

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

Our Ref: 19087

22nd May 2020

Re : Planning and Development Act 2000-2019 and the statutory regulations (as amended). Application by UBC Properties LLC for a period of ten years for development for the demolition of the existing two storey dwelling of Ballybane and associated farm buildings (565sqm); and the construction of 3 no. two storey data centres with mezzanine floors at each level of each facility and associated ancillary development that will have a gross floor area of 80,269sqm on an overall site of 16.5 hectares within the Grange Castle South Business Park on land within the townlands of Milltown; Ballybane and; Aungierstown and Ballybane; and bounding Baldonnel Road to the west; both the Old and New Nangor Road to the north; and Grange Castle South Access Road to the south, Baldonnel, Dublin 22.

Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by UBC Properties LLC to make the above application to South Dublin County Council. The application is for permission for a period of ten years for development with a gross floor area of 80,269sqm that will include 3 no. two storey data centres and ancillary elements including emergency generators, parking and vehicular routes, landscaping, attenuation and all other associate development on a site of 16.5ha. within a land holding bounding Baldonnel Road to the west; both the Old and New Nangor Road to the north; agricultural fields and the Grange Castle Motor Company to the east; and Grange Castle South Access Road to the south, Baldonnel, Dublin 22

The description of the proposed development as set out within the public notices is as follows:

- The demolition of the existing two storey dwelling of Ballybane and associated farm buildings (565sqm); and the construction of 3 no. two storey data centres with mezzanine floors at each level of each facility and associated ancillary development that will have a gross floor area of 80,269sqm on an overall site of 16.5 hectares.
- 1 no. two storey data centre (Building A) that will be located to the south-west of the site and will have a gross floor area of 28,573sqm. It will include 26 no. emergency generators located at ground floor level within a compound to the northern side of the data centre with associated flues that will be 25m in height. The facility will also include 26 no. ventilation shafts that will be located above the northern end of each emergency generator that will measure 20m in height;
- 1 no. two storey data centre (Building B) that will be located to the north-west of the site, and to the immediate north of Building A and will have a gross floor area of 21,725sqm. It will include 18 no. emergency generators located at ground floor level within a compound to the northern side of the data centre with associated flues that will be 25m in height. The facility will also include 18 no. ventilation shafts that will be located above the southern end of each emergency generator that will measure 20m in height;
- 1 no. two storey data centre (Building C) that will be constructed last and will be located to the eastern part of the site on a north-south axis and will have a gross floor area of 28,573sqm. It will include 26 no. emergency generators located at ground floor level within a compound to the western side of the data centre with associated flues that will be 25m in height. The facility will also include 26 no. ventilation shafts that will be located above the western end of each emergency generator that will measure 20m in height;
- Each of the three data centres will includes data storage rooms, associated electrical and mechanical plant rooms, loading bays, maintenance and storage spaces, office administration areas, and plant

including PV panels at roof level as well as a separate house generator for each facility that will provide emergency power to the admin and ancillary spaces. Each data centre will also include a diesel tank and a refuelling area to serve the proposed emergency generators;

- The overall height of each data centre apart from the flues and plant at roof level is c. 19.85m above the finished floor level;
- 1 no. temporary and single storey substation (29sqm);
- 3 no. single storey MV buildings (each 249sqm - 747sqm in total) that manage the supply of electricity from the Substations to each data centre and are located to the immediate west of the generator compound within Buildings A and B, and to the south of the generator compound within Building C; and
- 8 no. prefabricated containerised electrical rooms (65sqm each and 520sqm overall) that are stacked in pairs to the immediate south of the temporary substation.
- Ancillary site development works, that will include attenuation ponds and the installation and connection to the underground foul and storm water drainage network, and installation of utility ducts and cables, that will include the drilling and laying of ducts and cables under the Baldonnel Stream. Other ancillary site development works will include hard and soft landscaping, lighting, fencing, signage, services road, entrance gate, sprinkler tank house (72sqm), security hut (30sqm) and 150 no. car parking spaces, and 78 no. sheltered bicycle parking spaces. The development will be enclosed with landscaping to all frontages including a wetland to the west.

The development will be accessed from the Grange Castle South Access Road from the south via the Baldonnel Road. An Environmental Impact Assessment Report (EIAR) has been submitted with this application.

