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ENVIRONMENTAL IMPACT ASSESSMENT SCREENING REPORT FOR DATA CENTRE LICENCE APPLICATION ON A SITE AT CLONSHAUGH BUSINESS AND TECHNOLOGY PARK

Report Prepared For
Amazon Data Services Ireland Limited

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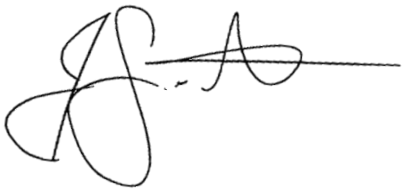
Signature		
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1.0 INTRODUCTION

On behalf of Amazon Data Services Ireland Ltd. ("ADSIL" or 'the applicant'), AWN Consulting Limited (AWN) has prepared the following Environmental Impact Assessment (EIA) Screening Report to accompany the EPA Industrial Emissions Licence application for the existing data storage facility (the subject '**Installation'** under this licence application i.e. the physical elements to which this application applies) located in Clonshaugh Business and Technology Park, Clonshaugh, Dublin 17.

This EIA Screening Report should be read in conjunction with the drawings and reports submitted with the Licence Application.

The existing Installation is located on a site of c. 7.9 hectares (ha) in total ('**the Site'**). and is located at the main entrance to the established Clonshaugh Business & Technology Park, approximately 200 m off the Oscar Traynor Road. Developments within this business park are similar 'individual lot' type developments. The park is situated 3 km from Dublin Airport and 6 km from Dublin City Centre.. The M1 motorway runs parallel to the business park site boundary to the West of this site location. Access to and from the park at present is from Oscar Traynor Road.

The Installation, for which the EPA Industrial Emissions Licence is sought, comprises 3 no. two storey data storage installation buildings (Buildings W, X and Y) and ancillary elements. Building X and Y consists of a 2-storey building connected via link corridor.

The Installation requires a continuous supply of electricity to operate. During normal operations, the facility is supplied electricity from the national grid. Outside of normal operations, the facility is first supplied electricity by some or all of the onsite battery installations and then by some or all of the onsite emergency backup generators. Outside of routine testing and maintenance, the operation of these emergency back-up generators is typically only required under the following emergency circumstances:

- A loss, reduction or instability of grid power supply,
- Critical maintenance to power systems,
- A request from the utility supplier (or third party acting on its behalf) to reduce grid electricity load.

The Installation will comprise 40 no. 5.44 MW_{th} diesel powered emergency back-up generators, 2 no. 0.337 MW_{th} diesel powered fire pumps and 2 no. 0.423 MWth diesel powered fire pumps.

The relevant requirement for an Industrial Emissions (IE) Licence is outlined within the First Schedule of the EPA Act 1992. Activity '*Class 2.1 Combustion of fuels in installations with a total rated thermal input of 50 MW or more'* specifically relates to this facility.

The combined thermal input from the emergency generators once is 219.12 MW_{th}, this exceeds the 50MW_{th} threshold of *Class 2.1* First Schedule of the EPA Act 1992. The applicant is applying to the Environmental Protection Agency (EPA) for an Industrial Emissions (IE) Licence (the subject '**Project'** in which this EIA Screening Report relates) principally relating to the operation of diesel-powered emergency standby generators under Activity Class 2.1.

1.1 PURPOSE OF THIS REPORT

The EPA Act 1992 (as amended) Section 83(2A) sets out the requirements for the Environmental Protection Agency ('EPA' or 'the Agency') in respect of the determination of applications for licences. Section 83(2A) sets the procedure for the EPA to consider applications subject to Environmental Impact Assessment; as follows.

Section 83(2A):

> *(b) The Agency as part of its consideration of an application for a licence shall ensure before a licence or a revised licence is granted, and where the activity to which such licence or revised licence relates is likely to have significant effects on the environment by virtue,* inter alia *, of its nature, size or location, that, in accordance with this subsection and* section 87(1A)*, the application is made subject to an environmental impact assessment as respects the matters that come within the functions of the Agency including the functions conferred on the Agency by or under this Act.*
>
> *(*ba*) Where the Agency receives an application for a licence in respect of an activity relating to development or proposed development referred to in* paragraph (c)(ii) *the Agency shall require the applicant for a licence to provide it with information on the characteristics of the activity and its likely significant effects on the environment.*
>
> *(* bb *) Where an applicant is subject to a requirement by the Agency under* paragraph (ba) *it shall —*
>
> > *(i) provide the information specified in Annex IIA to the EIA Directive, and*
> >
> > *(ii) where relevant, take into account the available results of other relevant assessments of the effects on the environment carried out pursuant to any Act or under European Union legislation (other than the EIA Directive).*
>
> *(*bc*) Where an applicant is subject to a requirement by the Agency under* paragraph (ba) *it may also provide a description of any features of the activity or measures envisaged to avoid or prevent significant adverse effects on the environment.*
>
> *(*bd*) Where the Agency receives information from an applicant under* paragraph (bb) *it shall make a determination as to whether the activity to which the licence or revised licence applied for relates should be subject to environmental impact assessment on the basis of such information, taking into account the relevant selection criteria specified in Annex III to the EIA Directive and, where relevant, the results of preliminary verifications or assessments of the effects on the environment carried out pursuant to any Act or under European Union legislation (other than the EIA Directive).*

The EPA Act 1992 requires under Section 83(2A)(*b*) that the Agency, as part of its consideration of an application that is likely to have significant effects on the environment by virtue, *inter alia*, of its nature, size or location, that, the application is made subject to an environmental impact assessment. The environmental impact assessment shall be undertaken in respect of the matters that come within the functions of the Agency.

The Act Section 83(2A)(*ba*) requires that where the Agency receives an application for a licence in respect of an activity relating to development or Project referred to in paragraph (c)(ii) the Agency shall require the applicant for a licence to provide it with information on the characteristics of the activity and its likely significant effects on the environment.

Section 83(2A)(c) states:

> *c) Subject to paragraph (b) and section 87(1A) to (1I) , an environmental impact assessment shall be carried out by the Agency in respect of an application for a licence relating to an activity, where development comprising or for the purpose of the activity is:*
>
> *(i) development of a class specified in Part 1 of Schedule 5 to the Planning and Development Regulations 2001, or*
>
> *(ii) development of a class specified in Part 2 of Schedule 5 to the Planning and Development Regulations 2001 that the Agency determines would be likely to have significant effects on the environment.*

The purpose of this report is threefold:

1. To appraise the Project with respect to the criteria referred to in Section 83(2A)(c) to determine if the Project is development of a class specified in Part 1 of Schedule 5 to the Planning and Development Regulations 2001, or development of a class specified in Part 2 of Schedule 5 to the Planning and Development Regulations 2001 that the Agency determines would be likely to have significant effects on the environment.
2. To provide sufficient information to the Agency to make a determination under Section 83(2A)(*bd*) as to whether the activity to which the licence applied for relates should be subject to environmental impact assessment.
3. To document the studies undertaken by the Applicant which demonstrate there the Project is not likely to have significant effects on the environment in respect to the matters that come within the functions of the Agency.

1.2 EIA SCREENING LEGISLATION AND GUIDANCE

The legislation and guidance listed below has informed this report and the EIA Screening methodology:

- Office of the Planning Regulator Practice Note PN02 Environmental Impact Assessment Screening. June 2021[1]
- European Union (Planning & Development) (Environmental Impact Assessment) Regulations 2018;
- Environmental Impact Assessment of Projects – Guidance on Screening. (2017). European Commission[2].
- Environmental Impact Assessment of Projects - Guidance on the preparation of the Environmental Impact Assessment Report. (2017) European Commission.
- European Union Environmental Impact Assessment (EIA) Directive 2011/92/EU as amended by 2014/52/EU
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. (August 2018). Department of Housing, Planning and Local Government.

- Guidelines on the Information to be contained in Environmental Impact Assessment Reports. (Draft, August 2017). Environment Protection Agency.
- Advice Notes for preparing Environmental Impact Statements. (Draft, September 2015). Environment Protection Agency
- Planning and Development Act, 2000 (as amended)
- Planning and Development Regulations 2001 (as amended)
- Interpretation of definitions of project categories of Annex I and II of the EIA Directive. (2015) European Commission
- Guidance for Consent Authorities regarding Sub-threshold Development (2003; DoEHLG).

The screening process followed in this report is in accordance with the EIA Directive 2011/92/EU of the European Parliament and of the Council as amended by 2014/52/EU and follows the format as per Section 3.2 of the Draft EPA Guidelines (August 2017)[3]. The potential for significant effects of the proposed Project has been considered against Schedule 7 of the *Planning and Development Regulations, 2001 as amended*[4].

In producing this report due regard has been paid to other EIA guidance including the European Union's 2017 EIA *Guidance on Screening*[5] and *Guidance on the preparation of the Environmental Impact Assessment Report*[6] as well as the published *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessm*ent[7].

It is important for the Planning Authority to note that Article 27 of the EU Directive 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*". This screening exercise is used to establish whether the Project is likely to have significant effects on the environment and if an EIA Report is required.

1.3 SCREENING METHODOLOGY

The key steps to screen for an EIA is set out in Section 3.2 of the EPA Guidelines (August 2017). This EIA Screening Report has been arranged to address the information as required by these steps. These steps are:

1. Is the development a type that that requires EIA?
2. Is it of a type that requires mandatory EIA?
3. Is it above the specified threshold?
4. Is it a type of project that could lead to effects? and/or
5. Is it a sensitive location? and/or
6. Could the effects be significant?

An assessment of the Points 1 to 3 above has been undertaken by comparing the Project against the relevant legislation and thresholds set out in Schedule 5 of the Planning and Development Regulations 2001, this evaluation has been documented in Section 2.0 of this report.

In order to address Points 4 to 6 above, an evaluation of the characteristics of the project, the sensitivity of the location of the Installation, and the potential for significant impacts has been made, taking into account the relevant selection criteria specified in Annex III to the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU.

The information required to be submitted by the developer for the Agency is set out in Annex IIA of the EU Directive. Annex II.A of EIA Directive sets out the information to be provided by the developer:

1. A description of the project, including in particular:
    a. a description of the physical characteristics of the whole project and, where relevant, of demolition works;
    b. a description of the location of the project, with particular regard to the environmental sensitivity of geographical areas likely to be affected.
2. A description of the aspects of the environment likely to be significantly affected by the project.
3. 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:
    a. the expected residues and emissions and the production of waste, where relevant;
    b. the use of natural resources, in particular soil, land, water and biodiversity.
4. The criteria of Annex III shall be taken into account, where relevant, when compiling the information in accordance with points 1 to 3.';

The Agency should have regard to the Annex III criteria in forming an opinion as to whether or not a development is likely to have significant effects on the environment by virtue, inter alia, of their nature, size or location should be subject to EIA.

1. Characteristics of projects - (Set out in Section 3.0 of this Report)

The characteristics of projects must be considered, with particular regard to:

a. the size and design of the whole project;
b. cumulation with other existing and/or approved projects;
c. the use of natural resources, in particular land, soil, water and biodiversity;
d. the production of waste;
e. pollution and nuisances;
f. the risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;
g. the risks to human health (for example due to water contamination or air pollution).

2. Location of projects - (Set out in Section 4.0 of this Report)

The environmental sensitivity of geographical areas likely to be affected by projects must be considered, with particular regard to:

a. the existing and approved land use;
b. the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
c. the absorption capacity of the natural environment, paying particular attention to the following areas:
    I. wetlands, riparian areas, river mouths;
    II. (ii) coastal zones and the marine environment;
    III. (iii) mountain and forest areas;
    IV. (iv) nature reserves and parks;

V. (v) areas classified or protected under national legislation; Natura 2000 areas designated by Member States pursuant to Directive 92/43/EEC and Directive 2009/147/EC;
VI. (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
VII. (vii) densely populated areas;
VIII. (viii) landscapes and sites of historical, cultural or archaeological significance.

3. Type and characteristics of the potential impact- (Set out in Section 5.0 of this Report)

The likely significant effects of projects on the environment must be considered in relation to criteria set out in points 1 and 2 of this Annex, with regard to the impact of the project on the factors specified in Article 3(1), taking into account:

a. the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
b. the nature of the impact;
c. the transboundary nature of the impact;
d. the intensity and complexity of the impact;
e. the probability of the impact;
f. the expected onset, duration, frequency and reversibility of the impact;
g. the cumulation of the impact with the impact of other existing and/or approved projects;
h. the possibility of effectively reducing the impact.

The main body of this report (Sections 3.0, 4.0 and 5.0) will cover Annex II.A fully, but it has been set out to present the information under the headings provided in Annex III of the EIA Directive, in order to assist the Agency in their assessment of determining the requirement for EIA

The various reports submitted with the IE Licence Application address a variety of environmental issues and assess the impact of the Project and demonstrate that, the Installation will not have a significant impact on the environment. This EIA Screening Report should be read in conjunction with the accompanying Licence Application reports and drawings.

2.0 SCREENING EVALUATION

2.1 IS THE DEVELOPMENT A PROJECT?

The first step in screening is to examine whether the proposal is a *project* as understood by the EU Directive. For the purposes of the EU Directive, 'project' means:

- the execution of construction works or of other installations or schemes, or
- other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources.

The EPA Guidance (2017) states that if a Project is not of a type covered by the Directive, there is no statutory requirement for it to be subject to environmental impact assessment. In determining if the Project is of a type covered by the Directive it may

be necessary to go beyond the general description of the project and to consider the component parts of the project and/or any processes arising from it.

If any such parts or processes are significant and, in their own right, fall within a class of development covered by the Directive, the proposed Project as a whole may fall within the requirements of the Directive.

The operation of the Installation emissions to air and the generation of noise for instance taking a conservative approach could be considered to be 'interventions in the natural surroundings and landscape' therefore, the Project meets the definition of a 'project' as understood by the EU Directive.

2.2 IS THE DEVELOPMENT A PROJECT THAT REQUIRES A MANDATORY EIA?

The next step is to determine if the Project is of a project type that requires mandatory EIA; i.e. is the Project of a project type in which thresholds do not exist. The types of projects to which thresholds do not apply are types that are considered to always be likely to have significant effects.

Ireland's type of projects for which an EIA is mandatory is set out in the Schedule 5 Part 1 and Part 2 of the Planning and Development Regulations 2001. This list was developed from Annex I and Annex II of the EIA Directive.

There is no specific Project type listed under Schedule 5, Part 1 or Part 2 of the Planning and Development Regulations 2001 for the subject Project.

In considering the wider context and the component parts of the Project it would most appropriately fall under the project type *Schedule 5, Part 2, Class 10 Infrastructure Projects*. Class 10 is of a type that sets out project thresholds; therefore, the next screening step is to determine whether the project exceeds the specific project threshold.

2.3 IS THE PROJECT ABOVE THE THRESHOLD FOR EIA?

An EIA Report prepared by the Applicant must accompany an application for permission of a class set out in the Schedule 5 Part 1 and Part 2 of the Planning and Development Regulations 2001 which equals or exceeds, as the case may be, a limit, quantity or threshold set for that class of development. A development that does not exceed a limit, quantity or threshold set for that class of development in Schedule 5 of the Regulations is known as a 'sub-threshold development'.

The subject Project and component parts have been considered against the thresholds outlined in Schedule 5, Part 2 Class 10 (a) to (m). The most relevant project type in the context of the Project is Class 10 (a):

It is considered that the most relevant development class in the context of the Project under Part 2, Schedule 5 of the Planning and Development Regulations 2001 is Class 10(a):

10. Infrastructure projects

(a) Industrial estate development projects, where the area would exceed 15 hectares.

The Project is within an Industrial Estate and as the total site area is c. 7.9 hectares, it does not exceed the limit, quantity or threshold set out in Part 2, Schedule 5, Class 10(a), therefore an EIA is not required for this IE license application.

The Project site area is not equal to nor does it exceed the limit, quantity or threshold set out in Class 10(a); therefore, an EIA is not mandatory.

2.4 CONCLUSION – SUB THRESHOLD DEVELOPMENT

The Project is '*of a type set out in Part 2 of Schedule 5 [in the Planning and Development Regulations, 2001 (as amended)] which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development*'. The Project is outside the mandatory requirements for EIA, and is considered to be sub-threshold for the relevant project type.

The following Sections 3.0, 4.0 and 5.0 will provide information on the characteristics of the Project; the location and context, and its likely impact on the environment as well as a description of any features of the project and/or measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment. These sections present the information required under Annex II.A of the EU Directive, broadly set out in the structure Annex III criteria to ensure that each aspect for consideration is robustly addressed in order to assist the Agency in an assessment of determining if EIA is required for the subject Project.

3.0 CHARACTERISTICS OF THE PROJECT

This section addresses the characteristics of the Project by describing the development in detail. This is to identify all areas of potential issues to explore further and assess for impacts.

3.1 SIZE AND DESIGN OF THE PROJECT

The Installation consists of 3 no. two storey data centre buildings (Buildings W, Building X and Building Y) with facilities containing; data storage rooms, electrical and mechanical plant rooms and support areas including offices and welfare facilities, loading bays, back-up generators with emission stacks, water storage tanks, and mechanical plant at roof level. Building X and Y are connected via link corridor.

The Installation received Final Grant of planning permission from Dublin County Council (DCC) under the separate applications listed below:

- Building W; final grant of permission on 2 April 2012 (DCC Reg. Ref.: 3534/11).
- Building X and Y; final grant of permission on 19 August 2013 (DCC Reg. Ref.: 2688/13), and final grant of permission on 24 October 2013 DCC Reg. Ref.: 2979/13).

The three data storage facilities generally consist of the following primary aspects:

- Data Storage Rooms housing IT electrical equipment;
- Internal and External Air Handling Unit (AHU) Plant Rooms to house the equipment required to maintain the temperature, humidity, and power supply for the installation;
- Administration areas (office space, meeting rooms, welfare facilities etc.);

- Diesel powered emergency back-up generators, including day tanks (and associated emissions stacks/flues);
- Evaporative cooling water storage tanks; and;
- Loading bays and associated infrastructure.

Building W consists of a 2-storey building comprising electrical rooms for electronic operations, loading bay, stores, office, and staff facilities. The gross floor area of the building including ancillary elements is c. 9,469 sq.m. The building includes, mechanical plant at roof level of the main building with associated visual screening. The external generator yard comprises 13 no. diesel powered emergency back-up generators, with associated diesel fuel day tanks. Diesel fuel is provided to the day tanks from the Tank Farm to the south of the Site.

Building X and Y consists of a 2-storey building connected via link corridor and comprises electrical rooms for electronic operations, electrical and mechanical plant rooms and support areas including offices and welfare facilities and a loading bay. The gross floor area of the development including ancillary elements is c. 21,750 sq.m.. The building includes ground level external air handling units with associated visual screening. Building X includes an internal generator yard containing 20 no. diesel powered emergency back-up generators, with associated diesel fuel day tanks. Building Y includes an external generator yard containing 7 no. containerised diesel-powered emergency back-up generators, with associated diesel fuel day tanks. Diesel fuel is provided to the day tanks associated with Building X and Y from the Tank Farm to the south of Building X.

<u>In addition to the 3 no. data storage facilities, the Installation also includes:</u>

- An electrical Gas Insulated Switchgear (GIS) 110 kV Substation (owned and operated by ESB);
- 1 no. transformer compound located at the GIS Substation with associated control room (owned and operated by ADSIL);
- 1 no. diesel fuel tank farm comprising 3 no. 52,000 L tanks within a concrete bund located in the east of the Site associated with Building W;
- 1 no. diesel fuel tank farm with 5 no. 54,000 L tanks within a concrete bund located in the north east of the Site associated with Building X and Building Y;
- 1 no. 250 m^3 sprinkler water tank, and associated pump house including 2 no. diesel powered fire sprinkler pumps for Building W;
- 1 no. 405 m^3 sprinkler water tank and associated pump house including 2 no. diesel powered fire sprinkler pumps for Building X and Building Y;
- Internal site road network, and car parking;
- Underground foul and storm water drainage network,
- Underground water supply network

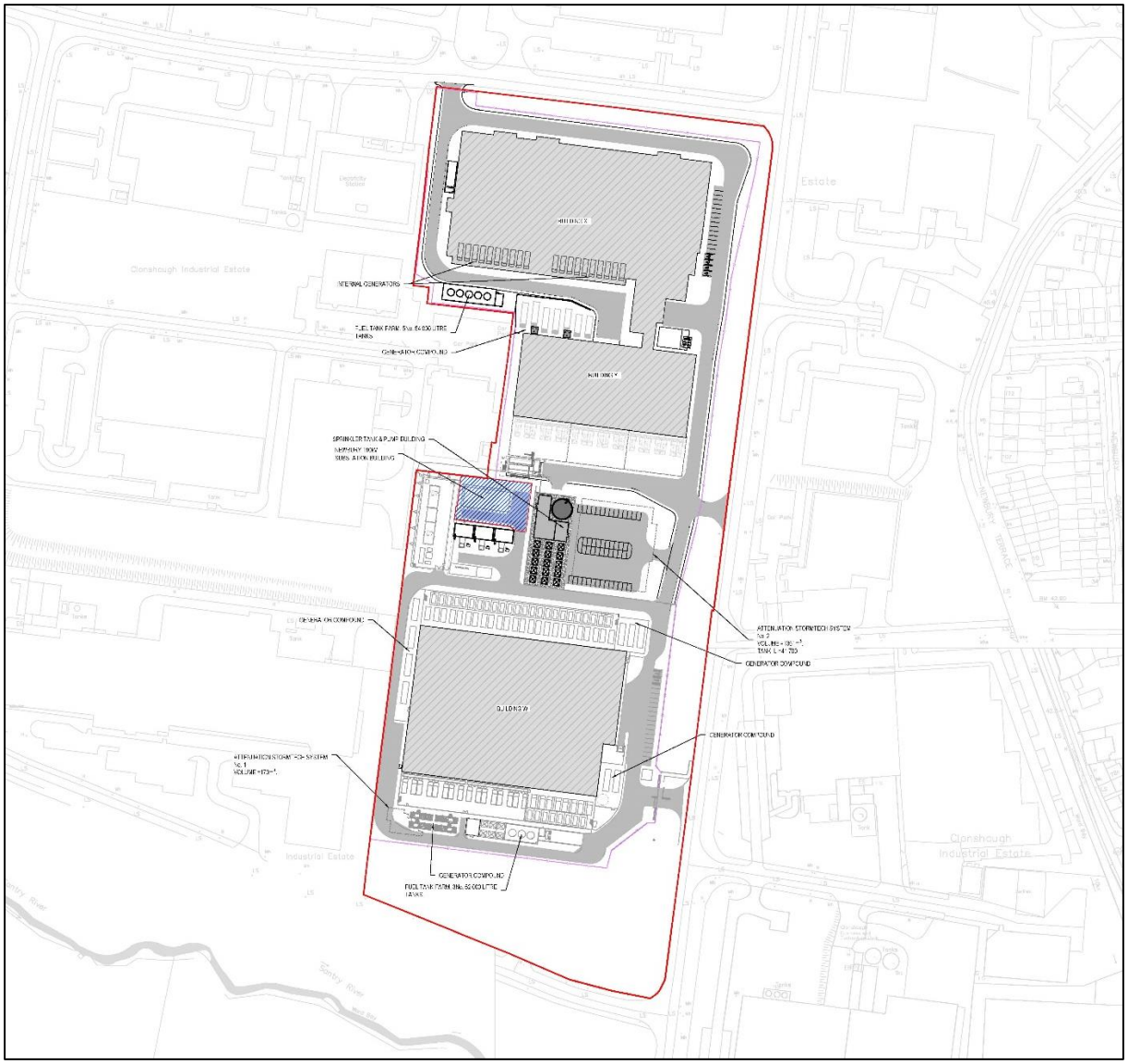

Figure 3.1 *Installation Site Layout (Source: Drawing number 21_123F-CSE-00-XX-DR-C-0002 SITE LAYOUT PLAN)*

3.1.1 Emergency Backup Generators

The Installation is supported by diesel-powered emergency back-up generators that are located in the generator compound associated with each data storage building. These generators provide the necessary power to ensure the data centre buildings continue to operate in the event of a temporary failure of electricity supply. An uninterruptible power source or UPS system is also provided for the short-term transition from mains power to the emergency back-up generators.

The Installation requires a continuous supply of electricity to operate. During normal operations, the facility is supplied electricity from the national grid. Outside of normal operations, the facility is first supplied electricity by some or all of the onsite battery Installations and then by some or all of the onsite backup generators. Outside of routine testing and maintenance, the operation of these back-up generators is typically only required under the following emergency circumstances:

- A loss, reduction, or instability of grid power supply,

- Critical maintenance to power systems,
- A request from the utility supplier (or third party acting on its behalf) to reduce grid electricity load.

Each of the three data storage buildings are accompanied by a designated generator compound. There is no interconnectivity between the generators of different buildings.

The individual generators are housed within containers (Building W and Building Y) or within a generator building (Building X) with various designed control measures in place including acoustic attenuation, exhaust silences. Diesel is stored locally in in day tanks in the generator building (for Building X) or within each containerised generator (Building W and Y).

The individual double skinned day tanks at the emergency back-up generators have level gauges (high and low) connected to an onboard controller which will alarm to prevent overfilling and identify a sudden loss of fuel within the tank.

The containerised emergency backup generator housing includes retention bunding in the base of the container, there are leak detection systems within the bund. Should hydrocarbon be detected in the base of the container the system sends an alarm signal to the BMS to alert EOTs. The onboard controller for individual generators is connected to the Building Management System (BMS).

3.1.2 Diesel Fuel Oil

Fuel (diesel) for the emergency back-up generators is stored in multiple locations across the Site; that includes bulk diesel tanks and day tanks located with each emergency back-up generator.

All fuel tanks, bunded storage and pipelines have been designed for the specific purpose and contents. As required the structures will be rendered impervious to the materials stored therein. All fuel tanks, bunded storage and pipelines are integrity tested following installation by vendor. Diesel fuel pipelines above ground are Carbon Steel, and below ground are Close Fit PLX (dual-contained pipe system).

There is a total diesel storage capacity on site of 535,000 litres, 535 m^3 or approximately 460 tonnes (assumed density of 0.86 l/kg). The tanks on site are filled to 80% capacity under normal conditions; therefore, the total diesel storage on site is 424,800 litres, 424.8 m^3 or approximately 365 tonnes (assumed density of 0.86 l/kg).

In accordance with the Commission for Energy Regulation (CER) regulations, low sulphur diesel is used.

Bulk Diesel Tank Farms

Bulk diesel is supplied to Building W generators from the 3 no. 52,000 L tanks located in the southeast of the Site; the bund has a capacity of 316.80 m^3. The bund capacity exceeds the EPA guidance for 110% of the capacity of the largest tank or drum within the bunded area, or 25% of the total volume of the substance which could be stored within the bunded area.

Bulk diesel is supplied to Building X and Y generators from the 5 no. 54,000 L tanks located in the northeast of the Site; the bund has a capacity of 408 m^3. The bund capacity exceeds the EPA guidance for 110% of the capacity of the largest tank or

drum within the bunded area, or 25% of the total volume of the substance which could be stored within the bunded area.

The bund is constructed of suitable concrete and has undergone testing for integrity during the commissioning phase. All pipelines are integrity tested following installation by vendor. The bunds and delivery bays are equipped with hydrocarbon probes in the bund sump which detects diesel in the bund. This triggers closure of the sump discharge should hydrocarbon be detected in the sump and sends an alarm signal to the BMS to alert EOTs.

The bulk fuel tanks are fitted with automated level gauges and the online readings from these gauges are fed back into the facility's BMS/EPMS. The bulk tanks also have high/low level alarms (90% high, 30% low) and a high-level switch at 95% which alarm to the BMS/EPMS critical alarm.

Fuel delivery to the bulk storage tanks will take place within the designated fuel unloading areas under strict Standard Operating Procedures. Diesel will then be piped from the bulk storage tanks to the emergency backup generator. Diesel fuel pipelines above ground are Carbon Steel, and below ground are Close Fit PLX (dual-contained pipe system).

Buildings W

Bulk diesel is supplied to the emergency backup generator day tanks at Building W from the Bulk Tank Farm in the southeast of the Site.

Each of the 13 no. emergency backup generators at Buildings A are accompanied by a double skinned day tank (2,500 litres each) for immediate supply to the generator. These day tanks are equipped with level gauges with high/low alerts which will also alarm to BMS/EPMS critical alarm.

There are 2-no. diesel powered fire pumps at the sprinkler house that have 3 no. double skinned day tanks (1,000 litres each) for immediate supply to the fire pump.

Buildings X and Y

Bulk diesel is supplied to the emergency backup generators day tanks at Building X and Y from the Bulk Tank Farm in the northeast of the Site.

Each of the 20 no. emergency backup generators at Buildings X, and 7 no. emergency backup generators at Buildings Y, are accompanied by a double skinned day tank (2,500 litres each) for immediate supply to the generator. These day tanks are equipped with level gauges with high/low alerts which will also alarm to BMS/EPMS critical alarm.

There are 2-no. diesel powered fire pumps at the sprinkler house that have 3 no. double skinned day tanks (1,000 litres each) for immediate supply to the fire pump.

3.2 CUMULATION WITH OTHER EXISTING OR PERMITTED DEVELOPMENT

As part of the assessment of the impact of the Project, account has been taken of any relevant developments that are currently permitted, within the surrounding areas, that may be likely to result in cumulative impacts. Following an assessment, of the potential impact of the Project it has been concluded that the only likely cumulative impacts relate to Air Emissions from the emergency backup generators.

There is no likelihood of potential impacts from any other environmental factor. The potential for cumulative Impacts is discussed further in Section 5.10 of this report.

3.3 NATURE OF ANY ASSOCIATED DEMOLITION WORKS

There are no demolition works related to the subject Project.

3.4 USE OF NATURAL RESOURCES (LAND, SOIL, WATER, BIODIVERSITY)

This section describes the subject Project in terms of the use of natural resources, in particular land, soil, water, biodiversity. The Installation not consume significant of natural resources during the operation of the Installation as it relates to the subject Project.

Land and Soil

The Installation is constructed and operational and there is no ongoing disturbance or consumption of the land or soil environment during the operation of the Installation as it relates to the subject Project.

Water Consumption

The water supply to the Site is sourced from mains water supply via a metred connection from the existing main to the south of the Installation in accordance with the DCC Planning Ref. 2979/13, 2688/13 and 3534/11. Water is used at the Installation for both staff welfare and cooling functions of the building's AHUs.

The Installation has a demand for general potable supply, for cleaning, drinking and sanitary facilities, cooling equipment, and for firefighting. The development requires an average annual water supply of 17,886 m^3. Where water demand is required during a short-term drought, additional supply can be provided from an alternative source such as tanker supply.

Wastewater requirement

Domestic effluent arising from occupation of the Site, including the transformer compound and control building will be discharged the public foul sewer (at Emission Points SE1 through SE4). Refer to Drawing 21_123F-00-XX-DR-C-1200 for the foul drainage layout. The foul water connection to the public foul sewer is in accordance with the DCC Planning Ref. 2979/13, 2688/13 and 3534/11.

The foul network ultimately coveys the wastewater for final treatment and disposal at Ringsend Wastewater Treatment Plant (WWTP) in Dublin.

Biodiversity

Investigations into the impacts of the Installation on biodiversity including species and habitats has been undertaken by the Moore Group. The Appropriate Assessment (AA) Screening report is included as Attachment-6-3-4-AA Screening-Licence-Apr-2022 to the Licence Application.

This analysis found that the nearest European sites to the Project are the Dublin Bay sites, with the nearest being South Dublin Bay and River Tolka Estuary SPA (Site Code 004024) situated almost 4km to the south. Other sites with potential connectivity to the

Project are the North Dublin Bay SAC (000206) and North Bull Island SPA (Site Code 004006); these are located over 4km to the east of the Project and indirectly liked via stormwater discharge to the Santry River. There is no connectivity to any other European sites.

The project is located within an established light industrial area in the northern suburbs of Dublin. The Santry River runs to the south of the site. 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.

Waste Generation

There will be minimal solid and liquid waste produced at the data storage facilities, the waste will comprise mainly domestic wastes, kitchen wastes, packaging wastes, non-hazardous WEEE, E-Waste, filters, waste oils and spent batteries.

All waste materials will be segregated into appropriate categories and will be stored in appropriate bins or other suitable receptacles in designated, easily accessible areas of the Site.

Packaging waste associated with rack deliveries to the data storage facilities is collected in recycling bins.

The small amounts of hazardous waste generated are stored in designated storage areas. The waste is covered, and a mobile retention bund is in place to contain any liquid waste that requires storage, where required. The waste is collected from these areas by an authorised waste contractor for recovery and / or disposal off-site.

Waste oil and filters and waste batteries are not stored onsite and are removed by the maintenance contractors during maintenance operations and change outs.

Waste sludge from the hydrocarbon interceptors are removed directly from each interceptor by a specialised and appropriately licensed contractor by means of a vacuum tanker.

Other smaller amounts of domestic waste are produced at the offices and other staff areas including the canteens. This includes paper and office waste as well as dry mixed recyclables and compost food wastes. Very small quantities of mixed municipal wastes may also be produced from time to time. These are separated at each of the individual data storage facilities and then are emptied into skips/larger bins externally for collection by the nominated waste contractor. The quantities are small due to the number of staff present onsite on a daily basis.

The Project gives rise to a variety of waste streams as set out in Attachment-8-1 if the Licence Application and duplicated below in Table 3.1 below.

Table 3.1 *Estimates on waste generation at the Installation*

Description of waste generated at the facility or installation	Estimate for tonnes generated per annum
Dry Mixed Recyclables (DMR) primarily generated from canteens and offices in each data storage facility	47 tonnes
Food / Organic waste	2.5 tonnes
Wood (pallets) from deliveries	0.6 tonnes

Glass generated from canteens in each data storage facility	Very low quantities
Waste Printer Cartridges/Toners generated from office activities	c. 3 printer cartridges per year per data storage facility
General Mixed Waste	1.0 Tonnes
Filters and other Media including: Air Filters; Evaporative Media; Containment Curtains	c. 0.5 tonnes
Waste from minor spills	1.4 tonnes
Other Filters containing hazardous substances	107 kgs
Used oil	Vendor Managed
Oily water from separators	18 tonnes
Paints (Latex and Oil), Paint Thinners, Paint Primers and other chemical residues in empty containers	Not generated under usual circumstances – handled by Vendor
Aerosol cans (Empty)	Very low quantities
Fluorescent tubes: note all fluorescent tubes are being phased out and replaced with LED.	15 kgs
Paints (Latex and Oil), Paint Thinners, Paint Primers and other chemical residues in empty containers containing organic solvents or other hazardous substances	Not generated under usual circumstances – handled by Vendor
Lithium batteries	0.017 tonnes
Lead Acid Sealed Batteries	0.15 tonnes
Miscellaneous Parts and Equipment inc. fans, hard drives, cables, connectors (Non Hazardous)	20 tonnes
Miscellaneous Parts and Equipment needing refinement inc. PCBAs, switches, servers, transformers, CPUs, laptops (Non Hazardous)	3.18 tonnes
Metals (copper, steel, aluminium)	2.5 tonnes
Other clean material, unmixed - excluding packaging	0.12 tonnes
Broken Office Equipment (with no other life)	0.125 tonnes
alkaline batteries	16 kgs
discarded equipment other	100 kgs

3.5 POLLUTION AND NUISANCES

Planning permissions for the data storage facilities that are relevant to this Licence application under Class 2.1 of the EPA Act 1992 (as amended) have been granted on site (refer to Section 6 of this licence application). The Installation is existing, and requires no further development works, and as such the Project is subject to the existing planning permissions and any conditions that relate to pollution and nuisances.

The Project activities and are contained within buildings and is no potential short-term nuisances such as odour, birds, mud, flies or vermin. There is limited potential for litter generation from the external storage of waste at the Site when waste is deposited into

the skips and when the skips/bins are being collected. Regular inspections are carried out to ensure that litter is collected and placed in the appropriate receptacles.

3.6 RISK OF MAJOR ACCIDENTS AND/OR DISASTERS

Landslides, Seismic Activity and Volcanic Activity

The Geological Survey Ireland (GSI) landslide database[1] was consulted and the nearest landslide to the Project was 11 km to the east of the Site in a very different geological environment, referred to as the Diswellstown 1990 event which occurred on 24 December 1999. There have been no recorded landslide events at the Site. Due to the local topography and the underlying strata there is a negligible risk of a landslide event occurring at the Site.

In Ireland, seismic activity is recorded by the Irish National Seismic Network. The Geophysics Section of the School of Cosmic Physics at the Dublin Institute for Advanced Studies (DIAS) has been recording seismic events in Ireland since 1978. The station configuration has varied over the years. Currently there are five permanent broadband seismic recording stations in Ireland and operated by DIAS. The seismic data from the stations comes into DIAS in real-time and are studied for local and regional events. Records since 1980 show that the nearest seismic activity to the Project was in the Irish sea (1.0 – 2.0 Ml magnitude) and ~50 km to the south in the Wicklow Mountains. There is a very low risk of seismic activity to the Project site. There are no active volcanoes in Ireland so there is no risk from volcanic activity.

Flooding/Sea Level Rise

The potential risk of flooding on the Site was reviewed with regard to incidences of historical, regional and local flooding relevant to the area of the subject site. Resources on flooding aspects for the subject area were reviewed and included the following:

- Catchment Flood Risk Assessment and Management (CFRAM).
- Review of Historic Flood Events Office of Public Works (OPW) on-line database[2].
- Fingal Development Plan Strategic Flood Risk Assessment 2017-2023.

A review of available information has identified no flood hazards at the Site; therefore, in accordance with Flood Risk Management (FRM) Guidelines the Site is located within Flood Zone C, where the probability of flooding is low. Low Probability flood events have an indicative 1-in-a-1000 chance of occurring or being exceeded in any given year. This is also referred to as an Annual Exceedance Probability (AEP) of 0.1%. The Installation is considered '*Appropriate'* for Flood Zone C.

Major Accidents/Hazards

The Seveso Directive (Directive 82/501/EEC, Directive 96/82/EC, Directive 2012/18/EU) was developed by the EU after a series of catastrophic accidents involving major industrial sites and dangerous substances. Such accidents can give

[1]https://www.gsi.ie/en-ie/programmes-and-projects/geohazards/activities/Pages/National-Landslide-Mapping.aspx

[2] https://www.floodinfo.ie/map/floodmaps/

rise to serious injury to people or serious damage to the environment, both on and off the Site of the accident. The Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 (S.I. No. 209 of 2015) (the "COMAH Regulations"), implement the latest Seveso III Directive (2012/18/EU).

The Installation is not a Seveso/COMAH facility. The only substance stored on site controlled under Seveso/COMAH will be diesel for generators and the amounts proposed do not exceed the relevant thresholds of the Seveso Directive. The Project site is not located within the consultation distance of any COMAH establishment that is notified to the HSA.

The Irish HSE Records and Maps have been reviewed and the closest active COMAH site is the Lower Tier Establishment at Exolum Aviation Ireland Ltd (formerly CLH) Corballis Road, Dublin Airport, Dublin 2. This is located west over 2.8 km from the Site. Due to the separation distance from the Site, there are no potential impacts, interactions or cumulative impacts with the Project. This Lower Tier Establishment does not form a constraint to development at the Project site.

3.7 RISKS TO HUMAN HEALTH

The characteristics of the Project, in terms of the risks to human health have been considered in this assessment. The primary potential impacts of the Project on human health would be increase in air pollution, noise, or pollution of groundwater/drainage as a result of the Project.

The location of the Project is located in a predominantly commercial and industrial area within an IDA Business park. An undeveloped green area runs along the Santry River to the South of the Site. The nearest residential locations are the properties to the east along the Clonshaugh road, to the south along the Oscar Traynor road.

The potential impacts on human health as a result of the generation air emissions are considered to be negligible, and have been assessed through a detailed Air Quality Impact Assessment detailed further in Section 5.4 of this report. Therefore, the Project does not pose a risk to human health in respect of Air Quality.

The potential impacts on human health as a result of the generation of noise is are considered to be negligible and have been assessed through a detailed Noise Impact Assessment detailed further in Section 5.5 of this report. Therefore, the Project does not pose a risk to human health in respect of Noise.

As noted in Section 3.6 above the Installation is not a Seveso/COMAH facility. The only substance stored on site controlled under Seveso/COMAH will be diesel for generators and the amounts proposed do not exceed the relevant thresholds of the Seveso Directive. Therefore, the Project does not pose a risk to human health in respect of Major Accident Hazards.

The Geological Survey of Ireland data shows that the Site does not lie within a drinking water protection area. The area is serviced by mains water supply therefore it is unlikely that any wells are used for potable water supply. There are no watercourses on the Site and no open water connection to the Santry River. As such the only pathway for contamination of a water resource would be through the stormwater drainage system. The Installation includes an appropriately designed stormwater network including hydrocarbon interceptors that will ensure any risk from diesel spills through the carparks or unloading areas is minimised. Therefore, the Project does not pose a risk to human health in respect of underground drinking water supplies. Wastewater

from the Project will connect to mains supplies, therefore, the Project does not pose a risk to human health in respect of underground drinking water supplies or wastewater pollution.

4.0 LOCATION AND CONTEXT OF THE PROJECT

4.1 EXISTING AND APPROVED LAND USE

The Installation is located on a site of c. 7.9 hectares and is located at the main entrance to the established Clonshaugh Business & Technology Park, approximately 200 m off Oscar Traynor Road. Developments within this business park are similar 'individual lot' type developments. The Clonshaugh Business & Technology Park is situated 3km from Dublin Airport and 6 km from Dublin City Centre. To the south of the Site is a sports grounds facility and to the East of the Business Park are residential estates. The M1 motorway runs parallel to the business park site boundary to the West of this site location. Access to and from the park at present is from Oscar Traynor Road.

The IDA Clonshaugh Business and Technology accommodates a range of technology and industrial type uses and is bounded by the M50/M1 to the west, the Santry River to the south with Oscar Traynor Road beyond, residential areas to east and the R139 to the north.

The wider context of the Site is defined primarily by commercial and industrial development. Large areas of the surrounding lands to the south and north within the Clonshaugh Business & Technology Park have been developed in the past 10-15 years and are occupied by industrial campuses including commercial and retail uses, including manufacturing, data centres and food manufacturing uses.

The closest occupied residential properties are located c. 200m east of the Site boundary along the Clonshaugh Road. The surrounding 1 km of the Site includes IE and IPC Licenced sites including:

- Forest Laboratories Ireland Limited (P0306-03), located to the immediate west of the Site; and
- Wood-Printcraft Limited (P0143-01) located to the southeast in Coolock Industrial Estate
- Mondelez Ireland Production Limited (P0809-01) located to the southeast in Coolock Industrial Estate

The Site location and wider context is presented in 21_123F-CSE-00-XX-DR-C-0001 Overall Site Location Plan included with this application.

4.2 RELATIVE ABUNDANCE, AVAILABILITY, QUALITY AND REGENERATIVE CAPACITY OF NATURAL RESOURCES IN THE AREA AND ITS UNDERGROUND

4.2.1 Hydrogeology and Hydrology

Inspection of the available Geological Survey of Ireland mapping shows that the bedrock geology underlying the Project site belongs the Lucan Formation (west area) and Tober Colleen Formation (to the east). The GSI categorises the bedrock aquifer underlying the Project site as having a 'Low' vulnerability (>10 m of low permeable overburden thickness) which is consistent with the Site investigation results.

The bedrock aquifer underlying most of the Project site according to the GSI National Draft Bedrock Aquifer Map is classified as a 'Poor Aquifer' (Pl) which is described as Bedrock which is Generally Unproductive except for Local Zones. The north-western part of the Site is, however, classified as a Locally Important Aquifer (Ll), Bedrock which is Moderately Productive only in Local Zones).The Site is not located near any public groundwater supplies or group schemes. There are no groundwater source protection zones in the immediate vicinity of the Site.

The Groundwater Body (GWB) underlying the Site is the Dublin GWB. Currently, this GWB is classified under the WFD Risk Score system (EPA, 2021) as 'under review'. The Dublin GWB was given a classification of 'Good' for the last WFD cycle (2013-2018).

Currently, the EPA classifies the Santry River waterbody located to the south of the Site as having 'Poor' status (3rd Cycle 2013-2018) and as being 'At risk' of not achieving Good status, which means that there is a possible threat to the ecological status resulting in harm to the river ecosystems. This 'Poor' status in the Santry River is due to its Invertebrate Status or Potential (EPA, 2021). An active EPA water quality station is located next to the subject site (Clonshaugh Road Bridge); this station is classified with a Biological Q Rating of 'Q2-3' according to its 2019 records, which means a 'Moderately Polluted' status in the river. This is consistent with historical ecological conditions recorded in the Santry River during previous years.

There is no direct discharge proposed to the Santry River or groundwater related to the Project. There is an indirect discharge via the business park storm sewer to the Santry River. The stormwater from the Site is discharged at the 2 no emission points SW1 discharges connects to a 450mm business park storm sewer, SW2 connects to a 900 mm diameter, business park storm sewer that is located to the east of the Site that flows north to south. The stormwater passes through Hydrocarbon Interceptors on site to ensure that the quality of the stormwater discharge is controlled. This network is shown on Drawing 21_123F-00-XX-DR-C-1100 Surface Water Layout Plan included with the Licence Application.

The storm sewer outfalls into the Santry River that is located to the south of the Site; the Santry River flows 5.15 km east, to the North Bull Island transitional water body, and ultimately the Dublin Bay.

4.2.2 Biodiversity

The potential impacts of the Project on designated sites has been considered in terms of the sensitivity of the location through the Moore Group Appropriate Assessment (AA) Screening report included as Attachment-6-3-4-AA Screening-Licence-Apr-2022 to this Licence Application.

There are no Annexed habitats or species within or adjacent to the Site. The Site habitats using the Fossitt's Guide to Habitats in Ireland as mainly of Buildings and Artificial Surfaces (BL3) with areas of area of Ornamental / Non-native Shrub (WS3). The Site, due to its build environment and surroundings has a low local ecological value.

This AA Screening (Attachment-6-3-4-AA Screening-Licence-Apr-2022) found that the nearest European sites to the Project are the Dublin Bay sites, with the nearest being South Dublin Bay and River Tolka Estuary SPA (Site Code 004024) situated almost 4km to the south. Other sites with potential connectivity to the Project are the North Dublin Bay SAC (000206) and North Bull Island SPA (Site Code 004006); these are

located over 4km to the east of the Project and indirectly liked via stormwater discharge to the Santry River. There is no connectivity to any other European sites.

The project is located within an established light industrial area in the northern suburbs of Dublin. The Santry River runs to the south of the site. 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.

The AA Screening (Attachment-6-3-4-AA Screening-Licence-Apr-2022) concluded that:

There are no predicted effects on any European sites given:

- *The distance between the Project and any European Sites, over 3.9km;*
- *There are no predicted emissions to air, water or the environment during the operational phases 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.

4.3 ABSORPTION CAPACITY OF THE NATURAL ENVIRONMENT

The project, due to its size and localised nature will not have any potential effect on wetlands, riparian areas, river mouths, mountain and forest areas, nature reserves and parks, or densely populated areas,

It is noted that there is an indirect discharge to coastal zones and the marine environment via the business park storm sewer to the Santry River. The storm sewer outfalls into the Santry River that is located to the south of the Site; the Santry River flows 5.15 km east, to the North Bull Island transitional water body, and ultimately the Dublin Bay. However, the design set out in Section 5.3 ensures that the Project will not have any potential effect on these areas.

The environmental sensitivity of the proposed location in respect of Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive been addressed through the AA Screening (Attachment-6-3-4-AA Screening-Licence-Apr-2022) as previously outlined.

The Installation is existing, and requires no further development works, and as such the Project will not have any potential effect on landscapes and sites of historical, cultural or archaeological significance.

5.0 TYPES AND CHARACTERISTICS OF POTENTIAL IMPACTS

This section sets out the likely significant effects on the environment of the Project in relation to the following factors as set out in Article 3(1) [of the EIA Directive]; that states the following figures

This section shall identify, describe and assess in an appropriate manner, in the light of each individual case, the direct and indirect significant effects of a project on the following factors as set out in Article 3(1) of the EIA Directive:

a) population and human health;
b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC;
c) land, soil, water, air and climate;
d) material assets, cultural heritage and the landscape;
e) the interaction between the factors referred to in points (a) to (d).

The quality, magnitude and duration of potential impacts are defined in accordance with the criteria provided in the *Guidelines on Information to be contained in Environmental Impact Assessment Reports* (EPA, 2017). The criteria are presented below in Table 5.1.

Table 5.1 *Schedule of Impacts following EPA 2017 (draft) Guidelines*

Characteristic	Term	Description
Quality of Effects	Positive	A change which improves the quality of the environment
	Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.
	Negative	A change which reduces the quality of the environment
Describing the Significance of Effects	Imperceptible	An impact capable of measurement but without noticeable consequences
	Not significant	An effect which causes noticeable changes in the character of the environment but without noticeable consequences
	Slight	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities
	Moderate	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends
	Significant	An effect, which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment
	Very Significant	An effect which, by its character, magnitude, duration or intensity significantly alters the majority of a sensitive aspect of the environment.
	Profound	An impact which obliterates sensitive characteristics
Describing the Extent and Context of Effects	Extent	Describe the size of the area, the number of sites, and the proportion of a population affected by an effect.
	Context	Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions (is it the biggest, longest effect ever?)

Characteristic	Term	Description
Describing the Probability of Effects	Likely Effects	The effects that can reasonably be expected to occur as a result of the planned project if all mitigation measures are properly implemented.
	Unlikely Effects	The effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.
Describing the Duration and Frequency of Effects	Momentary Effects	Effects lasting from seconds to minutes
	Brief Effects	Effects lasting less than a day
	Temporary Effects	Effects lasting less than a year
	Short-term Effects	Effects lasting one to seven years.
	Medium-term Effects	Effects lasting seven to fifteen years
	Long-term Effects	Effects lasting fifteen to sixty years
	Permanent Effects	Effects lasting over sixty years
	Reversible Effects	Effects that can be undone, for example through remediation or restoration
	Frequency of Effects	Describe how often the effect will occur. (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually)
Type of Effects	Indirect Effects	Impacts on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway.
	Cumulative	The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects.
	'Do Nothing'	The environment as it would be in the future should no development of any kind be carried out
	`Worst case' Effects	The effects arising from a project in the case where mitigation measures substantially fail
	Indeterminable	When the full consequences of a change in the environment cannot be described
	Irreversible	When the character, distinctiveness, diversity, or reproductive capacity of an environment is permanently lost
	Residual	Degree of environmental change that will occur after the proposed mitigation measures have taken effect
	Synergistic	Where the resultant impact is of greater significance than the sum of its constituents

5.1 POPULATION AND HUMAN HEALTH

The EC 2017 *Guidance on the preparation of the Environmental Impact Assessment Report* outlines that human health is a very broad factor that is be highly project dependent. The guidance states: *The notion of human health should be considered in the context of the other factors in Article 3(1) of the EIA Directive and thus environmentally related health issues (such as health effects caused by the release of toxic substances to the environment, health risks arising from major hazards associated with the Project, effects caused by changes in disease vectors caused by the Project, changes in living conditions, effects on vulnerable groups, exposure to traffic noise or air pollutants) are obvious aspects to study.*

The EPA guidance explains that the scope of population and human health is project dependant but should consider significant impacts likely to affect aspects such as: convenience (expanded range of transport options); nuisance/ disturbance from lighting; displaced settlement patterns (residential); employment opportunities; settlement patterns; land use patterns; access for tourism, amenity, health impacts and/or nuisance due to noise, dust or water pollution; and health and safety.

The primary potential impacts of the Project on human health would be the potential for increased air pollution, noise, or pollution of groundwater/watercourses as a result of the Project have been considered in further detail within this report. There are no planned direct discharges to water or land, although the risk of accidental discharge or spills exists. There is no additional visual impact, impact on local parks, local tourism or shopping amenities, as a result of the Project.

A detailed Air Quality Impact Assessment has been undertaken for the Project (discussed in Section 5.4) to assess the impact of the Installation with reference to human health criteria and concluded, based on conservative assumptions, that the Project will not result in any off-site exceedance of the relevant ambient air quality standards.

The adherence to noise criteria set by DCC has been a central consideration in the design of the Installation. The Noise Impact Assessment undertaken for the Project (discussed in Section 5.5), predicted that the noise levels from the Project comply with the relevant noise criteria as discussed in Section 5.5.

The Geological Survey Ireland (GSI) data indicates that the Site does not lie within a drinking water protection area, therefore the Site is not particularly sensitive in respect of drinking water supplies. The area is serviced by mains water supply therefore it is unlikely that any wells in the area are used for potable water supply. The Installation includes an stormwater network designed to ensure that during the operational phase the risk from diesel spills through the carparks or unloading areas is minimised through the use of hydrocarbon interceptors. Wastewater from the Project will connect to mains supplies and will not have a potential impact on local amenities or the local population.

The potential impact of the Installation with respect to populations and human health during the operational of the Project is ***neutral***, ***not significant*** and ***long-term***.

5.2 BIODIVERSITY, WITH PARTICULAR ATTENTION TO SPECIES AND HABITATS PROTECTED UNDER DIRECTIVE 92/43/EEC AND DIRECTIVE 2009/147/EC;

The potential impact from the Project on habitats protected under Directive 92/43/EEC and Directive 2009/147/have been considered as a part of the AA Screening: Attachment-6-3-4-AA Screening-Licence-Apr-2022 which has been included with the License Application documentation.

The AA Screening (Attachment-6-3-4-AA Screening-Licence-Apr-2022) concluded that:

There are no predicted effects on any European sites given:

- *The distance between the Project and any European Sites, over 3.9km;*
- *There are no predicted emissions to air, water or the environment during the operational phases that would result in significant effects.*

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

5. *The Project is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.*
6. *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.*
7. *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.*
8. *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.

There are no Annexed habitats or species within or adjacent to the Site. The Site habitats using the Fossitt's Guide to Habitats in Ireland as mainly of Buildings and Artificial Surfaces (BL3) with areas of area of Ornamental / Non-native Shrub (WS3). The Site, due to its build environment and surroundings has a low local ecological value.

The potential impact of the Project on biodiversity; with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC as a result of the Project is ***neutral, imperceptible, long-term***.

5.3 LAND, SOIL, AND WATER

Surface water runoff from roads and car parking areas, and bulk fuel storage areas can potentially contain elevated levels of contaminants such as hydrocarbons. Hydrocarbons are a known carcinogen (cause cancer) in many animals and suspected to be carcinogenic to humans. There are no other likely significant impacts as a result of the Project.

The Site stormwater network conveys the stormwater through hydrocarbon interceptors to one of 2 no. stormwater attenuation systems constructed on the Site, or directly to the business park storm sewer.

The Class 1 hydrocarbon interceptors are located down gradient of the storm cells, and prior to outfall, this ensures the quality of stormwater discharge is controlled prior discharge offsite; and removing hydrocarbons prior to discharge. The interceptors are equipped with level detection and will connect to the BMS/EPMS critical alarm.

Additional onsite control and mitigation measures are in place including:

- Double skinned day tanks, with high- and low-level alarms;
- Bunded bulk diesel tanks with high- and low-level alarms;
- Bulk diesel tank bunds and delivery bays are equipped with hydrocarbon probes in the bund sump which detects diesel in the bund. This triggers closure of the sump discharge should hydrocarbon be detected in the sump and sends an alarm signal to the BMS to alert EOTs.

- Hydrocarbon interceptors with level alarms; and
- Standard operating procedures for fuel delivery.

In the unlikely event of an accidental release, the onsite control and mitigation measures will ensure there is an there is a negligible potential for impact to the receiving storm or soil/groundwater.

Taking into account the designed measures of the Installation, the potential impact to land, soils, geology, hydrogeology, and hydrology as a result of the Project is ***neutral, imperceptible, long-term***.

5.4 AIR QUALITY AND CLIMATE

The greatest potential impact on air quality as a result of the Project is emissions from the emergency back-up generators. The following is a list of the minor air emission points.

- Building W: 13 no. 5.44 MW_{th} diesel powered emergency back-up generator stacks with a minimum height of 6 m above ground level.
- Building X: 20 no. 5.44 MW_{th} diesel powered emergency back-up generator stacks with a minimum height of 16 m above ground level.
- Building Y: 7 no. 5.44 MW_{th} diesel powered emergency back-up generator stacks with a minimum height of 16 m above ground level.
- