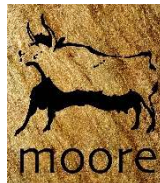


Report for the purposes of Appropriate Assessment Screening

ADSIL Blanchardstown IE Licence

Prepared by: Moore Group – Environmental Services

22 February 2022



On behalf of ADSIL

Project Proponent	ADSIL
Project	ADSIL Blanchardstown IE Licence
Title	Report for the purposes of Appropriate Assessment Screening ADSIL Blanchardstown IE Licence

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Appendix A – Finding of No Significant Effects Report

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Abbreviations

AA	Appropriate Assessment
EEC	European Economic Community
EPA	Environmental Protection Agency
EU	European Union
GIS	Geographical Information System
LAP	Local Area Plan
NHA	Natural Heritage Area
NIS	Natura Impact Statement
NPWS	National Parks and Wildlife Service
OSI	Ordnance Survey Ireland
pNHA	proposed Natural Heritage Area
SAC	Special Area of Conservation
SPA	Special Protection Area
SuDS	Sustainable Drainage System
WFD	Water Framework Directive

1. Introduction

1.1. General Introduction

This report for the purposes of Appropriate Assessment (AA) Screening has been prepared to support an application for Industrial Emissions Licence (IEL) for the Project (described in Section 3 below). This report contains information required for the competent authority to undertake screening for Appropriate Assessment (AA) in respect of the operation of a data storage facility at Snugborough, Blanchardstown, Dublin 15 (Fingal) (hereafter referred to as the Project) to determine whether it is likely individually or in combination with other plans and projects to have a significant effect on any European sites, in light of best scientific knowledge.

Having regard to the provisions of the Planning and Development Act 2000 – 2021 (the “Planning Acts”) (section 177U), the purpose of a screening exercise under section 177U of the PDA 2000 is to assess, in view of best scientific knowledge, if the Project, individually or in combination with another plan or project is likely to have a significant effect on a European site.

If it cannot be *excluded* on the basis of objective information that the Project, individually or in combination with other plans or projects, will have a significant effect on a European site then it is necessary to carry out a Stage 2 appropriate assessment under section 177V of the Planning Acts.

When screening the project, there are two possible outcomes:

- the project poses no potential for a likely significant effect and as such requires no further assessment; and
- the project has potential to have likely significant effect (or this is uncertain) unless mitigation measures are applied, and therefore an AA of the project is necessary.

This report has been prepared by Moore Group - Environmental Services to enable the EPA to carry out AA screening in relation to the Project. The report was compiled by Ger O'Donohoe (B.Sc. Applied Aquatic Sciences (GMIT, 1993) & M.Sc. Environmental Sciences (TCD, 1999)) who has 27 years' experience in environmental impact assessment and has completed numerous Appropriate Assessment Screening Reports and Natura Impact Statements on terrestrial and aquatic habitats for various development types.

1.2. Legislative Background - The Habitats and Birds Directives

Article 6 of the Habitats Directive is transposed into Irish Law inter alia by the Part XAB of the Planning Acts (section 177U and 177V) govern the requirement to carry out appropriate assessment screening and appropriate assessment, where required, per Section 1.1 above.

The Habitats Directive (Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora) is the main legislative instrument for the protection and conservation of biodiversity in the European Union (EU). Under the Habitats Directive, Member States are obliged to designate Special Areas of Conservation (SACs) which contain habitats or species considered important for protection and conservation in a EU context.

The Birds Directive (Council Directive 2009/147/EC on the conservation of wild birds), transposed into Irish law by the Bird and Natural Habitats Regulations 2011, as amended, is concerned with the long-term protection and management of all wild bird species and their habitats in the EU. Among other things, the Birds Directive requires that Special Protection Areas (SPAs) be established to protect migratory species and species which are rare, vulnerable, in danger of extinction, or otherwise require special attention.

SACs designated under the Habitats Directive and SPAs, designated under the Birds Directive, form a pan-European network of protected sites known as Natura 2000. The Habitats Directive sets out a unified system for the protection and management of SACs and SPAs. These sites are also referred to as European sites.

Articles 6(3) and 6(4) of the Habitats Directive set out the requirement for an assessment of proposed plans and projects likely to have a significant effect on Natura 2000 sites.

Article 6(3) establishes the requirement to screen all plans and projects and to carry out an appropriate assessment if required (Appropriate Assessment (AA)). Article 6(4) establishes requirements in cases of imperative reasons of overriding public interest:

Article 6(3): *“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an appropriate assessment of its implications for the site in view of the site’s conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”*

2. Methodology

The Commission’s methodological guidance (EC, 2002, 2018, 2021 see Section 2.1 below) promotes a four-stage process to complete the AA and outlines the issues and tests at each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required.

Stages 1 and 2 deal with the main requirements for assessment under Article 6(3). Stage 3 may be part of Article 6(3) or may be a necessary precursor to Stage 4. Stage 4 is the main derogation step of Article 6(4).

Stage 1 Screening: This stage examines the likely effects of a project either alone or in combination with other projects upon a Natura 2000 site and considers whether it can be objectively concluded that these effects will not be significant. In order to screen out a project, it must be excluded, on the basis of objective information, that the Project, individually or in combination with other plans or projects, will have a significant effect on a European site.

Stage 2 Appropriate Assessment: In this stage, there is a consideration of the impact of the project with a view to ascertain whether there will be any adverse effect on the integrity of the Natura 2000 site either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. Additionally, where there are predicted impacts, an assessment of the potential mitigation of those impacts is considered.

Stage 3 Assessment of Alternative Solutions: This stage examines alternative ways of implementing the project that, where possible, avoid any adverse impacts on the integrity of the Natura 2000 site.

Stage 4 Assessment where no alternative solutions exist and where adverse impacts remain: Where imperative reasons of overriding public interest (IROPI) exist, an assessment to consider whether compensatory measures will or will not effectively offset the damage to the sites will be necessary.

To ensure that the Project complies fully with the requirements of Article 6 of the Habitats Directive and all relevant Irish transposing legislation, Moore Group compiled this report to enable the EPA to carry out AA screening in relation to the Project to determine whether the Project, individually or in combination with another plan or project will have a significant effect on a Natura 2000 site.

2.1. Guidance

This report has been compiled in accordance with guidance contained in the following documents:

- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities. (Department of Environment, Heritage and Local Government, 2010 rev.).
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 & PSSP 2/10.
- Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 2001); hereafter referred to as the EC Article 6 Guidance Document.
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (EC Environment Directorate-General, 2000); hereafter referred to as MN2000.
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (EC, 2018).
- Guidance document on the strict protection of animal species of Community interest under the Habitats Directive (EC, 2021).

- Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC (EC, 2021).
- Office of the Planning Regulator (OPR) Practice Note PN01 Appropriate Assessment Screening for Development Management (OPR, 2021).

2.2. Data Sources

Sources of information that were used to collect data on the Natura 2000 network of sites, and the environment within which they are located, are listed below:

- The following mapping and Geographical Information Systems (GIS) data sources, as required:
 - National Parks & Wildlife (NPWS) protected site boundary data;
 - Ordnance Survey of Ireland (OSI) mapping and aerial photography;
 - OSI/Environmental Protection Agency (EPA) rivers and streams, and catchments;
 - Open Street Maps;
 - Digital Elevation Model over Europe (EU-DEM);
 - Google Earth and Bing aerial photography 1995-2022;
- Online data available on Natura 2000 sites as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie including:
 - Natura 2000 - Standard Data Form;
 - Conservation Objectives;
 - Site Synopses;
- National Biodiversity Data Centre records;
 - Online database of rare, threatened and protected species;
 - Publicly accessible biodiversity datasets.
- Status of EU Protected Habitats in Ireland. (National Parks & Wildlife Service, 2019); and
- Relevant Development Plans;
 - Fingal County Development Plan 2017-2023

3. Description of the Project

The Project consists of the operation of an Amazon Data Services Ireland Ltd. (“ADSIL”) data storage facility (the subject ‘installation’ under this licence application), which is located in the Blanchardstown Industrial Park, Snugborough Road, Dublin 15, and situated 2km from the N3 Road and 2.5km from the M50. The Industrial Park is situated 9 km from Dublin City Centre.

The applicant is applying to the Environmental Protection Agency (EPA) for an Industrial Emissions (IE) Licence principally relating to the operation of diesel-powered emergency generators under Activity Class 2.1.

Figure 1 shows the Project location and Figure 2 shows a detailed view of the Project boundary on recent aerial photography. Figure 3 shows the layout of the Project.

Stormwater Emissions

Rainwater runoff from impermeable areas of the site will be collected via the onsite storm water drainage network. This network will convey the stormwater via Class 1 Hydrocarbon interceptors to one of 4 no. stormwater attenuation storage systems (See Drawing 21_123D-CSE-00-XX-DR-C-1100).

The attenuated stormwater discharges offsite at 4 no. Emission Points (SW1, SW2, SW3, SW4) as shown on Drawing Reference: 21_123D-CSE-00-XX-DR-C-1100 Surface Water Layout Plan.

The 4 no. emissions points discharges attenuated stormwater to the 1200 mm diameter existing surface water drainage main, located to the south in the public road and runs through the IDA Blanchardstown Business and Technology Park. This stormwater main flows east to the man-made attenuation structure (artificial lake) located in College Business Park, from here it drains westwards to the Ballycoolin Stream, the Ballycoolin Stream flows 1.2 km downstream in a southerly direction and confluences with River Tolka.

In addition to domestic effluent generated on site, there is a requirement to have the capability to discharge run-off from coolant effluent into the storm water network. The coolant effluent is a byproduct of potable water used when atmospheric temperatures are above the setpoint to cool components within the Installation. This is recirculated mains water that has been through the AHUs only. There is no addition of water treatment chemicals.

During winter months when the water is not required for evaporative cooling systems it is drained down typically every 7 days to the stormwater system to prevent legionella growth.

During the summer months the water is re-circulated into the evaporative cooling units. As water evaporates over time the total suspended solids accumulate and therefore the system flushes the water storage tanks. The cut off for this is currently a conductivity reading of 1,500 micro siemens ($\mu\text{S}/\text{cm}$), these setpoints are reviewed in line with BAT/industry best practice.

The evaporative cooling water for the site is sourced from the mains water provided by Irish Water, the water requires no chemical treatment. The AHUs are clean systems and therefore the Evaporative Cooling Water is of sufficient quality to be discharged to stormwater, furthermore this water diluted in the site's stormwater attenuation ponds.

Foul Water Emissions

Domestic Only. The foul network ultimately discharges into a regional pumping station before final treatment and disposal at Ringsend Wastewater Treatment Plant (WWTP) in Dublin.

Air Emissions

The subject site is not within, or proximal to a European conservation site. European sites (SAC and SPA) are located at minimum, 9.06 km from the site. Details of international conservation sites, Special Protection Areas and Special Areas of Conservation within 15km of the proposed site are seen in Table 2.

Emissions of NO_x have the potential to impact vegetation and sensitive plant species. Directive 2008/50/EC has set limit values for vegetation effects 1. As such it is typical to assess the impact of NO_x emissions from a facility on any nearby sensitive ecological areas in close proximity to the site. There are no European sites within 1 km of the subject site . The closest sensitive ecological area is the Royal Canal Proposed Natural Heritage Area (pNHA) (site code 002103) which is located c. 2.4 km south of the subject site. Dispersion modelling of NO_x emissions from the facility at this distance is not required as there is no potential for significant impacts to vegetation as a result of emissions from the facility at such a distance. Emissions from the back-up generators on site peak at the site boundary and fall off rapidly with increasing distance from the facility.

