks, Eirgrid and Gas Networks Ireland. The Council will facilitate the sustainable expansion of existing and future network requirements, in order to ensure satisfactory levels of supply and to minimise constraints for development."*

Chapter 10 of the CDP is clear in its focus on moving away from carbon-based fossil fuels including gas and the use of alternative non-polluting, low carbon and renewable energy sources such as wind, solar, hydro, and geothermal. It is also clear that, where new facilities are proposed, it should be in conjunction with the relevant service providers.

As stated, whilst it is apparent that there is planning policy support for data centres and planning permission has been granted for a data centre on site, there is also a need to balance the demand for development with climate action as well as the capability of the national grid to provide for such developments.
The Planning Authority considers that limited justification for the gas power generation is provided in the planning application report. The long term plan for energy supply is not apparent for the site and the potential for the gas infrastructure to adapt is not outlined. The Planning Authority is concerned with the lack of consideration for alternative energy supply, including renewable energy.
In relation to the power generation on site, the applicant is requested to clarify the following:

- The appropriateness of the proposal for an on-site gas plant based on national, regional and local policy in terms of energy requirements and climate change, including the Government Policy Statement on Security of Electricity Supply and CRU Direction to the System Operators related to Data Centre grid connection processing;
- provide more detail regarding the alternative sources of power generating assessed as part of the alternatives.
- consider whether it is possible to incorporate a portion of renewable energy generation.
- Outline the long term plan for the energy supply of the data centre and the use/need for the gas power generation area if a connection to the electricity grid is secured.
- Details of any connection agreements with Eirgrid / ESB, existing or pending, as well as details of any consultation undertaken with Eirgrid / ESB
- Details of any consultation undertaken with Gas Networks Ireland
- Information on whether the existing site is serviced in terms of utilities and if not the proposals for undertaking the development required to facilitate servicing.
- Details of the connection to the surrounding area and national gas grid

Furthermore, the applicant is advised that the Planning Authority remains concerned with regard to the number and extent of large demand connections in this area and the demand for future grid reinforcements. The absence of power via Eirgrid and the use of gas-powered generators conflicts with the macro policies in the Development Plan around Energy.
The other elements of the proposal involve altering an existing permission and are therefore acceptable in principle.

EPA and CRU
No comments have been received from the Commission for Regulation of Utilities or the Environmental Protection Agency. The applicant states that they will apply to the CRU for the necessary Authorisations and Licences following receipt of planning permission for the proposed power plant. The Planning Authority considers that further information should be sought by way of **Additional Information request.**

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10 Year Permission
The Planning Authority is not of the opinion that a 10 year permission is necessary in this instance. The applicant is requested to provide a justification for seeking 10 years. It is noted that the Planning Statement states that this is 'in order to carry out the development and facilitate the installation of all necessary equipment relating to the data centre and OSPG. **Additional information** is therefore requested.

Site Notice
In accordance with Article 19(4) "*Where a valid planning application is made in respect of any land or structure, and a subsequent application is made within 6 months from the date of making the first1mentioned application in respect of land substantially consisting of the site or part of the site to which the first1mentioned application related, in lieu of the requirements of sub-article (1)(b), the site notice for the subsequent application shall be inscribed or printed in indelible ink on a yellow background and affixed on rigid, durable material and be secured against damage from bad weather and other causes".*

The current planning application was valid on 30 May 2022. The most recent previous application prior to this was made on 5 July 2021 and not within 6 months.

Residential Amenity
The EHO has stated that there are no objections, subject to conditions.

Design and Visual Amenity
Design
Section 11.2.1 Design Statements of the CDP requires developments over 1,000sq.m to be accompanied by a Design Statement consisting of a site analysis, a concept plan and/or masterplan, a statement based on the design criteria listed in Section 11.2.0 and/or tables 11.17 and 11.18 and a statement or Quality Audit addressing street design as outlined within the Design Manual for Urban Roads and Streets.

The applicant has submitted a design statement. This sets out:
- background
- details of the site and surrounding area
- concept ideas
- proposed site plan
- landscaping
- transport and access
- design and layout

The design statement is considered adequate in this instance.

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Visual Amenity

The site is currently greenfield (although it is noted it has previously been used as a builder's compound). It is located at the entrance to profile park and fronts Nangor Road. It is therefore in a highly prominent location. The surrounding lands are predominantly undeveloped. The proposal seeks amendments to a datacentre granted permission under SD21A/0186: as follows:

- reconfiguration and alterations to the data centre building to include removal of front of house offices at third floor level – *This would have a negligible visual impact*
- alterations to floor levels at second floor to provide consistency between front of house and data halls, – *This would have a negligible visual impact*
- parapet height increases of front of house to c.16.8m, – *This would have a negligible visual impact*
- provision of storage at second floor level in lieu of relocated internal generators to the external generator yard and associated elevational alterations; - *Inclusion of internal storage has no visual impact. The relocation to the generator yard would have a negligible impact. Noted that there are minor elevations changes, but these do not have a significant impact.*
- extension of loading dock at ground floor level by c.60sqm in area with minor height increase to c.5.3m; - *this would be to the west elevation at the main entrance and could potentially have a significant impact on the main entrance plaza. The applicant is requested to provide further details of this area, including visuals and details of materials via* ***additional information.***
- removal of 3 air plenums to the front (north) elevation and provision of screening to generator flues in lieu of omitted plenums; - *this would have an impact on visual amenity; however, the proposed amendment is considered acceptable and the proposed detail on the northern elevation would still contain detailing and breaking up of massing.*
- alterations at roof level to include removal of 2m high gantry screening; - *These alterations are considered acceptable. The removal of items at roof level would decrease visual impact.*
- alterations to the permitted generator plant yard to the north of the data centre to include the removal of fuel tanks, reconfiguration of plant and generators, provision of 2 additional external generators (increase from 5 to 9 external generators), provision of 4 additional external plant rooms, provision of diesel pump tank cabinets and stepover, relocation of generator yard doors and enlarged generator yard to accommodate the proposed modifications; – *This would have a negligible visual impact*
- increase in plant areas by c.77sq.m; - *Noted that ancillary plant buildings are a max. of approx. 3.5m and would therefore have a limited visual impact*

- reconfiguration of plant within the permitted chiller plant yard to the south of the data centre; - *this would be to the rear of the proposal and would have an acceptable impact.*
- removal of 1 sprinkler/water tank and removal of stairs and door to the side of the waste compound; -*This would have a negligible visual impact*
- reconfiguration of car parking and motorcycle spaces and removal of 1 accessible space. 64 total number of car parking spaces; -*This would have a negligible visual impact*

The applicant is also proposing an onsite power generation compound. It is noted that from the submitted elevations, the north and south elevations are elongated, while the east and west elevations are shorter. It is apparent that the building has a different orientation to the main data centre and what is labelled 'west' is more south or south west. Similarly, the east elevation is more north or north east. The south is more east or south east and the north is more west or north west. The applicant is requested to submit revised elevations detailing the correct orientation. It is noted that some green walls are proposed, with the main material of the building being composite panels (light grey). The flues would be stainless steel and 14.5m high. The photomontages submitted indicate that the proposal would not largely be visible. However, given the overall length of the building, the Planning Authority would welcome more localised visuals, indicating in particular the north, south and west elevations. This should include a visual incorporating the entrance plaza with DB8. **Additional information** is therefore requested.

It is noted that the applicant has included a number of CGIs / photomontages and that these do not indicate a significant change from the approved scheme.

Parking, Transport and Access
Roads has stated:

"This application is a modification of SD21A/0186. There are two vehicular access points including general and emergency access. The applicant has proposed to engage with SDCC to remove the redundant entrance on the New Nangor Road separately, this could be achieved as part of the planning conditions. Drawing for Existing Access no. 1 general layout "DB080-RKD-00-ZZ-DR-A-SITE-1035" by RKD, shows the location of the proposed vehicular access. Existing access to be widened to 10820 mm. Access no. 3 located on the north west boundary and access no. 1 on to Nangor Road (R-120) shall be closed.

Access & Roads Layout:
The reconfiguration of car parking and motorcycle spaces and removal of 1 accessible space. 64 total number of car parking spaces; there are four mobility impaired spaces. The proposal is to provide 64 no. parking spaces at the proposed development including 25 no. spaces for the future development, Parking is located to the north of the proposed development. The roads department are satisfied with the justification for this parking provision.

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Permeability:
A proposed pedestrian access gate is proposed at Falcon Avenue connecting DB5 with Profile Park via landscaped entrance plaza. SDCC road section is satisfied with proposed pedestrian access.

Car Parking:
A total of 10% of vehicular parking spaces shall be EV charging ready on the first opening of the development and 100% of the remaining g spaces shall be ducted for future EV connections. A total of 9no. vehicular spaces shall be mobility impaired spaces. This is greater than the 5% minimum requirement in the SDCC County Development Plan.

Bicycle Parking:
Applicant has proposed 14 no. sheltered bicycle spaces. SDCC road section believe the low worker numbers at a development of this nature justify a lower number of sheltered bicycle spaces in this instance. This level of provision shall still encourage greater numbers of cycle journeys at this development. The proposed bike parking is located conveniently to the entrance of the Building."
There are no objections, subject to conditions.

Services and Drainage
Water Services has assessed the proposal and has requested additional information relating to:

- water catchments and where each catchment drains to
- Flood risk

This should be provided via **additional information.**

Irish Water has raised no objections subject to conditions.

Archaeology
An Archaeological Assessment has been prepared by Reliqua Limited. The applicant requests conditions regarding potential archaeology on site and monitoring during construction. This is considered acceptable

Landscaping
Public Realm has raised no objections.

Energy Analysis
It is noted that under SD21A/0186, The applicant has provided a report entitled "Energy Statement and Part L Compliance". They have also indicated a waste heat recovery building.

The application is considered acceptable in this regard, subject to conditions.

Heritage and Bats
The applicant has provided an Ecological Impact Assessment, prepared by Malone O'Regan Environmental. Surveys (May 2022), surveys undertaken include desk, field, habitat, protected/notable species. A number of mitigation measures are set out. The proposal is considered acceptable in this regard, subject to conditions.

Aviation Safety
The site is located within the Department of Defence Inner Zone. It is noted that the proposed development on site does not increase the overall height to that which was previously permitted. There are, however, additional flues, and the applicant is requested to consult with the Department of Defence regarding any requirement for the proposed development. This should be done via **additional information.**

Environmental Impact Assessment Report
The applicant has submitted an Environmental Impact Assessment Screening Report. This sets out that the development does not require a mandatory EIAR, nor does it meet the criteria where a sub-threshold EIA would be warranted. The Planning Authority is concerned that the cumulative impacts of recently permitted developments, particularly within Profile Park have not been considered and, as such, the applicant is requested to undertake a wider screening process. The Planning Authority is concerned that, cumulatively, the proposal is of a scale and nature that would result in significant effects on the environment. The need for environmental impact assessment cannot, therefore, be excluded at this stage. **Additional information** is requested.

Appropriate Assessment
Stage 1: Screening
Information for the purposes of assisting in screening for Appropriate Assessment was prepared by Malone O'Regan Environmental (May 2022). The screening report concludes

"the screening exercise has identified a number of designated bird species which have been brought forward for further consideration due to the potential for significant likely effects, as outlines in Table 6-1, as a result of the Proposed Development, in the absence of mitigation measures".

Stage 2: Assessment of Potential Significant Impacts
The submitted NIS identifies potential impact on the conservation objectives of sites within the Natura 2000 network during both the construction and operational phases. Therefore, progression to Stage 2 of the Appropriate Assessment process is required. Section 7 of the submitted NIS further assesses the potential issues arising from the Proposed Development and the mitigation measures required to negate any potential significant likely effects on these habitats and species".

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Stage 2 examines:

- Potential impairment of water quality during construction and
- Potential impairment of water quality during the operational phase

The report states that it is considered highly unlikely that any construction work pollutants could impact on water quality of the South Dublin Bay and River Tolka Estuary SPA. If pollutants did enter, they would dilute of settle over the 27.2km distance. Taking the precautionary approach, measures are proposed to be put in place in accordance with best practice guidance to avoid imp-acts on these receptors. Inland fisheries Ireland and National Road Authority best practice guidelines will be followed.

During the operational phase, petrol interceptors, attenuation pond and hydrobrake will us utilised. Fuel tanks will be double skinned and have a minimum of 10% additional capacity and will be stored on hardstanding with a dedicated refuelling point. Spill kits will be provided.

The stage 2 report concludes "*the Proposed Development and all associated sites works, alone or in-combination with other projects, will not adversely affect the integrity and conservation status of any of the qualifying interests of the South Dublin Bay and River Tolka Estuary SPA or any other Natura 2000 sites*".

