

# ENVIRONMENTAL IMPACT ASSESSMENT SCREENING REPORT

## DATA STORAGE FACILITY AT THE FORMER KINGSTON TECHNOLOGY BUILDING, IDA BLANCHARDSTOWN BUSINESS AND TECHNOLOGY PARK, BALLYCOOLIN ROAD AND SNUGBOROUGH ROAD, BLANCHARDSTOWN, DUBLIN 15

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Technical Report Prepared For

**Maris Developments**

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Our Reference

EN/18/10048R01

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Date of Issue

5 June 2018

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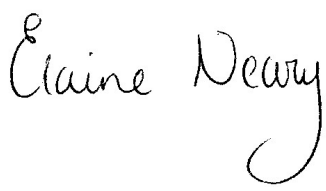

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**Document History**

Document Reference		Original Issue Date	
EN/18/10048R01		5 June 2018	
Revision Level	Revision Date	Description	Sections Affected

**Record of Approval**

Details	Written by	Approved by
Signature		
Name	Elaine Neary	Fergal Callaghan
Title	Principal Consultant	Director
Date	5 June 2018	5 June 2018

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## 1.0 INTRODUCTION

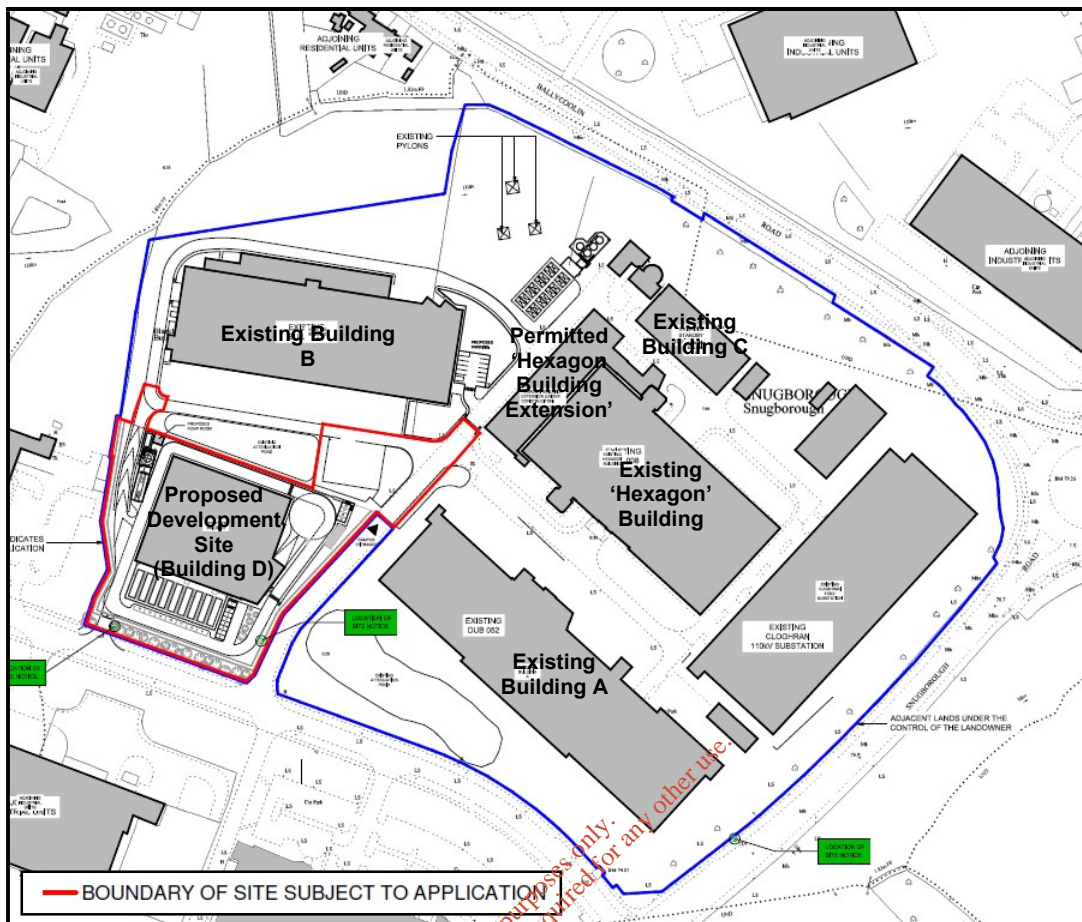
At the request of MCA Architects (MCA) and on behalf of Maris Developments (henceforth “the applicant”), AWN Consulting Ltd (AWN) has prepared the following Environmental Impact Assessment (EIA) Screening Report to accompany the planning application for development at the former Kingston Technology Building, IDA Blanchardstown Business and Technology Park, Ballycoolin Road and Snugborough Road, Blanchardstown, Dublin 15.

The proposed development will comprise the following:

- Demolition of an existing industrial building (c. 4000m<sup>2</sup>) on the subject site along with 2 no. existing ancillary structures, and all associated site clearance works;
- Construction of a new data storage facility (8,657m<sup>2</sup>) over two storeys (including a mezzanine level) with plant at roof level. The data storage facility building has parapet heights of 20.50m and 15.13m, with flues and lift overrun extending to a maximum overall height of 22.90m; the building will accommodate data storage rooms, electrical rooms, mechanical plant rooms, stair and lift cores, office administration areas, and staff facilities;
- Provision of emergency generators with associated flues within a fenced compound, diesel top-up tank and fuel piping;
- All associated site works including internal access road, new access to the adjacent site to the north, 19 no. car parking spaces, cycle parking, pump room (21.3m<sup>2</sup>), foul and storm water drainage, new boundary treatment, security fencing, lighting, underground cables, upgrading of existing transformers and landscaping.

The new data storage facility (herein referred to as Building D) will be accessed through the neighbouring data storage facility to the north (herein referred to as Building B) via the existing site entrance serving same. The proposed development will have an identical use to Building B and existing developments in Building A and the Hexagon Building. The proposed development has been designed to integrate with the existing neighbouring developments and form a unified campus with uniform boundary treatment, landscaping and complementary building design.

The location of the proposed development, the site boundary and the neighbouring buildings are presented in Figure 1.1 below.



**Figure 1.1** Site Location and Site Boundary (in red) (Source: MCA Architects, May 2018)

The proposed development will be operated by Amazon Data Services Ireland Ltd. (henceforth “the operator”).

As described in detail in Section 3.0 of this report, the proposed development is considered to be outside the mandatory requirements for EIA and is sub-threshold. A sub-threshold development may require an EIA where it is likely to have significant effects on the environment. This report has been prepared with the primary aim to provide sufficient information to the planning and environment departments of Fingal County Council (FCC) to allow them to determine potential EIA requirements for the project.

It is AWN’s opinion, based on the information provided in the following sections that the proposed development will not have a significant effect on the environment and therefore, an EIA report would not be required on a discretionary basis.

The screening process followed in this report is in accordance with the 2014 EIA Directive (2014/52/EU) and as per Section 3.2 of the Draft EPA “Guidelines on the Information to be contained in Environmental Impact Assessment Reports” (August 2017) and the Department of Housing, Planning, Community and Local Government’s “Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licencing Systems Key Issues Consultation Paper” (May 2017). The 2014 EIA Directive, the aforementioned Draft EPA Guidelines and Consultation Paper have been referenced in the absence of transposition of the 2014 EIA Directive into Irish law. The requirements are similar to those previously required under the “EIA Guidance for Consent Authorities regarding Sub-threshold Development” publication prepared by the Department of Environment, Heritage and Local Government (DoEHLG) in 2003.

Due regard has also been paid to the other EIA guidance in relation to content and methodologies involved in preparation of EIA including Draft EPA “*Advice Notes for preparing Environmental Impact Statements*” (September 2015) as well as the more recently published “*Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*” (2013).

### Screening Process

Screening describes the process of ascertaining whether a development requires an EIA by assessing the project in the context of the statutory mandatory thresholds and discretionary requirements for EIA.

The requirement for EIA for certain types and scales of development is set out in the EIA Directives (2003/35/EC, 2008/1/EC, 2011/92/EC and most recently 2014/52/EU) and given primary effect in Ireland by the European Communities (Environmental Impact Assessment) Regulations 1989-2006, Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001-2018. It should be noted that this Screening Report is prepared in accordance with the 2014 EIA Directive and the above Irish legislation in the absence of new Regulations to transpose the 2014 EIA Directive into Irish legislation. However, it is not considered that this will present an issue for the planning authority as we understand that the planning authority can screen out the need to conduct an EIA under either regime.