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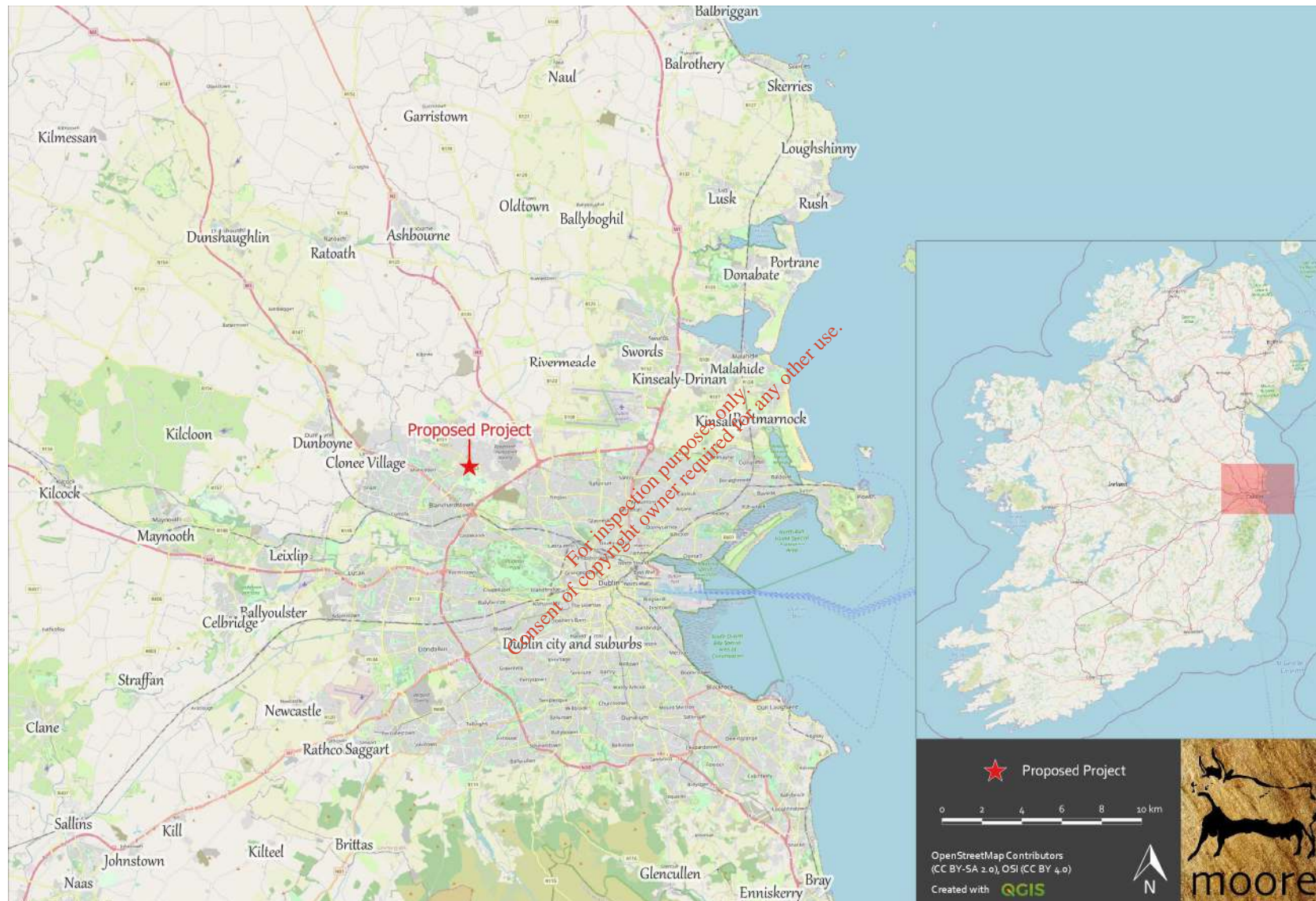


Figure 1. Showing the Project location at Blanchardstown, Dublin 15.

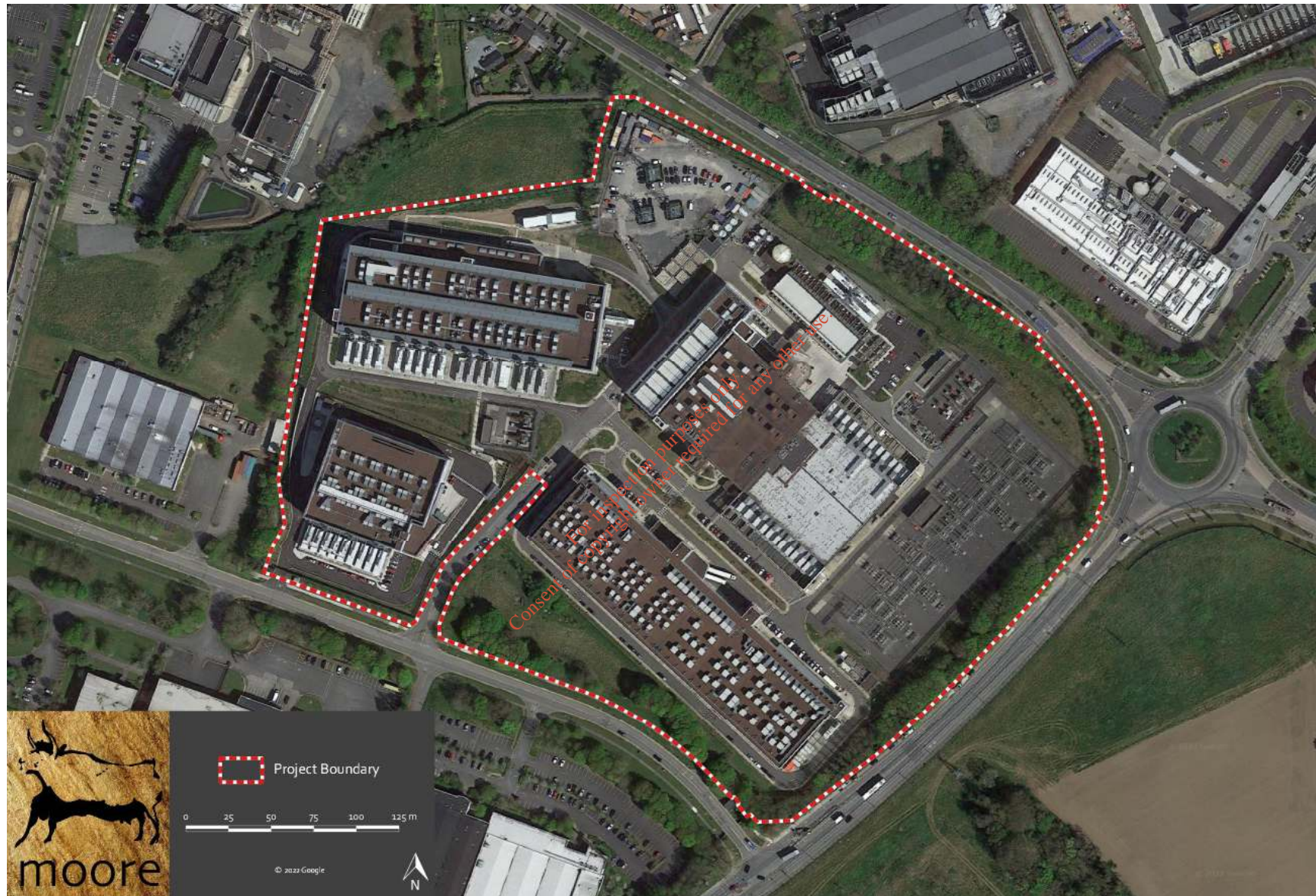


Figure 2. Showing the Project boundary on recent aerial photography.

4. Identification of Natura 2000 Sites

4.1. Description of Natura Sites Potentially Significantly Affected

The Department of Housing, Planning and Local Government (previously DoEHLG)'s Guidance on Appropriate Assessment (2009) recommends an assessment of European sites within a Zone of Influence (ZoI) of 15km. However, this distance is a guidance only and a zone of influence of a Project is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. In accordance with the OPR Practice Note, PN01, the ZoI should be established on a case-by-case basis using the Source- Pathway-Receptor framework and not by arbitrary distances (such as 15km).