Having reviewed the submitted information, the Planning Authority has concluded that, having regard to the nature of the development, connection to public services and the distance from the Natura 2000 sites, the proposed development, including the proposed mitigation, would not result on any significant impacts on Natura 2000 sites.

Development Contributions Assessment Overall Quantum
on-site gas power generation compound c.2,604sq.m
Reduction in data centre permitted under SD21A/086 by 44sq.m to 9,795sq.m
Ancillary plant and site works.

SEA Monitoring Information

Building Use Type Proposed:	Data Centre and Power Generator
Floor Area:	12,399sq.m
Land Type:	Greenfield.
Site Area:	2.65 Ha

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Conclusion
Overall, it is considered that although the application site is located within lands that are zoned EE in which the principle of a data centre has been deemed acceptable, the applicant has failed to provide sufficient information to enable the Planning Authority to make an informed decision or support the proposal. Based on the size, scale, and significance of the piece of infrastructure that is proposed, it is considered that additional information in relation to a number of matters to ensure the proposal is in keeping with the planning and sustainable development of the area.

Recommendation
Request additional information.

Additional information requested: 25 July 2022
Additional information received: 21 October 2022

Consultees:
Water Services: No objections, subject to conditions.
Irish Water: No objections, subject to conditions.
Roads: No objections, subject to conditions.
Parks: Request details in line with new CDP.
EHO: No report received at time of writing.
IAA: No report received at time of writing.
DOD: No report received at time of writing.
CRU: No report received at time of writing.

Zoning
The subject site is zoned objective 'EE' - '*To provide for enterprise and employment related uses*' in the South Dublin County Development Plan 2022-2028.

Development Plan Maps: Flood Zone B, Bird Hazards, Inner Horizontal Surface (Casement).

Relevant Policies in the CDP 2022-2028
Notice of Draft Ministerial Direction in the Matter of Section 31 of the Planning and Development Act 2000 (as amended) South Dublin County Development Plan 2022-2028
The Planning Authority has been directed to take the following steps:

… Amend the land use zoning objectives in tables 13.4, 13.8 and 13.10 to reinstate data centre use class as an 'open for consideration' use class in the REGEN, Enterprise & Employment (EE) and Major Retail Centre (MRC) zoning objectives.

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Note: For reference, tables 13.4, 13.8 and 13.10 are numbered in the adopted Development Plan as 12.4, 12.8 and 12.10.

… Changes to land use zoning objectives for REGEN, Major Retail Centre and Enterprise and Employment (Material Amendments 13.1, 13.2 and 13.3) which make data centre use class a 'not permitted' use class across all zoning objectives in the Plan inconsistent with Regional Policy Objective 8.25 in the RSES for the EMRA which promotes Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations and lacks an appropriate evidential basis.

Relevant Policy in South Dublin County Council Development Plan (2022-2028):
CS5 Objective 2:
To ensure that, insofar as possible, space extensive enterprise is located on lands which are outside the M50, and which do not compromise labour intensive opportunities on zoned lands adjacent to public transport.

Chapter 4 Green Infrastructure
Section 4.1 Methodology
GI1 Objective 4: To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.

Section 4.2.1 Biodiversity
GI2 Objective 4: To integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter.

Section 4.2.2 Sustainable Water Management
GI4 Objective 1: To limit surface water run-off from new developments through the use of Sustainable Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Explanatory Design and Evaluation Guide, 2022.
Chapter 5 Quality Design and Healthy Placemaking
Section 5.2.1 The Delivery of Sustainable Neighbourhoods 'The Plan Approach'

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QDP2 Objective 1:
To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal.

Section 5.2.2 Context

Policy QDP3: Neighbourhood Context
Support and facilitate proposals which contribute in a positive manner to the character and setting of an area.
QDP3 Objective 1:
To ensure new development contributes in a positive manner to the character and setting of the immediate area in which a proposed development is located taking into consideration the provisions set out in Chapters 3 and 4 of this Plan and having regard to the requirements set out in Chapter 12: Implementation and Monitoring in relation to design statements.

SECTION 5.2.3 Healthy Placemaking
QDP4 Objective 2:
To promote a high standard of building and urban design, creating public spaces that are distinctive, safe, universally accessible and facilitate social and cultural diversity and interaction.

Policy QDP7: High Quality Design – Development General Promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.

QDP7 Objective 6:
To ensure that development provides an integrated and balanced approach to movement, healthy placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2019).

QDP7 Objective 7:
To ensure that all proposals for development contribute positively to providing a coherent enclosure of streets and public spaces, taking into consideration the proportions and activities of buildings on both sides of a street or surrounding a public space, providing for good standards of daylight and sunlight, and micro climatic conditions and having regard to the guidance and principles set out in the South Dublin County's Building Height and Density Guide and the Design Manual for Urban Streets and Roads (DMURS) (2019).

QDP7 Objective 8:
To promote and support a Universal Design Approach to residential and non-residential development – having regard in particular to the universal design principles and guidance in relation to Buildings for Everyone, Housing and Shared Space as promoted by the Centre for Excellence in Universal Design at the National Disability Authority – ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES. (See also Chapter 8: Community Infrastructure and Open Space).

Policy QDP11: Materials, Colours and Textures Promote high-quality building finishes that are appropriate to context, durable and adhere to the principles of sustainability and energy efficiency.
QDP11 Objective 1:
To require the use of high quality and durable materials and finishes that make a positive contribution to placemaking.

QDP11 Objective 2:
To promote the use of structural materials that have low to zero embodied energy and CO2 emissions and ensure a wood-first policy on public buildings funded or part-funded by the Council.

QDP11 Objective 3:
To promote the reuse and recycling of materials to promote the circular economy and reduce construction and demolition waste.

EDE1: Overarching
EDE1 Objective 6:
To ensure that economic and enterprise related development is provided in a manner which facilitates a reduction in greenhouse gas emissions by supporting and promoting the following measures:

- *An increase in employment densities within walkable distances of communities and on public transport routes;*
- *Promotion of walking and cycling and use of public transport through increased permeability and mobility management measures within and outside employment areas;*
- *The sourcing of power from district heating and renewables including wind, hydro and solar;*
- *Additional native tree planting and landscaping on existing and proposed enterprise zones and development sites to aid with carbon sequestration, contribute to the green infrastructure network of the County and promote quality placemaking.*

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EDE2: Green Economy

Section 9.2.1 Green and Innovative Economy

EDE3 Objective 5:
To promote, through good placemaking, the delivery of places and communities which encourage employers and workers alike to live in the County, closer to their workplaces, promoting more sustainable travel and a good quality of life.

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.

EDE7 Objective 1:
To ensure that, insofar as possible, space extensive enterprise is located on lands which are outside the M50, and which do not compromise labour intensive opportunities on zoned lands adjacent to public transport.
EDE7 Objective 2:
To require that space extensive enterprise demonstrates the following:
- *The appropriateness of the site for the proposed use having regard to EDE7 Objective 1;*
- *Strong energy efficiency measures to reduce their carbon footprint in support of national targets towards a net zero carbon economy, including renewable energy generation;*
- *Maximise on site renewable energy generation to ensure as far as possible 100% powered by renewable energy, where on site demand cannot be met in this way, provide evidence of engagement with power purchase agreements in Ireland (PPA);*
- *Sufficient capacity within the relevant water, wastewater and electricity network to accommodate the use proposed;*
- *Measures to support the just transition to a circular economy;*
- *Measures to facilitate district heating or heat networks where excess heat is produced;*
- *A high-quality design approach to buildings which reduces the massing and visual impact;*
- *A comprehensive understanding of employment once operational;*
- *A comprehensive understanding of levels of traffic to and from the site at construction and operation stage;*
- *Provide evidence of sign up to the Climate Neutral Data Centre Pact.*

EDE7 Objective 3:
To ensure that landscaping and site layout in space extensive developments provides for demonstrated biodiversity measures and that landscape and biodiversity measures integrate into the green infrastructure network, in accordance with the Green Infrastructure Strategy set out in Chapter 4 of this Plan.

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Policy E3: Energy Performance in Existing and New Buildings Support high levels of energy conservation, energy efficiency and the use of renewable energy sources in new and existing buildings including the retro fitting of energy efficiency measures in the existing building stock in accordance with relevant building regulations, national policy and guidance and the targets of the National and South Dublin Climate Change Action Plans.

E3 Objective 1:
To reduce the need for energy, enhance energy efficiency and secure the use of renewable energy sources in refurbished and upgraded dwellings, and other buildings through the design and location of new development, in accordance with relevant building regulations and national policy and guidance.

E3 Objective 3:
To require all new development to be designed to take account of the impacts of climate change, and that energy efficiency, energy provision and renewable energy measures are incorporated in accordance with national building regulations and relevant policy and guidelines.

E12 Objective 1:
To promote the generation and supply of low carbon and renewable energy alternatives.

Policy IE6: Electricity Infrastructure Protect the existing electricity infrastructure and support the development of a safe, secure and reliable supply of electricity and the development of enhanced electricity networks as well as new transmission infrastructure projects subject to the relevant environmental assessments.

IE6 Objective 2:
To support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission / distribution of a renewable energy focused generation in line with RPO 10.22

Policy IE1: Overarching Policy Ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.
Policy IE2: Water Supply and Wastewater
Policy IE3: Surface Water and Groundwater
Policy IE4: Flood Risk
Policy IE7: Waste Management
Policy IE8: Environmental Quality

12.3.1 Appropriate Assessment
12.3.2 Ecological Protection
12.3.3 Environmental Impact Assessment

12.3.4 Archaeological Heritage
12.3.5 Landscape Character Assessment
12.3.7 Protected Structures
12.4.1 Green Infrastructure Definition and Spatial Framework
12.4.2 Green Infrastructure and Development Management
Green Space Factor (GSF)

12.4.3 Riparian Corridors
12.5 Quality Design and Healthy Placemaking
12.5.1 Universal Design
12.5.2 Design Considerations and Statements

12.5.3 Density and Building Heights
12.5.4 Public Realm: (At the Site Level)
12.5.5 Healthy Placemaking and Public Realm: (At the Neighbourhood Level)
12.7.1 Bicycle Parking / Storage Standards; Bicycle Parking Design / Provision
12.7.2 Traffic and Transport Assessments
12.7.3 Travel Plans

Table 12.24: Thresholds for the Submission of a Workplace Travel Plan

Land Use	Workplace Travel Plan Statement	Indicative Number of Jobs	Standardised Workplace Travel Plan	Indicative Number of Jobs
Industrial	>2,500 sq. m	25-100	>6,000 sq. m	>100

12.7.4 Car Parking Standards
12.7.5 Car Parking / Charging for Electric Vehicles (EVs)
12.7.6 Car Parking Design and Layout
12.8.6 Public Art
12.9.2 Enterprise and Employment Areas:
Table 12.27: Key Principles for Development within Enterprise and Employment Zones.
12.9.4 Space Extensive Enterprises

12.10.1 Energy Performance in New Buildings
12.10.2 Low Carbon District Heating Networks
12.10.3 Energy from Waste
12.10.4 Solar Photovoltaic

12.11.1 Water Management
12.11.3 Waste Management

12.11.4 Environmental Hazard Management

12.11.5 Aviation, Airports and Aerodromes
12.11.6 Restricted and Prohibited Development
12.11.7 Shielding / Safeguarding

The implications of the new CDP are discussed further under the items below.

Assessment:
Item 1:
The application site is located within an area that is zoned 'Enterprise and Employment' and is subject to zoning objective 'EE - To provide for enterprise and employment related uses.' In terms of the use class proposed, a power plant is considered to fall under 'Public Services' as defined in Schedule 5: Definition of Use Classes & Zoning Matrix Table of the County Development Plan (CDP) which is permitted in principle within lands zoned EE. The applicant states in their Planning Statement (Brock McClure) that it will be 6-8 years before the development would be considered for connection to the grid and the proposal to provide the onsite generation plant will proceed without a grid connection. It is stated 'it can therefore be assumed that this proposal is not a 'public services' until such time that ESB can confirm terms and conditions for a grid connection.' The applicant is, therefore requested to set out how the proposed development is in keeping with the Land Use Matrix of the Development Plan.

Applicant's response:
There has been no confirmation from EirGrid or ESBN regarding the technical and commercial details of power supply connection for the data centre development. In order to progress with the project without a national grid power supply, the applicant proposed the construction of a privately owned and operated on-site power generation plant, at their own expense. The purpose of the plant is to generate power for the permitted data centre until such time that ESB can make a formal technical and commercial proposal. It is the intention to prove a power plant that can operate off grid on day one and in the future, be connected and embedded into the national grid.

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

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

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

The OSPG is intrinsically linked to the permitted data centre development and is considered an associated use. Data Centre is clearly defined under its own separate use under the Plan.
The proposed development cannot therefore be considered a public service.