The planning rationale for the Proposed Development can be summarised as:

- The proposed development is to be located on a site that is zoned EE that has the objective 'To provide for Enterprise and Employment Related Uses' under the South Dublin County Development Plan 2016-2022. The acceptability of data centres on EE zoned lands is well established, with several examples of such developments, within the Grange Castle and wider area;
- The architectural design and masterplan approach has positively responded to the overall development of the site and context ensuring it integrates well with the established pattern of development as well as providing positive biodiversity gains throughout the site;
- The national and local planning policy context is supportive of the development of Information Communication Technology (ICT) infrastructure, including data centre development such as this, as they underpin Ireland's international position as a location for ICT;
- The proposed development has been prepared to accord with the relevant policies, objectives and standards of the South Dublin County Development Plan 2016-2022; and
- The proposed development will be compatible with its surroundings and the pattern of development in the vicinity, which comprises for the most part of similar large industrial type buildings and data centres.

Pre-application consultations have been undertaken with the Planning Authority prior to the lodgement of this application. A formal pre-application meeting was held with the Council on the 28th January 2020 that included representatives of the Planning, and Roads/Transportation, Parks, Sanitary Services and Heritage Departments. The relevant issues discussed during the course of the pre-application meeting are addressed within this report and the accompanying application documents.

In addition, the relevant environmental specialists have liaised directly and independently with statutory bodies (including the Water Services and Parks Departments of SDCC, Irish Water, Eirgrid, ESB, NPWS, and the Department of Defence etc.) by correspondence during the course of the preparation of the application and EIA Report. Prior to the commencement of development the applicant will seek to enter into water and wastewater connection agreements with Irish Water. Further details on this are outlined within the Engineering Services Report by CS Consulting Engineers.

Whilst the gross floor area of the proposed development is 80,269sqm this includes a number of incidental areas. With reference to the area schedule that accompanies this report, we respectfully request that the floor area to which the development contribution should be applicable under the Development Contribution Scheme made by South Dublin County Council should be 64,112sqm.

The design approach is one that seeks to minimise the visual impact of the Proposed Development on the public realm and this led to mitigation in design and layout of all three data centres and the overall master planning of the site. The master planning approach is aimed at achieving the maximum level of landscaping and attenuation as part of Phase 1 of the Proposed Development with the rest of the landscaping and attenuation being achieved around and following the completion of the 110kV GIS Substation that will be located to the east of the site and will be subject to a separate planning application. Subject to a separate grant of permission, the 110kV GIS Substation is proposed to be constructed within the second year of development ensuring that all landscaping and attenuation is in place within the first two years following the commencement of construction of the Proposed Development.

This report, should be assessed in conjunction with the submitted architectural drawings; EIA Report as well as engineering and other details. These plans provide both detailed information in terms of the nature and extent of the proposal as well as an assessment of the environmental impact of the scheme including mitigation measures to address potential impacts.

The assessment of the application under the EIA Report has clearly determined that with appropriate mitigation the proposal will not have a negative impact on its environment. The mitigation proposed is both reasonable and based on best planning and environmental practice that will facilitate the integration of the development within the existing and expanding land uses, whilst respecting the amenity of existing residential uses and the ecology, amenity and environment of the area.