The Zone of Influence may be determined by considering the Project's potential connectivity with European sites, in terms of:

- Nature, scale, timing and duration of works and possible impacts, nature and size of excavations, storage of materials, flat/sloping sites;
- Distance and nature of pathways (dilution and dispersion; intervening 'buffer' lands, roads etc.); and
- Sensitivity and location of ecological features.

The potential for source pathway receptor connectivity is firstly identified through GIS interrogation and detailed information is then provided on sites with connectivity. European sites that are located within a potential Zone of Influence of the Project are presented in Figure 4, below. Spatial boundary data on the Natura 2000 network was extracted from the NPWS website (www.npws.ie) on 11 February 2022. This data was interrogated using GIS analysis to provide mapping, distances, locations and pathways to all sites of conservation concern including pNHAs, NHA and European sites.

This exercise found that the nearest European site to the Project is the Rye Water Valley/Carton SAC (Site Code 001398), located over 9km to the southwest.

The Project is located within the hydrological catchment of the River Tolka which discharges to north Dublin Bay at the East Point Business Park.

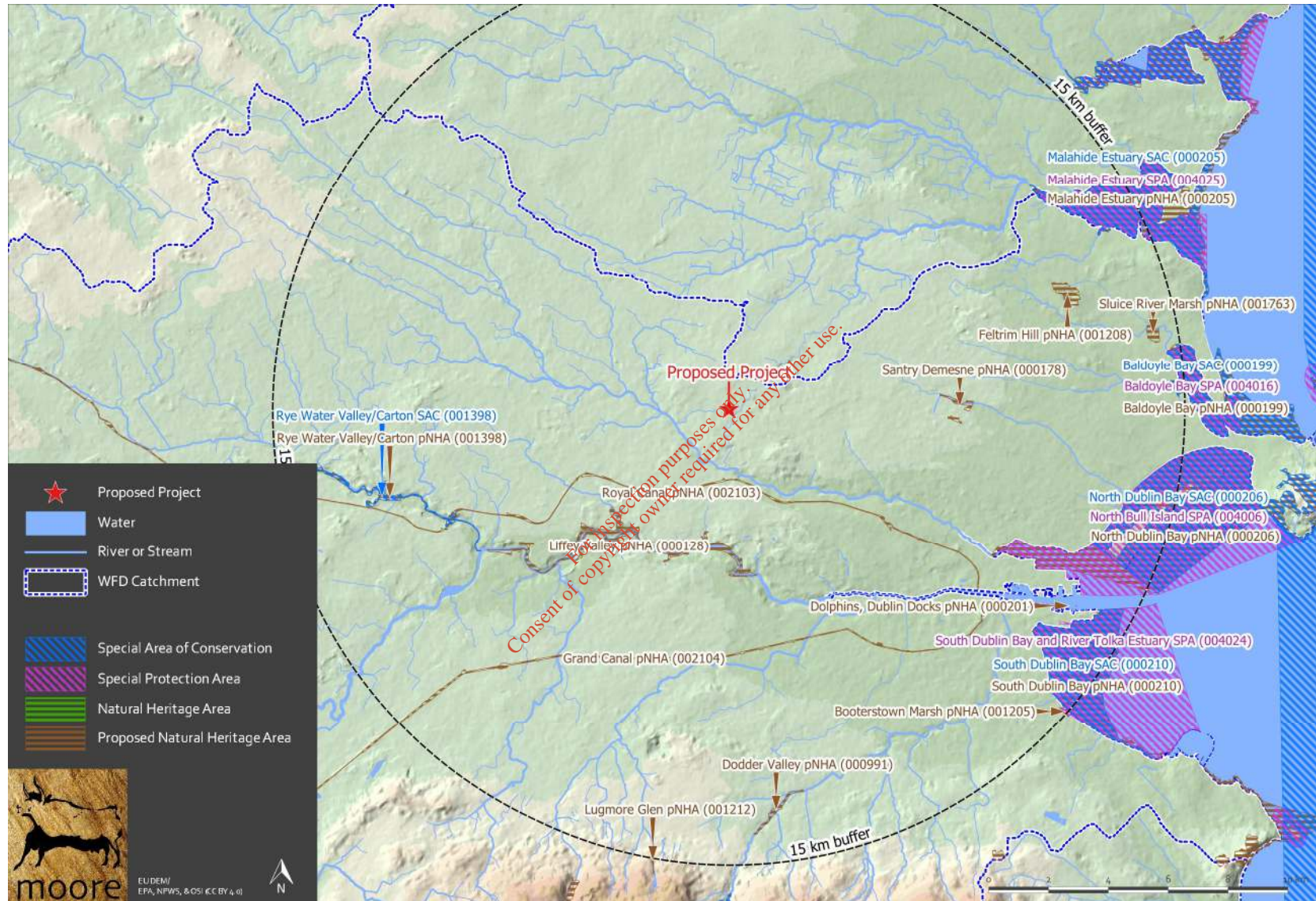


Figure 4. Showing European sites and NHAs/pNHAs within the wider Potential Zone of Influence of the Project.

4.2. Ecological Network Supporting Natura 2000 Sites

A concurrent GIS analysis of the proposed Natural Heritage Areas (pNHA) and designated Natural Heritage Areas (NHA) in terms of their role in supporting the species using Natura 2000 sites was undertaken along with GIS investigation of European sites. It was assumed that these supporting roles mainly related to mobile fauna such as mammals and birds which may use pNHAs and NHAs as “stepping stones” between Natura 2000 sites.

Article 10 of the Habitats Directive and the Habitats Regulations 2011 place a high degree of importance on such non-Natura 2000 areas as features that connect the Natura 2000 network. Features such as ponds, woodlands and important hedgerows were taken into account during the preparation of this AA Screening report.

The NHAs and pNHAs identified in Figure 4 are either located outside the Zone of Influence or considered under the higher conservation status as European sites.

5. Identification of Potential Impacts & Assessment of Significance

The Project is not directly connected with or necessary to the management of the sites considered in the assessment and therefore potential impacts must be identified and considered.

5.1. Assessment of Likely Significant Effects

There is no direct connectivity to any European sites within or outside the potential Zone of Influence.

The consideration of all potential direct and indirect impacts that may result in significant effects on the conservation objectives of a European site, taking into account the size and scale of the Project are presented in Table 1.

Table 1. Assessment of Likely Significant Effects.

Identification of all potential direct and indirect impacts that may result in significant effects on the conservation objectives of a European site, taking into account the size and scale of the project.	
Impacts:	Significance of Impacts:
Construction phase e.g. Vegetation clearance Demolition	None The Project involves an application an IE Licence for the operation of an existing developed facility.