The Department of Housing, Local Government and Heritage consequent to a recommendation made to him by the Office of the Planning Regulator has issued a direction in relation to data centre use on EE zoned lands. The Direction requested that Date Centre use be removed as 'not permitted' use under the 'EE' Zoning.

CDP 2022-2028 defines public service as:
A building or part thereof or land used for the provision of public services. Public services include all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, drainage and other statutory undertakers, it includes public lavatories, public telephone boxes, bus shelters, bring centres, green waste and composting facilities.

Data Centre is defined as:
A data centre is a physical facility composed of networked computers and storage that businesses and other organisations use to organise, process, store and disseminate large amounts of data.

The OSPG is ancillary to the permitted data centre and will serve DB8 only. It is not comparable to the plant granted permission under SD21A/0167.

Assessment:
It is noted that the applicant states that the principle of the power generation facility is intrinsically linked to the data centre, which has permission. Therefore, the proposal should be considered in accordance with policies relating to data centres.

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EDE7 Objective 2 is:
"To require that space extensive enterprise demonstrates the following:

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

It is noted that Planning Permission was granted for the data centre under the previous CDP. Whilst this application seeks to amend the permitted data centre, it is considered that the impacts of the changes to the permitted data centre should be assessed under the new CDP. It is noted that the applicant has stated that the proposal is not a public services and is directly related to the data centre use only. As such, the applicant is requested to demonstrate compliance with the above objectives.

It is noted that Item 2 below requested information in relation to renewable energy. In response to this item, the applicant has provided the following information regarding renewable energy:

- *Solar and wind – lack of land. PV cell installed toprovide power to the front of house office*
- *Bio-diesel- volume to be stored on site would be in excess of 1,000,000 litres and there is not sufficient space to accommodate this. Re-fueling is problematic*

The applicant has indicated that the plant will be capable of using hydrogen power but will not use this in the first instance. It also states that GNI will blend natural gas with green hydrogen by the end of the decade and that any input of hydrogen will be reliant upon GNIs future development plans. This is not considered to meet the above requirements.

It is also indicated that the applicant intends to use PPAs. However, no evidence has been provided of same. The applicant states in paragraph 2.8 of their response, that PPAs will be purchased once the development is connected to the grid. Elsewhere in their response, there is no indication that connection to the grid is feasible. If the applicant intends to use PPAs, then the ability to do so should be clearly indicated.

Clarification of additional information is therefore requested. It is noted that the applicant has already provided a significant level of detail regarding the design of the proposal, which is considered acceptable.

Item 2:
It is noted that the applicant states that there would be no immediate connection to the grid. However, it is noted that there is potential to connect in future. The applicant is therefore requested to provide the following details in relation to the power generation on site:

- The appropriateness of the proposal for an on-site gas plant based on national, regional and local policy in terms of energy requirements and climate change, including the Government Policy Statement on Security of Electricity Supply and CRU Direction to the System Operators related to Data Centre grid connection processing;
- provide more detail regarding the alternative sources of power generating assessed as part of the alternatives (including renewables).
- consider incorporating a portion of renewable energy generation.
- Details of the future proofing of the data centre and the gas power plant to adapt to an alternative energy supply
- Long term plan for the gas powered generation plant when data centre is connected to grid
- Details of any connection agreements with Eirgrid / ESB, existing or pending, as well as details of any consultation undertaken with Eirgrid / ESB
- Details of any consultation undertaken with Gas Networks Ireland
- Information on whether the existing site is serviced in terms of utilities and if not the proposals for undertaking the development required to facilitate servicing.
- Details of the connection to the surrounding area and national gas grid

Applicant's response:

- *Based on the government statement on the Role of Date Centres in Ireland's Enterprise Strategy published in July 2022, Equinix proposal for an off-grid power solution in this constrained area has been designed and foreseen while maintaining the objective to connect to the national grid as soon as possible. Once connected to the grid, the power plant will be able to contribute to the security of the national grid and the overall network de-carbonisation strategy.*
- *Alternative power solutions:*

Option	Description	Summary of Assessment
1	Natural Gas Generators, reciprocating engines	• Fuel efficiency is high and NOX and CO emissions are low compared to diesel alternatives • Fuel efficiency is much better compared to turbines • Smaller machine capacities (1MW) are available which helps with load acceptance and load matching • Smaller plant • Best suited to off grid power generation application • Hydrogen ready
2	Natural Gas Generators, Turbines (Single Cycle)	• Best performance is seen at higher loads of >30MW and is not efficient at low loads of <10MW which this project requires • Typical machine sizes are >3MW and this does not suit the small load build up for this project or provide the required resilience with a small number of machines. • Start up times for turbines is extremely slow and the data centre requires quick start up times from the power plant.
		• Electrical efficiency of turbines is 30% lower than gas engines • Hydrogen ready
3	Diesel Generators, reciprocating Engines	• High noise and emissions output • SCR and Urea treatment required for exhaust gases • Low levels of efficiency and high rate of fuel consumption • Extremely large volumes of fuel to be stored on site and re-fuelling with many tankers (powered by diesel fuel) required on a weekly basis
4	Natural Gas Fuel Cells	• Insufficient space to accommodate the plant • High cost compared to reciprocating engines • Lack of proven track record for resilient operation and to availability of service. • Hydrogen ready

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- *High Level assessment of the following renewables was undertaken:*
    - *Solar and wind – lack of land. PV cell installed toprovide power to the front of house office*
    - *Bio-diesel- volume to be stored on site would be in excess of 1,000,000 litres and there is not sufficient space to accommodate this. Re-fueling is problematic*
- *The proposal will be connected to GN low pressure network. GNI network currently provides a natural gas supply with the sustainable decarbonising objective of blending natural gas with green Hydrogen before the end of the decade. The power plant generators are reciprocating machines designed to run on natural gas or nay blended natural gas / hydrogen mix. The plant can operate on 100% hydrogen. Once the development is connected to the grid, it is corporate policy to purchase green energy through Corporate PPAs wherever these re available.*
- *When data centre is connected to the grid the main source of energy will be Corporate PPAs for Green Energy. The on-site power plant can still be utilised to provide full flexibility to the grid while the plant is operating on the GNI network. The flexibility and part load capacity of natural gas power plant embedded in the EDB electricity supply network will further assist in the maximisation of the countryside renewable generation capacity and contribute to the security of supply*
- *There is no technical or commercial offer from ESB but there have been discussions with representatives to understand in principle the likely supply arrangements and optimum entry points to the site.*
    - *Oct 2020 – preliminary discussions with ESB led to energy concept being prepared for the development which shows direct 10kV feeders terminating into a metering station located on the site*
    - *Nov 2020 – power supply application lodged with ESB*
    - *Feb 2021 – email received from ESB stating that application for supply as now live in their system and that they would seek approval from EirGrid for this application and the process would likely exceed 90 days.*
    - *May 2021 – contact made after 90 day period - advised that Eirgrid would need to undertake a network study, and this could take several more months*
    - *May 2022 – received notification that all applications are paused and ESB will advise all applicants how to move forward with applications once direction has been received from EirGrid and CRU*
    - *August 2022 – Received email from ESB confirming that discussions with CRU have concluded but they need to finalise some further points with EirGrid and CRU.*
    - *Sept 2022 – No further updates provided.*

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- *Signed connection agreement with GNI and fees paid associated with this service. Consultant team has met with GNI representatives on site a number of times to discuss utility landing points and has coordinated the location of gas skid / pressure station on the site.*
- *There are no existing utilities servicing the site so new utility landing points will be required and status of each are listed as follows:*
    - *Power – application made, await ESB response*
    - *Gas: application made, agreed and payment fir connection has been made*
    - *Water: application will be made once planning application is complete*
    - *Drainage: infrastructure has been assessed and connections agreed*
    - *Telecoms: Equinix to advise status*
- *GNI has confirmed that the permitted development will receive a 45MW connection @400mbar.*
- *Flex power will be subject to the ESB supply terms and conditions, which is currently unknown and is therefore not considered to be a planning condition relevant for this application.*

Assessment:
The applicant has not provided an assessment of the appropriateness of the proposal in terms of national, regional and local policy in terms of energy requirements and climate change. Comment has been made in relation to the 'Role of Data Centres in Ireland's Enterprise Strategy,' but not the Government Policy Statement on Security of Electricity Supply and CRU Direction to the System Operators. It is not considered that the proposal meets the Principles for Sustainable Data Centre Development, as set out in Role of Data Centres in Ireland's Enterprise Strategy.' These are:

- Economic Impact: The Government has a preference 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.
- Renewables Additionality - The Government has a preference for data centre developments that can demonstrate the additionality of their renewable energy use in Ireland.
- Co-location or proximity with future-proofing 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 Corporate Power Purchase Agreements, private wire or other arrangement.
- 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.

- 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.

The proposed development does not appear to be in keeping with the above.

Clarification of additional information is therefore requested. This should set out the appropriateness of the proposal for an on-site gas plant based on national, regional and local policy in terms of energy requirements and climate change, including the Government Policy Statement on Security of Electricity Supply and CRU Direction to the System Operators related to Data Centre grid connection processing.

Renewable energy has been discussed above and **clarification of further information** is requested in this regard.

In terms of adaptation of the plant for alternative energy supply, the applicant appears to be reliant upon GNI proposals for alternative energy and has not put forward any site specific proposal in this regard. **Clarification of additional information** is therefore sought.

The applicant has stated that there is no current agreement to connect to the grid, however, consultation has been undertaken. Therefore, no details of the long term plan for the power plant have been provided, i.e., whether it would be decommissioned. Should permission be granted, the proposal would be solely reliant on the on-site power plant. The applicant has also stated that water connection would be sought once planning permission is granted. The applicant has not, therefore, met the requirements of EDE7 Objective 2, part of which requires:

- *Sufficient capacity within the relevant water, wastewater and electricity network to accommodate the use proposed;*

The applicant has not demonstrated compliance with the above and **clarification of additional information** is requested.

The Planning Authority note that consultation with GNI has been undertaken.

Item 3:
The applicant is requested to engage with the Property Management Branch of the Department of Defence in terms of the construction and operation phases of development, to assess any potential impact on flight procedures and communication, navigation and surveillance equipment present at Casement Aerodrome, a letter of consent shall be obtained from the Department of Defence.

Applicant's response:
Discussions held with DOD. See correspondence from DoD from October 2022. Thermal plume modelling was undertaken.

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

Assessment:
The applicant refers to a communication from the Department of Defence. The applicant has undertaken modelling as part of an aviation impact assessment. Conditions are recommended in the event of grant.

Item 4:
The applicant is requested to provide correspondence from the Commission for Regulation of Utilities/Eirgrid that connection is feasible and the timeline for the connection, as well as details of any consultation undertaken with these bodies. The applicant is also requested to provide any details of discussions with the EPA.
Applicant's response:
Client team have met with CRU on 7 September 2022. CRU advised that as the development does not have a utility power connection, they are unable to assess compliance with the CRU directives for Data Centres. The CRU advised that if the site does not have a power supply, then the client can apply for a license authorising the power plant to be constructed and to generate power. Planning approval required to obtain CRU license.

No direct discussions with EPA. Emissions and Air Quality Consultant has advised that the on-stie CO2 emissions will occur as a result of the proposed development. While the operation of the scheme would result in GHG emissions, these will be regulated under the Emission Trading Scheme (ETC) and thus impact to climate is deemed direct, negative, long-term and slight.

Assessment:
The Planning Authority is concerned that the submission of the planning application is premature, given the lack of grid connection. As noted in items above, the applicant has failed to demonstrate compliance with CDP policies in relation to energy generation and data centres.

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Item 5:
The Planning Authority is not of the opinion that a 10 year permission is necessary in this instance. The applicant is requested to provide a justification for seeking 10 years.
Applicant's response:
10 year permission is required to allow the OSPG equipment to be installed in phases to match the power load increased of the permitted data centre, once operational. All site infrastructure works, including roads, drainage, facades ad screening of the proposed ISPG development will be completes as part of the initial phase of works, which is anticipate do be completed within 3 years of the development being permitted by SDCC. The only element that will be deferred from the initial installation phase will be a number of the OSPG equipment units.

Assessment:
In the event of grant, a condition is recommended seeking the applicant to agree a phasing plan in accordance with the above.

Item 6:
The applicant is requested to provide the following additional details in relation to design:
a) alterations to DB08:
- extension of loading dock at ground floor level by c.6osqm in area with minor height increase to c.5.3m; - this would be to the west elevation at the main entrance and would potentially have a significant impact on the main entrance plaza. The applicant is requested to provide further details of this area, including visuals and details of materials

b) on site power generator
- The applicant is requested to provide revised elevations detailing the correct orientation of each elevation.
- given the overall length of the building, the Planning Authority would welcome more localised visuals, indicating in particular the north, south and west elevations. This should include a visual incorporating the entrance plaza with DB8
Applicant's response:
See photomontages and additional views. Architects design statement, pages 33-35 indicate materials.