Article 27 of Directive 2014/52/EU states that “*The screening procedure should ensure that an environmental impact assessment is only required for projects likely to have significant effects on the environment*”.

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 and it is below the relevant threshold as set out in the Planning and Development Regulations 2001-2018 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. (Refer to Section 3.0).

This Screening Report is therefore presented for the sub-threshold development to show that the proposed development is not likely to have a significant effect on the environment.

## **1.1 Contributors to the EIA Screening Report**

The preparation and co-ordination of this EIA Screening Report has been completed by Dr. Fergal Callaghan and Elaine Neary of AWN Consulting in conjunction with input from specialist subcontractors.

Dr. Fergal Callaghan has a B.Sc. (Industrial Biochemistry) and Ph.D. Chemical Engineering (Waste and Wastewater Treatment), is a full member of the Chartered Institute of Waste Management (CIWM), associate member of The Institution of Chemical Engineers (AMICHE), member of the Environmental Protection Subject Group, IChemE, graduate member of The Chartered Institute of Water and Environmental Management, a member of the IChemE Water Group, a member of

the International Water Association (IWA) and a member of the European Water Association. He has over 24 years' engineering and consultancy experience in the Irish, UK and European environmental industry.

Elaine Neary has a BA (Natural Sciences), MAppSc. (Environmental Science) and is a Chartered Member of the Institute of Waste Management (MCWIM). She is an Associate in AWN and has over 14 years' experience in environmental consultancy with extensive experience in Environmental Impact Assessment and EPA IED/IPPC and Waste Licence Application and Co-Ordination. She has project managed, coordinated and prepared specialist inputs for numerous EIS/EIA's.

## 2.0 DESCRIPTION OF THE DEVELOPMENT

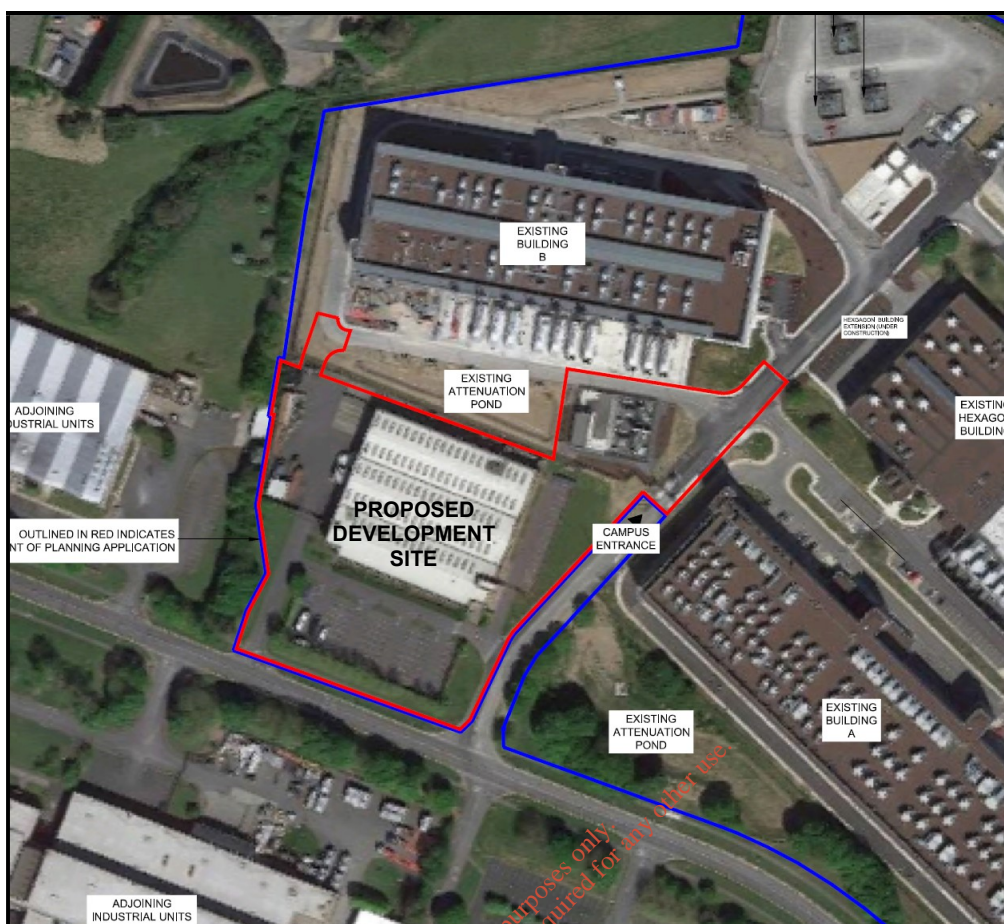
### 2.1 Existing Development

The proposed development site is the former Kingston Technology Building in the IDA Blanchardstown Business and Technology Park, Ballycoolin Road and Snugborough Road, Blanchardstown, Dublin 15. The proposed development site is c. 1.6 ha in extent. The area for the overall campus, including the proposed development site is c. 12.9 ha.

The land immediately surrounding the site (<500m radius) is predominantly industrial (consisting of different manufacturing and logistic facilities) and some sparse pockets of undeveloped land, with the exception of some residential dwellings c. 220m to the north west along Ballycoolin Road, residential dwellings to the south-east of the site along Ballycoolin Road, to the south of the site within the Westway and Sheephill estates and to the west of the site along Blanchardstown Road North. The location of the site and the neighbouring buildings are presented in Figure 1.1.

The site is currently occupied by an industrial building (c. 4,000m<sup>2</sup>), two ancillary structures (c. 50m<sup>2</sup> and 30m<sup>2</sup>) and hard standing areas, parking and areas of open space. The main building consists of warehouse/distribution area, offices, meeting rooms, a canteen and staff facilities. The existing development on the site is illustrated in Figure 2.1.





**Figure 2.1** Existing Development showing proposed Site Boundary (in red) (Source: MCA Architects, May 2018)

It is proposed to demolish the existing building and ancillary structures and carry out all associated site clearance works to facilitate redevelopment of the site.

## 2.2 Proposed Development

The proposed development will comprise the following:

- Demolition of an existing industrial building (c. 4000m<sup>2</sup>) on the subject site along with 2 no. existing ancillary structures, and all associated site clearance works;
- Construction of a new data storage facility (8,657m<sup>2</sup>) over two storeys (including a mezzanine level) with plant at roof level. The data storage facility building has parapet heights of 20.50m and 15.13m, with flues and lift overrun extending to a maximum overall height of 22.90m; the building will accommodate data storage rooms, electrical rooms, mechanical plant rooms, stair and lift cores, office administration areas, and staff facilities;
- Provision of emergency generators with associated flues within a fenced compound, diesel top-up tank and fuel piping;
- All associated site works including internal access road, new access to the adjacent site to the north, 19 no. car parking spaces, cycle parking, pump room (21.3m<sup>2</sup>), foul and storm water drainage, new boundary treatment, security fencing, lighting, underground cables, upgrading of existing transformers and landscaping.

Visually the appearance of the proposed data storage facility is intended to complement the neighbouring buildings. Details on the visual treatment of the



proposed building are provided in the Architectural report and landscape plan that accompanies the planning application.

As detailed in Section 1.0, the proposed development will be accessed through the neighbouring Building B to the north via the existing site entrance serving same. The proposed site layout plan is illustrated in Figure 2.2.