<p>Surface water runoff from soil excavation/infill/landscaping (including borrow pits)</p> <p>Dust, noise, vibration</p> <p>Lighting disturbance</p> <p>Impact on groundwater/dewatering</p> <p>Storage of excavated/construction materials</p> <p>Access to site</p> <p>Pests</p>	
<p>Operational phase e.g.</p> <p>Direct emission to air and water</p> <p>Surface water runoff containing contaminant or sediment</p> <p>Lighting disturbance</p> <p>Noise/vibration</p> <p>Changes to water/groundwater due to drainage or abstraction</p> <p>Presence of people, vehicles and activities</p> <p>Physical presence of structures (e.g. collision risks)</p> <p>Potential for accidents or incidents</p>	<p>None</p> <p>All foul and surface water runoff from the operational facility is contained on site and discharged to urban drainage systems.</p> <p>There is no real likelihood of any significant effects on European Sites in the wider catchment area.</p> <p>The facility is located at a distance of removal such that there will be no disturbance to qualifying interest species in any European sites.</p>
<p>In-combination/Other</p>	<p>None</p> <p>The Project site is located at an already developed facility.</p> <p>No likely significant in-combination effects are identified.</p>
<p>Describe any likely changes to the European site:</p>	
<p>Examples of the type of changes to give consideration to include:</p> <p>Reduction or fragmentation of habitat area</p> <p>Disturbance to QI species</p>	<p>None.</p> <p>The Project site is not located adjacent or within a European site, therefore there is no risk of habitat loss or fragmentation or any effects on QI habitats or species directly or ex-situ.</p>

Habitat or species fragmentation Reduction or fragmentation in species density Changes in key indicators of conservation status value (water quality etc.) Changes to areas of sensitivity or threats to QI Interference with the key relationships that define the structure or ecological function of the site Climate change	
Are 'mitigation' measures necessary to reach a conclusion that likely significant effects can be ruled out at screening?	
No	N/A

On the basis of the information supplied, which is considered adequate to undertake a screening determination and having regard to:

- the intervening land uses and distance from European sites,
- all foul and surface water runoff from the operational facility is contained on site and discharged to urban drainage systems.

It may be concluded that the Project, 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.

5.2. Assessment of Potential In-Combination Effects

In-combination effects are changes in the environment that result from numerous human-induced, small-scale alterations. In-combination effects can be thought of as occurring through two main pathways: first, through persistent additions or losses of the same materials or resource, and second, through the compounding effects as a result of the coming together of two or more effects.

As part of the Screening for an Appropriate Assessment, in addition to the Project, other relevant plans and projects in the area must also be considered at this stage. This step aims to identify at this early stage any possible significant in-combination effects of the Project with other such plans and projects on European sites.

A review of the National Planning Application Database was undertaken. The first stage of this review confirmed that there were no data gaps in the area where the Project is located. The database was then queried for

developments granted planning permission within 250m of the Project within the last three years, these are presented in Table 2 below.

Table 2.Planning applications granted permission in the vicinity of the Project.

Planning Ref.	Description of development	Comments
FW19A/0089	Demolition of two existing light industrial / commercial buildings and clearance works (on a phased basis); Construction of two data storage facilities. Each of the two data storage facilities will accommodate data halls, associated electrical and mechanical plant rooms, loading bays, maintenance and storage space, office administration areas, water treatment rooms, and extract louvres and solar panels at roof level; Each of the proposed data storage facilities will have a gross floor area c. 28,699 sq.m (57,398 sq.m in total); Emergency generators (32 in total for both facilities), associated emission stacks Provision of an underground connection to the existing substation Construction of a two-storey office / administration building to the west of the two proposed data storage facilities with a gross floor area of c. 1,579 sq.m; Construction of internal road network, circulation areas and footpaths, provision of 160 no. car parking spaces and 60 no. cycle parking spaces; Hard and soft landscaping and planting, boundary treatments and security gates, bin storage, security hut, switchrooms, lighting, and all associated works including underground foul and storm water drainage network, attenuation area, and utility cables.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW19A/0147	Provision of a generator and air handling unit compound including 4 no stainless steel flues, all to the south-east corner (rear and side of existing building), and provision of 218 sq.m. internal mezzanine plant area within the existing structure, all required to provide critical technical support to Data Hall 3.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW19A/0161	The Project comprises of a container compound for the purposes of providing ancillary modular plant, electronic equipment and machinery space. The development comprises provision of 4 no. modular prefabricated containers.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW19A/0111	The Project comprises of a container compound for the purposes of providing ancillary modular plant, electronic equipment and machinery space. The development comprises provision of 2 no. modular prefabricated containers (stacked to form 2 no. storeys), associated access arrangements and staircases, a boundary fence enclosure around the Project with 4 no. access points, the relocation of an existing car parking space, the relocation of the existing bicycle parking, associated plant and all ancillary works.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW19A/0176	The proposal will consist of modifications to the development permitted under FW18A/0032 comprising the following 1) alterations to existing rotunda retained on site following demolition of Clyde House under FW17A/0205 2) modifications to the 3 permitted data halls to include electrical plant rooms 3) omission of permitted 1st floor link bridge across the data halls 4) alterations to permitted ancillary plant areas including a fuel pump room and tanks; water treatment tanks; sprinklers; treatment compounds and plant rooms across the site 5) reduction in location and extent of flue stacks across the site. The proposed modifications result in a reduced Gross External Area for the development from c.19,700m ² to c.13,700m ² . A 110kv substation located within the site to serve the development will be the subject of a separate Strategic Infrastructure Development application to AnBord Pleanála under section 182A of the Planning and Development Act 2000 (as amended)	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW20A/0019	Temporary development (5 year duration) consisting of the following; (a) hardstanding external car park for c.45 no. cars with vehicular access onto the Public Road (b) an external car wash bay (c) a steel clad	There are no predicted in-combination effects given that it is predicted that the Project