Assessment:
The Planning Authority welcomes the additional visuals, which are considered acceptable. Conditions regarding materials and flue details recommended in the event of grant.

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Item 7:
The applicant is requested to:
a. Submit a report and drawing showing where each catchment is draining to. The drawing shall show how water flow is controlled in each catchment. The maximum discharge rate shall not exceed Qbar or green field runoff rate for the site. Show on revised drawing and report what the discharge rate is for each catchment in the development. Prior to submission of this report, the applicant is requested to contact water services in South Dublin County Council to discuss the revised submission.
b) Submit a report and drawing to show what flood risk there is for the site. If there is a flood risk, the applicant is requested to show what mitigation measures are proposed in respect to such a flood risk.
Applicant's response:
See engineers report and drawing.

Assessment:
Water Services has raised no objections, subject to conditions.

Irish Water has also raised no objections, subject to conditions.

Item 8:
The applicant has submitted an Environmental Impact Assessment Screening Report. This sets out that the development does not require a mandatory EIAR, nor does it meet the criteria where a sub-threshold EIA would be warranted. The Planning Authority is concerned that the cumulative impacts of recently permitted developments, particularly within Profile Park have not been considered and, as such, the applicant is requested to undertake a wider screening process. The Planning Authority is concerned that, cumulatively, the proposal is of a scale and nature that would result in significant effects on the environment. The applicant is requested to undertake a revised EIAR Screening and, if necessary, undertake a full EIA.
Applicant's response:
See updated Screening Report. No EIAR required.

Assessment:
The Planning Authority is concerned that Table 7-1 of the revised EIA Screening, does not consider the cumulative impacts of the proposed development and the Planning Applications listed under Table 1-2. Table 9-1 also fails to fully consider cumulative impacts.

The Planning Authority do not agree with the screening assessment provided. Having regard to the nature of the proposed development, the number of similar proposals close to the proposed development, the potential impact on material assets (Gas) and the distance of the site from nearby sensitive receptors, it is considered that the proposal may have significant effects on the environment. The need for environmental impact assessment cannot, therefore, be excluded at preliminary examination.

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The applicant is requested to undertake an Environmental Impact Assessment.
Clarification of further information is therefore requested.

Item 9:
The applicant is advised that the South Dublin County Development Plan 2022 - 2028 was made by resolution by the Elected Members on June 22nd and will come into effect on August 3rd, 2022. In accordance with Section 34 (2) of the Planning and Development Act 2000 (as amended), the Planning Authority will have regard to the South Dublin County Development Plan 2022-2028 as the development plan for the area when making decisions in relation to applications from August 3rd, 2022.
In this context, the applicant is requested to provide a report demonstrating that the proposed development is in accordance with the South Dublin County Development Plan 2022-2028.
Applicant's response:
Applicant sets out details of the Ministerial Direction in relation to data centres.

Assessment:
The Planning Authority note the ministerial direction.

The Planning Authority also consider the following elements of the CDP relevant in this instance:

The proposal would create **317sq.m** of additional floor area. It is noted that the total on site would be 9,839sq.m.

Development in Employment Lands:
EDE1 Objective 6:
To ensure that economic and enterprise related development is provided in a manner which facilitates a reduction in greenhouse gas emissions by supporting and promoting the following measures:
An increase in employment densities within walkable distances of communities and on public transport routes;
Promotion of walking and cycling and use of public transport through increased permeability and mobility management measures within and outside employment areas;
The sourcing of power from district heating and renewables including wind, hydro and solar;
Additional native tree planting and landscaping on existing and proposed enterprise zones and development sites to aid with carbon sequestration, contribute to the green infrastructure network of the County and promote quality placemaking.

EDE3 Objective 5:
To promote, through good placemaking, the delivery of places and communities which encourage employers and workers alike to live in the County, closer to their workplaces, promoting more sustainable travel and a good quality of life.

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The applicant has not demonstrated compliance with EDE1 Objective 6 and EDE3 Objective 5. This should be requested as **Clarification of additional Information.**

EDE7 Objective 3:
To ensure that landscaping and site layout in space extensive developments provides for demonstrated biodiversity measures and that landscape and biodiversity measures integrate into the green infrastructure network, in accordance with the Green Infrastructure Strategy set out in Chapter 4 of this Plan

The applicant is requested to demonstrate compliance with EDE7 Objective 3 via **clarification of additional information.**

Energy and Climate Change:
Policy QDP11: Materials, Colours and Textures Promote high-quality building finishes that are appropriate to context, durable and adhere to the principles of sustainability and energy efficiency.
QDP11 Objective 2:
To promote the use of structural materials that have low to zero embodied energy and CO2 emissions and ensure a wood-first policy on public buildings funded or part-funded by the Council.

QDP11 Objective 3:
To promote the reuse and recycling of materials to promote the circular economy and reduce construction and demolition waste.

Policy E3: Energy Performance in Existing and New Buildings Support high levels of energy conservation, energy efficiency and the use of renewable energy sources in new and existing buildings including the retro fitting of energy efficiency measures in the existing building stock in accordance with relevant building regulations, national policy and guidance and the targets of the National and South Dublin Climate Change Action Plans.
E3 Objective 1:
To reduce the need for energy, enhance energy efficiency and secure the use of renewable energy sources in refurbished and upgraded dwellings, and other buildings through the design and location of new development, in accordance with relevant building regulations and national policy and guidance.

E3 Objective 3:
To require all new development to be designed to take account of the impacts of climate change, and that energy efficiency, energy provision and renewable energy measures are incorporated in accordance with national building regulations and relevant policy and guidelines.

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The applicant is requested to demonstrate compliance with Policies QDP11 and E3, as well as their relevant objectives, via **clarification of additional information**.

Infrastructure:
Policy IE6: Electricity Infrastructure Protect the existing electricity infrastructure and support the development of a safe, secure and reliable supply of electricity and the development of enhanced electricity networks as well as new transmission infrastructure projects subject to the relevant environmental assessments.

IE6 Objective 2:
To support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission / distribution of a renewable energy focused generation in line with RPO 10.22
IE6 Objective 4:
To ensure that the design of energy networks achieves the least possible environmental impact and that where such impacts are inevitable, they are mitigated to the greatest possible extent.

The applicant is requested to demonstrate compliance with Policy IE6 and the related objectives via **clarification of additional information.**

Green Infrastructure:
The site is not located within any primary or secondary GI corridors.

All planning applications 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, having regard to the following:

- *In the case of small-scale developments this may consist of a simple landscape plan which includes objectives to protect or restore existing on site GI assets, provides for connection to local or primary GI corridors or includes elements which allow the site to act as a local stepping stone;*
- *Where the development site is located within or close to a Core or 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);*
- *The characteristics and assets of the proximate GI Core, Corridor or Stepping- Stone should be reflected within proposed development, for example continuation of hedgerows, tree planting, waterways;*
- *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;*

- *Development sites which are not located proximate to designated GI Cores or Corridors should identify the nearest designated GI Core, Corridor or Stepping Stone and make provision for GI interventions on the site which could eventually provide a link to local Stepping Stones, Cores or Corridors;*
- *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.*

*All development proposals shall be accompanied by a **Green Infrastructure Plan**, which will normally be submitted as part of the suite of Landscape Plans that are required for a development. Plans shall include the following:*

- *Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County;*
- *Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;*
- *Indicate how the development proposals link to and enhance the wider GI Network of the County;*
- *Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site;*
- *Proposals for identification and control of invasive species.*

Regardless of development size or type, applicants must submit an overall site summary quantifying and detailing the following:

- *tree and hedgerow removal;*
- *tree and hedgerow retention;*
- *new tree and hedgerow planting.*

The applicant is requested to submit the relevant plan via **additional information**.

Green Space Factor (GSF)

This applies to developments over 500sq.m. It is therefore not required in this instance.

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Implementation:

12.5.1 Universal Design
Larger scale development proposals should include an Access Statement setting out how universal design approaches will be featured within the development. All development proposals should incorporate best practice design including the elements set out below, where relevant (it should be noted that some of these areas are regulated by other local authority functions such as Building Control):

- *Promotion of lifetime housing design;*
- *Incorporation of adaptable home offices to facilitate working from home;*
- *Provision of designated accessible parking and set down points for people with disabilities and parents with children;*
- *Level pedestrian routes with sufficient width;*
- *Use of surfaces suitable for wheelchairs and buggies;*
- *Use of tactile and blister paving;*
- *Use of colour contrast, particularly in the public realm;*
- *Provision of wayfinding and signage at appropriate levels, particularly in the public realm;*
- *Ensuring level access to buildings from the street that is suitable for wheelchairs and buggies;*
- *Provision of automatic doors.*

The applicant is requested to submit an Access Statement via **clarification of additional information.**

'The Plan Approach' Compliance Report (paragraph 12.5.2):
Applications for new development shall be accompanied by a statement from a suitably qualified person detailing how 'the plan approach' has been taken into consideration and incorporated into the design of the development, including the materials and finishes proposed, and demonstrating how the eight overarching principles for the achievement of successful and sustainable neighbourhoods have been addressed which are:

- *The Context of an area (Character / Infrastructure – GI / Natural / Physical);*
- *Healthy Placemaking;*
- *Connected Neighbourhoods;*
- *Public Realm;*
- *The Delivery of High-Quality and Inclusive Development;*
- *Appropriate Density and Building Heights;*
- *Mix of dwelling types;*
- *Materials, Colours and Textures.*

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The principles set out above shall be demonstrated through the submission of a report clearly detailing how careful consideration has been given to each element within the context and character of a site including analysis and integration in so far as possible of natural, cultural and built heritage and key green infrastructure elements in line with the policies and objectives set out in Chapters 3 and 4 of this Plan. In addition, all planning applications for development must demonstrate how the proposal constitutes a positive urban design response to the local context and how it contributes to placemaking and the identity of an area.

The applicant is requested to submit the relevant statement via **clarification of additional information**.

Design Statements:
Paragraph 12.5.2 sets out specific requirements for design statement. The proposal would create less than 1,000sq.m floor area and therefore does not need to meet these requirements.

12.7.1 Bicycle Parking / Storage Standards; Bicycle Parking Design / Provision
The Roads Department has raised no objections to the proposed development in this regard.

12.7.2 Traffic and Transport Assessments
The Planning Authority may also require such assessments where a particular development may have a significant impact on the County road network. All such statements should also be prepared in accordance with the Guidelines.

The Roads Department has raised no objections to the proposed development in this regard.

12.7.3 Travel Plans
Does not meet threshold for requirement.

12.7.4 Car Parking Standards
The Roads Department has raised no objections to the proposed development in this regard.

12.7.5 Car Parking / Charging for Electric Vehicles (EVs)
The requirement for EV parking is 20%. This should be indicated as **clarification of additional information.**

12.9.2 Enterprise and Employment Areas and Table 12.27: Key Principles for Development within Enterprise and Employment Zones
The applicant is requested to submit the relevant statement via **clarification of additional information**.

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12.9.4 Space Extensive Enterprises
Insofar as possible, space extensive enterprise should be located on lands which are outside the M50 and which do not compromise labour intensive opportunity on zoned lands adjacent to public transport, as per EDE7 Objective 1.

To require that space extensive enterprises demonstrate the following:

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

The applicant is requested to show compliance with the above via **clarification of additional information**

12.10.1 Energy Performance in New Buildings
Proposal does not meet the trigger (1,000sq.m).

12.10.2 Low Carbon District Heating Networks
Proposal does not meet the trigger (10,000sq.m).

12.10.3 Energy from Waste
Development proposals for new industrial and commercial developments and large extensions to existing premises, where the processes associated with the primary operation of the proposal generates significant waste heat, must:

- *Carry out an Energy Analysis of the proposed development and identify the details of potential waste heat generated and suitability for waste heat recovery and utilisation with adjoining sites;*
- *Include heat recovery and re-use technology on site;*
- *Include heat distribution infrastructure above or below ground, (including future proofing of the building fabric to facilitate future connection, safeguarding any pipe work routes up to the boundary to adjoining sites);*

or

- *Provide evidence that heat recovery and distribution has been fully explored and is not feasible.*

Ensure that appropriate conditions are attached to planning applications to achieve district heating in identified areas having regard to above.