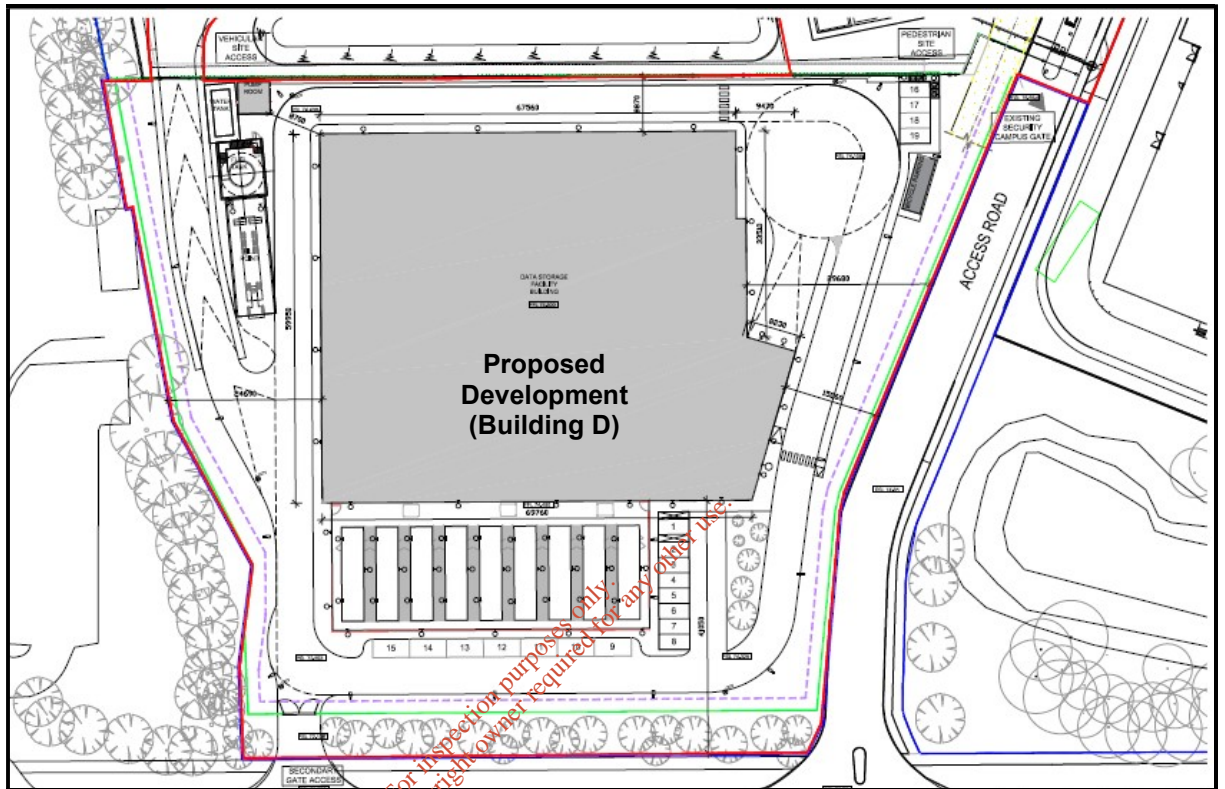


Figure 2.2 Proposed Site Layout Plan (Source: MCA Architects, June 2018)

## 2.3 Planning Context

A planning report has been prepared by John Spain Associates (JSA) and accompanies this application. The following sections present a brief summary of the planning context of the proposed development with particular regard to environmental aspects.

### 2.3.1 National Planning Framework

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development in Ireland to 2040. It contains policies which are supportive of the development of ICT infrastructure, with particular reference made to data centres.

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 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 NPF further 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 centres. 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.”*

As concluded in the planning report which accompanies this application, 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 in accordance with this key body of national planning policy.

### 2.3.2 Regional Planning Policy

The Planning and Development Acts 2000-2017 required that all Regional Authorities shall at the direction of the Minister make Regional Planning Guidelines. There are eight Regional Authorities in Ireland, which were set up in 1994 under the Local Government Act 1991 (Regional Authorities) Establishment Order 1993.

The current Regional Planning Guidelines were made by the Dublin Regional Authority during 2010. The Dublin region covers Greater Dublin including Dublin City Council, Dun Laoghaire Rathdown County Council, Fingal County Council and South Dublin County Council as well as Meath County Council, Kildare County Council and Wicklow County Council. The lifetime of this plan is between 2010 and 2022.

By 2022 the Greater Dublin Area (GDA) is targeted to be a vibrant, active and sustainable international Gateway region with strong connectivity across the entire GDA region, nationally and worldwide. The city and its environs are targeted in the guidelines to grow by 103,000 persons up to 2022. This represents a significant population growth of 7.5% on 2016.

Other items of note from the Regional Planning Guidelines 2010-2022 report include;

- Employment within the Dublin region is expected to continue to increase and the importance of the recent rapid increase in the ICT sector to sustaining that growth is recognised.
- The potential impact of the improved transport and utilities infrastructure on the region.

Blanchardstown is designated as a ‘Level 2 – Major Town Centre and County Town Centres’ and is identified, along with Swords, Sandyford and Tallaght as drivers with the core of the GDA for sustained international and regional economic development and growth.

### 2.3.3 Fingal County Council Policy

Similarly, the recently enacted *Fingal County Development Plan 2017-2023* identifies the importance of foreign direct investment.

In the document, Blanchardstown is identified as one of the largest urban centres in the County. It is classed as a Metropolitan Consolidation Town, which performs the role of one of County’s primary development centres.

The Plan states that strategic policy will seek to encourage infill development and intensification of development within appropriate locations in Blanchardstown and

promote enterprise and employment particularly in the growth centres such as Blanchardstown.

The proposed development is to be located within an area zoned 'Objective HT' (High Technology) with the aim to;

*'Provide for office, research and development and high technology/high technology manufacturing type employment in a high quality built and landscaped environment'*

Objective ED95 of the Plan in relation to this land use zoning states the objective to;

*"Encourage the development of corporate offices and knowledge based enterprise in the County on High Technology zoned lands and work with key stakeholders, relevant agencies and sectoral representatives to achieve such development"*

Economic Development Objectives of note for the proposed development included within the plan include Objective ED110:

*"Proactively respond to the needs of enterprises undertaking pharmaceutical, data centre, food production and logistics activities that require bespoke building facilities to meet their specific manufacturing requirements."*

#### 2.3.4 Planning Summary

The proposed development is located on suitably zoned lands in an industrial area to the north of Blanchardstown town centre. The proposed use is consistent with the existing neighbouring buildings and will integrate with these facilities both visually and functionally. The proposed development will sustain the land use, while minimising transport demand and adding to the overall sustainability of the site.

#### 2.3.5 Planning Permissions

As part of the assessment of the proposed development, account has been taken of planned developments in the area, as well as existing local land uses.

The FCC Planning Department website was consulted in order to generate a list of granted planning permissions from the surrounding areas of the proposed development within the previous 5 years. Table 2.1 below presents a list of notable applications granted permission within that period.

FCC Planning Application Reference No.	Summary Description of Development as per FCC Planning File	Location of Development	Decision Date
FW13A/0067	Permission for a development that will consist of a new 2-storey building for use as electrical rooms for electronic operations, mechanical plant rooms, a double vehicle loading bay, ancillary workshops, and including within the building office and staff facilities, part at mezzanine level over ground floor level. Total plan area 20,995 sq.m. This will include external roof top air handling units with associated visual screening.	Hexagon Building, IDA Blanchardstown Business, and Technology Park, Snugborough Road, Blanchardstown, Dublin 15	August 12, 2013
FW13A/0139	Permission for the change of use, increase in internal area and modifications to the existing Block B and Link Building at the Aurora site, Ballycoolin Business Park, Ballycoolin Road, Dublin 15. The proposed development will consist of the change of use of 4,000 m2 of existing production facility space to high technology office use, 665m2 of additional first floor area within the main high bay area will be provided. The link building area will be reduced by 182m2. The increased floor area and modifications are comprised of: Provision of additional general office space on a new first floor mezzanine of 2,555 m2 located in the previous production hall area. The total floor area of the modified buildings ( Block B and Link Building ) will be 8,698 m2 (GIA).	Block B and Link Building at the, Aurora Site, Ballycoolin Business Park, Ballycoolin Road, Dublin 15	February 17, 2014
FW15A/0096	Permission for the modification to the North elevation of the existing Block B	Block B, Aurora Site, Ballycoolin Business Park, Ballycoolin Road, Dublin 15	August 26, 2015
FW15A/0115	The construction of a new two storey Pharmaceutical manufacturing building (Gross Floor Area 2,187m <sup>2</sup> ), external steel stairs, single storey enclosed electrical plant room (Gross Floor Area 25.4m <sup>2</sup> ), Erection of a new sign and logo (5.28m <sup>2</sup> ) over existing office entrance. And all ancillary and associated site development works. Retention of an existing single storey temporary office building (Gross floor area 85.2m <sup>2</sup> ), for a period of 5 years. Retention of an existing single storey contractors compound (site area 1,616m <sup>2</sup> ), for a period of 5 years. (Planning Permission Ref FW09a/0090 refers). And all ancillary and associated site development works.	Blanchardstown Industrial Park, Snugborough Road, Blanchardstown, Dublin 15	October 12, 2015
FW15A/0135	Permission for a new 2-storey building for use as electrical rooms for electronic operations, together with mechanical plant rooms, a double vehicle loading bay and ancillary workshops.	Hexagon Building, IDA Blanchardstown Busines & Technology Park, Snugborough Road, Blanchardstown, Dublin 15	November 30, 2015