Planning Ref.	Description of development	Comments
	commercial unit (c.287 sq.m.) for both internal parking/recovery and car valeting (d) a chemical WC cubicle for staff (e) advertising signage as erected (f) external lighting column and CCTV cameras and (g) connection to (e) advertising signage as erected (f) external lighting column and CCTV cameras and (g) connection to surface water network and all other associated siteworks.	will have no effect on any European site.
FW20A/0087	Construction of 3 no. data hall buildings with ancillary buildings. The single storey rotunda building will be retained and reconfigured from previously permitted under (Reg. Refs FW18A/0032 and FW19A/0176). The overall height of the data hall buildings ranges from c.5.7m to c.17.6m to roof level and c.14.4m to c.24.8m including the roof top plant. The Project includes the provision of a 2 storey generator building (c.1,990sqm) comprising 20 no. MV generators and generator rooms, loadbank and customer compound with 5 no. flues c.19m high; 2 no. transformers (c.88sqm each); skip compactor and bin store area(c.51sqm); fuel pump room (c.24sqm); 12 no. above ground fuel tanks (c.8.4m high) within a fuel compound; 7 no. water tanks (c.16m high); water treatment plant room (c.228sqm); 2 no. salt saturators (c.5.7m high); heat recovery plant room (c.49sqm); sprinkler pump room (c.32sqm) and 2 no. sprinkler tanks (c.13.6m high).The total gross floor area of the data halls, front of house and ancillary structures is c.25,225sqm. A proposed 110kv substation located to the south east of this site is subject of a separate Strategic Infrastructure Development application to An Bord Pleanála under section 182A of the Planning and Development Act 2000 (as amended).	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW20A/0181	Permission for development comprising amendments to the development permitted under Reg Ref.: FW19A/0089, a ten-year permission. (a) Amendments to the permitted site layout plan (b) Amendments to the two permitted data storage facilities, to include internal reconfiguration of the permitted buildings, (c) Amendments to permitted stair and lift cores, including the removal of one stair core and provision of two additional lift cores in each data storage facility building;(d) Associated amendments to the external facades and building envelopes of the two data storage facilities (including an increase in parapet height of 0.68 metres to both buildings); (e) Amendments to the permitted emergency generators, transformers, emission stacks, and plant adjacent to the two data storage facilities; (f) Amendments to the permitted office / administration building (g) Amendments to the permitted underground connection to the existing substation (permitted under Reg Ref: FW16A/0159) (h) Amendments to the phasing plan for the permitted development; (i) All associated amendments to hard landscaping and planting. boundary treatments and security gates, water storage tanks, bin storage, security hut, switchrooms, lighting, and all associated works including underground foul and storm water drainage network.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW20A/0109	Permission for amendments to previously approved Grant of Permission (Reg. FW19A/0147) at Keppel, Unit B10 IDA Business Park, Ballycoolin, Dublin 15 YN9K	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW20A/0154	Permission for development to consist of the erection of a new ESB Substation adjoining switch room and associated site development works to include the alteration of existing fence to accommodate the new substation.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW20A/0119	For amendments to previously approved Grant of Permission (Reg Ref F at Keppel Unit B10 Business Park, Ballycoolin Dublin 15 YN9K.	There are no predicted in-combination effects given that it is predicted that the Project

Planning Ref.	Description of development	Comments
	The development consists of the enlargement of external mechanical compound to the Eastern elevation to accommodate reconfiguration of previously approved mechanical plant and minor changes to the compound elevations as a result of aforementioned amendments	will have no effect on any European site.
FW21A/0092	Permission for amendments to the development permitted under Reg. Ref.: FW19A/0089 (a ten year permission), as amended under Reg. Ref.: FW20A/0181. The proposed amendments comprise the alteration of the phasing of the development, to provide for the delivery of the entire southern data storage facility building within the first phase of the development, with the entire northern data storage facility building to form part of the second phase of development.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW21A/0073	The development will consist of revisions to parent permission FCC Reg. Ref. FW20A/0087 to include the following: Alterations to plant areas at second/third floor level of the permitted DB5x data hall (formerly known as Building No. 3. Removal of the permitted MV generator building and replacement with a proposed gas generator compound comprising 9 no. gas generators with 9 no associated flues 0.18m high; provision of 1 no. switchroom building comprising electrical rooms and a control station at ground floor level (c.478sqm at c.6m high) and air compressor (c.38sqm at C.4.5m high); reduction in the number of fuel tanks from 12 no. permitted fuel tanks to 6 no. proposed fuel tanks within a fuel compound and revisions to the permitted fuel pumphouse c.41sqm; Removal of the permitted skip compactor and bin store and provision of a proposed AGI Compound. Provision of 2 no. smaller transformers and load bank (c.29sqm); Relocation and revisions to the permitted heat recovery plant room (C.48sqm) and slight relocation of the permitted sprinkler pump room (c.32sqm). The total gross internal floor area of the development including data halls and ancillary structures is reduced to C.19,040 sqm from c.25,225 sqm under FCC Reg. Ref. FW20A/0087; All other development as permitted under FCC Reg. Ref. FW20A/0087; A permitted 110kv substation located to the south east of this site was subject of a separate Strategic Infrastructure Development application to An Bord Pleanála (ABP Ref. 307296-20) under section 182A of the Planning and Development Act 2000 (as amended).	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.

The Fingal County Development Plan in complying with the requirements of the Habitats Directive requires that all Projects and Plans that could affect the Natura 2000 sites in the same potential Zone of Influence of the Project site would be initially screened for Appropriate Assessment and if requiring Stage 2 AA, that appropriate employable mitigation measures would be put in place to avoid, reduce or ameliorate negative impacts. In this way any, in-combination impacts with Plans or Projects for the Project area and surrounding townlands in which the Project site is located, would be avoided.

The listed developments have been granted permission in most cases with conditions relating to sustainable development by the consenting authority in compliance with the relevant Local Authority Development Plan and in compliance with the Local Authority requirement with regard to the Habitats Directive. The development cannot have received planning permission without having met the consenting authority requirement in this regard. There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.

There are no predicted in-combination effects given that it is predicted that the Project will have no significant effect on any European site.

Any new applications for the Project area will be assessed on a case by case basis *initially* by Fingal County Council which will determine the requirement for AA Screening as per the requirements of Article 6(3) of the Habitats Directive.

Other IE Licences are reviewed and tested by the EPA.

6. Conclusion

There is no connectivity to any European sites within or outside the potential Zone of Influence.

There are no predicted effects on any European sites given:

- The distance between the Project and any European Sites over 9km;
- There are no predicted emissions to air, water or the environment during the operational phase that would result in significant effects.

It has been objectively concluded by Moore Group Environmental Services that:

1. The Project is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.
2. The Project is unlikely to either directly or indirectly significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment.
3. The Project, alone or in combination with other projects, is not likely to have significant effects on the European sites considered in this assessment in view of their conservation objectives.
4. It is possible to conclude that significant effects can be excluded at the screening stage.

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

An appropriate assessment is not, therefore, required.

A finding of no significant effects report is presented in Appendix A in accordance with the EU Commission's methodological guidance (European Commission, 2002).

7. References

Department of the Environment, Heritage and Local Government (2010) Guidance on Appropriate Assessment of Plans and Projects in Ireland (as amended February 2010).