1. Compliance with Statutory Regulations

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

- The Site Location Map has been prepared on an OS base to a scale of 1:2,500 for the application. An Ordnance Survey Datum local benchmark is indicated on the Map. The application site is outlined in red on this map. The OS map indicates the location of all seven site notice locations and the two legal wayleaves that cross the site.
- The Proposed Site Layout Plan is to a scale of 1:1,000, as agreed with Planning Registry prior to making of the planning application, and indicates the location of the application site in relation to the surrounding environment. Relevant features (such as buildings, trees and roads) adjoining or in the vicinity of the application site are all shown. The drawing indicates the roof plan of the proposed data centres. A layout plan for each of the three main data centre buildings will be provided at 1:500 for clarity purposes.
- An Existing Site Layout Plan is to a scale of 1:1,000, as agreed with Planning Registry prior to making of the planning application, indicates the existing site and the abandoned farm buildings to be demolished.
- As per article 22(2)(iv), the site notice positions (7 no.) are shown clearly on the Site Location Map and wider map. These positions are conspicuous and meet the requirements of article 19(1)(c) as they are located at the existing main vehicular and pedestrian entrance to the site from a public road, and at the site itself fully in accordance with Article 19 of the Regulations.
- All other statutory plans, elevations and sections, unless otherwise stated, are drawn to scales of not less than 1:200, in accordance with Article 23(1)(b) and (2) of the Regulations. This ensures that a detailed level of information is provided to the Planning Authority to enable their full assessment of the application. However, as the scale of the data centre development is such that at a scale of 1:200 the site sections do not fit onto an A0 plan we have submitted site sections, as agreed with Planning Registry prior to making of the planning application, at 1:500 on an A0 drawing.
- The proposed floor and roof plans and elevations for the buildings are indicated on drawings submitted with the application. These drawings show the levels pertaining to the site. Floor levels are shown on all plans, sections and elevations of the proposed development. All levels are relative to Ordnance Survey Datum.
- The principal dimensions including height of the different elements of the proposed development and the site are indicated on the plans, elevations and sections as lodged with this application in accordance with article 23(1)(f).
- All drawings are clearly coloured and marked to distinguish the proposal, in accordance with article 23(1)(e).
- All OS mapping is appropriately identified in accordance with article 23(1)(g).
- The north point is indicated on all relevant maps and plans in accordance with article 23(1)(h).
- The newspaper notice appeared in the Irish Daily Mail, and which is recognised as an appropriate newspaper for a planning application in this area.

The legal interest of the applicant in making this application is fully set out in the application package. The site is currently broken into one ownership and a letter of consent from South Dublin County Council and folio maps indicating the ownership is submitted with the application form.

2. Site analysis

The Proposed Development is to be located on a site of c. 16.5 hectares that consists of a primarily greenfield site within the Grange Castle South Business Park and at the time of making this application is in the ownership of South Dublin County Council. This includes the abandoned and unoccupied two storey farmhouse property known as Ballybane that is located on the Old Nangor Road, Dublin 22. This property and associated buildings are proposed to be demolished as part of the Proposed Development.

The site is bounded by the realigned Baldonnel Road to the west; by the old and new Nangor Road to the north; by agricultural fields and the Grange Castle Motor Company to the east; and by the Grange Castle South Access Road that provides access off the Baldonnel Road into Grange Castle South Business Park to the south.

The western part of the site is relatively featureless apart from the abandoned farmhouse and its associated buildings and structures that includes a large barn that are located bounding the now gated Old Nangor Road to the north-west of the site. There are small pockets of hedgerow and planting either side and bounding the curtilage of this abandoned property. A further hedgerow bounds the northern side of the Baldonnel Stream where it transects across the site at the north-eastern corner of the site. A hedgerow bounds the entire eastern boundary of the site.

An existing foul line wayleave bounds the stream on its southern side as well as along the eastern boundary of the site to the corner of the Castlebaggot Substation. A 15m ESB wayleave bounds the eastern boundary of the site from the New Nangor Road to the Grange Castle South Access Road. A 3m wide wayleave belonging to the 3M mobile network to facilitate access to a mobile phone mast is located within this ESB wayleave. In addition, a service strip of 10m is required to facilitate underground services around the site along the Proposed Development site boundary as part of the sale from South Dublin County Council.



Aerial view of Proposed Development site in context as viewed from East

The lands have been subject to now completed archaeological investigation work under licence from the National Monuments Service, Department of Culture, Heritage and the Gaeltacht on behalf of South Dublin County Council.

Large areas of the surrounding lands to the south and north within the Grange Castle Business Park and Profile Park have been developed in the past 10-15 years and are occupied by industrial campuses including pharmaceutical, data centres and food manufacturing uses. The closest occupied residential properties are located c. 230m south of the proposed site boundary along the Baldonnel Road.

The overall site is located between the N4 and N7 national primary roads and is served by a road network that has recently undergone an upgrade as well as the new Business Park road (Grange Castle South Access Road) that provides access into this part of the Grange Castle Business Park from the Baldonnel Road.

3. Pre-application consultations

A pre-application meeting was held in respect of the proposed development at the offices of South Dublin County Council in Tallaght on the 28th January 2020. A previous informal meeting had been held with the Senior Executive Planner, County Architect and Director of Services in charge of the Grange Castle Business Park on the 20th January 2020. The formal pre-application meeting was attended by Fiona Redmond (Senior Executive Planner); Sarah Watson (Planning Officer); Rosaleen Dwyer (Heritage Officer); Laurence Colleran (Public Realm); John Joe Hegarty (Transport) and Brian Harkin (Water and Drainage); with representatives of the Project Architects, Engineers; Environmental Consultants and Marston Planning Consultancy.

This part of the Planning Report sets out key points discussed during the course of the pre-application consultations and demonstrates how the submitted application responds to the points raised.

Masterplan approach

It was noted during this pre-application meeting that the Council would welcome a master plan approach for the full development of the site. The principle of a ten year permission under which all of the site would be developed, apart from the 110kV GIS Substation that would be applied for under a separate application, due to the substation potentially being deemed as Strategic Infrastructure Development, was accepted in principle. It was explained that this would enable the landscaping, attenuation and biodiversity gains to the site to be delivered within the early phases of the proposed development.

Phase 1 of the Proposed Development will include the construction of Building A and temporary substation, as well as 2 no. attenuation ponds and the entire landscaping to the south, west and north of the site. The rest of the landscaping and two further attenuation ponds that form part of the Proposed Development will be completed following completion of the 110kV GIS Substation and its HV connections that will form a separate planning application. This will ensure that the entire landscape and attenuation master plan for the site is in place within the first two years following the commencement of construction of the Proposed Development.

A separate planning application for the installation of the MV distribution cable will be submitted to SDCC to support interim power demand to the first Data Centre (Building A). Subject to a grant of planning permission, the temporary MV connection works are proposed to commence in the first quarter of 2021, with a construction period of three months.

Phase 2 of the Proposed Development will be the construction of the second data centre (Building B) located to the north-west of the site; and Phase 3 of the Proposed Development will comprise the construction of the final data centre on the site (Building C) to the east of Buildings A and B.

Overall layout and design

Some concerns were raised at the pre-application meeting in relation to the visual impact of the data centre buildings when viewed from the Grange Castle South Access Road; from Baldonnel Road to the west and when approaching along the Nangor Road to the north. This led to a reappraisal of the orientation of the three data centre buildings and flues and ventilation shafts.

In terms of Building A, which is located to the south-west of the site and parallel to the Grange Castle Access Road, it was reoriented 180 degrees following the initial informal meeting so that its formal elevation faced the access road so that the generators, flues and ventilation shafts were orientated into the centre of the site. An administration element was retained to its western elevation, and the quality of its presentation improved,

so that it provided a high quality elevation towards the entrance into the business park. The southern formal elevation of Building A was further broken down across its length with vertical fins across its length and darker finish to the ground floor. In combination with landscape mitigation this will contribute to the impression of a lighter building volume.

Building B, which is located to the north of Building A, and south of and parallel to the Nangor Road, was at the formal pre-application meeting also reoriented so that its formal elevation faced the public road to the north and the generators, flues and ventilation shafts were orientated into the centre of the site. Concerns were raised over the visual impact this was having when viewed from along Nangor Road.

In order to address visual impact concerns regarding Building B ventilation shafts and flues, the generators were reoriented so that the 20m high ventilation shafts would be set back closer to the data centre with the 25m flues set centrally within them. This aids to reduce the visual mass and visibility of Building B. In addition we have introduced a screen to this elevation to further enhance the elevation. A similar screen has been introduced on the northern part of Block C that extends to the north of Building B. Building C, which sits on a north to south alignment remains with its broken down more formal elevation to the east.

All buildings have taken the same design approach in terms of the use of vertical fins and darker treatment of the elevation at ground level as well as full storey height glazing at the entrance and at the main office level. High-quality metal cladding panels provide the background material and define the prevalent colour for each building. A composition of these vertical fins is carried around the side and rear elevations, providing texture, colour and contrast and effectively breaking up the perceived massing of each building.

This overall design and approach was positively received by the planners and County Architect when consulted following the formal pre-application meeting.

Positive biodiversity gain

The Heritage Officer raised at the pre-application meeting the need to ensure that all hedgerows should be retained, and that there should be no net loss in biodiversity. Indeed within the meeting it was stated by the Heritage Officer that there appeared to be a net biodiversity gain in the proposed scheme. The baseline biodiversity assessment included a bat survey of all buildings on site fully in accordance with the request of the Heritage Officer and the results have been incorporated within the EIA Report. Further bat surveys will be undertaken prior to the demolition of these buildings.

The landscape approach in providing berms, mature native planting, as well as mixes of other planting will as well as providing a natural screen to the Proposed Development, even at year 1 of operations, will also create wildlife and biodiversity corridors around the site that will connect with existing planting and hedgerows.

The need for development to be set back from the Baldonnel Stream was raised within the meeting. Policy G3, Objective 2 of the County Development Plan requires a biodiversity zone of not less than 10metres from the top of the bank of all watercourses within the County. In accordance with this Objective a 10metre corridor on each side of, and along the length of the stream has been provided. Reference was made at the pre-application meeting to a potential 15metres buffer if at all possible. This additional requirement of a buffer of 15m has been achieved for all of the c. 500m length of the stream along the northern boundary of the site.

The landscape plan accompanying this application proposes heavy landscaping throughout and particularly to the north between the stream and the Proposed Development, and including the replanting of the stream banks where it has been realigned. Existing hedgerows and other vegetation will be retained along the Baldonnel Stream and strengthened with native planting. This will create commuting and foraging corridors within the Proposed Development site for a range of fauna species. A woodland belt is proposed along the northern boundary of the site. Large, semi-mature tree planting has been proposed for this area and will provide an immediate ecological corridor within the site. This will be further aided by proposed bat boxes and bird boxes, as well as two artificial otter holts that will be installed in the banks of the Baldonnel Stream. All of these measures, with the significant set-back to the stream will ensure that the Proposed Development fully accords with Policy G3, Objective 2 of the County Development Plan and provide a net biodiversity gain for the site.

Further consultation

The need for the applicant to consult with the Department of Defence due to the position of the site within the Department of Defence Inner Zone was raised at the meeting, including the potential for the attenuation ponds to attract birds. The consultation with the Department of Defence, which is attached to the covering note of this application, stated that their only requirement was that given the proximity to Casement Aerodrome, the operation of cranes should be co-ordinated with Air Corps Air Traffic Services, no later than 28 days before use. We wish to confirm the applicant's acceptance of such a condition and requirement. Furthermore, we note that the attenuation ponds are designed to act as such rather than just artificial ponds that would more likely attract birds. Added to the fact that they are located close to the data centres and within a busy and well-lit business park, from our experience of similar attenuation ponds on other sites in the area where they have not attracted birds in great numbers beyond that already in the area, the potential concern over this issue is one that does not need to be further addressed.

Additional photomontage views

It was requested that additional photomontage / views be provided within the final application documentation. These additional views have been incorporated into the Landscape and Visual Impact chapter (Chapter 11) of the EIA Report.

Energy Statement

It was noted during the pre-application meeting that submission of an energy statement is a requirement under section 11.7.6 of the County Development Plan. In accordance with this requirement, an energy statement has been prepared and is submitted with the application.

Environmental Impact Assessment Report

It was noted at the pre-application meeting that an EIA Report was under preparation to accompany the planning application. The current application is duly accompanied by an EIA Report prepared by Marston Planning Consultancy and other specialised consultants. The Non-Technical Summary provides an overview of the EIA Report, which demonstrates that, subject to the mitigation measures proposed, it will not have a negative impact on its environment

4. Description of the Proposed Development

The Proposed Development is to develop 3 no. two-storey data centres with mezzanine floors at each level and ancillary elements with a gross floor area of 80,269sqm. The proposed data centres are referred to as Buildings A, B and C. The Proposed Development is to seek permission for a period of ten years.

In order to facilitate the proposed development it is proposed to demolish the abandoned dwelling and associated buildings known as Ballybane, Old Nangor Road, Clondalkin, Dublin 22. The three data centres follow an identical internal layout and floorplan that provides maximum efficiency and the requisite levels of accessibility and services for these high technology buildings.

Buildings A and C each have a gross floor area of 28,573sqm over two floors; with Building B having a gross floor area of 21,725sqm over two floors.

