

Comhairle Chontae Atha Cliath Theas

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Record of Executive Business and Chief Executive's Order

Reg. Reference: SD24A/0164W **Application Date:** 28-Jun-2024
Submission Type: New Application **Registration Date:** 28-Jun-2024

Correspondence Name and Address: Máire McNamee, Ove Arup & Partners Ireland Limited, 50 Ringsend Road, Dublin 4, D04 T6X0

Proposed Development: Ten-year planning permission is sought for the expansion of existing Google Ireland Limited operations at Grange Castle Business Park South, Dublin, including the development of a 72, 400m² data storage facility which will incorporate data halls with associated support areas, a high voltage compound, offices and staff facilities, a loading area, mechanical and electrical yards, internal and external utilities, security fence and gates, landscaping including acoustic screening, 2 no. stormwater attenuation ponds, additional internal vehicle and pedestrian infrastructure, together with ancillary buildings and site infrastructure. The development also includes the creation of a new active travel thoroughfare connecting Grange Castle Business Park South and Profile Park Road.

Location: Grange Castle Business Park South and Profile Park, , Baldonnell, Dublin, D22 X602

Applicant Name: Google Ireland Limited

Application Type: Permission

Description of Site and Surroundings

Site Area

Stated as 20.44Ha on the application form

Site Description

The site is located on the outskirts of Dublin (approximately 13km southwest of the city centre). The site is part of the Google Data Centre Campus bounded by the Baldonnell Road to the south, the Digital Realty Profile Park to the east and the existing DC1 and DC2 to the north. The site is located within an area of mixed industrial and agricultural land. The southwest of the site is currently utilised as an area for car parking (associated with the DC1 and DC2 developments).

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The area is characterised by undeveloped plots, including this partially developed plot, as well as a number of other consented Data Centres. A watercourse bisects the southern site area, running downslope in a south to north direction.

Proposal

The proposed development consists of:

- Ten-year planning permission is sought for the expansion of existing Google Ireland Limited operations at Grange Castle Business Park South, Dublin,
- The development of a 72,400m² data storage facility which will incorporate:
 - o data halls with associated support areas (referred to as DC3),
 - o a high voltage compound, offices and staff facilities,
 - o a loading area,
 - o mechanical and electrical yards,
 - o internal and external utilities,
 - o security fence and gates,
 - o landscaping including acoustic screening,
 - o 2 no. stormwater attenuation ponds,
 - o additional internal vehicle and pedestrian infrastructure,
 - o together with ancillary buildings and site infrastructure.
 - o The development also includes the creation of a new active travel thoroughfare connecting Grange Castle Business Park South and Profile Park Road.

Power Supply

The submitted EIAR, section 8.4.4.2 states that the Proposed Development will be powered through an **existing Eirgrid grid connection**. The Proposed Development includes the installation of a new High Voltage (HV) compound to support proposed DC3. The existing power grid connection with Eirgrid is sufficient to operate the full campus including DC1, DC2 and DC3, according to the EIAR report submitted by the applicant. The design of the Proposed Development includes measures to address the effects caused by the increased demand on power required during operation.

Additionally, the EIAR report also states that *'in Ireland, GIL has signed a 14 year Power Purchase Agreement (PPA) (with the possibility to extend by five years) with Power Capital Renewable Energy for 58 megawatts (MW) of new-to-the grid capacity from the Tullabeg Solar Farm through an existing grid connection.*

This agreement has allowed the development of a new renewable energy project which was granted planning in 2022 is currently under construction. It will add new renewable energy to the grid that GIL's offices and data centres run on, contributing to the decarbonisation of Ireland's electricity system and of their operations'.

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Furthermore, section 4.4.2.1 of the EIAR states that *'It is proposed to construct an HV compound on the northern side of the development site, just north of the existing DC1 facility and east of the existing substation. Once operational, this new proposed HV compound will supply electricity to sections of the Proposed Development. Emergency generators will provide electricity to the facility in the event of a power loss. These emergency generators are housed within individual enclosures. In addition, it is proposed to provide photovoltaic (PV) panels on part of the roof of the DC building. This is expected to generate 20% of the energy need associated with that occupied building through the use of renewable power. The Proposed Development has been designed to facilitate district heating where surplus heat is produced. This system has the potential to deliver heat for both space heating and water heating needs to buildings external to the site through a network of insulated underground pipelines. This will be realised once a suitable off taker is available, and the adequate critical load is achieved. GIL intends to make an application for approval under section 182A of the Planning and Development Act 2000 (as amended) for those elements of the Proposed Development comprising "transmission" under section 182A (9).'*

The proposed power supply is, in summary:

- Existing power grid connection with Eirgrid.
- Onsite PV panels (expected to generate 20% of the energy need associated with the occupied building)
- Onsite emergency generators (back up only and not used as main power source).

Zoning

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

An element of the site (south east) is zoned objective 'RU' *'To protect and improve rural amenity and to provide for the development of agriculture'*.

Development Plan Maps:

Bird Hazards - Casement

Bird Hazards - Weston

Inner Horizontal Surface - Casement

Baldonnel Solar Safeguarding Zone

There are a number of monuments and protected structures in proximity to the site.

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Consultations

Internal

Roads – Report Received, Additional Information Requested

Public Lighting – No report received at time of writing

Water Services – Report Received, recommend additional information and recommend

Refusal

Waste Management – No report received at time of writing

Parks – Report Received, Additional Information Requested

Heritage Officer – No report received at time of writing

External

Department of Defence – No observations received.

Inland Fisheries Ireland – No observations received.

Irish Aviation Authority – No observations received.

National Transport Agency – No observations received.

Transport Infrastructure Ireland – No observations received.

Uisce Eireann (Irish Water) – Report Received, standard conditions to be applied

HSE Environmental Health Officer – Report Received, Grant Subject to Conditions

Commission for Regulation of Utilities – No observations received.

An Taisce – Observation Received

EPA – Observation Received

SEA Sensitivity Screening

Overlap with the following SEA Sensitivity Screening layers:

Flood Zones A and B

Submissions/Observations /Representations

A number of submissions were received with regard to this application. These are considered in the overall assessment of the planning application. For the purpose of this report these are summarised as follows:

- Reasoning for 10 year permission
- CRU guidelines regarding Electricity Demand Side Strategy and Implementation Plan not yet released
- Compliance with Climate action plan
- Cumulative impact of the Data Centres on the site and in the area
- Carbon Targets and quantify amount of carbon emissions from site
- Compliance with SDCC Development Plan EDE7 Objective 2
- Clarity on back up generation required

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- Concentration of Data Centres in SDCC and on EE lands
- Adhere to 2022 Statement by DETTE on Data Centres and demand accommodation
- Use of Green Walls and Roofs not included
- Design of the proposed structure
- EPA press release May 2024 on National and EU Targets and the impact of this proposal and other on these targets, notably Green House Gas Emissions
- Obligations of the Council under Climate Action and Low Carbon Development Act 2015
- Obligations of the Council under Article 4(1) of the Directive 2000/60/EC (Water Framework Directive)
- Legal obligations of SDCC
- Lack of competent Authority with regard monitoring of GHG
- Projected emissions of the proposed development
- PPA is flawed given the level of energy required
- Overall impact on Ireland's Electricity Consumption
- Clarification of methodology on emissions required
- Achievement of 80% renewables
- PPA details and output described potential for double counting of energy within PPA
- Clarify if PPA relates solely to proposed development or wider CIL site
- Is PPA figure, as stated, maximum peak output
- The 20% PV solar figures, will this contribute to energy supply and demand or onsite use
- Proposed development employment contribution
- Failing to limit the energy the use of the proposed energy centre, impact on then energy grid, and climate issues
- Use of backup generators
- Current context with regard achieving low carbon emissions nationally
- EIA Directive 2014/52/EU not fully complied with and therefore long term effects cannot be quantified
- Cumulative impacts of the wider developments and wider site on emissions
- Clarify figure of 60% stated in EIAR for PPA and how it has been supported
- Feasibility of District Heating connection and proposal
- Legal Climate obligations under Climate Action and Low Carbon Development Act
- Impact on water and water consumption of proposal
- The need for the applicant to demonstrate compatibility with the carbon budget
- PPA does not address potential emissions from onsite back up generation
- The applicants obligations to report under EU Energy Efficiency Directive and EU Corporate Sustainability Due Diligence and Reporting Directives

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- Note the Climate Change Advisory Council review of electricity Sector

An Taisce have submitted an observation raising concerns in relation to emissions, climate legal obligations, government statement on data centres, grid capacity and water.

The EPA have submitted an observation in relation to the applicant's industrial emissions licence requirements.

The above submissions and observations have been reviewed in full and taken into account in the following assessment of the proposed development.