European Commission (2000) Managing Natura 2000 sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.

European Commission Environment DG (2002) Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission, Brussels.

European Commission (2007) Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC: Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interests, compensatory measures, overall coherence and opinion of the Commission. European Commission, Brussels.

European Commission (2018) Managing Natura 2000 sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.

European Commission (2021) Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC, Brussels 28.9.21.

European Commission (2021) Guidance document on the strict protection of animal species of Community interest under the Habitats Directive, Brussels 12.10.21.

NPWS (2019) The Status of EU Protected Habitats and Species in Ireland. National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin.

NPWS (2022) National Parks and Wildlife Service Metadata available online at <https://www.npws.ie/maps-and-data>

Office-of-the-Planning-Regulator (2021) Appropriate Assessment Screening for Development Management OPR Practice Note PN01. March 2021

Appendix A

FINDING OF NO SIGNIFICANT EFFECTS REPORT

Finding no significant effects report matrix

Name of project or plan

ADSIL Blanchardstown IE Licence

Name and location of the Natura 2000 site(s)

This exercise found that the nearest European site to the Project is the Rye Water Valley/Carton SAC (Site Code 001398), located over 9km to the southwest.

The Project is located within the hydrological catchment of the River Tolka, approximately 1km to the northeast of the River and in an industrial estate in northeast Dublin. A review of aerial photography, Ordnance Survey Ireland (OSI) mapping and OSI Geographical Information System (GIS) data for rivers and streams indicates that there are no notable surface water features onsite and no direct hydrological pathways to offsite surface water bodies.

There is no connectivity to any European sites within or outside the potential Zone of Influence.

Description of the project or plan

The Project consists of the operation of an Amazon Data Services Ireland Ltd. ("ADSIL") data storage facility (the subject 'installation' under this licence application), which is located in the Blanchardstown Industrial Park, Snugborough Road, Dublin 15, and situated 2km from the N3 Road and 2.5km from the M50. The Industrial Park is situated 9 km from Dublin City Centre.

Is the project or plan directly connected with or necessary to the management of the site(s)

No

Are there other projects or plans that together with the projects or plan being assessed could affect the site

A review of the National Planning Application Database was undertaken. The first stage of this review confirmed that there were no data outages in the area where the Project is located. The database was then queried for developments granted planning permission within 250m of the Project within the last three years, these are presented in the Table below.

Planning applications granted permission in the vicinity of the Project.

Planning Ref.	Description of development	Comments
FW19A/0089	Demolition of two existing light industrial / commercial buildings and clearance works (on a phased basis); Construction of two data storage facilities. Each of the two data storage facilities will accommodate data halls, associated electrical and mechanical plant rooms, loading bays, maintenance and storage space, office administration areas, water treatment rooms, and extract louvres and solar panels at roof level; Each of the proposed data storage facilities will have a gross floor area c. 28,699 sq.m (57,398 sq.m in total); Emergency generators (32 in total for both facilities), associated emission stacks Provision of an underground connection to the existing substation Construction of a two-storey office / administration building to the west of the two proposed data storage facilities with a gross floor area of c. 1,579 sq.m; Construction of internal road network, circulation	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.

Planning Ref.	Description of development	Comments
	areas and footpaths, provision of 160 no. car parking spaces and 60 no. cycle parking spaces; Hard and soft landscaping and planting, boundary treatments and security gates, bin storage, security hut, switchrooms, lighting, and all associated works including underground foul and storm water drainage network, attenuation area, and utility cables.	
FW19A/0147	Provision of a generator and air handling unit compound including 4 no stainless steel flues, all to the south-east corner (rear and side of existing building), and provision of 218 sq.m. internal mezzanine plant area within the existing structure, all required to provide critical technical support to Data Hall 3.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW19A/0161	The Project comprises of a container compound for the purposes of providing ancillary modular plant, electronic equipment and machinery space. The development comprises provision of 4 no. modular prefabricated containers.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW19A/0111	The Project comprises of a container compound for the purposes of providing ancillary modular plant, electronic equipment and machinery space. The development comprises provision of 2 no. modular prefabricated containers (stacked to form 2 no. storeys), associated access arrangements and staircases, a boundary fence enclosure around the Project with 4 no. access points, the relocation of an existing car parking space, the relocation of the existing bicycle parking, associated plant and all ancillary works.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW19A/0176	The proposal will consist of modifications to the development permitted under FW18A/0032 comprising the following 1) alterations to existing rotunda retained on site following demolition of Clyde House under FW17A/0205 2) modifications to the 3 permitted data halls to include electrical plant rooms 3) omission of permitted 1st floor link bridge across the data halls 4) alterations to permitted ancillary plant areas including a fuel pump room and tanks; water treatment tanks; sprinklers; treatment compounds and plant rooms across the site 5) reduction in location and extent of flue stacks across the site. The proposed modifications result in a reduced Gross External Area for the development from c.19,700m ² to c.13,700m ² . A 110kv substation located within the site to serve the development will be the subject of a separate Strategic Infrastructure Development application to AnBord Pleanála under section 182A of the Planning and Development Act 2000 (as amended)	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW20A/0019	Temporary development (5 year duration) consisting of the following; (a) hardstanding external car park for c.45 no. cars with vehicular access onto the Public Road (b) an external car wash bay (c) a steel clad commercial unit (c.287 sq.m.) for both internal parking/recovery and car valeting (d) a chemical WC cubicle for staff (e) advertising signage as erected (f) external lighting column and CCTV cameras and (g) connection to (e) advertising signage as erected (f) external lighting column and CCTV cameras and (g) connection to surface water network and all other associated siteworks.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW20A/0087	Construction of 3 no. data hall buildings with ancillary buildings. The single storey rotunda building will be retained and reconfigured from previously permitted under (Reg. Refs FW18A/0032 and FW19A/0176). The overall height of the data hall buildings ranges from c.5.7m to c.17.6m to roof level and c.14.4m to c.24.8m	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.

Planning Ref.	Description of development	Comments
	including the roof top plant. The Project includes the provision of a 2 storey generator building (c.1,990sqm) comprising 20 no. MV generators and generator rooms, loadbank and customer compound with 5 no. flues c.19m high; 2 no. transformers (c.88sqm each); skip compactor and bin store area(c.51sqm); fuel pump room (c.24sqm); 12 no. above ground fuel tanks (c.8.4m high) within a fuel compound; 7 no. water tanks (c.16m high); water treatment plant room (c.228sqm); 2 no. salt saturators (c.5.7m high); heat recovery plant room (c.49sqm); sprinkler pump room (c.32sqm) and 2 no. sprinkler tanks (c.13.6m high).The total gross floor area of the data halls, front of house and ancillary structures is c.25,225sqm. A proposed 110kv substation located to the south east of this site is subject of a separate Strategic Infrastructure Development application to An Bord Pleanála under section 182A of the Planning and Development Act 2000 (as amended).	
FW20A/0181	Permission for development comprising amendments to the development permitted under Reg Ref.: FW19A/0089, a ten-year permission. (a) Amendments to the permitted site layout plan, (b) Amendments to the two permitted data storage facilities, to include internal reconfiguration of the permitted buildings, (c) Amendments to permitted stair and lift cores, including the removal of one stair core and provision of two additional lift cores in each data storage facility building; (d) Associated amendments to the external facades and building envelopes of the two data storage facilities (including an increase in parapet height of 0.68 metres to both buildings); (e) Amendments to the permitted emergency generators, transformers, emission stacks, and plant adjacent to the two data storage facilities; (f) Amendments to the permitted office / administration building (g) Amendments to the permitted underground connection to the existing substation (permitted under Reg Ref: FW16A/0159) (h) Amendments to the phasing plan for the permitted development; (i) All associated amendments to hard landscaping and planting, boundary treatments and security gates, water storage tanks, bin storage, security hut, switchrooms, lighting, and all associated works including underground foul and storm water drainage network.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW20A/0109	Permission for amendments to previously approved Grant of Permission (Reg. FW19A/0147) at Keppel, Unit B10 IDA Business Park, Ballycoolin, Dublin 15 YN9K	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW20A/0154	Permission for development to consist of the erection of a new ESB Substation adjoining switch room and associated site development works to include the alteration of existing fence to accommodate the new substation.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW20A/0119	For amendments to previously approved Grant of Permission (Reg Ref F at Keppel Unit B10 Business Park, Ballycoolin Dublin 15 YN9K. The development consists of the enlargement of external mechanical compound to the Eastern elevation to accomodate reconfiguration of previously approved	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.

Planning Ref.	Description of development	Comments
	mechanical plant and minor changes to the compound elevations as a result of aforementioned amendments	
FW21A/0092	Permission for amendments to the development permitted under Reg. Ref.: FW19A/0089 (a ten year permission), as amended under Reg. Ref.: FW20A/0181. The proposed amendments comprise the alteration of the phasing of the development, to provide for the delivery of the entire southern data storage facility building within the first phase of the development, with the entire northern data storage facility building to form part of the second phase of development.	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.
FW21A/0073	The development will consist of revisions to parent permission FCC Reg. Ref. FW20A/0087 to include the following: Alterations to plant areas at second/third floor level of the permitted DB5x data hall (formerly known as Building No. 3. Removal of the permitted MV generator building and replacement with a proposed gas generator compound comprising 9 no. gas generators with 9 no associated flues 0.18m high; provision of 1 no. switchroom building comprising electrical rooms and a control station at ground floor level (c.478sqm at c.6m high) and air compressor (c.38sqm at C.4.5m high); reduction in the number of fuel tanks from 12 no. permitted fuel tanks to 6 no. proposed fuel tanks within a fuel compound and revisions to the permitted fuel pumphouse c.41sqm; Removal of the permitted skip compactor and bin store and provision of a proposed AGI Compound. Provision of 2 no. smaller transformers and load bank (c.29sqm); Relocation and revisions to the permitted heat recovery plant room (C.48sqm) and slight relocation of the permitted sprinkler pump room (c.32sqm). The total gross internal floor area of the development including data halls and ancillary structures is reduced to C.19,040 sqm from c.25,225 sqm under FCC Reg. Ref. FW20A/0087; All other development as permitted under FCC Reg. Ref. FW20A/0087; A permitted 110kv substation located to the south east of this site was subject of a separate Strategic Infrastructure Development application to An Bord Pleanála (ABP Ref. 307296-20) under section 182A of the Planning and Development Act 2000 (as amended).	There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.

The Fingal County Development Plan in complying with the requirements of the Habitats Directive requires that all Projects and Plans that could affect the Natura 2000 sites in the same potential Zone of Influence of the Project site would be initially screened for Appropriate Assessment and if requiring Stage 2 AA, that appropriate employable mitigation measures would be put in place to avoid, reduce or ameliorate negative impacts. In this way any, in-combination impacts with Plans or Projects for the Project area and surrounding townlands in which the Project site is located, would be avoided.

The listed developments have been granted permission in most cases with conditions relating to sustainable development by the consenting authority in compliance with the relevant Local Authority Development Plan and in compliance with the Local Authority requirement for regard to the Habitats Directive. The development cannot have received planning permission without having met the consenting authority requirement in this regard. There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.

There are no predicted in-combination effects given that the reasons discussed in the 'Comments' column of the Table above and given that the Project is unlikely to have any adverse effects on any European sites

Any new applications for the Project area will be assessed on a case by case basis *initially* by Fingal County Council which will determine the requirement for AA Screening as per the requirements of Article 6(3) of the Habitats Directive.

Other IE Licences are reviewed and tested by the EPA.

THE ASSESSMENT OF SIGNIFICANCE OF EFFECTS

Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 site.

On the basis of the information supplied, which is considered adequate to undertake a screening determination and having regard to:

- the intervening land uses and distance from European sites,
- all foul and surface water runoff from the operational facility is contained on site and discharged to urban drainage systems.

It may be concluded that the Project, 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.

Explain why these effects are not considered significant.

There are no predicted effects on any European sites given:

- The distance between the Project and any European Sites over 9km;
- There are no predicted emissions to air, water or the environment during the operational phase that would result in significant effects.

List of agencies consulted: provide contact name and telephone or e-mail address

N/A

Response to consultation

N/A.

DATA COLLECTED TO CARRY OUT THE ASSESSMENT

Who carried out the assessment

Moore Group Environmental Services.

Sources of data

NPWS database of designated sites at www.npws.ie

National Biodiversity Data Centre database <http://maps.biodiversityireland.ie>

Level of assessment completed

Desktop Assessment. Fieldwork was carried out as part of the EIA process.

Where can the full results of the assessment be accessed and viewed

EPA web portal.

OVERALL CONCLUSIONS

There are no predicted effects on any European sites given:

- The distance between the Project and any European Sites over 9km;
- There are no predicted emissions to air, water or the environment during the operational phase that would result in significant effects.

It has been objectively concluded by Moore Group Environmental Services that:

1. The Project is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.
2. The Project is unlikely to either directly or indirectly significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment.
3. The Project, alone or in combination with other projects, is not likely to have significant effects on the European sites considered in this assessment in view of their conservation objectives.
4. It is possible to conclude that significant effects can be excluded at the screening stage.

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

An appropriate assessment is not, therefore, required.

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