The applicant is requested to address the above via **clarification of additional information.**

Environmental Impact Assessment

As part of the initial application of the current application, the Planning Authority raised concerns in relation to likely significantly impact of the proposed development. Having reviewed the revised information submitted, the Planning Authority remains concerns that Table 7-1 of the revised EIA Screening, does not consider the cumulative impacts of the proposed development and the Planning Applications listed under Table 1-2. Table 9-1 also fails to fully consider cumulative impacts. Furthermore, having regard to the nature of the proposed development, the number of similar proposals close to the proposed development, the potential impact on material assets (Gas) and the distance of the site from nearby sensitive receptors, it is considered that the proposal may have significant effects on the environment. The need for environmental impact assessment cannot, therefore, be excluded at preliminary examination.

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EIA Screening Determination

A. Application Details		
Reference	SD22A/0156	
Development Summary	Amendments to permitted data centre and provision of onsite power generation	
	Yes/ No/ **N/A**	Comment (if relevant)
1. Was a Screening Determination carried out by the applicant?	Yes	EIA stated as not required, both at initial stage and additional information stage
2. Has Schedule 7A information been submitted?	Yes	Not provided at initial stage. Not provided at additional information stage.
3. Has an AA screening report or NIS been submitted?	Yes	NIS – May 2022
4. Is an IED/ IPC or Waste Licence (or review of licence) required from the EPA? If YES has the EPA commented on the need for an EIAR?	No	
5. Have any other relevant assessments of the effects on the environment which have a significant bearing on the project been carried out pursuant to other relevant Directives	No	

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B. Examination	Where relevant, briefly describe the characteristics of impacts (i.e. the nature and extent) and any Mitigation Measures proposed to avoid or prevent a significant effect. (having regard to the probability, magnitude (including population size affected), complexity, duration, frequency, intensity, and reversibility of impact)	Is this likely to result in significant effects on the environment? Yes / No / Uncertain
Characteristics of proposal (including demolition, construction, operation, or decommissioning)		
1.1 Is the project significantly different in character or scale to the existing surrounding or environment?	No. In a designated employment area with recently permitted data centres and power plants.	Uncertain
1.2 Will construction, operation, decommissioning, or demolition works causing physical changes to the locality (topography, land use, waterbodies)?	No	No
1.3 Will construction or operation of the project use natural resources such as land, soil, water, materials/minerals, or energy, especially resources which are non-renewable or in short supply?	Yes, proposal will use natural gas.	Yes
1.4 Will the project involve the use, storage, transport, handling, or production of substance which would be harmful to human health or the environment?	No such materials required or produced.	No
1.5 Will the project produce solid waste, release pollutants or any hazardous/ toxic/ noxious substances?	Proposal would impact air quality. EHO has not raised concerns in this regard.	No
1.6 Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal **waters,** or the sea?	No discharge of pollutants to ground or surface waters.	No

1.7 Will the project cause noise and vibration or release of light, heat, energy, or electromagnetic radiation?	Potential noise issues, assessments undertaken, EHO recommended conditions.	No
1.8 Will there be any risks to human health, for example due to water contamination or air pollution?	Some dust during construction, , EHO recommended conditions. CEMP provided	No
1.9 Will there be any risk of major accidents that could affect human health or the environment?	No risk of major accidents given nature of project. Site is not Seveso.	No
1.10 Will the project affect the social environment (population, employment)	No significant impacts.	No
1.11 Is the project part of a wider large scale change that could result in cumulative effects on the environment?	Yes	Yes

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2. Location of proposed development		
2.1 Is the proposed development located on, in, adjoining or have the potential to impact on any of the following: a) European site (SAC/ SPA/ pSAC/ pSPA) b) NHA/pNHA c) Designated Nature Reserve d) Designated refuge for flora or fauna e) Place, site or feature of ecological interest, the preservation/conservation/ protection of which is an objective of a development plan/ LAP/ draft plan or variation of a plan	Grand Canal pNHA approx. 1km from the stie. No pathway for waste or surface water to reach these receptors.	No
2.2 Could any protected, important, or sensitive species of flora or fauna which use areas on or around the site, for example: for breeding, nesting, foraging, resting, over- wintering, or migration, be significantly affected by the project?	Ecological assessment submitted indicates potential impact on a number of features and mitigation is proposed.	No
2.3 Are there any other features of landscape, historic, archaeological, or cultural importance that could be affected?	No.	No

2.4 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, for example: forestry, agriculture, water/coastal, fisheries, minerals	No	No
2.5 Are there any water resources including surface waters, for example: rivers, lakes/ponds, coastal or groundwaters which could be affected by the project, particularly in terms of their volume and flood risk	No	No
2.6 ls the location susceptible to subsidence, landslides, or erosion?	No	No
2.7 Are there any key transport routes(e.g. National primary Roads) on or around the location which are susceptible to congestion, or which cause environmental problems, which could be affected by the project?	No	No

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2.8 Are there existing sensitive land uses or community facilities (such as hospitals, schools etc.) which could be significantly affected by the project?	No	No

3. Any other factors that should be considered which lead to environmental Impacts		
3.1 Cumulative Effects: Could this project together with existing and/or approved development result in cumulative effects during the construction/ operation phase	Yes – multiple new gas connections in the area.	Yes
3.2 Transboundary Effects: Is this project likely to result in transboundary effects.	No	No
3.3 Are there any other relevant considerations?	No	No
Real likelihood of significant effects on the environment.	**X**	**EIAR Required**
No real likelihood of significant effects on the environment.		**EIAR Not Required**

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Having regard to the screening determination set out above***, t***he Planning Authority is concerned that, cumulatively, the proposal is of a scale and nature that would result in significant effects on the environment. The need for environmental impact assessment cannot, therefore, be excluded.

Development Contributions Assessment Overall Quantum
on-site gas power generation compound 257sq.m
Overall reduction in data centre / ancillary buildings permitted under SD21A/086 by 44sq.m to 9,795sq.m (including a 60sq.m increase in the data centre).
Ancillary plant and site works.

SEA Monitoring Information

Building Use Type Proposed:	Data Centre amendments and Power Generator
Floor Area:	317sq.m
Land Type:	Greenfield.
Site Area:	2.65 Ha

Conclusion
Overall, it is considered that although the application site is located within lands that are zoned EE in which the principle of a data centre has been deemed acceptable under SD21/0186. Notwithstanding this, this amendment application changes the permitted data centre from one powered by electricity and connected to the national grid to one powered by gas. Furthermore, the current proposal falls under the consideration of a new County Development Plan. As such, the proposed amendments and addition of a power generation facility must meet different requirements. The applicant has failed to provide sufficient information to enable the Planning Authority to make an informed decision or support the proposal.
In addition to this, the Planning Authority consider that the proposed development is EIAR development and, as such, a full EIAR should be undertaken.
It is considered that clarification of additional information in relation to a number of matters should be requested to ensure the proposal is in keeping with the planning and sustainable development of the area.

Recommendation
Request Clarification of additional information.

Clarification of additional information requested: 17 November 2022
Clarification of additional information received: 26 April 2023

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Consultees:
Water Services: No objection, subject to conditions.
Irish Water: No objection, subject to conditions.
EHO: No objection, subject to conditions.
Roads: No objection, subject to conditions.
Parks: No objection, subject to conditions.
Health and Safety Authority: No report received at time of writing.
NTA: No report received at time of writing.
DoD: No report received at time of writing.
TII: No observations.
IAA: No report received at time of writing.
Department of Housing, Local Government and Heritage: No report received at time of writing.
IFI: No objection, subject to conditions.

Submissions:
Significant information was advertised for a period of 5 weeks. Closing date for submissions was 27 June 2023.

2 Submissions received:

- Planning authority must determine the application in accordance with relevant guidelines and legislation
- Planning authority must assess the application under the habitats directive
- Planning authority must assess the application under the EIAR directive
- The extent of the information submitted in insufficient to determine the application in accordance with the law
- The applicant should provide sufficient information to describe the development
- The applicant should provide information as to the specific models of generators that are being proposed – such information allows assessment of:
    - Fuel consumption and thermal inputs per hour
    - Capacity to use alternative renewable fuels
    - Variation of power output possible
    - Generation efficient curves under various power outputs
    - Capacity for heat recovery and related CHP efficiencies
    - Capacity to utilise carbon capture technology

- Application should outline waste heat parameters, costs associated with district heating, quantity of percentage of useful use of the thermal energy input.
- Planning Authority should define how long the operational phase of the plant should be given its reliance on fossil fuels and EU climate targets.

- Planning authority has been lax in relation to ensuring generation related development ensures sufficient detail to assess the proposals in the context of environment and climate related compliance.
- Application should define the maximum number of hours the plant is to generation out of the 8766 hours in an average year
- While the power system in Dublin is challenged to supply large electricity consumers with power, question must arise as to whether certain developments are proceeding despite the absence of necessary infrastructure such as renewable rich power grid.
- Large electricity users should:
    - Avail of direct lines to directly access Renewable Electricity supplies such as solar, wind, biomass, biogas to maximise the renewable portion of electricity they consume as a first measure
    - Utilise high efficiency thermal power generation
    - Locate generation plants to maximise useful heat recovery
    - Use renewable fuels for a portion of thermal power generation such as would contribute to targets
    - Utilise carbon capture technology

- Does the applicant have the right to run direct lines through public roads?
- There needs to be less data centres, not more. We don't need extensions to data centres when we are facing a climate emergency.

Assessment:

Item 1:

Clarification of Item 1.

As additional information, the applicant was requested to set out how the proposal was in keeping with the relevant land use zoning matrix. The applicant has stated that the proposed development is not a 'public service' and is solely linked to the adjacent data centre. Since the additional information request was made, the County Development Plan 2022-2028 has been adopted. Taking into account the draft Ministerial Direction, data centres are 'open for consideration within EE lands.

Data Centres are 'space extensive'. The applicant is, therefore, requested to demonstrate how the proposed amendments to the development proposed to SD21A/0186 are compliant with Policy EDE7 and its associated objectives.

Applicant's response:
It is noted that Profile Park and Grange Castle were originally earmarked for the development of enterprise and employment uses by nature covering large expanses of land. There is a 6 year road programme to extend the New Nangor Road between R120 and Brownstown to enable access to employment lands within Grange Castle and onward connections as appropriate. The site is well served by bus and rail connections. SM3 objective 22 also seeks to investigate the option of an inter-county rail service stopping at Kishoge Station. Given the accessibility of the site, the use is appropriate. Section 9.1 of the CDP states "The Citywest Business Campus and Grange Castle Business Park are modern business parks located in the west of the County with capacity to attract large scale industries of regional, national and international significance, due to the availability of large plot sizes, infrastructure and corporate park style environments. These areas have attracted a significant number of blue-chip national and multi-national corporations. Significant investment has been made over the past two decades in infrastructure and services to support these economic areas. Grange Castle Business Park is identified in the MASP as a strategic development area for the promotion of high-tech manufacturing, research and development".

EDE5 promotes building in clusters.
The type of data centre proposed is a retail co-location data centre known as International Business Exchanges (IBX) to support and co locate multiple companies in Ireland in one facility and allow high speed interconnectivity between multiple organisations.
DB8 will create employment synergies with DB2. The overall project, once operational, will provide 14no. permanent jobs, employed on a shift basis over a 24 hour period seven days a week.

EDE7 objective 2:

- *The appropriateness of the site for the proposed use having regard to EDE7 Objective 1;*

Location is appropriate

- *Strong energy efficiency measures to reduce their carbon footprint in support of national targets towards a net zero carbon economy, including renewable energy generation;*

Renewable energy generation on site was explored for this project and is included to support the operation of the front of house areas through energy saving technologies including solar/PV, low energy lighting, sensor lighting controls, heat recovery and variable speed pumps.

However, renewable energy generation to support the operation of the permitted data centre was discounted for the following reasons:

- *Solar and wind: due to the lack of available and suitable land on the site, it is not possible to generate substantial power from renewable sources of power such as PV and wind. PV cells are installed at roof level to provide power to the front of house office building in the data centre, which has been recognised and accepted in the planning approval received for the data centre building. Best use of solar and wind is at a utility level. Eirgrid are continually de-carbonising the grid by increasing solar and wind power plants to support the national grid. Once Eirgrid achieve the de-carbonisation goals for the power grid, as a consumer, the applicant will automatically benefit from using green utility power derived from renewable sources, once the project received a permanent power supply.*
- *Bio-diesel: as an alternative fuel source was considered for the project, but the volume to be stored on site is in excess of 1,000,000 litres. Given the site constraints, there is insufficient space to accommodate a fuel storage facility of this scale. Furthermore, the re-fuelling process is problematic and relies on multiple diesel powered tankers to deliver fuel 2-3 times a week. This is also heavily reliant on the fuel supply chain network and any shortages in stock or problems with delivery could cause the Data Centre to be without power for extended periods of time.*
- *National targets: Climate Action Plan targets set out*
- *Energy efficiency: The data centre, which is the main component of the project, incorporates several energy efficiency measures to reduce carbon footprint, including:*
-
    - *Makes efficient use of the site as it is multi storey and the proposed OSPG creates a compact and efficient development that utilises existing services and road infrastructure*
    - *Back up diesel fuel is reduced. The permitted development had a diesel storage capacity of 450,000 litres and the proposed development now has a reduced storage capacity of 135,000 litres.*
    - *Supplementary power is provided by PV roof panels. A heat recovery building is also provided in the event future connection can be made to a district heating system in the area.*
    - *The IT cooling system is an air-cooled system which wools water via free cooling, air cooled chillers.*

- *The global development of data centres has seen significant design and construction improvements relating to energy efficiency of buildings.*
- *The environmental impact of the proposal is minimised through energy saving technologies.*

- *The internal office space, workshop and storage spaces require heating and cooling. Cooling is provided through main chiller system. Airside heat recovery systems with air-to-air heat pumps shall be installed to provide heating and cooling to the office areas.*
- *Energy efficient, Electrically Commutated (EC) fans and motors shall be utilised for units up to 6kW in output and variable speed .*
- *All other data storage engineering services installations proposed have been considered in detail from an energy perspective.*
- *Data centre is exempt from meeting TGD Part L. Office space meets the requirements.*
- *Ambient temperature will be 25 degrees to save energy and reduce carbon footprint. Cool air delivered to these areas by the air cooled chillers. For 7-9 months of the year the chillers will not require to run as the temperature is below 15 degrees outside.*
- *Data centre will have a PUE of 1.27*
- *Data centres have agreed a number of measures to make data centres climate neutral by 2023.*

- *Maximise on site renewable energy generation to ensure as far as possible 100% powered by renewable energy, where on site demand cannot be met in this way, provide evidence of engagement with power purchase agreements in Ireland (PPA);*
  - *OSPG will be used until grid connection can be achieved.*
  - *Medium term option (decommission the plant) – grid upgraded and there may be sufficient capacity to support the development*
  - *Medium term option (maintain OSPG with a grid connection after 6-8 years). This would be a flexible arrangement*
  - *Long term option (retain OSPG with no grid connection). If grid not upgraded in 6-8 years and connection is not available for the data centre, the proposed OSPG would remain operational for the long term.*
  - *Corporate PPAs – energy use will be offset from a CPPA. This will comply with the relevant policies in climate Action Plan and Government's Statement on role of data centres. The applicant will implement a CPPA with a renewable energy plant that is in the development stage which will add to the renewable energy capacity in Ireland. Equinix commits not to commence the operation of the data centre prior to the operation of the CPPA renewable energy plant.*

- *Sufficient capacity within the relevant water, wastewater and electricity network to accommodate the use proposed;*
  - *COF from Irish Water for supply and waste water*
  - *No grid connection. OSPG to be constructed.*

- *Measures to support the just transition to a circular economy;*
  - *Circular economy is promoted as part of the proposal*

- *Measures to facilitate district heating or heat networks where excess heat is produced;*
  - *Profile Park has been identified in the CODEMA – Dublin Region Energy Masterplan as having potential for District Heating. Heat recovery building has been included. All infrastructure and ducting provided.*

- *A high-quality design approach to buildings which reduces the massing and visual impact;*
  - *OSPG has been sensitively designed to have regard to the road frontage to the west of Profile Park and the potential visual impact from Nangor Road to the north. Verified views provided.*

- *A comprehensive understanding of employment once operational;*
  - *100-200 construction workers. 14 permanent employees*

- *A comprehensive understanding of levels of traffic to and from the site at construction and operation stage;*

Two-Way Link	AM Peak Hour (08:00hrs-08:59hrs)	PM Peak Hour (17:00hrs-17:59hrs)
Ground Works	10	10
D&C Waste	2	2
Deliveries	10	10
Workers	80	80
Total	**102**	**102**

Table 1 - Peak Construction Trips

	Roundabout Flow	Construction	% Increase
AM (08:00-09:00)	1224	102	8.33%
PM (17:00-18:00)	1080	102	9.44%

Table 2 - Percentage Impact of Development on Roundabout

Shift Pattern	Time			
12 Hour Shift	07:00-19:00		19:00-07:00	
	Arrivals	Departures	Arrivals	Departures
Trips	33	33	33	33
Two-Way	66		66	

Table 3 - Predicted staffing requirements for proposed development

- *Provide evidence of sign up to the Climate Neutral Data Centre Pact.*
  - *Applicant signed up to the Climate Neutral Data Centre Pack in January 2021 – see attached confirmation*

EDE7 Objective 3: see enclosed landscape material.

Assessment:
In terms of EDE 7 objective 1, the site is located outside the M50. The proposal amends an existing data centre; therefore, the location is of the data centre itself is fixed.

It is noted that the applicant has included measures within the data centre itself to make it more efficient, however, it is not possible to secure large scale renewables on the site to power the facility. The applicant states that they will engage in PPAs, however, no evidence of this is provided.

It is noted that the applicant has received confirmation of feasibility from Irish Water, but not a connection from Eirgrid, either fixed of flexible, and the purpose of the plant would be solely to power the data centre as a result of this.

Having regard to the existing insufficient capacity in the electricity network (grid), the lack of a fixed connection agreement to connect to the grid, the lack of significant on site renewable energy to power the proposed development, the lack of evidence provided in relation to the applicant's engagement with Power Purchase Agreements (PPAs) in Ireland, and the reliance on a predominantly gas powered plant to provide energy to the development, it is considered that the applicant has failed to demonstrate that the proposed use is acceptable on EE zoned lands, in accordance with EDE7 objective 2 and section 12.9.4 of the South Dublin County Development Plan 2022-2028.
In this regard the proposed development, would, therefore, be contrary to the proper planning and sustainable development of the area and planning permission should be **refused.**

It is noted that the applicant has addressed the other elements of EDE7 adequately.

Item 2:
Clarification of Item 2.
a. The applicant has not provided an assessment of the appropriateness of the proposals to power the permitted data centre by gas instead of by electricity (as previously permitted) in terms of national, regional and local policy in terms of energy requirements and climate change. The applicant is requested to consider the following documents and set out how the requirements of each are met:

- National Planning Framework
- Regional Spatial and Economic Strategy
- Climate Action Plan 2021 (Government of Ireland)
- SDCC Climate Change Action Plan
- Government Policy Statement on Security of Electricity Supply
- CRU Direction to the System Operators
- Role of Data Centres in Ireland's Enterprise Strategy'

b. In terms of adaptation of the plant for alternative energy supply, the applicant appears to be reliant upon GNI proposals for alternative energy and has not put forward any site specific proposal in this regard. No renewable energy on site is proposed. The applicant is requested to set out any details of proposed on site renewables, in light of the requirements of Policy EDE7.

c. As requested by CFI 1, the applicant is requested to demonstrate that there is sufficient capacity within the relevant water, wastewater and electricity network to accommodate the use proposed, in line with EDE 7.

d. The applicant has stated that there is no current agreement to connect to the grid, however, consultation has been undertaken with EirGrid. Therefore, no details of the long term plan for the power plant have been provided, i.e., whether it would be decommissioned etc. The applicant is requested to provide further details regarding the long term proposal for the plant.
Applicant's response:
Statement of compliance submitted in applicant's response.

Assessment:
In relation to the NPF2040, the applicant states that the proposal makes efficient use of the site, as it is multi storey and utilises existing site services and road infrastructure and is well connected. It will also contribute to the emerging digital infrastructure of the area and will contribute to the Irish economy. Renewable technologies and heat pumps are provided.

In terms of the RSES, the applicant notes that Ireland is seen as a suitable location of data centres.

With regards the climate action plan, the applicant states that gas power is considered appropriate.

For the Government Policy Statement on Security of Electricity Supply, the applicant states that the OSPG is an interim solution and has been designed to accommodate other fuel types.

The CRU has directed Eirgrid and ESBN to assess applications for connection of Data Centres in terms of:

- Whether the site is within a constrained region
- The ability of the site to bring onsite dispatchable generation equivalent to or greater than their demand
- The ability of the data centre to provide flexibility in their demand by reducing consumption when requested by the system operator

The applicant states that they have tried to secure a connection with Eirgrid but have not been successful in doing so. They are unaware whether the area is constrained or unconstrained. The OSPG has sufficient capacity to serve the data centre and could provide flexible demand.
For the role of Data Centres in Ireland's enterprise strategy, the applicant states that the project will contribute to the emerging digital infrastructure. It will not impact the grid as it is separate from it. In terms of renewables, the applicant states that they will use PPAs. The applicant has an agreed gas supply with GNI.

As with Item 1 above, it is not considered that the applicant has adequately demonstrated that the proposal in not in a constrained area, due to the lack of connection to the grid, there is a lack of onsite renewable energy generation and evidence of engagement in PPAs.

Item 3:
Clarification of Item 8
The Planning Authority do not agree with the EIA screening assessment provided. Having regard to the nature of the proposed modifications to power the data centre by gas instead of electricity, the number of similar exiting and permitted data centres close to the proposed development and the potential impact on Material Assets, it is considered that the proposal is likely to result in significant effects on the environment. The need for environmental impact assessment cannot, therefore, be excluded at preliminary examination.

The applicant is requested to undertake an Environmental Impact Assessment of the proposed development.

Applicant's response:
EIAR provided.

Assessment:
Adequacy of Environmental Impact Assessment Report (EIAR)
The applicant states that the EIAR has been prepared, following the Clarification of Further Information request from the Local Authority.

An EIAR process is defined in the EIA regulations and Directive. That an environment impact assessment means a process consisting of:

(i) The preparation of an environmental impact assessment report;
(ii) The carrying out of consultations;
(iii) The examination by the competent authority of the information presented in the EIA report and any supplementary information provided, where necessary, by the developer;
(iv) The reasoned conclusion by the competent authority on the significant effects of the project on the environment, taking into account the results of the examination referred to in point (iii) and, where appropriate, its own supplementary examinations and;
(v) The integration of the competent authority's reasoned conclusion into any of the decisions.

The EIAR is prepared by the developer and is submitted to a Competent Authority as part of a consent process. The EIAR consists of a systematic analysis and assessment of the potential effects of a proposed project on the receiving environment. The amended EIA Directive prescribes a range of environmental factors which are used to organise descriptions of the environment and these factors must be addressed in the EIAR. These are listed in Article 3 (1) of the amended directive.
What an EIAR is to contain:
the developer shall include at least:
(a) a description of the project comprising information on the site, design, size and other relevant features of the project;
(b) a description of the likely significant effects of the project on the environment;
(c) a description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
(d) a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;

(e) a non-technical summary of the information referred to in points (a) to (d); and
(f) any additional information specified in Annex IV relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.

Adequacy of Environmental Impact Assessment Report (EIAR)
The EIAR sets out:
Chapter 1 – Introduction
Chapter 2 – Description of the Proposed Development and Site Context
Chapter 3 – Consideration of Alternatives
Chapters 4 – 18 sets out the required topics
Chapter 19 – sets out cumulative effects
Chapter 20 – sets out interactions
Chapter 21 – Sets out a summary of mitigation measures

An Environmental Impact Assessment Report (EIAR) has been submitted as part of the planning application which contains the EIAR and an Appendices. The direct, indirect and cumulative effects of the proposed project on the specified factors are identified, described and assessed in the following sections:

- Alternatives
- Population and human health
- Biodiversity
- Lands and Soils, Geology and Hydrogeology
- Water
- Noise and Vibration
- Air Quality
- Microclimate - wind
- Landscape and Visual Impact
- Traffic and Transportation
- Material Assets – utilities
- Cultural Heritage - Architectural
- Cultural Heritage – archaeological
- Daylight, Sunlight and Overshadowing
- Climate

Subject to Article 108 of the Planning and Development Regulations 2001 (as amended) the Planning Authority is required to examine the adequacy of the EIAR submitted. It is considered that the proposed EIAR contains the information as set out in Schedule 6 of the Planning and Development Regulations (2001) as amended and in accordance with European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

Alternatives

Alternative Operational Scenarios

Whilst the proposal to power the permitted data centre by electricity was previously permitted, Equinix has not received a commercial or technical offer to supply permanent power to the site. It has been verbally confirmed by ESB that power to the site is likely to be available in 6-8 years.

Equinix will engage with Eirgrid to achieve a future connection for the grid to facilitate the delivery of renewable electricity via the electrical grid. The Equinix strategy is to utilise CPPAs. As such it is Equinix intent to continue to engage to achieve a grid connection form Eirgrid.

In the absence of a grid connection the proposal is to utilise On Site Power generation (OSPG) with energy supplied via the Gas Networks Ireland grid. The intent with the OSPG plant is that:

• The plant would be operational to bridge the gap in electrical utility availability i.e., be operational until electrical utility supply is available.

• The plant would act in a flex capacity to allow the DB8 demand to be removed from the grid if required by the utility provider.

Once the electrical utility is available and there is not a requirement for flex the intent is that the OSPG plant would be decommissioned. It is Equinix strategic target for Climate Neutral Data Centre and the electricity consumption at current operational data centres in Ireland to be matched 100% with renewable energy GOs through CPPAs so it is Equinix preferred solution to have a grid connection to help meet the company's global strategic targets.

Alternative Locations

Having regard to these various environmental and development considerations, Profile Park was considered the most appropriate location for the permitted data centre having regard to:

• Profile Park is marketed and promoted as Ireland's Data Centre Cluster;

• the co-locational benefits beside the existing DB2 Data Centre in Kilcarberry Business Park owned and operated by the Applicant Equinix;

• the gas connection to the national supply;

• excellent transport connections to the M50, N4 and N7; and

• largescale data centre requirements relating to site scale and size

No Alternative sites or locations for the proposed OSPG development were considered by the Applicant for the following reasons:

• The Proposed Development includes amendments to an already permitted data centre development located on this site,

• The purpose of the Proposed Development specifically the OSPG (On Site Power Generation Plant) is to power the permitted data centre development on site due to the change in project scope as there is now no connection agreement with Eirgrid to provide power from the grid to the permitted development. Therefore, the proposed OSPG will provide power to the permitted development under SDCC Ref. SD21A/0186.
• The subject site has the space to accommodate the proposed OSPG to power the permitted development.
• The close proximity to the data centre, making the underground infrastructure most optimal.
• The Site is located in an area that is identified in South Dublin County Councils Development Plan as providing employment. The permitted development is dependent on the proposed OSPG in the absence of a formal connection agreement from EirGrid.
This EIAR has presented 3 scenarios where the OSPG would be decommissioned until such a time that the grid is able to provide power to the site in 6-8 years or retained on a flex agreement or retained for a longer period of time.
• There is no evidence of site contamination on the site making it suitable for development, we refer to chapter 6 of this EIAR for more details on the Land and Soil associated with the site.

Having regard to the site specific nature of the development, further consideration of alternative site locations are not considered essential in respect of the EIAR legislation and guidance.

Alternative Design and Layouts – For the Overall Project
Each of the options for the Overall Project considered followed the site constraints identified at due diligence stage of the project, which can be summarized as follows:
• Existing watermain and ESB wayleaves to the north and north-west, which force the setback of the development.
• Required 8m protection zone for the existing hedgerow along the dry ditch at east and south boundary.
4 options were considered. Option 4, which includes the OSPG was chosen.

Alternative Technologies
Permitted Development
Data Centre Technology – Details of the technology for the permitted data centre on the site are set out.
Data Centre Efficiency - Equinix adhere to the Climate Neutral Data Centre Pact (CNDCP) which mandates that by January 1, 2025, new data centres operating at full capacity in cool climates will meet an annual PUE target of 1.3, and 1.4 for new data centres operating at full capacity in warm climates. This target takes into account all new and emerging technologies and the efficiencies achievable with all associated plant and equipment.
This data centre is in compliance with these targets and achieves a PUE of 1.27 at full load capacity.

Proposed Development - On Site Power Generation Plant

Technology Types - Equinix considered a number of technologies as part of the selection/screening process to identify the most suitable for the application within the proposed development. These technologies were:

• Natural Gas Generators – reciprocating engine
• Natural Gas Generators – single cycle turbines
• Diesel Generators - reciprocating Engines
• Natural Gas Fuel Cells Fuel Source - Whilst the use of on-site renewable energy was assessed for this project, it is the intent of the Client to provide a power plant solution that is ready to interface, operate and support Ireland's de-carbonised utilities when they start to come online from 2030 onwards. By building an on-site power plant this in itself has the biggest impact in supporting the use of

renewable energy. Once the project receives a utility power supply, and the OSPG is able to deliver power, this will directly allow the wider transmission electrical grid to take on more input power from wind and solar sources knowing that projects like this one, can self-support power during times when the sun and wind sources are not at full levels of production.

A high-level assessment was made of the following renewable sources of energy and fuel to serve the OSPG.

Solar & Wind

Due to the lack of spare land on the site it is not possible to generate substantial power from renewable sources of power such as PV and Wind. To appreciate the amount of space required the following two examples demonstrate this issue.

- Solar - Ireland's largest solar farm is located at the Lilly Factory in Kinsale, Co Cork. The output of this plant is 5.6MW and occupies a land area of 16 Acres. The proposed development has a land area of 6.5 Acres and requires a power output of 10MW. It can be seen from this comparison that to supply the facility with solar power is not feasible as there is insufficient available land. PV cells are installed on the project to provide power to the front of house office building in the data centre, which has been recognised and accepted in the planning approval received for the permitted data centre building.
- Wind –Wind farms to supply a load of 10MW are typically located offshore where available space is less of a problem or on land in remote areas where wind patterns are favourable and space is available. If a single 2MW wind turbine is considered. The height of the centre of the fan blades sits at 80m from the ground and the rotor diameter is 116m. The maximum height limit on the site is restricted to 22m by SDCC due to the adjacent aerodrome and general planning restrictions, so therefore, even a single 2MW wind turbine cannot be located on this site, which would deem on site wind power generation unfeasible.

The best use of solar and wind power is at a utility level. Eirgrid are continually de-carbonising the grid by adding more and more solar and wind power plants to support the national gird. So, when EirGrid achieve the de-carbonisation goals for the power grid, as a consumer, Equinix will automatically benefit from using green utility power derived from renewable sources, once the project receives a permanent power supply. For further discussion, please refer to the following section, "Natural Gas and Renewable Fuel Sources".

Bio-diesel

Bio-diesel was considered for the project, but the volume to be stored on site is in excess of 1,000,000litres and there is not sufficient space to accommodate a fuel storage facility of this scale. Also, the re-fuelling process is problematic, and relies on multiple diesel powered tankers to deliver fuel 2-3 times every week.

This particular option is also heavily reliant on the fuel supply chain network and any shortages in stock or problems with delivery could cause the data centre to be without power for extended periods of time which would not be acceptable to the end users.

Natural Gas and Renewable Fuel Sources

Natural gas is seen as the transitional energy source that will lead the Gas and Electricity utility networks to a decarbonised status and will provide support to those utilities in the event insufficient power can be generated from solar and wind farms.

The use of renewable gas as a fuel source will increase as Gas Networks Ireland (GNI) de-carbonise their supply networks and incorporate Natural Gas/biomethane, Natural gas/hydrogen blends, 100% biomethane or 100% hydrogen.

Biomethane is a carbon-neutral renewable gas made from farm and food waste, and biomethane can seamlessly replace natural gas on the network today and help reduce agricultural emissions.

Hydrogen is a carbon free gas that can be made from renewable electricity and stored until needed. It can be blended with natural gas and biomethane or used in its purest form for zero carbon energy.

GNI have a de-carbonisation mandate (https://www.gasnetworks.ie/vision-2050/irelands-decarbonisation)and Equiniox will be able to take advantage of this once made available to consumers.

The OSPG that has been proposed is able to operate on these renewable fuels with little or no modification to the plant and equipment.

Parameters and Metrics
Each of the above technologies were considered in the context of the preferred operating parameters including:
• CRU Requirements
• Primarily fuel natural gas
• Future Electric power grid frequency at 50Hz
• Emissions compliant to EU regulations
• Proximity to the ESB electrical distribution and network
• Proximity to the Gas Network Ireland (GNI) gas transmission network
• Capital cost and operating cost. In addition, the following performance metrics were considered which included:
• Engineering, Procurement, Construction Expenditure
• Operating Expenditure
• Plot area
• Heat rate
• Start-up / loading times
• Minimum operating level
• Water usage
• Construction & commissioning times

Environmental Measures
Each of the technology options were considered initially in terms of its key environmental impacts under the following main operational parameters.
• Spatial requirements
• Atmospheric emissions
• Noise emissions
• Water supply
• Wastewater emissions
Option Selection – Alternative Designs considered for the OSPG
Option 1, natural gas engine generators, as the most suitable solution for this application.

Alternative Size and Scale
OSPG
The size of the proposed OSPG compound has been based on the 10 no. gas engines providing in total 10 MW (which is what is required for the permitted data centre), ancillary prefabricated structures being switch rooms and Battery Energy Storage System (BESS), as well as gas supplier metering skid and access road (sized for a small truck being able to deliver spare parts).

The available space on site, which was a location for the future data centre which has now been abandoned, proved ideal to house the OSPG compound, therefore no alternative scale solution has been investigated.

It has been considered whether the generator flues should be grouped or should they be arranged in individual stacks.

To assist with the visual impact, it has been decided to group them. They have been arranged in 2 groups, 5 flues in each, which matches the potential phasing in deployment of the plant. We refer to the Landscape and Visual assessment Chapter for more information.

Alternatives to the modifications to the Permitted Data Centre
Loading Dock area increase - During the design process it became evident that more space will be required within the loading dock area. It has been decided to extend the single storey part of the building to the north as this would have a lesser associated impact on surrounding spaces than the extension to the west. In case of extension to the west both the car parking area and permitted Waste Bin Store would have to be redesigned. Extension to the north affected only the paved area within the entrance plaza area at the building entrance.

Removal of hot air plenums
During the detail design development, it has been advised by the building services designers that the 3 no. hot air plenums to the front (north) elevation will not be required. However, from the architectural design point of view it was evident that 3 vertical elements on the facade have been beneficial in screening the generator flues and splitting the massing of the long north façade. It has therefore been decided to retain the 3 no. screens that would act as architectural treatment of the front façade.
The design of the screens is similar to that of the front of the hot air plenums proposed earlier: light grey solid screens with metal mesh vertical strips as additional detail. Other colours of screening panels have been considered; however, light grey is consistent with the colour of the offices cladding and therefore has been selected.

Alterations to the permitted generator plant yard
The back-up generators diesel fuel storage has been reduced. The permitted development had a diesel storage capacity of 450,000litres and the proposed development now has a reduced storage capacity of 135,000 litres. The permitted development stored diesel in standalone double walled tanks with bunded concrete areas and hard standing and associated fill and spill control systems. The proposed development now utilises belly tanks within the generator modular enclosures.

We note the following from the proposed development that relate to power supply:

- Alterations to the permitted generator plant yard to the north of the data centre to include removal of 4 no. internal generators and plant rooms spaces from 2nd floor and provision of same within the Generator Yard – Overall increase of number of external gens from 5 no. to 9 no. and increase of number of external electrical plant rooms from 4 no. to 8 no. We note there is therefore no change in the number of overall generators located on site at 9 no. total generators.
- All previously permitted free standing fuel tanks are now removed.

Alternate Construction and Decommissioning

Construction practices for On Site Power Generation Plants are well understood in the industry and standard construction practices will be employed in the construction of this plant. Similarly, decommissioning practices will follow standard practices and will be carried out in accordance with EPA requirements as set out in the IE Licence.

Decommissioning

Overall Project - Data Centre and OSPG: It is unlikely that the Data Centre will require decommissioning in the medium to long term future. Regular maintenance and minor upgrade works will maintain the functional operation of the development over the medium to long term.

Proposed Development OSPG:

The key issue is that whilst the proposal to power the permitted data centre by electricity was previously permitted, Equinix has not received a commercial or technical offer to supply permanent power to the site. It has been verbally confirmed by ESB that power to the site is likely to be available in 6-8 years. Equinix will engage with Eirgrid to achieve a future connection for the grid to facilitate the delivery of renewable electricity via the electrical grid. The Equinix strategy is to utilise CPPAs. As such it is Equinix intent to continue to engage to achieve a grid connection form Eirgrid. In the absence of a grid connection the proposal is to utilise On Site Power generation (OSPG) with energy supplied via the Gas Networks Ireland grid.

The intent with the OSPG plant is that:

- The plant would be operational to bridge the gap in electrical utility availability i.e., be operational until electrical utility supply is available.
- The plant would act in a flex capacity to allow the DB8 demand to be removed from the grid if required by the utility provider. Once the electrical utility is available and there is not a requirement for flex the intent is that the OSPG plant would be decommissioned. It is Equinix strategic target for Climate Neutral Data Centre and the electricity consumption at current operational data centres in Ireland to be matched 100% with renewable energy GOs through CPPAs so it is Equinix preferred solution to have a grid connection to help meet the company's global strategic targets. The medium and long-term options for the OSPG are provided below.