Relevant Planning History

Application Site

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 - **GRANT PERMISSION**

SD06A/0568/EP – Extension of Duration of Permission – **GRANT PERMISSION**

SD16A/0148 - The painting of 5 murals max. 12.25m high totalling (1,192sq.m) on external walls of existing building, smaller images on 3 external flues (total 10sq.m) also mural painting on a 7.5m high external sprinkler tank (surface area 250sq.m). The installation of an external fence 1.8m high x 18m long inside the existing perimeter fence at external dining area with mural painted on the internal face (area 33sq.m) Total area of all murals is 1485sq.m. The murals will be lit with light fittings either on the building or nearby poles or ground - **GRANT PERMISSION.**

Adjacent Sites

SD14A/0023 - Construction of a two storey data storage facility (30,361sq.m.), a double height warehouse building (1,670 sq.m) and a HV Substation area with two buildings; 1 no. 2 storey building (968sq.m.) and 1 no. single storey building (190 sq.m) and associated site development works. Permission is also sought for a new site access and entrance gates, a security gatehouse, security gates, load bank garage, perimeter fencing, internal roadways,

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sprinkler tank, pump house, 10KV substation, water and fuel tanks, attenuation ponds, hard and soft landscaping, 83 no. new car parking spaces and bicycle shelter with ancillary site works. The highest point of any of the buildings is within 20m of the original ground level with the 25 no. stacks at 25m. Provision for a temporary construction entrance and haul road off the Baldonnell Road to the south of the site has been allowed for; an EIS (Environmental Impact Statement) will be submitted with this application, all on a 11.25 ha site - **GRANT PERMISSION**

SD14A/0284 - Alterations to previously granted Reg. Ref. SD14A/0023 consisting of alterations to the position of the security gatehouse and security gates, internal roads layout, attenuation ponds, access road to the two storey substation; alterations to the double height warehouse elevations plus an additional internal mezzanine level (floor area 165sq.m); alterations to the single storey substation building (increase in additional floor area of 88sq.m and compound area; alterations to the height of the Load Bank Garage Building; additional 27 car parking spaces; removal of previously granted MV substation to north west of site; all associated site development works required as part of the above mentioned alterations - **GRANT PERMISSION**

SD08A/0113 - 1 no detached logistics / distribution warehouse unit with ancillary offices (total floor area c.1842 m.sq.m) and associated site works including storm - water , attenuation, water services and boundary fencing - **GRANT PERMISSION**

SD10A/0063 - New 8m diameter sprinkler tank (8.5m in height) and pump house (floor area 30sq.m) to the rear of existing semi detached warehouse unit and associated site works on previously approved development Reg. Ref. SD08A/0052 on a 0.45 Ha site - **GRANT PERMISSION**

SD11A/0121 - Change of use of an existing logistics/distribution warehouse facility (approved under planning ref. no. SD08A/0052) to an electronic technology facility, associated works including modifications to existing structure. The development will consist of the following works and modifications to the existing building: installation of external plant over two storeys along the east and west elevations of the building on a new steel support system clad with acoustic louvered screens to match existing cladding colours; installation of a new first floor to provide additional plant areas; extension to the administration area at ground floor level with new windows to the south elevation to match existing; installation of additional windows at upper level over the existing administration area and existing roof lights removed; removal of existing doors to north facade and replacement with new cladding to colour match existing; associated internal alterations.

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Extent of site works includes: a sprinkler tank and pump house to the north east corner; extension of existing single storey substation in the south east corner to include a customer switch room; provision of a new main entrance to the east of the existing entrance to Unit 502, a new road layout, entrance gates and new entrance gates south of the building to access the car park; block existing main entrance to Unit 502 to provide set down area to access the ESB substation; construct a single storey security building to the east of the site with new gates and new visitor car parking; remove one existing dock leveller and an on-grade roller shutter door from the north west corner of the building with the existing depressed loading dock filled in; installation of self contained emergency stand by generators and other plant to the north west corner of the site, including all supporting structures for flues, and a 1.8m high fence and gate to generator enclosure; construct roadway around the building to the west, north and east of the site; boundary fencing around site with site landscaping; existing site entrance to Unit 503 to be retained as an alternative access point; divert existing culvert along eastern side of the site to facilitate development; install a bicycle shelter to the south west of the site; increase in site area from 9131sq.m. to 13925sq.m - **GRANT PERMISSION**

SD08A/0052 - (a) 2 no. semi-detached logistics / distribution warehouse units with ancillary offices (total floor c.3,574sq.m.) and associated site works including storm water attenuation, water services, boundary fencing; (b) extension of estate road previously permitted (SD07A/0280); (c) temporary access haul road previously permitted (SD07A/0280) - **GRANT PERMISSION**

SD07A/0280 - Further Information - The proposed development now consists of: 43 Units in 7 blocks comprising 16 Industrial Units (Blocks 1, 2 and 7), 24 Warehouse Units (Blocks 4, 5 and 6) and 3 Science and Technology Units (Block 3) all with ancillary office space (total floor area approximately 12,558 sq. m.). Site development works including storm water attenuated works, water services, boundary fencing, temporary access haul road, estate roads and 2 no. E.S.B. sub-stations, 241 car parking spaces, all on a site of approx. 3.314 hectares. (An increase in the overall floor area of the proposed development from 11,416 sq. m. to 12,558 sq. m., increase in parking spaces from 168 to 241, a reduction in the number of units from 45 to 43, alterations to overall area and internal configuration of unit types A, B, C, D and D1, and reduction in floor area of ancillary office space, removal of 2 units onto internal access road (Block 4), relocation of unit from Block 5 to Block 3, relocation of waste collection area, cycle parking and 2 electricity sub-stations/switch rooms, and alterations to elevation onto internal access road, and alterations to internal access road layout) - **GRANT PERMISSION**

Relevant Enforcement History

None recorded for subject site.

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Pre-Planning Consultation

PP018/24 - It is proposed to expand the existing operation at the Profile Park Site (which currently includes DC1 and DC2 in an area of 11.2 hectares) located in Grange Castle Business Park South and Profile Park, Dublin Ireland. The proposed development consists of a data storage facility which will incorporate data halls with associated support areas, a 110kV substation, offices and staff facilities, a loading area, mechanical and electrical yards, internal and external utilities, together with ancillary buildings. The new data centre will be approximately 72,400 sqm in size.

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 is hereby directed to take the following steps:

... b. Amend the land use zoning objectives in tables 12.4, 12.8 and 12.10 to reinstate data centre use class as an 'open for consideration' use class in the REGEN, Enterprise, and Employment (EE) and Major Retail Centre (MRC) zoning objectives.

Relevant Policy in South Dublin County 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

GII 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.

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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'

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.

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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).

QDP8 Objective 1:

To assess development proposals in accordance with the Building Height and Density Guide set out in Appendix 10 of this Development Plan and associated planning guidelines. In this regard, all medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq. m or as otherwise required by the Planning Authority) shall be accompanied by a 'Design Statement'. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in South Dublin County's Height and Density Guide. Any departures within the proposed development from the guidance set out in the Building Height and Density Guide for South Dublin County (Appendix 10) shall be clearly highlighted in the Design Statement. (See Chapter 12: Implementation and Monitoring).

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.

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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.*

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.

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EDE4: Urban Growth, Regeneration and Place Making

Urban Growth, Regeneration and Placemaking Support urban growth and regeneration through the promotion of good placemaking to attract employees and employers and to provide a competitive advantage to the County and diverse investment opportunity.

EDE4 Objective 1:

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

EDE4 Objective 4:

To direct people intensive enterprise and employment uses such as major office developments (>1,000 sq. m gross floor area) into appropriately zoned lands subject to their location within approximately 500 metres of a high frequency urban bus service and / or within 1000 metres walking distance of high capacity transport stops (Train / Luas), and to demonstrate the required walking distance or provision of a permeability project, in accordance with the Permeability Best Practice Guide (2015), to achieve same.

EDE4 SLO1:

To investigate the full potential for the 12th Lock lands as centrally located within growing employment and residential areas, with tourism and active travel potential along the Grand Canal and have cognisance of the potential for the lands and associated heritage buildings to become a hub supporting the surrounding land uses while protecting the natural environment.

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;*

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- *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.

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.

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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

12.3.10 Thermal Upgrading and Energy Efficiency in Historic and Traditional Buildings

12.4.1 Green Infrastructure Definition and Spatial Framework

12.4.2 Green Infrastructure and Development Management 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:

Applications for extensions or single houses will also require the submission of a GI Infrastructure Plan which may be incorporated into the proposed landscape plan. This should clearly incorporate GI elements and provide links to local 'Stepping-Stones', Cores and Corridors where appropriate. Some smaller scale development may require more detailed GI Infrastructure Plans. Depending on location and context of the site, this will be decided on a case-by-case basis.

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.*

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This information will be submitted in a digital format agreed with the Council to allow amalgamation and reporting on tree and hedgerow cover within the County over time.

Green Space Factor (GSF)

The GSF is a score-based requirement that establishes minimum standards for landscaping and GI provision in new developments. Minimum scoring requirements are based on the land-use zoning of a site (See GI5 Objective 4), this applies to all development comprising 2 or more residential units and any development with a floor area in excess of 500 sq. m.

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

<i>Land Use</i>	<i>Workplace Travel Plan Statement</i>	<i>Indicative Number of Jobs</i>	<i>Standardised Workplace Travel Plan</i>	<i>Indicative Number of Jobs</i>
<i>Offices / Financial</i>	<i>>500 sq. m</i>	<i>25-100</i>	<i>>2,000 sq. m</i>	<i>>100</i>
<i>Warehousing</i>	<i>>2,500 sq. m</i>	<i>25-100</i>	<i>>2,500 sq. m</i>	<i>>100</i>

12.7.4 Car Parking Standards

12.7.5 Car Parking / Charging for Electric Vehicles (EVs)

12.7.6 Car Parking Design and Layout

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12.8.6 Public Art

Major new commercial developments greater than 5,000 sq. m in size, in the case of non-residential development, and in excess of 500 units in the case of residential development, will be required to incorporate a physical artistic feature into the scheme to improve the built environment / public realm. This may include high quality features within the environment or landscaping, in agreement with the Council.

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

12.9.8 Seveso Sites

12.10.1 Energy Performance in New Buildings

Development proposals for medium to large scale residential and commercial developments in excess of 10 residential units and / or 1,000 sq. m of commercial floor space should be accompanied by an Energy Efficiency and Climate Change Adaptation Design Statement. The statement should detail:

- *How any on-site demolition, construction and long-term management of the development will be catered for;*
- *How energy and climate change adaptation considerations have been inherently addressed in the design and planning of the scheme.*

12.10.2 Low Carbon District Heating Networks

12.10.3 Energy from Waste

12.10.4 Solar Photovoltaic

12.11.1 Water Management

(i) Flood Risk Assessment

(ii) Surface Water

(iii) Sustainable Urban Drainage System (SuDS)

(iv) Groundwater

(v) Rain Water Harvesting

12.11.3 Waste Management

(ii) Design and Siting of Refuse Storage, Recycling and Bring Facilities in Developments

(iv) Construction and Demolition Waste

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12.11.4 Environmental Hazard Management

(i) Air Quality

(ii) Noise

(iii) Lighting

12.11.5 Aviation, Airports and Aerodromes

12.11.6 Restricted and Prohibited Development

12.11.7 Shielding / Safeguarding

Relevant Government Guidelines

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

Regional, Spatial & Economic Strategy 2020-2032 (RSES), Eastern & Midlands Regional Assembly (2019)

Section 5 – Dublin Metropolitan Area Strategic Plan, in Regional, Spatial and Economic Strategy 2019 – 2031.

Traffic and Transport Assessment Guidelines, Transport Infrastructure Ireland, (2014).

Design Manual for Urban Roads and Streets, Government of Ireland (2019).

Cycle Design Manual, National Transport Authority, (2023).

Spatial Planning and National Roads Guidelines for Planning Authorities, DoECLG, (2012).

The Planning System and Flood Risk Management - Guidelines for Planning Authorities, Department of the Environment, Heritage and Local Government & OPW, (2009).

Circular PL 2/2014 Flooding Guidelines (2014)

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

OPR Practice Note PN01 Appropriate Assessment Screening for Development Management, OPR (March 2021).

Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy (2022)

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Assessment

The main issues for assessment are:

- Zoning and Council policy
- Design, Visual Impact & Residential Amenity
- Energy and Waste
- Traffic, Access and Parking
- Landscaping and green infrastructure
- Drainage and Water Services and Flooding
- Green Infrastructure, Heritage and Biodiversity
- Environmental Health
- Lighting
- Aviation
- Environmental Impact Assessment
- Appropriate Assessment

Zoning and Council Policy

The subject site is largely subject the 'EE' zoning objective: *'to provide for enterprise and employment related uses'*. 'Data Centres', Offices 100 sq. m-1,000 sq. m, and Offices over 1,000 sq. m are Open for Consideration under this zoning objective.

The south-eastern part of the site is zoned 'RU'. The submitted Planning Report states that landscaping is proposed within this zoning. However, further detail is required in relation to works within this location, and the impact of the proposal on this zoning objective.

The applicant has requested a 10 year permission, however, has not clearly set out a reasoning for this request, which is notably inconsistent with the future planned operation of DC3 by 2027. Justification for this should be provided via **additional information**.

However, due to the fact **Refusal** is recommended on other items/aspects of the proposed development, **Additional Information** will not be sought in this instance.

Data Centres

Data Centre is defined as a space extensive use, and given the proposed development, this is a key policy requirement which requires consideration. The following CDP objectives must be met:

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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.

Policy EDE7: Space Extensive Land Use

Recognise the need for land extensive uses and ensure that they are located within appropriate locations having regard to infrastructural, transport and environmental considerations and the need for orderly growth.

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:

- a. The appropriateness of the site for the proposed use having regard to EDE7 Objective 1;*
- b. Strong energy efficiency measures to reduce their carbon footprint in support of national targets towards a net zero carbon economy, including renewable energy generation;*
- c. 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);*
- d. Sufficient capacity within the relevant water, wastewater and electricity network to accommodate the use proposed;*
- e. Measures to support the just transition to a circular economy;*
- f. Measures to facilitate district heating or heat networks where excess heat is produced;*
- g. A high-quality design approach to buildings which reduces the massing and visual impact;*
- h. A comprehensive understanding of employment once operational;*
- i. A comprehensive understanding of levels of traffic to and from the site at construction and operation stage;*
- j. Provide evidence of sign up to the Climate Neutral Data Centre Pact.*

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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

In terms of location, the site is outside the M50. The proposal is therefore considered acceptable in terms of CS5 Objective 2 and EDE7 Objective 1, and EDE7 Objective 2 **Part A**.

In terms of EDE7 Objective 2 the applicant states in their submission that this has been fully complied with.

With regard to **Part B** of the objective, the proposed development is required to demonstrate *Strong energy efficiency measures to reduce their carbon footprint in support of national targets towards a net zero carbon economy, including renewable energy generation.*

The applicant states in their planning report that the proposed development *'includes compliance with BER requirements, the use of renewable materials during construction, minimise construction waste, employ sustainable design, install PV, support green mobility, among other proposals'*. Existing energy use for DC1 and DC2 is managed through the Energy Management System (EnMS) which is implemented at the site since 2013 and is accredited to the ISO 50001 Standard. The EnMS includes regular cross-functional management reviews and is subject to both internal and external audits.

The applicant states that all Google Data Centres are designed with high efficiency standards to use as little energy as possible through minimizing power loss and removing unnecessary parts. The servers are also designed as energy proportional systems. According to the applicant under licence P1189-01 which applies to DC1 and DC2, the following conditions apply to carbon emissions and energy usage that must be implemented on site *the licensee shall prepare, maintain and implement a Schedule of Environmental Objectives and Targets. The schedule shall, as a minimum, provide for a review of all operations and processes, as referred to in the conditions of this licence, including an evaluation of practicable options including 'energy efficiency'*.

Under **Part C** the applicant is required to demonstrate how the proposed development seeks to *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).*

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The submitted documentation states that in Ireland, GIL has signed a 14 year Power Purchase Agreement (PPA) (with the possibility to extend by five years) with Power Capital Renewable Energy for 58 megawatts (MW) of new-to-the grid capacity from the Tullabeg Solar Farm through an existing grid connection. This agreement has allowed the development of a new renewable energy project which was granted planning in 2022 is currently under construction. It will add new renewable energy to the grid that GIL's offices and data centres run on, contributing to the decarbonisation of Ireland's electricity system and of their operations. GIL's current projections indicate that, once operational, this PPA would help its offices and data centres in Ireland to reach 60% carbon-free energy in 2025 when measured on an hourly basis.

The submitted documentation states that at present, GIL matches 100% of its electricity consumption of global operations with purchases of renewable energy on an annual basis. GIL would continue to apply that approach to mitigate carbon emissions generated during the Operational Phase of the development, in accordance with CAP24. The proposed development includes measures to facilitate district heating where surplus heat is produced, in accordance with CAP24 and the SDCC CDP.

In addition, it is proposed to provide photovoltaic (PV) panels on the roof of the Data Centre building. This is expected to generate 20% of the energy need associated with that occupied building through the use of renewable power. Other site specific measures include Variable Speed Drive (VSD) technology where appropriate to ensure that electrical drives operate efficiency over their demand range.

The EIAR section 17.5.2.1 relates to power supply during the operational stage. It states that *'The Proposed Development includes the installation of a HV Compound to support DC3. The existing power grid connection with Eirgrid is sufficient to operate the full campus including DC1, DC2 and DC3. The total annual energy consumption (assuming 100% IT load every hour of the year) is expected to be approximately 883GWh per annum during the Operational Phase potentially resulting in Negative, Significant and Long-Term effects on power supply due to the current energy demands in Ireland resulting in a sensitive baseline environment'*.

It appears that the PPA does not provide sufficient energy offset with regard to the need of the site in question or the wider GIL site. It is not clear if the 58MW figure relates to peak output from the PPA site in Tullybeg. Additionally, it is stated that the offsite energy supply can power 60% of the proposed development by 2025, however the development would not be operational till 2027 according to the EIAR and details submitted, this requires clarification with regard to the level of energy supply remaining by 2027. The applicant would need to clarify if there is a specific arrangement with regard the PPA and the site, or if the PPA relates to the wider site and/or wider GIL infrastructure in Ireland.

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The level of onsite solar PV is stated as 20% of the total required energy. This is significant shortfall in comparison to the required aim of 100%.

Therefore, it is considered that the applicant has failed to provide sufficient on site renewable energy or evidence of PPAs in Ireland and permission should be **Refused** on this basis.

Part D of the objective requires the applicant to demonstrate that there is Sufficient *capacity within the relevant water, wastewater and electricity network to accommodate the use proposed*. The applicant has stated the following in response to Part D:

The applicant has stated that there is sufficient capacity within the relevant water, wastewater and electricity network to accommodate the use proposed. According to the applicant and their pre-connection meetings with UE, Uisce Eireann has processed the DC3 Pre-Connection Application for both water supply and foul water discharge and has confirmed that their networks can cater for the Proposed Development without an Infrastructure Upgrade.

However, with regard to the power supply and electricity network it is not clear if there is sufficient capacity within the network for the proposed development, either as a sole development or as part of the wider site.

The EIAR section 17.5.2.1 relates to power supply during the operational stage. It states that *'The Proposed Development includes the installation of a HV Compound to support DC3. The existing power grid connection with Eirgrid is sufficient to operate the full campus including DC1, DC2 and DC3. The total annual energy consumption (assuming 100% IT load every hour of the year) is expected to be approximately 883GWh per annum during the Operational Phase potentially resulting in Negative, Significant and Long-Term effects on power supply due to the current energy demands in Ireland resulting in a sensitive baseline environment'*. Therefore, the outcome of the assessment, would be that a negative impact on the power supply, infers that the network does not have capacity to accommodate the proposed development.

The proposed development, given the impact, mainly during operational phase, on power supply, is considered not to meet the objectives of the policy. Therefore, the proposed should be **refused** under Part D of the objective.

Under **Part E**, the applicant is requested to demonstrate how *Measures to support the just transition to a circular economy* are included in the proposed development.

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The applicant has stated that there are a number of features that support this, including designing for adaptability, longevity, disassembly and replaceability, as well as material reuse, reduced construction waste. Further details are available in Chapter 16 (Resource and Waste Management) of the EIAR, and the Energy Efficiency and Climate Adaptation Statement provided in support of this application (section 16.2.7.1). This is considered satisfactory.

Under **Part F**, the applicant is required to demonstrate *Measures to facilitate district heating or heat networks where excess heat is produced.*

The applicant has confirmed that the proposed development could include measures to facilitate district heating or heat networks where excess heat is produced (as required by CAP 2024), if one becomes available, therefore there is no commitment to harnessing the excess heat produced from the proposed development. This can be secured by way of condition in the event of a grant of permission.

Under **Part G** the applicant is required to demonstrate *A high-quality design approach to buildings which reduces the massing and visual impact.*

The applicant has submitted a detailed design and access statement, and visual impact assessment, as well as assessing the proposal against Quality Design and Health Placemaking policy objectives within the Development Plan, these are dealt with further in the report.

With regard to the massing, the building provides long facades, which are unbroken in terms of massing, with little detail or architectural expression. As the use is located within an area of industrial uses and other data centres, it is acknowledged that the standard of design would not be as high quality as a residential or mixed use scheme. However the main Data Centre building itself runs parallel to the Baldonnell Road for an extensive length, and this extensive elevation would be read from this location which is a transitional zone between EE and RU zoning and residential properties.

It is considered that the application should introduce design solutions (break up massing and bulk and mix of materials, colours, textures, treatments) to reduce the longitudinal scale of the building from the view point of the Baldonnell Road.

Additionally, the office block design, massing and scale could be improved to reduce massing and improve the overall look of the proposed office. This presents the best opportunity for the revision of the overall design, scale and massing of the proposal.

Whilst it is acknowledged that some vertical ribbing has been included, this is considered to be insufficient with regard to the requirements of Part G of the objective.

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Therefore, it is not considered to accord with Part G and is **Refused**.

Under **Part H** the applicant is required to submit *A comprehensive understanding of employment once operational*.

The applicant has stated in the EIAR that the *'Proposed Development is expected to have a positive long term effect on the population of SDCC through employment generation. The Proposed Development is expected to create a need for approximately 50 additional staff, including 25 direct and 25 indirect staff, once DC3 is operational in 2027. Approximately 800 temporary construction jobs are expected to be provided during the 27-month Construction Phase of the Proposed Development'*.

It is therefore considered that the proposal **satisfies** the requirement of *EDE7 Objective 2, part H*.

Under **Part I** of the objective, the applicant is required to *A comprehensive understanding of levels of traffic to and from the site at construction and operation stage*.

This is assessed further below in this report under Traffic, Access and Parking.

Under **Part K** of the objective, the applicant is required to *Provide evidence of sign up to the Climate Neutral Data Centre Pact*.

Sufficient evidence of this has been submitted with the application. It is therefore considered that the proposal **satisfies** the requirement of **Part K**.

Therefore, with regard to EDE7 Objective 2, the applicant has failed to meet or demonstrate several of the criteria outlined, and therefore, given the nature of the proposed development, and the requirement of the Objective, it is considered that the proposal falls short of what is required with regard the PPA and Power Supply and Design, and therefore should be **Refused Permission**.

With regard to *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*, this element was reviewed by SDCC Public Realm and Parks.

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SDCC Public Realm and Parks state in their report that there are concerns related to the loss of a major green infrastructure corridor that travels through the southern centre of the site, this includes a stream and hedgerow. This is dealt with later in the report.

Therefore, with regard EDE7 Objective 3, the proposal does not adhere to the requirements of the policy and fails to *demonstrate biodiversity measures, and that landscape and biodiversity measures integrate into the green infrastructure network*. Therefore, on this basis the proposal would not be considered to meet the objective and is recommended for **Refusal**.

Offices

Offices are open for consideration within zoning objective EE.

EDE4 Objective 4:

To direct people intensive enterprise and employment uses such as major office developments (>1,000 sq. m gross floor area) into appropriately zoned lands subject to their location within approximately 500 metres of a high frequency urban bus service and / or within 1000 metres walking distance of high capacity transport stops (Train / Luas), and to demonstrate the required walking distance or provision of a permeability project, in accordance with the Permeability Best Practice Guide (2015), to achieve same

On EE zoned lands Offices over 1,000sqm are 'Open for Consideration'. The proposed development would comprise of an office space of 3,169sq.m. Whilst the proposed amount of office space is 'open for consideration', details and justification as to why it is required as part of the development and how it meets the SDCC County Development Plan has not been satisfactorily justified and **additional information** on this should be sought. However, due to the fact refusal is recommended on other items/aspects of the proposed development, additional information will not be sought in this instances.

Enterprise and Employment

With regard to Enterprise and Employment Areas, applicants are required to submit details with regard to Table 12.27, which outlines the Key Principles for Development within Enterprise and Employment Zones. The table below:

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Table 12.27: Key Principles for Development within Enterprise and Employment Zones

<p>Access and Movement</p>	<ul style="list-style-type: none"> • Major links to and through a site are provided as identified within the County Development Plan or relevant Local Area Plan, Masterplan and / or as determined by a site analysis process and / consultation with the planning authority; • The street network is easy to navigate with a clear hierarchy of streets identifying the function of each street; • Individual streets are designed in accordance with the requirements of the (DMURS) Design Manual for Urban Roads and Streets; • Large areas of parking (in particular staff parking) are located to the rear of buildings and screened from the street. Smaller areas of parking may be located to the front of buildings provided they are well designed (including areas of planting) and do not result in excessive setbacks from the street; • The design and layout of new business parks shall promote walking, cycling and the use of public transport, including adequate provision of cycle and pedestrian linkages. 	<p>This will be dealt with under the transport sections.</p> <p>The proposal does not comply with DMURS standards (notably footpaths do not meet the standards)</p>
<p>Open Space and Landscape</p>	<ul style="list-style-type: none"> • Provision of a detailed landscape plan showing site appropriate open space which may include a hierarchy of spaces suited to a variety of functions and activities. The landscape plan will also incorporate GI elements (see GI below); • Important natural features of the site such as trees, hedgerows and watercourses are retained, integrated within the landscape plan, and reinforced with the planting of native species; 	<p>This will be further discussed in the landscape and GI sections of the report, however, as set out in response to EDE7 Objective 3, it is not considered appropriate and does not meet the criteria of the objectives.</p>

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	<ul style="list-style-type: none"> • <i>Natural buffer zones and defensive planting are used to define private space and the use of fencing to the front of buildings is minimised. Where fences interface with the public domain they should be of a high quality and incorporate elements of landscaping (for screening);</i> • <i>Development within business parks shall maintain and promote a parkland-like setting with high quality landscaping</i> 	
<p>Green Infrastructure (GI)</p>	<ul style="list-style-type: none"> • <i>All development proposals shall be accompanied by a GI 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:</i> • <i>Site location plan showing the development site in the context of the wider GI as shown on the GI Strategy for the County;</i> • <i>Site survey and analysis, identifying existing GI and key assets within the site;</i> • <i>Indicate how the development proposals link to and enhance the wider GI network of the County;</i> • <i>Proposed GI protection, enhancement, and restoration proposals as part of the landscape plan, where appropriate, for the site;</i> • <i>Proposals for identification and control of invasive species.</i> • <i>Regardless of development size or type, applicants must submit an overall site summary quantifying and detailing the following:</i> • <i>tree and hedgerow removal;</i> 	<p>This will be further discussed in the landscape and GI sections of the report, however, as set out in response to EDE7 Objective 3, it is not considered appropriate and does not meet the criteria of the objectives.</p>

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	<ul style="list-style-type: none"> • <i>tree and hedgerow retention;</i> • <i>new tree and hedgerow planting.</i> • <i>This information will be submitted in a digital format agreed with the Council to allow amalgamation and reporting on tree and hedgerow cover within the County over time.</i> 	
<p><i>Built Form and Corporate Identity</i></p>	<ul style="list-style-type: none"> • <i>Building heights respond to the surrounding context with transitions provided where necessary which reinforce the urban structure with taller buildings located along key movement corridors, gateways, and nodes;</i> • <i>Individual buildings should be of contemporary architectural design and finish (including use of colour);</i> • <i>Various treatments, finishes and colours should be employed to reduce the bulk, massing, and scale of larger buildings;</i> • <i>The layout and design of buildings should maximise frontages onto the public realm and enclose private external spaces (such as service yards and car parks) and storage areas behind them;</i> • <i>Signage should be simple in design and designed to integrate with architectural features and / or the landscape setting (see also Section 12.5.7 Advertising, Corporate Identification and Public Information Signs).</i> 	<p>See comments on design, massing and scale of the proposal and integration into wider context (notably to the south), given the area is within a zone of transition from EE to RU.</p> <p>Given the surrounding context and the layout of the proposed scheme, the proposal should be revised in line with design changes and in terms of other comments made by SDCC Departments.</p>

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The provisions relating to the proposed development within the Economic Development and Employment Chapter of the CDP include Policy EDE1, which seeks to ensure *'The creation of a strong and resilient economic base providing expanded opportunities for employment and facilitating a good quality of life within vibrant and attractive places to live, work, visit and invest.'*

The proposed development broadly aligns with this policy approach, however, should also be considered against EDE1 Objective 6. At a high level, this Objective seeks to *'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....'*

With regard EDE1 Objective 6, the applicant has provided a response to the proposed developments compliance with the objective. It should be noted that the proposed development is not likely to lead to a sufficient reduction in greenhouse gas emissions, in general terms, despite compliance with the other measures set out in the objectives, based on the information assessed under EDE7 Objective 2.

Additionally, EDE1 Objective 6 requires the applicant to undertake *The sourcing of power from district heating and renewables including wind, hydro and solar.* Whilst the applicant has provided details of on site solar and a PPA, as well as the possibility of a district heating connection, these were assessed under their relevant policy objectives (EDE7 Objective 2 outlined previously in report).

The applicant was also required to submit a mobility management plan and provide details with regard tree planting and landscaping, this would be dealt with further in the report, as well as under EDE7 Objective 2.

Other Development Proposed

The other elements of the proposal are considered ancillary to the main units. It is noted that an element of the site is zoned 'RU.' The applicant should be requested to submit a plan indicating the delineation of this area and also to detail what works or changes would take place within 'RU' zoned lands. However, due to the fact refusal is recommended on other items/aspects of the proposed development, additional information would not be sought in this instances.