FW15A/0117	Permission for development at this site. Full planning permission on a 4.12 hectare site comprising an existing building formerly occupied by Creative Labs Ireland. The proposed development comprises of the change of use of floor-space part single part two storey building from light industrial warehouse use with ancillary office to use as a data centre with ancillary office.	Site formerly Creative Labs Ireland, Ballycoolin Industrial Estate, Ballycoolin, Blanchardstown, Dublin 15	December 14, 2015
FW17A/0031	The development will comprise modifications to the existing building as permitted for a change of use to data centre under FCC Ref. FW15A/0117	Unit 1, Block 4B, IDA Business Park, Ballycoolin, Dublin 15	May 2, 2017
FW17A/0034	The development will consist of a single storey extension of 1,111 sq.m. to the north elevation to the previously granted planning application No. FW15A/0135	The Hexagon Building, IDA Blanchardstown Business & Technology Park, Snugborough Road, Blanchardstown, Dublin 15	May 9, 2017
FW17A/0044	The development will consist of upgrade of existing boundary railings and palisade fence by increasing the height of the existing fencing and railings by 0.7 meters to the site boundary.	DUB 8-57, IDA, Blanchardstown Business & Technology Park, Snugborough Road, Blanchardstown, Dublin 15	May 19, 2017
FW17A/0064	The construction of a new process vent abatement plant	Ipsen Manufacturing, Blanchardstown Industrial Park, Blanchardstown, Dublin 15.	June 14, 2017
FW17A/0094	Retention of a) 2 no. generator compounds, b) boundary fencing, c) relocated internal access gate.	Unit B10, IDA Business Park, Ballycoolin, Dublin 15	July 18, 2017
FW17A/0140	To erect a 155sqm extension Wonderfoods facility, for the storage preparing and a 608sqm extension to the rear of the existing Wonderfoods facility, for the storage preparing and packing and distribution	IDA Business & Technology Park, Snugborough Road, Blanchardstown, Dublin 15	November 9, 2017
FW17A/0168	The separation into two buildings of Clyde House to form Clyde House 1 and Clyde House 2. The separation will consist of the demolition of the current link between gridlines Q and R and the construction of external walls to both buildings creating a separation of approximately 8.3m between buildings. There will be demolition of part of a plant enclosure within the yard on the western side of the building and the demolition of a single storey kitchen extension attached to the existing canteen. There will be provision of Fire Brigade access between the two buildings and a small reorganisation of car parking spaces to the north of Clyde House 2 and all associated site works	Clyde House, Blanchardstown Business & Technology Park, Blanchardstown, Dublin 15	November 24, 2017



FW17A/0205	The demolition of the southern section of Clyde House (c. 8,384m <sup>2</sup> ) once separated from Clyde House 2 as proposed under current planning application Reg. Ref. FW17A/0168 2) provision of a 2.4m high security fence and 1.5m high berm with plating to the eastern boundary of the Clyde House 1 site 3) associated site clearance works.	Clyde House, Blanchardstown Business & Technology Park, Blanchardstown, Dublin 15	January 12, 2018
FW17A/0237	1. The proposed extension of the existing 'Hexagon' data storage facility, with a GFA of 4,055sq.m. over two storeys with plant at roof level, and including an additional plant area at roof level of the existing Hexagon Building. The extension will have a maximum overall height of c.24 metres and will accommodate data storage rooms at ground and first floor levels, electrical room and generator transformers at first floor levels, and stair and lift cores; 2. An entrance lobby extension (GFA of 5.5sq.m.) to existing Building C (generator building); 3. The provision of 4 no. emergency generators with associated flues within a new palisade fenced compound to the north of Building C (generator building); 4. The provision of 40 no. car parking spaces to the northeast of the Hexagon Building and adjacent to Building C (in place of 39 no. spaces to be removed to accommodate the proposed extension) and the provision of 2 no. disabled spaces to the south of the Hexagon Building; 5. All associated site works including drainage, lighting, alteration to attenuation areas to the south of the Hexagon Building to cater for the proposed development, and utility cables.	IDA Business & Technology Park, Snugborough Road, Blanchardstown, Dublin 15	February 21, 2018

**Table 2.1** Recent Planning Permissions (Planning search conducted by AWN on 30<sup>th</sup> April 2018)

### 3.0 REQUIREMENT FOR ANEIA

The following sections are intended to demonstrate that the proposed development does not require an EIA.

There are four steps in determining need for EIA for projects which are set out below. Should any of the answers to steps 1, 2 or 4 be positive, then an EIA is required for the project and an EIAR should be prepared.

#### 1A. Is the Project an Annex I or Annex II Project as prescribed in the EIA Directives (2003/35/EC, 2008/1/EC, 2011/92/EC and most recently 2014/52/EU)?

The proposed development entails a planning application for a data storage facility adjacent to an existing data storage facility campus. The project is not listed under Annex I of the EIA Directive as prescribed in the EIA Directives (2003/35/EC, 2008/1/EC, 2011/92/EC and 2014/52/EU). The thresholds for Annex II projects are set out in the Planning and Development Regulations 2001-2018. The proposed development site area of c. 1.6 ha. does not exceed the Part 2, Class 10a threshold (from Planning and Development Regulations 2001-2018 *Schedule 5*) of "Industrial estate development projects, where the area would exceed 15 hectares". It is considered that 'industrial estate development projects' is the most relevant threshold in the context of the proposed development in the subject location. Furthermore, the

cumulative site area for the overall campus, including the proposed development site, of c. 12.9 ha. is also below this threshold.

### **1B. Is the project likely to have a significant effect on a Natura 2000 site?**

A Screening Study for Appropriate Assessment has been completed and is included in Appendix 1 of this report.

There are a limited number of ecologically designated sites within 15km of the proposed development however the proposal entails no significant emissions.

It is concluded that the proposed development, either alone or in combination with other plans or projects, is not likely to have significant effects on any Natura 2000 sites as a result of the construction or operation of the proposed development (as detailed in the Screening Study for Appropriate Assessment enclosed as Appendix 1).

### **2. Is the project on a mandatory list for which EIA is always required?**

Ireland's list of projects for which an EIA is required are set out in the Planning and Development Regulations 2001-2018. This list was developed from Annex I and Annex II of the EIA Directives. The activity is not listed under Annex I of the EIA Directives and does not exceed the thresholds set out in the Planning and Development Regulations 2001-2018 for Annex II projects.

### **3. Is the project on an exclusion list of projects for which EIA is not required?**

Schedule 2 Part 1 of the Planning and Development Regulations 2001-2018 sets out a number of projects which are considered exempted development however there is no formal exclusion list for projects which do not require an EIA. The overriding consideration of the EIA directive is to ensure that projects likely to have significant effects on the environment by virtue, inter alia, of their nature, size or location should be subject to EIA. Please refer to question 4 below for details on Sub-threshold Development.

### **4. Is the Project likely to have significant effects on the environment?**

On the basis of the information above, the proposed development is considered to be outside the mandatory requirements for EIA and sub-threshold for relevant development. The final step in the screening process is to determine the need for an EIA on a discretionary basis.

This is dependent on the sensitivity of the environment and where the project is likely to have significant effects, Article 4(4) of Directive 2014/52/EU requires the developer to provide information on the characteristics of the project and its likely significant effects on the environment, to allow the competent authorities to make a determination on the requirement for an EIA. This information as set out in Schedule 7 of the Planning and Development Regulations 2001-2018 is:

- Characteristics of Proposed Development:
  - Size of the Proposed Development
  - Cumulation with Other Proposed Developments
  - Nature of any associated Demolition Works
  - Use of Natural Resources
  - Production of Waste
  - Pollution and Nuisances

- Risk of Accidents, having regard to substances or technologies used
- Location of Proposed Development:
  - Existing land use
  - Relative abundance, quality and regenerative capacity of natural resources in the area;
  - Absorption capacity of the natural environment, paying particular attention to the following areas;
    - Wetlands, Coastal Zones, Mountain and Forest Areas, Nature Reserves and parks, Areas classified or protected under legislation including special protection areas, designated pursuant to Directives 79/409/EEC and 92/43/EEC, areas in which environmental quality standards laid down in legislation of the EU have already been exceeded, densely populated areas, landscapes and sites of historical, cultural or archaeological significance.
- Characteristics of the Potential Impacts:
  - The extent of the impact (geographical area and size of the affected population)
  - Trans frontier nature of the impact
  - Magnitude and Complexity of the impact
  - Probability of the Impact
  - Duration, Frequency and Reversibility of the Impact

In addition, Annex II.A of the 2014 EIA Directive states the following information should be provided by the developer for projects listed in Annex II of the Directive:

- A description of the project, including in particular:
  - A description of the physical characteristics of the whole project and, where relevant, of demolition works;
  - A description of the location of the project, with particular regard to the environmental sensitivity of geographical areas likely to be affected.
- A description of the aspects of the environment likely to be significantly affected by the project.
- A description of any likely significant effects, to the extent of the information available on such effects, of the project on the environment resulting from:
  - The expected residues and emissions and the production of waste, where relevant;
  - The use of natural resources, in particular soil, land, water and biodiversity.

The following sections (Sections 4.0, 5.0, 6.0 and 7.0 of this document) will address these requirements and assess whether the proposed development will result in likely significant effects and thereby confirming whether an EIA is required.

## 4.0 CHARACTERISTICS OF THE PROPOSED DEVELOPMENT

### 4.1 Size and Design of the Proposed Development

As detailed in Section 1.0, the proposed development will include the demolition of an existing industrial building (c. 4,000m<sup>2</sup>) along with two ancillary structures (50m<sup>2</sup> and 30m<sup>2</sup>) and all associated site clearance works and construction of a new data storage facility (8,657m<sup>2</sup>) over two storeys (including a mezzanine level) with plant at roof level. The data storage facility building has parapet heights of 20.5m and 15.13m, with flues and lift overrun extending to a maximum overall height of 22.9m. The flues for each of the back-up generators will be 22m high and they will be in groups of 3. The total site area is c. 1.6 ha.

The building has been designed to minimise the impact on the site and to complement the neighbouring buildings. Please refer to Section 7.8 for assessment of significance of landscape and visual impact.

It is considered that there are no likely significant effects associated with the size and design of the proposed development.

#### **4.2 Cumulation with Other Existing and/or Approved Developments**

The proposed development will be located on an existing developed industrial site within a predominantly industrial/commercial area. A list of recently permitted developments is provided in Table 2.1. The potential cumulative impact of the proposed development with these external developments has been considered in this assessment.

The only potentially significant emissions from the operation of the proposed development will be air and noise emissions. The potential impact of the air emissions from the site and the cumulative impact with neighbouring developments has been thoroughly assessed as set out in the Air Impact Assessment Report (included as Appendix 2) and it is concluded in the report, based on conservative assumptions, that the proposed development will not result in any off-site exceedance of the relevant air quality standards (refer to Section 7.6 for further detail). The potential impact of noise emissions from the proposed development and the cumulative impact with adjoining and neighbouring developments has been modelled and assessed as detailed in the Noise Assessment Report (included as Appendix 3). The Noise Assessment Report concludes that the proposed development will comply with the relevant noise criteria for the campus.

With regard to the other environmental aspects, each project currently permitted (as per the projects listed in Table 2.1) is subject to EIA and/or planning conditions which include appropriate mitigation measures to minimise environmental impacts. As long as mitigation measures for other developments are implemented as permitted, there will be no significant cumulative effects.

#### **4.3 Nature of any associated Demolition Works**

As detailed in Section 2.1, it is proposed to demolish the existing industrial building (c. 4,000m<sup>2</sup>) along with two ancillary structures (c. 50m<sup>2</sup> and 30m<sup>2</sup>) and carry out all associated site clearance to facilitate redevelopment of the site.

The existing building was originally built in the 1990's and consists of warehouse/distribution area, offices, meeting rooms, a canteen and staff facilities.

Site clearance will include removal of foundations, hardstanding area, parking areas and levelling of the site.

An Outline Demolition Plan has been prepared by the project engineers, O'Connor Sutton Cronin Consulting Engineers (OCSC), and accompanies the planning application. The Outline Demolition Plan outlines the procedures for demolishing the existing structures on site in accordance with best practice. A Construction and Demolition (C&D) Waste Management Plan, prepared by AWN, also accompanies the planning application. The C&D Waste Management Plan provides the information necessary to ensure that the management of C&D waste at the site is undertaken in accordance with the current legal and industry standards while maximising

prevention, reuse, recycling and recovery of waste with diversion from landfill, wherever possible.

#### 4.4 Use of Natural Resources (Land, Soil, Water, Biodiversity)

The construction of the proposed development will not use significant quantities of natural resources.

The subject site is an existing industrial site. As detailed in Sections 2.1 and 4.3, it is proposed that the demolition and removal of the existing building, ancillary structures, hard standing areas and site clearance works will be carried out to facilitate re-development of the site. The re-use of the existing building was considered but it was determined that it would not be feasible to re-use it for the proposed development. It is estimated that c. 6,000 tonnes of demolition waste will be generated. It will be segregated at source and reused offsite where practical. Where offsite reuse is not an option, the material will be recycled and/or recovered where feasible. Beneficial reuse of the demolition waste offsite may replace the use of virgin materials on another site.

Excavations will be required to facilitate construction. It is estimated that c. 11,000m<sup>3</sup> of surplus excavated material will require removal off-site. This material will be reused off site where possible.

During construction, all construction materials will be sourced from local suppliers including the c. 600m<sup>3</sup> of engineering grade fill material required, where possible, to minimise the impact of natural resources used in the transportation of materials.

The site is currently dominated by the existing industrial building, ancillary structures and surrounding hardstanding areas. This is referred to as habitat type *Buildings and artificial surfaces (BL3)*. This habitat type is considered as being of low to no ecological value. It is proposed that these buildings and artificial surfaces will be demolished/removed to facilitate redevelopment of the site. There are currently some shrubs along the site boundary and small grassed areas which are considered of low local ecological value. There are also trees along the southern boundary. The trees, shrubs and grassed areas will require removal but it is proposed to compensate for this loss through provision of on-street trees (such as silver birch) closer to the southern boundary as shown on the drawings. (Refer to the landscape plan that accompanies planning application).

Operationally the proposed development requires nominal water resources. The estimated peak daily water demand is c. 0.73 litres per second (l/s). The peak daily water demand agreed with Irish Water for the campus is 5.75 l/s. No increase in peak water demand is required for this proposed development. There is an existing water main on the site which will be upgraded and re-laid to suit the proposed site layout with new connection points within the site boundary. A new connection to the mains will not be required. Further detail is provided in the *Engineering Planning Report*, prepared by OCSC which accompanies the planning application.

Some civil works will be required to provide fibre connectivity from the existing fibre network located within the IDA business and technology park road.

The proposed development will have a maximum operational electrical demand of 12MW, with an overall maximum operational demand for the campus of 65.4MW. The power requirements for the proposed development will be provided via a connection to an existing MV substation and upgraded MV transformer in the north



east corner of the site and grid connection to the existing campus. No additional external grid connections are required to facilitate the proposed development.

In the event of a loss of power supply to the site (i.e. temporary grid blackout) diesel powered back-up generators will be activated at the facility. These generators are designed to automatically activate and provide power to the plant pending restoration of mains power. (An uninterruptible power source is also provided for the short-term transition from mains power to diesel generators). Based on the operator's experience, the back-up generators will rarely be used.

An Energy Statement, prepared by Ethos Engineering, has been submitted with the planning application documents which details the sustainable energy measures which have been considered and incorporated into the design of the proposed development.

It is considered that there are no likely significant effects associated with the use of natural resources.

#### **4.5 Production of Waste**

Waste produced during the demolition, site clearance and construction phases of the proposed development will be managed in accordance with a site-specific C&D Waste Management Plan (included with the planning application submission). This will ensure waste prevention, where feasible, and high levels of reuse, recovery and recycling of construction wastes arising.

C&D waste arising will be segregated at source where practical and transferred off site for reuse, recycling and recovery, with landfill disposal only to be used where there are no available reuse, recycling or recover options. Site clearance will require removal of topsoil, made ground and subsoil. The estimated volume of material to be excavated is c. 11,000m<sup>3</sup> (as advised by OCSC). Suitable clean inert material will be reused on site where possible. However, it is anticipated that there will be limited opportunities for reuse of material on site. Surplus excavated material will be transferred offsite for reuse, where possible. If beneficial reuse is not feasible, the material will be recovered, where possible.

Once operational, the proposed development will not generate significant quantities of wastes. The anticipated wastes during operations will be general non-hazardous waste and packaging waste (from staff at offices/canteen etc.), WEEE, empty containers, waste lubricant oil, waste batteries from the battery room, air filters and landscaping waste. Please refer to Section 7.11.

It is considered that there are no likely significant effects associated with the production of waste from the proposed development.

#### **4.6 Pollution and Nuisances**

Potential short-term nuisances (such as dust and noise etc.) associated with the demolition and construction phases and proposed mitigation measures to address them are outlined in the relevant sub-sections of Section 7.0 and are described in more detail in the Air Impact Assessment Report (included as Appendix 2) and Noise Assessment Report (included as Appendix 3).

Air and noise are the only potentially significant emissions from the operation of the proposed development. Air dispersion modelling was undertaken to assess the impact of the air emissions with reference to human health criteria and has taken into

account the cumulative impact with neighbouring data storage facilities. The assessment concluded, based on conservative assumptions, that the proposed development will not result in any off-site exceedance of the relevant ambient air quality standards (Refer to Section 7.6). The noise assessment carried out concluded that the noise emissions from the facility will be in compliance with the relevant noise criteria. (Refer to Section 7.7). In addition to meeting these criteria, the design will ensure that nuisance noise is avoided.

The potential for soil and/or water pollution during the operation phase is addressed in relevant sub-sections of Section 7.0 and mitigation measures are proposed to ensure that there are no significant effects on the environment.

Therefore, it is considered that the development will not result in significant pollution or nuisances.

#### **4.7 Risk of Major Accidents and/or Disasters**

The use of diesel in emergency generators does present potential risk in the event of a fire, leak or other loss of containment, however diesel is in daily use at industrial sites and businesses throughout Ireland and the proposed use presents no significant additional risk. It is considered that any additional fire risk from the use of diesel will be dealt with as part of the fire certification process for the proposed development.

It is considered that there are no likely significant effects associated with the risks of major accidents and/or disasters from the proposed development.

#### **4.8 Risks to Human Health**

The potential for impacts on human health is addressed in Section 7.1. It is concluded in Section 7.1 that the proposed development will result in no significant impacts on human health.

### **5.0 LOCATION OF THE PROPOSED DEVELOPMENT**

#### **5.1 Existing and Approved Land Use**

The proposed development is located adjacent to three existing data storage facilities in an established industrial area. It is considered that the proposed development is consistent with the existing land uses and the wider industrial/commercial land uses in the surrounding area. There are a number of existing data storage facilities adjoining the proposed development site.

#### **5.2 Relative Abundance, Availability, Quality and Regenerative Capacity of Natural Resources in the Area and its Underground**

As outlined in Section 4.3 above, the proposed development does not require significant additional natural resources. The main natural resources that will be utilised are summarised in Section 4.3.

It has been confirmed that there is sufficient power available via existing power connections to the existing campus. There are no likely significant effects as a consequence of the availability of sufficient power.

### **5.3 Absorption Capacity of the Natural Environment**

Each of the sub sections in Section 7.0 below addresses the sensitivity of the existing environment and thereby the absorptive capacity of the natural environment to the potential emissions and nuisances generated by the proposed development. Please refer to Section 7.0.

## **6.0 TYPE AND CHARACTERISTICS OF THE POTENTIAL IMPACT**

### **6.1 Magnitude and Spatial Extent of the Impact (including geographical area and size of the population likely to be affected)**

The proposed development will generate few emissions which will include noise emissions, emissions to air, surface water runoff from roofs and hardstanding areas and foul water discharges from welfare facilities. The only notable emissions will be additional air emissions from the emergency generators and noise emissions from the generators and other plant. The impact on air quality has been assessed and it was determined that there will be no exceedances of the relevant air quality standards as a result of the proposed development. The impact of noise has been assessed and the proposed development will comply with the relevant noise criteria. Therefore, there will be no significant impact on the surrounding area, environment or the population.

Any construction impacts will be minimised by adhering to best practice construction methods and a Construction Environmental Management Plan (CEMP).

### **6.2 Nature of the Impact**

The nature of the potential impacts are discussed for each environmental aspect in Section 7.0.

### **6.3 Transboundary Nature of the Impact**

The proposed development will generate air emissions which will be dispersed locally (See AWN Air Impact Assessment Report in Appendix 2). The air emissions will not result in any off-site exceedance of the relevant ambient air quality standards. There is no potential for transboundary impact and no significant effects.

### **6.4 Intensity and Complexity of the Impact**

The proposed development will generate air and noise emissions which comply with the relevant air quality standards and noise criteria. There will be no significant impact on the surrounding area, environment or the population.

### **6.5 Probability of the Impact**

There is no likelihood of significant effects on the surrounding area, environment or the population.

### **6.6 Expected Onset, Duration, Frequency and Reversibility of the Impact**

The lifetime of the facility is not defined however it is anticipated that the facility will continue to operate within the prevailing best practice limits in terms of potential nuisance generation to ensure no significant impact on sensitive receptors.

Upon closure of the facility there will be no long-term impact arising from impacts associated with the proposed development i.e. all impacts arising are anticipated to be reversible.

## **6.7 Cumulation of the Impact with Other Existing and/or Approved Developments**

As detailed in Section 4.2, the only potential significant emissions from the operation of the proposed development will be air and noise emissions. The impact of the air emissions from the site and the cumulative impact with other developments has been thoroughly assessed in the Air Impact Assessment Report (included as Appendix 2) and it was concluded, based on conservative assumptions, that the proposed development will not result in any off-site exceedance of the relevant air quality standards (Ref. to Section 7.6 for further detail). The Noise Assessment Report concludes that the proposed development will comply with the relevant noise criteria (Ref. to Section 7.7 for further detail).

## **6.8 The Possibility of Effectively Reducing the Impact**

As stated in Section 6.1, any construction impacts will be effectively reduced by adhering to best practice construction methods and a Construction Environmental Management Plan (CEMP).

As previously stated, the only potential significant emissions from the operation of the proposed development will be air and noise emissions. Measures incorporated into the design of the proposed development to effectively reduce the potential impact on air quality include selecting an adequate height for the flues for the proposed back-up generators to aid dispersion of the emissions and achieve compliance with the EU ambient air quality standards at all off-site locations (Ref. to Section 7.6 and Appendix 2 for further detail). Measures to mitigate noise emissions from the site include selection and design of any proposed plant to ensure compliance with the relevant noise criteria (Ref. to Section 7.7 and Appendix 3 for further detail).

## **7.0 ENVIRONMENTAL SENSITIVITY AND IMPACT OF THE PROPOSED DEVELOPMENT**

### **7.1 Population / Human Health**

The subject site is located in the IDA Blanchardstown Business and Technology Park in Blanchardstown within an established industrial area to the north of Blanchardstown town centre.

A wide variety of industrial units are located around the site. Building A is located to the south east, Building B is located to the north and the Hexagon Building is located to the north east. An extension to the Hexagon Building was granted planning permission in February 2018. Other neighbouring industrial uses include Luzern Technology Solutions (eCommerce technology and services provider), The Jelly Bean Factory (food manufacturer), Ipsen Manufacturing Ireland Ltd. (pharmaceutical company), IBM Ireland, Veritas Technologies LLC, eBay, InnaLabs and Safety Solutions.

The nearest residential locations are located c. 220m to the north west along Ballycoolin Road. There are other residential dwellings to the south-east of the site along Ballycoolin Road, to the south of the site within the Westway and Sheephill estates and to the west of the site along Blanchardstown Road North. A primary

school is located to the south west of the site in Corduff. The Institute of Technology Blanchardstown is located to the west.

The latest census data (2016) indicates that the Fingal area has a population of 296,214 which is 22.02% of the total Dublin population. The 2016 Census indicated a continuing high growth rate in Fingal, of 8%.

The primary potential impacts of the proposed development on human health would be increased air pollution, noise, or pollution of groundwater/watercourses as a result of the proposed development. Visual impact and traffic are also potential but perhaps lesser significant impacts (based on the nature of the proposed development). Visual impact is discussed in Section 7.8. Traffic is discussed in Section 7.10

As detailed in Section 7.6, air dispersion modelling was undertaken to assess the impact of the proposed development with reference to human health criteria and concluded, based on conservative assumptions, that the proposed development will not result in any off-site exceedance of the relevant ambient air quality standards (Ref. to Section 7.6 for further detail and Air Impact Assessment Report included as Appendix 2).

The design of the proposed development has taken due regard of the sensitivity of the surroundings in the IDA Business and Technology Park in Blanchardstown. Noise reduction is a central consideration in the design of the proposed development. Based on the findings of the Noise Impact Assessment Report included in Appendix 3, the predicted noise levels from the proposed development, comply with the relevant noise criteria.

There is no significant risk of pollution of soil, groundwater or watercourses associated with the proposed development.

Data storage activities are essentially clean activities carried out within a modern high quality industrial building with limited perceptible signs of the activity once constructed.

In conclusion, it is considered that the proposed development is not likely to have significant effects on population / human health aspects and would not warrant preparation of an EIA on population / human health grounds.

## 7.2 Land, Soils, Geology & Hydrogeology

According to the Geological Survey of Ireland (GSI) website, the proposed development site is underlain by made ground deposits which are further underlain by glacial till derived from carboniferous limestone. The majority of the existing building is underlain by '*Bedrock outcrop or subcrop*'. This indicates that the bedrock is close to the surface. The bedrock geology underlying the site and surrounding area is mapped as *Tober Colleen Formation*, described as "mixed sandstones, conglomerates, shales and limestones". These are heavily interbedded with each other.

The underlying bedrock geology at the site (*Tober Colleen Formation*) has been classified by the GSI as a '*Poor Aquifer (PI)*', this being bedrock which is generally unproductive except in local zones'. No superficial gravel aquifer was mapped at the site. Groundwater vulnerability was generally mapped as being '*High*' across the site. This indicates that the underlying bedrock is approximately 0 to 3m below ground level. This is confirmed by a number of geotechnical boreholes in the immediate



vicinity of the proposed development site where the majority of geotechnical boreholes met rock close to 3m.

The GSI data indicates that the site does not lie within a drinking water protection area. The GSI well card data shows a small number of wells / boreholes drilled in the wider region with a cluster of wells located c. 1.6km to the south east of the proposed development site. No yield class or extraction rates were provided for the wells and it is not known if the wells are still in use. Water strikes recorded within the boreholes range from 1.9 m – 2.6m below the ground level (m bgl). The area is serviced by mains water supply therefore it is unlikely that any wells are used for potable water supply.

The groundwater body (GWB) in the region of the site (Dublin Urban) is classified by the EPA under the Water Framework Directive (WFD) Risk Score system as '*2b – Probably not at risk of achieving good status*'. Currently, the Dublin GWB is classified as "*Good status*" at the proposed development site and surrounding area.

### 7.2.1 Construction Impacts

Excavations will be required to remove existing foundations and hardstanding areas and facilitate the construction of new foundations, hardstanding areas and the installation of services and attenuation storage. General demolition and construction activities will require temporary storage of cement and concrete materials, oils, fuels paints etc. which have the potential to cause localised pollution. It is proposed that a detailed Demolition Plan and a Construction Environmental Management Plan (CEMP) will be prepared and provided to FCC in advance of construction. The Demolition Plan and CEMP will ensure best practice demolition and construction with respect to storage of any hazardous substances (fuels, chemicals and other construction materials that may pose a risk to the environment).

### 7.2.2 Operational Impacts

There is a potential impact on the soil and geology environment during operation from localised accidental releases of fuel from fuel stored on site for the operation of emergency generators and from cars in car parking areas and/or oil leakage from the electrical transformers. Fuel storage will be bunded at the bulk storage tanks and at the tanks at the generators. The transformer area will also be bunded and will have a sump with a pump which will discharge to the foul drainage system via a petrol interceptor (NSBP003 or similar approved). The pump will be fitted with a leak detection system which will shut down the pumps and raise an alarm in the event of a leak. An environmental management plan will apply to the proposed development during the operational phase incorporating mitigation measures and emergency response measures.

It is considered that there is are no likely significant effects in terms of the land, soils and geological environment during the construction or operational phases and that the proposed development would not warrant preparation of an EIA on land, soils, geology or hydrogeology grounds.

## 7.3 **Hydrology**

The nearest surface water feature to the site is the Abbotstown River which is c. 0.4 km to the east-southeast (at its closest point to the site). The Abbotstown River runs in a northeast-southwest direction prior to forming a confluence with the Tolka River at Blanchardstown (Tolka Valley Park). There is no river water quality data for the Abbotstown River. The Tolka River at the Tolka Valley Park is the nearest river

quality data that is present to the site. This section of the Tolka River is classified as 'Poor'.

### 7.3.1 Construction Impacts

Excavations will be required to remove existing foundations and hardstanding areas and facilitate the construction of new foundations, hardstanding areas and the installation of services and attenuation storage. All excavations will be managed so as to avoid the generation of silt laden run off or release of runoff without appropriate mitigation i.e. treatment via a silt trap and a suitable interceptor.

As for Land, Soils, Geology & Hydrogeology above, it is proposed that a CEMP be prepared and provided to FCC in advance of construction. The CEMP will ensure best practice construction with respect to storage of any hazardous substances (fuels, chemicals and other construction materials that may pose a risk to the environment).

### 7.3.2 Operational Impacts

Surface water runoff will be generated from roofs and hardstanding areas. The existing site is predominantly hard impermeable landscaping and surface water runoff discharges unattenuated to a combined sewer. Specific Sustainable Urban Drainage (SuDS) measures have been incorporated into the design of the proposed development including soft landscaping, pervious paving and attenuation storage, which will reduce the existing runoff from the site. Surface water runoff from the site will be allowed to infiltrate to ground via the soft landscaping and pervious paving or will discharge to filter drains or the attenuation tank (with infiltration below) prior to discharge to the public drainage network via a full retention interceptor or hydrobrake flow control device.

There is the potential for impact on the hydrological environment during operation from localised accidental releases of fuel stored on site for the operation of emergency generators and from cars in car parking areas and/or oil leakage from the electrical transformers. However, fuel storage will be bunded, as will the transformer area (which will also have a sump with a pump which will discharge to the foul drainage system via a petrol interceptor and a leak detection system). As for Land, Soils, Geology & Hydrogeology above, it is proposed that an environmental management plan will apply to the proposed development during the operational phase incorporating mitigation measures and emergency response measures.

It is considered that there are no likely significant effects on water quality and that the proposed development would not warrant preparation of an EIA on hydrology grounds.

## 7.4 **Flooding**

The Office of Public Works (OPW) on-line database was reviewed with regard to incidences of historical, regional and local flooding relevant to the area. The proposed development site is regarded as a "Less Vulnerable Development" as it is planned to be used for industrial use. There were no flood events recorded at the site or immediate area. There are no final flood maps prepared for this site. According to the draft CFRAM (Catchment Flood Risk Assessment and Management) maps, there is no modelled flood event impacting on this proposed development. Therefore, this development resides in Flood Zone C which means the probability of flooding is low (less than 0.1% or 1 in 1000). The closest watercourse is Abbotstown River which is located approximately 0.4km east south east of the proposed development.

There are no historic flood events recorded for the proposed development site and the surrounding area. The nearest flood event occurred 1.85km south west of the proposed development site along the N2 at Blanchardstown. The flooding occurred along the Tolka River in April 2002.

It is considered that any localised drainage issues would be engineered out as required during construction.

It is concluded that the proposed development is located in an area which is not liable to flooding and will not in and of itself result in any additional flood risk.

## 7.5 Biodiversity (including species and habitats)

Appendix 1 contains a copy of an Appropriate Assessment (AA) Screening Study completed by Moore Group for the proposed development.

There are a number of Natura 2000 sites i.e. Special Areas of Conservation (SACs) and Special Protected Areas (SPAs) within 15km of the site. These include:

Site Code	Site name	Distance from site (km)
000199	Baldoyle Bay SAC	14.75
000205	Malahide Estuary SAC	12.58
000206	North Dublin Bay SAC	13.05
000210	South Dublin Bay SAC	12.64
001398	Rye Water Valley/Carton SAC	9.06
004006	North Bull Island SPA	13.43
004016	Baldoyle Bay SPA	13.05
004024	South Dublin Bay and River Tolka Estuary SPA	14.84
004025	Broadmeadow/Swords Estuary SPA	10.29

The closest European sites are those located at Ryewater Valley (c. 9km from the site) and in the coastal areas of Dublin, including South Dublin Bay SAC, North Dublin Bay SAC, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA (c. 12.64 – 14.84km from the site based on geodesic distance).

There is no meaningful biological or hydrological connectivity between the proposed development site and any Natura 2000 sites.

An analysis of proposed National Heritage Areas (pNHAs) in terms of their role in supporting the species using Natura 2000 sites was also undertaken. The AA Screening Study found no relevant connectivity between the project and the pNHAs. It is concluded in the attached AA Screening Study that the proposed development, alone or in combination with other projects, will not have a significant effect on any Natura 2000 sites (Refer to Appendix 1).

It is concluded that the proposed development will not have a significant effect on biodiversity and the proposed development would not warrant preparation of an EIA on biodiversity grounds.

## **7.6 Air Quality & Climate**

### **7.6.1 Construction Impacts**

The construction of the proposed development will require demolition and excavations and will require some off-site removal of surplus soils etc. with the potential to generate dust. As detailed in the Air Impact Assessment Report in Appendix 3, with the appropriate mitigation measures outlined in the Dust Minimisation Plan implemented, the impact to air quality during demolition and construction activities will be insignificant and pose no nuisance at nearby sensitive receptors

### **7.6.2 Operational Impacts**

Appendix 2 contains a copy of the Air Quality Assessment completed by AWN for the proposed development.

Air dispersion modelling was undertaken to assess the impact of the development on pollutant concentrations at the site boundary and at nearby residential receptors.

It is concluded in the attached report that the proposed development will not result in any off-site exceedance of the applicable ambient air quality standards (including at the nearest residential receptors). This study has incorporated conservative assumptions designed to overestimate the predicted concentrations at sensitive receptors. In relation to the spatial extent of emissions from the site, ambient concentrations decrease significantly away from the immediate area of the site.

In relation to climate no significant on-site CO<sub>2</sub> emissions will occur as a result of the proposed development, the indirect emissions of NO<sub>x</sub>, SO<sub>2</sub> and NMVOC are also not predicted to be significant. Overall the impact of the proposed data storage facility on climate is predicted to be insignificant in the short and long-term.

It can be concluded that the proposed development is not likely to have any significant effects in terms of air quality and would not warrant preparation of an EIA on air quality and climate grounds.

## **7.7 Noise**

### **7.7.1 Construction Impacts**

It is proposed that a CEMP will be prepared and provided to FCC in advance of demolition. This CEMP will include noise minimisation measures to ensure noise arising from demolition, site clearance and construction activities is prevented where possible and managed in accordance with best practice.

### **7.7.2 Operational Impacts**

Appendix 3 contains a copy of the Noise Impact Assessment Report prepared by AWN for the proposed development.

The Noise Impact Assessment Report concludes that the predicted noise levels from the development will comply with the relevant noise criteria.

Based on the assessment carried out by AWN, it can be concluded that the proposed development is not likely to have any significant effects in terms of noise and would not warrant preparation of an EIA.

## 7.8 Landscape and Visual Impact

The *Fingal County Council Development Plan 2017-2023* is the statutory planning control document pertaining to the site and its surrounds. In terms of landscape and visual amenity, the site:

- Is not located within or adjoining an Architectural or General Conservation Area
- Does not have a listing for Trees of Special Amenity Value
- Is not located within or adjoining a Native Woodland Trust
- Is not covered by protected views, scenic routes or viewpoints

Moreover, the proposed development will be located within an industrial area and is in keeping with the scale and height of the neighbouring buildings on the campus (i.e. existing Building A, Building B and Hexagon Building) and as well as the permitted Hexagon Building extension.

The proposed development is consistent with the land use zoning and the character of the permitted facility.

Landscape proposals are included Architectural report and landscape plan that accompanies the planning application.

In conclusion, the proposed development will not give rise to any significant landscape or visual effects either from within or outside of the site boundary and would not warrant preparation of an EIA on landscape and/or visual grounds.

## 7.9 Cultural Heritage/Archaeology

Appendix 4 contains a copy of the Cultural Heritage Report completed by Moore Group for the proposed development.

The proposed development will be constructed on previously disturbed ground on an industrial site which has been extensively disturbed for previous development. It is considered that any potential archaeological features that may have been present will have previously been disturbed. The Cultural Heritage report states that the potential of encountering previously unrecorded archaeological deposits during redevelopment of the site is very low and recommends that the development should be allowed to proceed without further mitigation (subject to approval of the National Monuments Service, Department of Culture, Heritage and the Gaeltacht).

Based on the cultural heritage assessment carried out, it is considered that the proposed development will not to give rise to any significant effects on cultural heritage / archaeology and would not warrant preparation of an EIA on cultural heritage / archaeological grounds.

## 7.10 Traffic

Details of the Traffic and Transport arrangements for the site are included in the OCSC Engineering Services Report which is included with the planning application documentation.

### 7.10.1 Construction Impacts

During the construction phase of the proposed development, there will be additional traffic movements to/from the site from construction personnel, security staff,



professional staff (i.e. design team, utility companies), excavation plant, dumper trucks and deliveries/removal of materials (waste/spoil). The majority of construction works will be completed within the site boundary with only minor offsite connection works required.

A number of measures are proposed in the OCSC Engineering Services Report to minimise the impact of the works on traffic and transportation including:

- Construction day beginning and ending outside peak travel hours so that the majority of workers travelling to and from the site will arrive before the a.m. peak hour and depart after the p.m. peak hour;
- Limited-onsite parking to encourage construction workers to use alternative options such as car-sharing and public transport. However, this will take into account required demand to prevent overspill into adjacent areas;
- Potential for construction workers to be brought to site in vans/mini-buses will be investigated;
- Delivery vehicles travelling to/from the site will be spread over the course of the working day to minimise number of HGV's travelling during peak hours.

It is proposed to implement these measures to avoid the local peak traffic hours and mitigate any potential short-term impacts.

#### 7.10.2 Operational Impacts

The proposed development will have up to 15-20 staff at any one time and 19 no. car parking spaces (including 1 no. disabled parking space). Other than staff travel to/from the site, additional trips will be limited to low frequency deliveries which can be scheduled to avoid peak traffic hours. The OCSC traffic and transportation assessment concludes that the potential traffic impact is considered negligible and likely to represent a net improvement relative to the former use.

The proposed development will not have a significant impact in terms of traffic and would not warrant preparation of an EIA on traffic grounds.

#### 7.11 **Resource Use Material Assets and Waste**

Other than materials necessary for the construction of the building the proposed development will not require/consume any substantial quantities of additional raw materials or water.

##### 7.11.1 Construction Impacts

The demolition of the existing building/structures and construction of the new building will inevitably involve generation of a variety of wastes (from demolition, excavations, offcuts etc.). These wastes will be managed in accordance with the project specific C&D Waste Management Plan which is being submitted with the planning application. The Plan will be updated and refined by the nominated contractor once final methods of construction, building materials, waste collectors and waste receiving facilities have been determined.

##### 7.11.2 Operational Impacts

As detailed in Section 4.1, the proposed development will have a maximum operational electrical demand of 12MW, with an overall maximum operational demand for the campus of 65.4MW. The power required for the proposed development will be available from the existing connection to the national grid from the campus which will be extended to the proposed development. No additional

external grid connections will be required for the proposed development. It has been confirmed that there is sufficient power available via existing power connections to the existing campus.

The applicant supports renewable targets by purchasing renewable power from suppliers which encourages renewable generation projects that contribute to the achievement of Ireland's national targets.

As stated in Section 4.4, the peak daily water demand agreed with Irish Water for the campus is 5.75 l/s. No increase in peak water demand is required for this proposed development.

An Energy Statement, prepared by Ethos Engineering, has been submitted with the planning application documents and details the sustainable energy measures which have been considered and incorporated into the design of the proposed development. It also considers the potential for reuse of waste heat from the proposed development as part of a district heating system.

All wastes generated by the facility will be managed in accordance with the requirements of the Waste Management Act as amended, and associated regulations.

It is considered that the proposed development will not have any significant impact in terms of resources or waste generation and would not warrant preparation of an EIA on the basis of resource use, material assets or waste.

## 7.12 Interactions

The potential interactions and inter-relationships between the environmental factors have been considered. It is considered that there no likely significant interactions.

## 8.0 FINDINGS AND CONCLUSIONS

On the basis of the information set out in Section 3.0 the proposed development does not mandatorily require an EIA and is Sub-threshold. The information set out in Sections 4.0, 5.0, 6.0 and 7.0 confirms that the proposed development is not likely to have any significant environmental effects.

An Appropriate Assessment Screening Study has been prepared (Appendix 1) and it is concluded that the proposed development, either alone or in combination with other plans or projects, is not likely to have any significant effects on designated/protected sites and a full Appropriate Assessment/Natura Impact Statement is not required.

Air dispersion modelling was undertaken to assess the impact of the development with reference to human health criteria and concluded, based on conservative assumptions, that the proposed development will not result in any off-site exceedance of the relevant ambient air quality standards (Appendix 2).

The Noise Impact Assessment Report (Appendix 3) assessed the potential noise impact of the development and concluded that the proposed development, will comply with the relevant noise criteria.

The preparation of and compliance with a Demolition Plan and a Construction Environmental Management Plan will ensure potential nuisances from the demolition and construction of the facility are avoided and minimised.

Implementation of an Environmental Management Plan once the development is operational will ensure the residual impact is of imperceptible significance.

In summary, the construction and operation of the proposed development will generate few additional emissions with no likelihood of significant effects. It is concluded that no EIA is required with the planning application.

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**APPENDIX 1**

**APPROPRIATE ASSESSMENT  
SCREENING STUDY  
MOORE GROUP – MAY 2018**

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**APPENDIX 2**

**AIR IMPACT ASSESSMENT REPORT  
AWN CONSULTING – MAY 2018**

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**APPENDIX 3**

**NOISE IMPACT ASSESSMENT  
AWN CONSULTING – MAY 2018**

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**APPENDIX 4**  
**CULTURAL HERITAGE ASSESSMENT**  
**MOORE GROUP – MAY 2018**

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