Each of the three data centres will include data storage rooms, associated electrical and mechanical plant rooms, loading bays, maintenance and storage spaces, office administration areas, and plant including PV panels at roof level as well as a separate house generator for each facility that will provide emergency power to the admin and ancillary spaces. Each data centre will also include a diesel tank and a refuelling area to serve the proposed emergency generators.

The location of the ancillary office administration space facing the public domain of each building will provide an element of visual interest and animation along each of these frontages. The design of the buildings has been carefully considered by Henry J Lyons Architects in order to complement the adjoining land uses. High quality, durable materials and finishes are proposed throughout, as illustrated within the Architectural Drawing pack and Design Statement.

Each of the data centres will be served by emergency generators (70 in total) and associated flues, which will be 25m in height, and ventilation shafts that will be 20m in height. These generators will provide power for the data centres in the unlikely event of a utility power failure. The overall height of each data centre apart from the flues and plant at roof level is c. 19.85m above the finished floor level

Building A is located to the south-west of the site and will have a gross floor area of 28,573sqm. It will include 26 no. emergency generators located at ground floor level within a compound to the northern side of the data centre with associated flues that will be 25m in height. The facility will also include 26 no. ventilation shafts that will be located above the northern end of each emergency generator that will measure 20m in height.

Building B is located to the north-west of the site, and to the immediate north of Building A and will have a gross floor area of 21,725sqm. It will include 18 no. emergency generators located at ground floor level within a compound to the northern side of the data centre with associated flues that will be 25m in height. The facility will also include 18 no. ventilation shafts that will be located above the southern end of each emergency generator that will measure 20m in height.

Building C will be constructed last and will be located to the eastern part of the site on a north-south axis and will have a gross floor area of 28,573sqm. It will include 26 no. emergency generators located at ground floor level within a compound to the western side of the data centre with associated flues that will be 25m in height. The facility will also include 26 no. ventilation shafts that will be located above the western end of each emergency generator that will measure 20m in height.

The proposed development will also include for the construction of an internal road network and circulation areas, security hut (30sqm) at entrance and site wide footpaths. The proposed development will also include 3 no. single storey MV buildings (each 249sqm - 747sqm in total) that manage the supply of electricity to each data centre and are located to the immediate west of the generator compound within Buildings A and B, and to the south of the generator compound within Building C. The application also includes for a single storey and temporary substation that will provide interim power demand for the first data centre (Building A), via an MV connection to the east that will be subject of a separate planning application. It is proposed that 8 no. prefabricated containerised electrical equipment rooms (65sqm each and 520sqm overall) that are stacked in pairs will be located to the immediate south of the temporary substation.

Car and Bicycle parking

It is proposed to provide 150 no. dedicated car parking spaces including 9 no. disabled accessible spaces (i.e. 50 spaces per data centre building) that will be accessed from the Grange Castle South Access Road to the immediate west of the Castlebaggot Sub-station. 16 number parking spaces, being 11% will be provided with Electric Vehicle charging (EV) points in line with the County Development Plan. All other car parking spaces will be future proofed through the inclusion of ducting to allow the rapid future installation of additional EV charging points as adoption increases.

The car parking provision is considered to be sufficient and an appropriate level of spaces based on the level of staffing along with maintenance contractors and visitors for the proposed data centres.

The proposed development shall include a total of 78 no. covered bicycle parking spaces, located in 3 no. clusters (each of 13no. Sheffield stands) close to building entrances. The bicycle parking provision is considered appropriate and adequate to encourage the use of active transit modes by staff accessing the proposed development.

The proposed car and cycle facilities are located in close proximity to the administration and staff facilities within each data centre, thereby maximising accessibility for future staff, for further details please refer to the TIA and Mobility Management Plan prepared by CS Consulting that accompanies this application.

Access, landscaping and other developments

The proposed development also includes the provision of access arrangements, pavements, and roadways to allow vehicular and pedestrian access to the three data centres. The proposed access onto the Grange Castle South Access Road to the south-east of the site will tie in with the roadways and access

arrangements within the Business Park. This access road, and a number of the surrounding roads bounding the site, contain dedicated off road cycling lanes.

The development will be enclosed with landscaping to all frontages. It is proposed to create a campus level of finish as opposed to an industrial form of development, with heavy landscaping throughout and particularly to the north, south and west of the overall site and data centres. The approach is to provide a landscape master plan that will be phased in two parts. The first phase will provide for all landscaping and attenuation to the north, south and west of the three main buildings; with the landscaping around the future substation that will be subject to a separate application to be implemented on completion of the Substation. The full landscaping and attenuation of the site will therefore be in place prior to the commencement of construction on Building B.

The development also includes for all ancillary development works, that will include 4 no. attenuation ponds and the installation and connection to the underground foul and storm water drainage network, and installation of utility ducts and cables that will include the drilling and laying of ducts and cables under the Baldonnell Stream. Other ancillary site development works will include hard and soft landscaping, lighting, fencing, signage, services road, entrance gate, and sprinkler tank house (72sqm).

Related development

It is proposed to apply under a separate planning application for a Medium Voltage (MV) connection that will include works to install new underground ducting and cable within a new trench to meet the existing distribution network.

It is also proposed to apply under a separate planning application to construct a permanent 110kV GIS Substation and two 110kV underground transmission lines from the proposed permanent substation to the existing Castlebaggot and Kilmahud substations. The provision of the permanent substation and transmission lines will be subject to its own application. Subject to pre-planning consultations with An Bord Pleanála this may be determined as being Strategic Infrastructure Development.

The cumulative effect of the Proposed Development together with other relevant developments, including the above, has been considered in Chapter 16 - Cumulative effect, of the EIA Report.

5. National and Regional Planning context

National Planning Framework

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

National Strategic Outcome 6 of the NPF relates to the creation of “*A Strong Economy Supported by Enterprise, Innovation and Skills*”. This strategic outcome is underpinned by a range of objectives relating to job creation and the fostering of enterprise and innovation. The following objective, relating to Information and Communications Technology (ICT) infrastructure (including datacentres) is included under National Strategic Outcome 6:

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

The Proposed Development comprises the provision of three new data centres and associated ancillary development, in a location which is well suited and serviced to accommodate such a use. The NPF also states under National Strategic Outcome 6:

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

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

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

The Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA) includes Regional Policy Objective (RPO) 8.23 which states the following:

“Local Authorities shall:

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

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

Regional Planning Guidelines – Greater Dublin Area, 2010-2022

The Regional Planning Guidelines (RPGs) sets out a strategic planned direction for growth in the Greater Dublin Area encompassing Dublin City, Dún Laoghaire-Rathdown, South Dublin, Fingal, Meath, Kildare and Wicklow. A number of policies and recommendations support the economic development of this region by developments similar to the subject proposal on sites such as this. These include Strategic Policies EP2, ER9 and ER10.

The RPGs identify the prevalence of converging sectors in particular the connection between Information and Communications Technology (ICT) and Green Technology. This convergence of sectors has led to new emerging sectors such as the prevalence of data centres in Ireland and on strategic sites such as this. The current proposal is considered to be in compliance with regional planning policies as they are strategically zoned employment land in South Dublin County Council.

6. Local Planning Context

South Dublin County Development Plan 2016-2022

The South Dublin County Development Plan is the statutory planning document that covers the entire South Dublin administrative area. The Plan was adopted in June 2016. The Proposed Development is to be located within an area zoned EE (Enterprise and Employment) under the County Development Plan with the stated aim:

“To provide for enterprise and employment related uses.”

The proposed use is a permitted use under this zoning. Significant precedent exists for the establishment of this use on other EE zoned lands in the area. EE zoned areas are established economic industrial areas running essentially in an arc northwards from City West to Grange and Grange Castle. The Proposed Development constitutes a significant investment in the Grangecastle Business Park at this strategic location identified for development of this nature. The proposal will contribute a high value added employment use in a location well suited to the proposed use having regard to its proximity to transport infrastructure and its zoning under the County Development Plan.

It is the policy of the Council to support sustainable enterprise and employment growth in South Dublin and in the Greater Dublin Area, whilst maintaining environmental quality. A number of objectives relate to EE zoned lands that include ET3 Objective 2 that states:

“To prioritise high tech manufacturing, research and development and associated uses in the established Business and Technology Cluster to the west of the County (Grange Castle and Citywest areas) to maximise

the value of higher order infrastructure and services that are required to support large scale strategic investment.”

Policy ET3 Objective 5 requires that *“all business parks and industrial areas are designed to the highest architectural and landscaping standards and that natural site features, such as watercourses, trees and hedgerows are retained and enhanced as an integral part of the scheme”*. The proposal retains and enhances natural site features by the use of the highest architectural and landscaping design standards.

Policy ET3 Specific Local Objective 1 supports the conducting of a review of the zoning of lands south of the Grand Canal and west and north of the R120, with a view to preparing a long term plan for the expansion of the Grange Castle Economic and Enterprise Zone, to accommodate strategic investment in the future, while also seeking to provide public open space along the Canal, including a natural heritage area in the vicinity of the historic canal quarries at Gollierstown. This rezoning has formed Variation no. 1 of the County Development Plan and does not relate to these lands.

The nature of the overall design has been informed by a site analysis of environmental issues. This has included noise and air quality objectives. The enhancement and creation of new bio-diversity corridors to fully integrate the scheme into the surrounding environment to ensure that direct and cumulative effects on biodiversity are addressed in the overall design. Suitable attenuation and sustainable drainage systems have also informed the design. This mitigation of design also increases native tree planting within the site from its current position. The design incorporates SUDS fully in accordance with policies of the Plan.

In conclusion it is considered that the proposal is in accordance with the policies and objectives of local land use planning policy as set out under the South Dublin County Development Plan 2016-2022.

7. Environmental Impact Assessment Report

The requirement for EIA for certain types and scales of development is set out in the EIA Directives (2011/92/EU and 2014/52/EU), European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (the bulk of which came into operation in September 2018), the European Communities (Environmental Impact Assessment) Regulations 1989-2006, Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001-2019. It should be noted that this EIA Report is prepared in accordance with the 2014 EIA Directive (2011/92/EU), as amended by the 2014 EIA Directive.

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

The project proposed is not listed under Annex I EIA Directives but it is above the relevant threshold as set out in the Planning and Development Regulations 2001-2019 for Annex II projects. The threshold for *“industrial estate development projects, where the area would exceed 15 hectares”* as set out in Part 2 of Schedule 5 of the Regulations was considered to be most relevant threshold in the context of the Proposed Development in the subject location. The Proposed Development site area exceeds this threshold and therefore an EIA Report is required for the Proposed Development.

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

8. Appropriate Assessment

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

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

9. Flood Risk Assessment

A Stage 1 Flood Risk Assessment has been undertaken for the site and forms a stand-alone report that forms part of this application. The assessment concluded that the development is not at risk of flooding. The assessment indicates that the Proposed Development would not adversely impact on the flood risk for other neighbouring properties. Further detail is provided in Chapter 8 – Hydrology of the EIA Report and the accompanying Stage 1 Flood Risk Assessment undertaken by CS Consulting that forms a stand-alone document as part of the planning application. Given the inland location of the site, it is not at risk from sea level rise.

10. Conclusion

The nature of the proposal fully accords with the zoning, policies and objectives of the County Development Plan and best practice in terms of compliance with putting forward suitable mitigation measures within the design and construction process to more than adequately mitigate environmental impacts of the development and impact on nearby residential properties.

The proposed development is in accordance with the policies and objectives of the National Planning Framework, Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly, the Regional Planning Guidelines for the Greater Dublin Area and the South Dublin County Development Plan 2016-2020.

It has been demonstrated within this report, as well as within the accompanying drawings, documents and EIA Report that the proposed development provides a suitable and appropriate use for the subject lands. The design and master planning of the site has taken into account any issues and discussions raised within the pre-application meeting with South Dublin County Council prior to lodgement of this application. The design and layout of the proposed development also provides for an appropriate use of the subject site that is cognisant of existing and permitted surrounding land uses.

In conclusion, for all of the foregoing arguments, reason and considerations, we respectfully request South Dublin County Council to accept the contents of the application, and to assess the subject development on its own individual merits and to grant planning permission for this development on the basis that by its nature and extent, the proposal would accord with the proper planning and sustainable development of this area including the preservation and improvement of amenities thereof.

We trust that everything is in order and look forward to a favourable decision in due course.

Yours faithfully,



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Marston Planning Consultancy