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Design, Visual Impact & Residential Amenity

Design and Visual Impact

Under **Part G** of EDE7 Objective 2 the applicant is required to demonstrate *A high-quality design approach to buildings which reduces the massing and visual impact*. It is considered that this has not been satisfactorily addressed, as outlined above.

Under 12.5.1 Universal Design, applicants are required to provide details of universal design principles being applied to the development.

QDP4 Objective 2 requires the promotion of *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*.

The applicant has responded to this in part 2.6 of the design and access statement, whereby, as stated by the applicant, and in line with Part M 0.1, *'universal design principles have been applied where practicable in line with the relevant guidelines within 'Building for Everyone: A Universal Design Approach (2010 edition). Application of this approach was not possible in every instance due to the precise technical layout of the building and the fact that most employees within the building would need to be physically able to operate the equipment therein'*. This has been applied to site access and building access with appropriate provision of the requirements of 12.5.1 of the CDP incorporated into the design of the proposed development.

Within the design and access statement the applicant has addressed the majority of the required detail related to compliance with the 'The Plan Approach'. Whilst the detail has been provided and set out in a satisfactory manner within the report, addressing the key requirements of the 'The Plan Approach', elements such as 'Materials, Colours and Textures' should be revised in light of the additional information request regarding the design and visual impact of the proposal.

The applicant has submitted a Design and Access Statement to respond to a number of items including *Policy QDP7 Objective 1*. The policy requires a response to the County Development Plan and the 2009 Urban Design Manual. There are 12 design criteria set out in the manual and the CDP. The elements including heights and materials/design have been dealt with previously, however the 12 principles requires assessment separately.

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The following are the 12 principles:

Criteria	Assessment of Criteria
Context	An overview of the site context and policy applicable to the site has been submitted as part of the Design and Access Statement
Connections	Whilst not directly set out, connections are dealt with through the site assessment and layout plans outlined in the Design and Access Statement
Inclusivity	This is dealt with in the Design and Access statement, and compliance with Part L and accessibility requirements for buildings and the site has been detailed.
Variety	At present the site proposes a mono-design structure, with little articulation or variety, given the issues with massing, scale and bulk, and the request to visit materials around the longitudinal elevation on Balldonell Road and the Office element, it is considered a more detailed response to Variety should be forthcoming as part of the redesign of the proposed development.
Efficiency	As part of the proposal efficiency related to energy needs to be outlined, this has been set out in a variety of documents including the planning report. This is considered acceptable subject to other assessments
Distinctiveness	See 'variety' section
Layout	A layout plan has been provided and is set out within the Design and Access statement, additional information is required with regard the delineation of zoning types and proposals on the RU zoning.
Public	The Design and Access statement outlines an approach to public realm, incorporating inclusivity principles outlined above.
Adaptability	This is outlined as part of the overall proposal, given the type of proposal, it is considered that the adaptability is satisfactory.

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Privacy and Amenity	The proposal includes an element of amenity for perspective employees.
Parking	Details have been provided as part of the application
Detailed Design	Information has been provided in the way of a visual impact assessment and design approach outlined throughout the submission. See response to Variety, Distinctiveness and Additional information points on bulk, scale and massing, as well as taking account of residential dwellings and surrounding characteristics.

Additionally, all proposals are required to comply with the requirements related to Density and Building Heights (12.5.3), which are set out in the provisions of the *South Dublin Building Heights and Density Guide*, development proposals for increased building heights and densities shall be accompanied by a contextual analysis, which has been provided by the applicant, however given the design, scale and massing concerns outlined with the proposal, it is likely that these assessments may need to be revised in light of the reasons for refusal under EDE7 Objective 2.

See Visual Impact below.

Public Realm and Placemaking

At site level, proposals are required to comply with 12.5.4 Public Realm, relating to public realm.

The applicant should clarify if there are any proposed areas for taking in charge, this can be addressed by **Additional Information**.

Additionally, given the nature, scale and size of the development, and how it interacts with the surrounding area, and in light of the changes requested with regard the overall design, it is not considered that the proposed development complies with Policy QDP3: *Neighbourhood Context: Support and facilitate proposals which contribute in a positive manner to the character and setting of an area*. This information can be supplied via a request for **Additional Information**. However, due to the fact refusal is recommended on other items/aspects of the proposed development, additional information will not be sought in this instances.

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Public Art

The applicant has not submitted details indicating compliance with 12.8.6 Public Art, which states *Major new commercial developments greater than 5,000 sq. m in size, in the case of non-residential development, and in excess of 500 units in the case of residential development, would be required to incorporate a physical artistic feature into the scheme to improve the built environment / public realm. This may include high quality features within the environment or landscaping, in agreement with the Council.*

The submitted Planning Report states that *As discussed at pre-planning consultation, it is our interpretation that based on the nature and location of the development, community infrastructure and open space policies are not explicitly relevant, particularly in relation to the requirement of public art. The DC campus is not public space and therefore this standard is considered irrelevant.*

This does not sufficiently address Section 12.8.6. It is noted that previously 5 no. murals were granted permission in and around the site. As these were granted permission for the facades of the building, there is perhaps an opportunity for the applicant to consider how this may be utilised alongside the massing and bulk issue outlined elsewhere in the report. Therefore, **Additional information** should be requested. However, due to the fact refusal is recommended on other items/aspects of the proposed development, additional information will not be sought in this instances.

Residential Amenity

The EHO has requested **conditions** be applied with regard to residential amenity and impact of the proposed development, see Environmental Health Section of the report.

There are a number of existing residential properties on Baldonnell Road, located to the east, and to the south west of the subject site. These are in close proximity to the proposed development.

The proposed building onsite, as outlined above, requires revision to its finish, colour palette and design, given the scale and extent of the structure. Additionally, the proposed building is approx. 11.174m high, predominantly along Baldonnell Road. The building, as currently designed, would alter the rural character of the area, and potentially impact the existing occupiers of the aforementioned dwellings nearby.

Therefore, as stated, the design, materials and finish should be revised to reflect the aforementioned concerns with regard to design. It is likely that the alteration of the design, in terms of finish, would aid the impact on the surrounding residential amenity.

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It is also acknowledged that the area has a number of characteristics given the land use zonings, and therefore the proposal should respond appropriately to the more sensitive receptors.

Whilst it is acknowledged that photomontage package was supplied, given the requested changes, it is considered appropriate to reassess the proposal in light of these, and therefore resubmit the Visual Impact Assessment, taking into account RPS, residential properties and rural character of the area more generally.

Therefore, it is considered appropriate to request **additional information** in the form of sections, for the south west of the site, which transect the Baldonnell Road, and show the relationship between the proposed development and the residential properties to the south, as well as updated view points along Baldonnell Road and showing the RPS in the context of the site.

However, due to the fact refusal is recommended on other items/aspects of the proposed development, additional information will not be sought in this instances.

Energy and Waste Energy

At a high level, new proposals in SDCC should comply with Policy E2: South Dublin Energy Profile, E2 Objective 1 states that new developments should *seek to reduce the reliance on fossil fuels in the County by reducing the energy demand of existing and new development* and E2 Objective 2 *seeks to promote the generation and supply of low carbon and renewable energy alternatives, having regard to the opportunities offered by the settlement hierarchy of the County and the built environment.*

Policy E3 states, *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.*

Following the assessment of the proposed development under EDE7 Objective 2, and the failure of the proposal to adequately accord with or demonstrate compliance with the relevant parts of the objectives related to energy efficiency, energy use and renewable energy requirements, it is therefore considered that the proposal does not accord with the above policies and objectives.

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Traffic, Access and Parking

The Roads Department have reviewed the proposed development and request additional information. Their report states the following:

Access & Roads Layout:

The site is bounded to the south by the Baldonnell Road, to the north by Profile Park, to the east and west by an industrial development.

Cycle routes and pedestrian walkways are provided along Profile Park leading to the Nangor Road as far as Kilcarbery and along Grange Castle Business Park to Baldonnell Road.

The main access to the proposed site is by the Grange Business Park Road. There is also a service entrance from Profile Park Road. A pedestrian, cycle, emergency vehicle and construction vehicle access is proposed to the east of the site.

Permeability:

Access is by the Grange Castle Business Park Road (main access) or Profile Park (service access).

The applicant proposes to link Profile Park Road to the north east of the site to Grange Castle Business Park Road at the north west via a cycle and footpath. A pedestrian crossing with tactile paving will connect the northern and southern side of Grange Castle Park Road.

This is welcomed by the Roads Department.

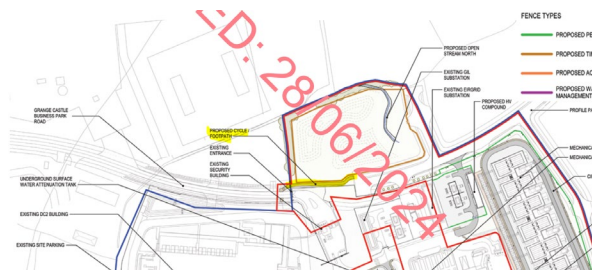


Fig 1. Proposed cycle and footpath joining Profile Park Road and Grange Castle Business Park Road

The applicant proposes to provide footpaths 1.5m wide (Environmental Impact Assessment Report (EIAR) 4.4.4.2). The minimum width permitted is 1.8m. The applicant shall provide a drawing of not less than 1:200 showing all pedestrian footpaths a minimum of 1.8m wide.

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4.4.4.2 Pedestrian/ Cycle Access and Routes

The footpath network will also be expanded to follow adjacent to the proposed circular road and footpaths continue up to new building entrances and connect to car parking provided. Footpaths on site are provided at 1.5m width.

Fig 2. Extract from applicants "Description of Proposed Development": Traffic and Transport

The applicant shall provide a cross-section drawing of all internal roads

Traffic and Transport Assessment:

The closest bus stop is on the Baldonnell Road entrance to Grange Castle Business Park and serves Park Wet station approximately every 2 no. hours. Approximately 800m from the entrance is the R134 with busses to Kilcarbery, Grange Castle approximately every 30 minutes at peak times, and hourly to Poolbeg.

As the extra development does not increase the amount of traffic in the area significantly, the Roads department are satisfied that junctions are no less capable of facilitating these vehicles.

Construction Traffic Management Plan

The applicant proposes to provide 300 no. car parking spaces in the construction compound. Access will be via the R134 and through Profile Park internal roads. It is estimated that there will be up to 800 construction worker vehicles on site and approximately 660 no. two-way staff trips to and from the site.

Approximately 500 vehicles have not been allocated parking spaces on site. Vehicles are not permitted to park on roads. The applicant shall provide additional information specifying where these excess vehicles will be parked.

Shift times for construction staff will be 07.00 to 19.00 Monday to Friday and 08.00 to 14.00 Saturdays. The applicants states that most of this traffic will be outside the morning and evening peak hours, with at most 660 no. trips to and from the site at peak times. This calculation is used to determine the traffic loadings at junctions in the vicinity.

Junctions examined were: Junction No. 1 R120 Adamstown Road / Grange Castle Access Road, Junction No. 2 R134 New Nangor Road / L2001 Baldonnell Road, Junction No. 3 Profile Park / R134 New Nangor Road and Junction No. 4 R136 Grange Castle Road / R134 New Nangor Road.

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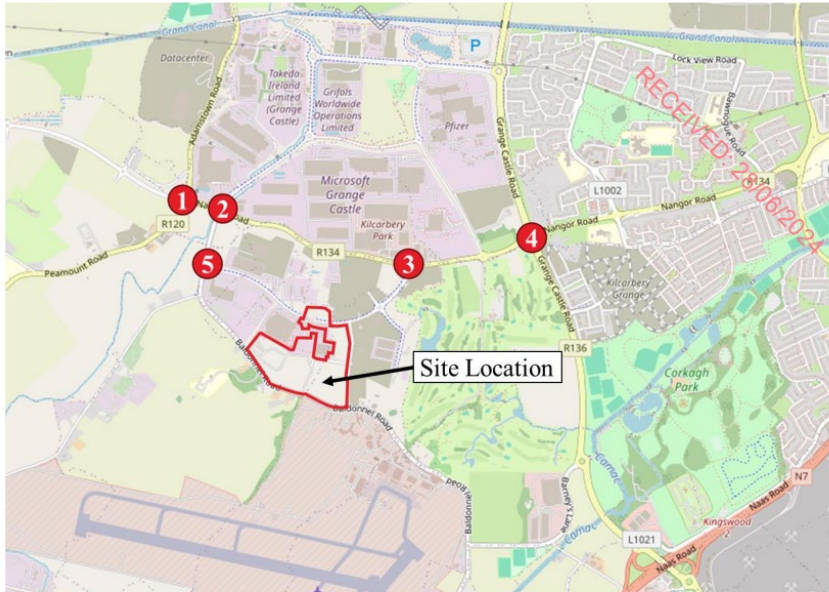


Figure 6.8: Traffic survey count locations.

Fig 3. Traffic survey count locations

During construction (2025), traffic increased in junctions 2, 3 and 4. Junction 2 operates at near capacity in the AM and increases to at capacity with construction traffic. In the PM construction traffic increased from near capacity to over-capacity, but with marginal additional queue length.

Junction 3 has capacity for existing and future vehicle use.

Junction 4 currently exceeds capacity during AM and PM peaks. Construction traffic adds only a minor increase in queue length.

The Roads department is satisfied that the construction phase of the development will only marginally increase queue lengths at some junctions.

The Roads department require additional information showing where the excess construction worker vehicles will be parked off-site.

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Operational Phase:

Staff work flexible shifts, starting any time between 6.30am and 10.00 am and finishing between 4.00pm and 7.30pm. The applicant considers that in a worst case scenario 70% of staff travel during peak hours. The travel pattern would be similar to the existing travel pattern. There is very little increase in traffic at junctions except at junction 5 (L3001 Baldonnell Road / Conchobar Murray Avenue) in 2027, 2032 and 2037 where the RFCs are under 0.85%.

The Roads department are satisfied with this proposal.

Road Safety Audit:

The applicant shall submit a Stage 1 and 2 Road Safety Audit

Car Parking:

This area is zone 1 area with regards to vehicle parking in the SDCDD Plan. According to South Dublin County Development Plan 2022-2028, the maximum number of car parking spaces for this warehouse type of building is 1 per 100 sqm. For a 72,400 sqm building, this means that is a maximum of 724 spaces should be provided. This is clearly excessive.

The applicant proposes to provide 42 no. car spaces including 10 no. EV charging stations (including 1 no. mobility impaired) 4 no. mobility impaired spaces and 2 no. buggy parking spaces to charge electric buggies for transport throughout the site.

In the Traffic and Transport report, the applicant estimates that there will be 50 no. additional staff (direct and indirect) in this new development. Based on the current modes of transport in the existing development, 85% of staff travel by car, 15% use car share or other means other than car.

For this new development therefore, it would be expected that 42 no. staff will travel exclusively by private car, and 8 no. by car share or other means of transport.

The Roads department recommend the number of car parking spaces be reduced. The applicant shall provide additional information on how it will reduce the number of car parking spaces by means of a robust and realistic Mobility Management Plan.

Bicycle Parking:

According to South Dublin County Development Plan 2022-2028, the minimum number of bicycle parking spaces for a warehouse is 1 per 200 sqm – 362 spaces. This is clearly excessive.

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The applicant proposes to provide 16 no. bicycle parking spaces. These are located to the southeast of the site.

The applicant estimates that there will be approximately 50 no. staff working in the new site. Bicycle parking stations are covered and comply with best practice.

The Roads department recognises that the site is distant from large residential centres but recommends that the number of bicycle parking spaces be increased.

Swept path analysis:

The applicant has provided a swept path analysis showing how refuse, fire tenders and other large vehicles can access the site.

The Roads Department is satisfied with this submission.

Roads recommend that the following additional information be requested from the applicant:

- 1. The applicant shall submit a Stage 1 & 2 Road Safety Audit.*
- 2. The applicant shall provide a drawing of not less than 1:200 showing all pedestrian footpaths a minimum of 1.8m wide.*
- 3. The applicant shall provide additional information on how it will reduce the number of car parking spaces.*
- 4. The applicant shall provide additional information showing an increase in bicycle parking spaces.*
- 5. The applicant shall provide additional information specifying where construction worker vehicles that cannot park on site will be located.*
- 6. The applicant shall provide a cross-section drawing of all internal roads*

In the event of a grant of permission Roads recommend that conditions are attached in relation to taking in charge, public lighting, road signs, mobility management plan and construction traffic management plan.

Due to the fact refusal is recommended on other items/aspects of the proposed development, additional information will not be sought in this instances.

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Water & Drainage

The proposed development has been referred to the SDCC Drainage and Water Services and to Uisce Eireann.

SDCC Drainage recommend that **additional information** for the proposed development is sought in relation to surface water:

1.1 Submit a report showing the site area, and different surface types such as building. Roads, permeable paving grass in m2 and their respective run off coefficients.

Show how much attenuation is required and how much is proposed in m3.

1.2 Submit drawing showing where surface water attenuation is located and what capacity ponds have in m3. Show all suds proposed.

1.3 Provide SuDS (Sustainable Drainage Systems) such as a Green Roof in proposed development.

1.4 It is not recommended to divert watercourse, and it is recommended that a setback distance of 10m either side of stream passing through site be provided.

GI3 Objective 4 states *To uncover existing culverts where appropriate and in accordance with relevant river catchment proposals to restore the watercourse to acceptable ecological standards for biodiversity wherever possible improving habitat connection and strengthening the County's GI network.*

GI 2 Objective 2 states *To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.*

The proposed development proposes to replace existing culverts, add new culverts and redirect an existing open stream to the eastern part of the site to include a new open stream and culverts. SDCC Water Services consider this inappropriate and does not recommend diverting the existing open watercourse. Water Services recommend that a setback distance of 10m either side of the stream be provided.

Additionally, SDCC Water Services has reviewed the information submitted with regard Flood Risk and recommend refusal:

2.1 Water services do not recommend development in flood zone A or B of site because it reduces the area where stream can flood naturally.

The county development plan 2020-2028 encourages a reduction of culverting and this development does not do that but increases the area being culverted.

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2.2 If this development is to be granted then limit the length of stream to be culverted and minimise development in flood zones A and B as much as possible.

Maintain a minimum setback distance of 10m to any watercourse on the site as much as possible also.

Having regard to the reports from Water Services and Public Realm and Parks, it is considered that the proposal does not sufficiently address GI policies and objectives through the proposed level of culverting and diversion of the existing stream proposed. The CDP encourages a reduction of culverting, and this development does not do that but increases the amount of culverting onsite.

Uisce Eireann has reviewed the proposed development and has no objection subject to standard connection agreement conditions.

Green infrastructure, Heritage & Biodiversity

Green Infrastructure

A report has been received from the SDCC Parks and Public Realm section relating to Green Infrastructure and Landscape. The section has concerns, outlined above, related to the fragmentation of existing vegetation, notably an onsite stream and hedgerow. The site has an existing stream and hedgerow running due south, dissecting the site. It is proposed that the stream be diverted, and the hedgerow removed.

Section 12.4.2 of the SDCC CDP states that *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, and additionally where possible, no net loss of existing trees / hedgerows on site.* These are further outlined in *Table 12.27: Key Principles for Development within Enterprise and Employment Zones*, which states *Important natural features of the site such as trees, hedgerows and watercourses are retained, integrated within the landscape plan and reinforced with the planting of native species.*

The removal of the hedgerow and associated stream fails to adhere to the policies NCBH11 Objectives 3, 4 and 5, whilst the loss of the stream fails to accord with *GI Objective 1: To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County.*

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Refusal is therefore recommended.

Green Space Factor

The applicant has stated that *'due to the limited green space factors on site, the preferred score cannot be achieved, and therefore alternative site-specific GI interventions or other contributions would be agreed with SDCC. Although the proposed development largely – but not fully – complies with this policy, any degree of non-compliance is considered minor'*.

Following a review of the materials submitted it is considered that given the scale of the proposal, the ecological features on site, and the elements of RU zoning that the applicant reconsider their approach to the GSF and reassess opportunities for greening across the site to improve their score. The proposal achieved a 0.26 score, when the required score for this site is 0.5 (although part of the site is zoned RU which is a zoning that requires 0.7).

The applicant is requested to revise their approach to the site with regard the GSF.

Architectural and Archaeological Heritage

With regard to Architectural and Archaeological Heritage, the proposed development is in proximity to the following:

- DU01604 – Church - Located in a circular raised graveyard (L 42m, Wth 30) on the edge of a valley (DU021-005002-). This may be the remains of an early ecclesiastical enclosure (DU021-005003-)
- DU01605 Graveyard - Located in a circular raised graveyard (L 42m, Wth 30) on the edge of a valley. Encloses the remains of a medieval church(DU021-005001-).
- RPS Ref: 184 Stone Church (Ruin) & Graveyard, Ringfort (Rath / Cashel), Earthwork(s) (RM)

The proposed development would be visible from the Baldonnell Road, and notably with regard to the protected structures. It should therefore be requested that the applicant submit visual photomontages showing the proposed development in the context of RPS 184 to ensure that the proposed development does not detract from the setting of the church.

Additionally, given the proposal is in a transition zone between EE and RU zoning, design needs to be cognisant of the sensitivities between these areas. Therefore, additional view points should be submitted to show the rural character of Baldonnell Road.

Given the fact refusal is recommended on other items/aspects of the proposed development, additional information will not be sought in this instance.

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Environmental Health

With regard to environmental health, the proposed development is assessed as per Policy IE8: Environmental Quality.

A report received from the HSE Environmental Health Officer (EHO) has indicated *the main concerns from Environmental Health relate to Noise from both construction and operation stages in addition to Air. The main consideration regarding air is in relation to Dust and this has been addressed in the conditions of consent.*

The EHO stated the following with regard to Noise:

With a data centre development, the main concern is with regard to on-going noise emissions as these have the potential to cause a nuisance to any surrounding receivers. The main components of this application with reference to noise include:

- *A total of 69 emergency generators*
- *Building services noise*

The proposals detailed above are all noise generating activities and have the potential to generate excessive noise. There is extensive construction required for this development and these works have been addressed in the conditions of consent.

There are 11 close noise sensitive receivers (NSRs) to the development, and they are all residential. They are located between 185m to 25m to the south of the site on the Baldonnell road.

Section 9.5 of the acoustic report highlights the noise predictions under 3 scenarios.

- *Scenario 1 is representative of normal operation.*
- *Scenario 2 represents occasional testing of emergency generators.*
- *Scenario 3 is representative of the emergency situation when an issue with supply from the national grid has occurred.*

Environmental Health have only looked at scenario 1 as this is most representative of the day to day running of the proposed development.

The report concludes in table 9.33 that for Scenario 1 (evening time), no change is predicted at 5 NSRs, an Imperceptible, Long-Term Effect is predicted at 2 NSRs, and a Negative, Slight to Moderate, Long-Term Effect is predicted at 6 NSRs, and in table 9.34 that for Scenario 1 (daytime), no change is predicted at 6 NSRs, an Imperceptible, Long-Term Effect is predicted at 5 NSRs, and a Negative, Slight to Moderate, Long-Term Effect is predicted at 2 NSRs.

It should be noted that predicted noise levels at all NSRs comply with the IEL noise limits, and in table 9.35 for Scenario 1 (night time), no change is predicted at 6 NSRs, an Imperceptible, Long-Term Effect is predicted at 4 NSRs, and a Negative, Slight to Moderate, Long-Term Effect is predicted at 3 NSRs.

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As highlighted in the report above noise levels would exceed measured background levels with the potential effect of Negative, slight to moderate for day time, evening time and night time at some NSRs. The Environmental Health Department can only accept this planning application if evening and night time noise levels generated from this proposal do not exceed the background noise levels for evening and night.

The EHO considered the proposal acceptable, subject to the imposition of **conditions** relating to: operation of equipment, noise arising from construction, background noise, noise of plant at sensitive properties during construction, submission of an acoustic verification report, emissions of malodours, minimise air blow dust from site, refuse storage location and community consultation.

Lighting

The application was reviewed by SDCC Public Lighting, which considered the proposed development appropriate from a lighting perspective, subject to a **condition** requiring the submission of a public lighting scheme to SDCC, as well as design details, for written agreement.

Aviation

The subject site is located within aviation layers: Bird Hazards for Weston and Casement, Inner Horizontal Surface - Casement and Baldonnell Solar Safeguarding Zone.

The proposal includes an element of solar panels as part of the data centre energy alternatives on site. A glint and glare assessment report was submitted with regard to the proposed development. This report concluded that there would be no undue impact on the surrounding aviation related activities. The site is located within the Inner Horizontal Surface for Casement. Given the height of the proposal and associated flues, it will not penetrate this surface.

No observations had been received from the DoD and IAA at the time of writing this report. In the event of a grant of permission a condition should be attached seeking consultation with DoD regarding the glint and glare assessment.

Environmental Impact Assessment Report

The applicant has submitted an Environmental Impact Assessment Report having regard to Article 103 of the Planning and Development Regulations 2001, as amended, for an EIAR to be undertaken as it was considered that significant impacts on the environment could not be excluded in this instance.

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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.*

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Adequacy of Environmental Impact Assessment Report (EIAR)

The EIAR sets out:

Chapter 1 – Introduction

Chapter 2 – Description of the Proposed Development

Chapter 3 – Planning and Development Context

Chapter 4 – Consideration of Alternatives

Chapters 5 – 15 sets out the required topics

Chapter 16 – sets out interactions.

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:

- Glossary 1
- Non-Technical Summary 1
- Chapter 1 - Introduction 1.1
- Chapter 2 - Need for the Proposed Development 2.1
- Chapter 3 – Alternatives 3.1
- Chapter 4 - Description of the Proposed Development 4.1
- Chapter 5 - Construction 5.1
- Chapter 6 - Traffic and Transport 6.1
- Chapter 7 - Air Quality 7.1
- Chapter 8 - Climate 8.1
- Chapter 9 - Noise and Vibration 9.1
- Chapter 10 - Population and Human Health 10.1
- Chapter 11 - Biodiversity 11.1
- Chapter 12 - Water 12.1
- Chapter 13 - Land, Soils, Geology and Hydrogeology 13.1
- Chapter 14 - Archaeology, Architectural and Cultural Heritage 14.1
- Chapter 15 - Landscape and Visual 15.1
- Chapter 16 - Resource and Waste Management 16.1
- Chapter 17 - Material Assets 17.1
- Chapter 18 - Major Accidents and Disasters 18.1
- Chapter 19 - Cumulative Effects and Environmental Interactions 19.1
- Chapter 20 - Summary of Mitigation and Monitoring 20.1
- Chapter 21 - Summary of Significant Residual Effects 21.1

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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

The EIAR examines the following alternatives:

These are reasonable alternatives which are relevant to the project and its specific characteristics and must also indicate the main reasons for the option chosen taking into account the effects of the Proposed Development on the environment and may relate to matters such as Proposed Development design, technology, location, size and scale, as set out in Article 5(1)(d) and Annex IV, clause 2 of the EIA Directive and Schedule 6, clauses 1(d) and 2(b) to the Planning and Development Regulations 2001 as amended (the 2001 Regulations).

Section 3.2 presents the legislative framework and guidance which has been considered during the preparation of this Chapter. Sections 3.3 (Alternative Sites) and 3.4 (Alternative Layout Designs) present the alternatives (and comparison of environmental effects, where relevant) that were considered by GIL.

Taking the foregoing guidance and legislative framework into account, the alternatives in relation to this Proposed Development are considered in terms of alternative site locations (Section 3.3) and alternative layout designs (Section 3.4) at the preferred site. The nature of the building and the technical requirements do not allow for alternative technologies or alternative building layouts to be investigated as part of this development. Any small change in the building characteristics and the way the parts interact with each other would void the building function, due to the complexity of the operations being carried out and the complexity of the interaction between the parts composing the DC3 development.

In accordance with EPA guidance, the range of alternatives can include a 'do-nothing'. The 'do-nothing' scenario has been assessed under all relevant environmental disciplines. In general, in the absence of the Proposed Development, the direct and indirect employment opportunities would not arise. In addition, the do-nothing scenario would limit the data centre capacity required to power the cloud and the digital revolution that is transforming all sectors of the economy

The EIAR proposes 13 no. alternatives which were considered and reviewed as part of the assessment of the proposal.

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In terms of alternatives, the EIAR concludes:

In accordance with the requirements of the EIA Directive, as amended, a description of the reasonable alternatives and an indication of the main reasons for the option chosen, taking into account the effects of the Proposed Development on the environment has been provided.

*Ultimately, **Option 13 is considered to be the preferred option** in terms of environmental effects, functionality and constructability. It minimises the potential visual and noise effects at off-site receptors. It also accomplishes the objectives of the Proposed Development in a satisfactory manner.*

Whilst the Planning Department has reviewed the alternatives put forward by the applicant and acknowledges that the applicant has considered a number of options, there are outstanding concerns and issues with the proposed development with regard the County Development Plan Policies and Objectives. Therefore, these concerns should be addressed, and once incorporated another option be considered and submitted via **additional information**.

However, as there are substantive reasons for **refusal** to be overcome, **Additional Information** will not be sought in this instance.

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 have been considered, however, as the proposal is to be **refused**, it is considered that the cumulative impacts of the interactions, once EDE7 Objectives 2 and 3 have been satisfied, should be reviewed and reassessed.

Conclusion

It is considered that the information contained within the EIAR requires amending following any changes in the scheme to ensure the proposed development allows for adequate assessment of the potential impacts of the proposed development on the receiving environment and complies with the requirements of Article 94 of the Planning and Development Regulations 2001 (as amended).

In particular, amendments should include update to the requirements under EDE7 Objective 2 and 3 as these require further consideration. Further assessment of cumulative impacts in terms of data centres permitted close to the site should also be undertaken. As stated previously in this report, further consideration should be given to the visual impact of the proposed development.

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Screening for Appropriate Assessment

The applicant has submitted an Appropriate Assessment Report (Combined Screening and NIS) prepared by ARUP.

Screening for Appropriate Assessment

The submitted report provides the following AA screening conclusion:

6.7 Screening Assessment Outcome

The S-P-R method has identified that the Proposed Development could potentially result in likely significant effects on the SCIs of the South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA and QI habitats of South Dublin Bay SAC and North Dublin Bay SAC. All other sites discussed in Table 6.1 are screened for LSE and therefore do not need to be considered in Stage 2 full AA.

The presence of a weak hydrological pathway between the Proposed Development and the European sites provides the potential for contaminants to travel downstream arising from an accidental pollution event, surface water run-off/dust carrying suspended silt or contaminants to freshwater environments (surface and ground) to the SACs. Aerial emissions of dust entering the hydrological pathways to downstream European sites may also indirectly affect the SCIs of the SPA sites.

As the SSCOs for these European sites are to set to maintain (or achieve) favourable conditions for the habitats and species for that site (EC, 2012), the impacts outlined above the potential to restrict the ability of the European sites to achieve this objective.

Given that this potential does exist, and in application of the precautionary principle, the above impacts, pathways and receptors cannot be screened out for LSE on European sites and therefore they are brought forward for consideration in a full AA in Section 7. Mitigation measures to eliminate any potential for adverse effects on the integrity of a European site are provided in Section 8.

6.8 Conclusion

Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, cannot be excluded, for the reasons set out in Section 6.6 above. In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the ZoI, and their conservation objectives, have been fully considered. Therefore, it is the professional opinion of the authors of this report that the application for consent for the Proposed Development does require an Appropriate Assessment and the preparation of a Natura Impact Statement (NIS).

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Table 1: Description of the project and site characteristics

Planning File Reference	SD24A/0164W
Brief description of the project	Data Centre within Grange Castle
Brief description of site characteristics	Partially developed Greenfield site zoned EE and RU
Application accompanied by a NIS Y/N	Yes

Table 2: Identification of European Sites which may be impacted by the project

European Site	List of Qualifying Interest/ Special Conservation Interest	Distance from proposed development (m/km)(approx.)	Connections (Source-Pathway-Receptor)	Considered further in screening Y/N
Rye Water Valley/Carton SAC	3 Qualifying Interests CO001398.pdf (npws.ie)	5.8 km	No	No
Glenasmole Valley SAC	3 Qualifying Interests CO001209.pdf (npws.ie)	7.7 km	No	No
Wicklow Mountains SAC	13 Qualifying Interests ConservationObjectives.rdl (npws.ie)	9.3 km	No	No
Wicklow Mountains SPA	2 Qualifying Interests - Merlin (Falco columbarius) [A098] Peregrine (Falco peregrinus) [A103] CO004040.pdf (npws.ie)	12.5 km	No	No
North Bull Island SPA	18 Qualifying Interests ConservationObjectives.rdl (npws.ie)	18.2 km	Indirect hydrological pathway via stream and drainage networks.	Yes
North Dublin Bay SAC	10 Qualifying Interests	18.2km	Indirect hydrological pathway via stream and drainage networks.	Yes

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South Dublin Bay SAC	4 Qualifying Interests ConservationObjectives.rdl (npws.ie)	15.6 km	Indirect hydrological pathway via stream and drainage networks.	Yes
South Dublin Bay and River Tolka Estuary SPA	14 Qualifying Interests ConservationObjectives.rdl (npws.ie)	15.2 km	Indirect hydrological pathway via stream and drainage networks.	Yes

Table 3: Assessment of Likely Significant Effects

Identify all potential direct and indirect impacts (alone or in combination) that may have an effect on the conservation objectives of a European site, taking into account the size and scale of the project:	
Likely Impacts	Possible Significance of Impacts (duration, magnitude etc.)
<p>Construction phase e.g.</p> <ul style="list-style-type: none"> • Vegetation clearance • Demolition • Surface water runoff from soil excavation/infill/landscaping (including borrow pits) • Dust, noise, vibration • Lighting disturbance • Impact on groundwater/dewatering • Storage of excavated/construction materials • Access to site • Pests 	<p>During the construction stage there is the potential for surface water run-off. However, the hydrological connection to the Dublin Bay sites is indirect and weak. The construction phase would not result in significant environmental impacts that could affect European Sites within the wider catchment area.</p>
<p>Operational phase e.g.</p> <ul style="list-style-type: none"> • Direct emission to air and water • Surface water runoff containing contaminant or sediment • Lighting disturbance 	<p>Foul and surface water would ultimately lead to the Dublin Bay sites. Surface water would firstly be managed onsite as much as possible. The hydrological connections are indirect and weak, and the separation distance is significant, such that there is no real likelihood of any significant effects on</p>

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<ul style="list-style-type: none"> • Noise/vibration • Changes to water/groundwater due to drainage or abstraction • Presence of people, vehicles and activities • Physical presence of structures (e.g. collision risks) • Potential for accidents or incidents 	European Sites in the wider catchment area.
In-combination/Other	All extant developments are similarly served by urban drainage systems and the WWTP and have been screened out for appropriate assessment.

Are 'mitigation' measures necessary to reach a conclusion that likely significant effects can be ruled out at screening?
Yes No X

Table 4: Screening Determination Statement

Assessment of significance of effects:		
Describe how the proposed development (alone or in-combination) is/is not likely to have significant effects on European site(s) in view of its conservation objectives.		
<p>On the basis of the information on file, which is considered adequate to undertake a screening determination and having regard to:</p> <ul style="list-style-type: none"> • the nature and scale of the proposed development, • the intervening land uses and distance from European sites, • the lack of direct connections with regard to the Source-Pathway-Receptor model, <p>it is concluded that the proposed development, individually or in-combination with other plans or projects, would not be likely to have a significant effect on the above listed European sites or any other European site, in view of the said sites' conservation objectives.</p> <p>An appropriate assessment is not, therefore, required.</p>		
Conclusion:		
	Indicate (X)	Recommendation
It is clear that there is no likelihood of significant effects on a European site	X	The proposal can be screened out. Appropriate assessment not required.

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It is uncertain whether the proposal will have a significant effect on a European site		Request further information to complete screening Request NIS Refuse permission
Significant effects are likely		Request NIS Refuse permission
Completed by	PC	
Date	22/08/2024	

A Natura Impact Statement has been submitted with the application. This is dealt with below.

Natura Impact Statement

A Natura Impact Statement has been submitted with the application. This concludes that:

In order for the AA to comply with the requirements of Article 6(3) the Habitats Directive, an AA undertaken by the public authority must include an examination, analysis, evaluation, findings, conclusions and a final determination. The information in this NIS will, along with all other information including submissions and observations relevant to AA, enable SDCC to perform its statutory function in this regard.

This NIS has examined and analysed, in light of the best scientific knowledge, with respect to the relevant European sites, the sources and pathways for effect, and how these may result in adverse effects on the integrity of identified European sites.

With the provision of the identified mitigation measures provided in Section 8, it has been objectively concluded by Arup, through precise and definitive findings and conclusions capable of removing all reasonable scientific doubt that the Proposed Development will not result in adverse effects (directly or indirectly) on the integrity and conservation objectives of any of the QIs/SCIs of the South Dublin Bay and River Tolka Estuary SPA, South Dublin Bay SAC, North Dublin Bay SAC and North Bull Island SPA or any other European site, alone or in combination with other plans and/or projects.

Conclusion

Having regard to the information submitted, it is considered that the application be **REFUSED** as it fails to comply with key policies and objectives within the County Development Plan 2022-2028, including EDE7 Objective 2 and GI policies and objectives, and it is not considered that the proposed development is in keeping with the sustainable planning and development of the area.

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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 significant on site renewable energy to power (below 100%) the proposed development, the lack of clarity provided in relation to the applicant's engagement with Power Purchase Agreements (PPAs) in Ireland with regard the development in question rather than the site or wider arrangements in place, the lack of a connection to the surrounding district heating network, the proposed design of the development as well as how it relates to its surroundings, and lack of detail of how the proposal will impact power supply once operational (2027), 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.
2. The proposed development does not comply with EDE7 Objective 3, GI1 Objective 4, GI2 Objective 2, GI2 Objective 4, GI1 Objective 1, NCBH11 Objective 3, 4 and 5 and GI5 Objective 4 the South Dublin County Development Plan 2022-2028 in relation to the retention and protection of existing green infrastructure (stream and hedgerow), culverting and alteration of the stream on site, provision of green infrastructure, and complying with the SDCC Green Space Factor. In this regard the proposed development, would, therefore, be contrary to the proper planning and sustainable development of the area.

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REG. REF. SD24A/0164W

LOCATION: Grange Castle Business Park South and Profile Park, , Baldonnell, Dublin,
D22 X602

Caitlin O'Shea

Caitlin O'Shea

A/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: 22/08/2024

Eoin Burke

Eoin Burke, Senior Planner

To whom the appropriate powers have been delegated by the order number DELG (3124) of the Chief Executive of South Dublin County Council*