1. Medium Term Option:
   Decommission the OSPG plant. In the next 6-8 years, the grid will be upgraded by ESBN and they may decide that there is sufficient capacity in the network to serve and support this development. In this instance, OSPG plant may no longer be required.
2. Medium Term Option:
   Retain the OSPG with a grid connection after 6-8 years of full operation ESBN could request that the plant is retained on a permanent basis and operate on the terms and requirements of the CRU in order to support the security of the new de-carbonised national grid. In this case, the Consumer would have a "flex" agreement with ESBN and would be required to operate the OSPG on a limited time period to support the decarbonised grid at times when renewable energy supply to the grid is at low levels. As the OSPG hours of operation are currently unknown for this option, the hours of operation have been estimated based on an existing/similar OSPG development that is currently in a flex agreement which operates for 500 hours of the year.
3. Long Term Option:
   Retain the OSPG with no grid connection If the grid is not upgraded by ESBN in the next 6-8 years and connection is not available for the permitted Data Centre, the proposed OSPG would remain operational for the long term (+15 years). This scenario has been assessed in the Climate Chapter of the accompanying EIAR.

Do – Nothing Alternative

As highlighted above the site is zoned for 'EE' with an objective to "To provide for enterprise and employment related uses". Consideration of an alternative location would equate to a 'do-nothing' alternative for the subject site. The lands would remain greenfield as the permitted data centre development on site would not be able to source power and would cease to function without the proposed development and would not maximise upon the development potential of the site, which would be contrary to the policy objectives of the County Plan which promotes enterprise and employment. The County Development Plan allows for a proactive approach to data centres as per the above objectives.

Furthermore, developing a data centre at this location would also derive the benefits and maximise upon existing infrastructure, which is supported by the County Development Plan.

EIAR Reasoned Conclusion

Having regard to the environmental information contained within the EIAR and information submitted as part of the application, it is considered that the main significant direct and indirect residual effects of the proposed development on the environment are as follows:

- Population and human health
    - Effects on Businesses and Residences:
      There will be a temporary, imperceptible, positive effect on local business with the presence of construction workers using local facilities during the construction phase of the proposed development. The health effects associated with the employment generation during the construction stage and the decommissioning phase if required would be temporary, not significant and slight positive in nature.
    - Effects on Tourism and Amenity:
      The proposed development would be built in an area where other large-scale industrial developments are already present. The proposed development is therefore in keeping with the existing trends in the area.
    - Effect on Human Health from Air Quality and Climate:
      The residual impacts on air quality from the construction of the proposed development will be short-term and imperceptibly negative and for the operational phase of the proposed development will be long-term, negative and slight. Thus, in terms of air quality, both the construction phase and operational phase will be not significant

- Effects on Amenity and Tourism:
  Due to the site context and surrounding land uses set out above the effects on Amenity and Tourism will be Neutral, Imperceptible and long term. The cumulative impact is slight in magnitude, neutral in quality, and long term / permanent in duration. The cumulative impact can be described as moderate in magnitude (the development is in keeping with the existing trends), negative in quality, and long term / permanent in duration.

- Biodiversity
  - Hedgerow / Treeline - Vegetation removal / disturbance to root systems - imperceptible
  - Hedgerow / Treeline – Planting – slightly positive
  - Natural Heritage Areas / Drainage Ditches / Otter – water quality deterioration - imperceptible
  - Amphibians – disturbance – imperceptible
  - Badgers / Other Species - Disturbance and entrapment - imperceptible
  - Bats - Disturbance from lighting - imperceptible
  - Invasive Species - Introduction and spread of invasive species – imperceptible

- Lands and Soils, Geology and Hydrogeology
  - Construction:
    - Risks to Human Health – Enabling Works and Construction Workers (High) – local – short term, temporary - Negligible – not significant
    - Risks to Human Health - Adjacent Site Users (High) - local – short term, temporary - Negligible – not significant
    - Risks to Controlled Waters - Groundwater (Locally Important) (High) - local – short term, temporary - Negligible – not significant
    - Risks to Controlled Water - Baldonnel Stream (Medium) - local – short term, temporary - Negligible – not significant
    - Risks to Controlled Waters - Controlled Waters (Medium – Low) – local, permanent - Minor beneficial – not significant

  - Operation:
    - Risks to Human Health – Future users and Adjacent Site Users (High) - local, permanent - Negligible – not significant
    - Risks to Controlled Waters - Groundwater (Locally Important) (High) - local, permanent - Minor adverse –not significant
    - Risks to Controlled Water - Baldonnel Stream (Medium) - local, permanent - Minor adverse –not significant

  - Risks to Controlled Waters - Controlled Waters (Medium – Low) – local, permanent - Minor adverse –not significant
  - Risks to Buildings, Utilities and Services - Buildings, Utilities and Services(Medium) - local, permanent - Negligible – not significant

- Water - The proposed development has been designed in line with good industry practice, and, as such, mitigation against the risk of major accidents and/or disasters is embedded through the design and in accordance with planning and legislative requirements.

- Noise and Vibration –
  - Construction phase: 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 there is not a significant impact at noise-sensitive locations in terms of ambient noise levels subject to appropriate management of the issues on the site.
  - Operational phase: operational noise assessment of fixed plant associated with the proposed plant has shown that in accordance with the scale in the EPA EIA Report Guidelines 2022 there will be a negative, not significant to slight, long term effect at the closest residences

- Air Quality - Once the mitigation measures outlined in Section 9.6 are implemented, the residual impacts on air quality from the construction of the Overall Project – Data Centre & OSPG Scenario will be short term and imperceptibly negative and for the operational phase of the Overall Project – Data Centre & OSPG Scenario will be long-term, negative and slight. Thus, in terms of air quality, both the construction phase and operational phase will be not significant.

- Microclimate – wind - Wind cannot be eliminated or mitigated as it depends on weather conditions which could vary. The data of the historical wind conditions collected and reported in the previous sections show that the wind speeds likely to occur on the site are below critical values and that a pleasant and comfortable microclimate can be maintained for most of the time and under the most frequent wind scenarios. Gusts and storms can still occur, however, and they can create unpleasant and sometimes unsafe conditions. The pedestrian activities concerning the Lawson Comfort and Distress Criteria are not in general carried out during those weather conditions. Having considered the above, no further changes to the development design and further increase of the landscaping are suggested, as safety and pedestrian comfort are maintained under Lawson Comfort and Distress Criteria.

- Landscape and Visual Impact
    - Construction phase:
        - Loss of existing vegetation - the likely effect is short-term, negative and moderate. In the long term will be increased biodiversity on site and visual screening, which will assist in the integration of the development into the landscape. This can be rated as a long term, positive and significant effect.
        - Earthworks - The likely effect is short-term, negative and significant during the construction stage only. Once the berm is constructed and planted the effect will be long-term, neutral and slight. The planted berm will assist in the integration of the development into the landscape.

    - Operational phase:
        - Intensification of use of the site from unused to commercial use, changing the landscape character - The likely effect is long term / permanent, positive and moderate. The subject site is located within the existing business park with other business/industrial parks located in the surrounding area. Therefore, the change is considered in line with established trends and is not significant.
        - The visual effect on the area - The effects on the visual environment
        - vary from imperceptible (thanks to the topography and existing vegetation in the area) to significant, from neutral to positive and long term / permanent

- Traffic and Transportation – no detail on residual impact, or magnitude of residual impact identified.
- Material Assets – utilities - The material assets identified in the study area are considered to be typical infrastructure frequently encountered in civil engineering infrastructure projects, in both rural and urban environments. As such, it is considered that the resulting predicted impacts on material assets from the Overall Project will be positive, slight and permanent
- Cultural Heritage - Architectural - Litter, decay and weather erosion may affect the boundary ditch / banks / vegetation
- Cultural Heritage – archaeological - All licensed excavations and monitoring are subject to conditions outlined in the terms of the licence issued to the archaeologist by the National Monuments Service.
- Daylight, Sunlight and Overshadowing - The effect of the Overall Project was mitigated through design. Any residual impact on the daylight, sunlight and overshadowing of the adjacent properties from the Overall Project is not significant.

- Climate - Once the mitigation measures outlined in Section 18.6 are implemented, the residual impacts on climate from the construction of the proposed development will be short-term and imperceptibly negative and for the operational phase of the proposed development will be long-term, negative and minor adverse. Thus, in terms of climate, both the construction phase and operational phase will be not significant.

It is considered that the information contained within the EIAR 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).

Notwithstanding the conclusions of the EIAR, the Planning Authority remain concerned regarding the impact of the proposed development due to the lack of Eirgrid connection and lack of renewables in terms of meeting the requirements of the South Dublin CDP 2022-2028.

Item 4:
Clarification of Item 9
The applicant was requested to provide a report demonstrating that the proposal is in accordance with the South Dublin County Development Plan 2022-2028. The Planning Authority note the information submitted and consider that clarification is required.
The applicant is requested to demonstrate how the proposed amendments to the development proposed to SD21A/0186 are compliant with:

- EDE1 Objective 6 and EDE3 Objective 5
- Policies QDP11 and E3, as well as their relevant objectives
- Policy IE6 and the related objectives
- 12.4.2 Green Infrastructure and Development Management
- 12.5.1 Universal Design
- 'The Plan Approach' Compliance Report (paragraph 12.5.2):
- 12.7.5 Car Parking / Charging for Electric Vehicles (EVs)
- 12.9.2 Enterprise and Employment Areas and Table 12.27: Key Principles for Development within Enterprise and Employment Zones
- 12.9.4 Space Extensive Enterprises
- 12.10.3 Energy from Waste

Applicant's response:
EDE3 Objective 5 – the site is proximate to good road infrastructure and rail and bus services. Pedestrian network promotes walking and cycling.
Policies QDP11 and E3, as well as their relevant objectives – materials are durable and help create a high quality built form. See design statement. Designers are aware of the obligation to support and facilitate a circular economy. As part of energy efficiency measures, Equinix will operate facility at higher temperature.
IE6 – typical ESBN connection will be made to facilitate internal electrical connections and street lighting. In the absence of a grid connection, the data centre will be powered by gas, as agreed by the connection agreement with GNI. The development would therefore not compromise performance of the National Grid.

12.4.2 Green Infrastructure and Development Management – see LVIA. Landscape plan is in line with policies NCBH5, GI2, GI4, GI5. Tree survey carried out GSF score is 0.44. Site has achieved 22.5% green cover and 12.5% permeable (35% total). SuDS features have been incorporated.

12.5.1 Universal Design – development is a secure facility
'The Plan Approach' Compliance Report (paragraph 12.5.2) – see design statement
12.7.5 Car Parking / Charging for Electric Vehicles (EVs) – all spaces provided with EV ducting. 20% of spaces are EV.
12.9.2 Enterprise and Employment Areas and Table 12.27: Key Principles for development within Enterprise and Employment Zones – statement provided.
12.9.4 Space Extensive Enterprises – addressed under CFI item 1
12.10.3 Energy from Waste – heat recovery building permitted.

Assessment:
The applicant's assessment of the above policies are noted. Concerns remain regarding Section 12.9.2 and the OSPG.

Conclusion
The applicant has failed to demonstrate that the proposed development has an appropriate grid connection. In addition, the applicant has failed to provide evidence of sufficient on site renewable energy or evidence of PPAs in Ireland.

Given the reliance on an OSPG, that would operate on gas, it is considered that the applicant has failed to demonstrate compliance with Policy EDE7, specifically objective 2.

Having regard to the foregoing assessment and conclusion, it is recommended **that planning permission be refused for the proposed development.**

It is noted that there were a number of other elements to the proposal, discussed above and noted as acceptable subject to conditions, however, given the scale of the element recommended for refusal, it is considered that planning permission should be refused in this instance.

Recommendation

I recommend that a decision to Refuse Permission be made under the Planning & Development Act, 2000 (as amended) for the reasons set out in the Schedule hereto:-

SCHEDULE

REASON(S)

1. Having regard to the existing insufficient capacity in the electricity network (grid), the lack of a fixed connection agreement to connect to the grid, the lack of significant on site renewable energy to power the proposed development, the lack of evidence provided in relation to the applicant's engagement with Power Purchase Agreements (PPAs) in Ireland, and the reliance on a gas powered plant to provide energy to the development, it is considered that the applicant has failed to demonstrate that the proposed use is acceptable on EE zoned lands, in accordance with EDE7 objective 2 and section 12.9.4 of the South Dublin County Development Plan 2022-2028.
   In this regard the proposed development, would, therefore, be contrary to the proper planning and sustainable development of the area.

Comhairle Chontae Atha Cliath Theas

PR/0921/23

Record of Executive Business and Chief Executive's Order

REG. REF. SD22A/0156
LOCATION: Plot 100, Profile Park, Nangor Road, Clondalkin, Dublin 22

Colm Harte

Colm Harte,
Senior Executive Planner

ORDER: A decision pursuant to Section 34(1) of the Planning & Development Act 2000 (as amended) to Refuse Permission for the above proposal for the reasons set out above is hereby made.

Date: 08 August 2023

Mick Mulhern, Director of Land Use, Planning & Transportation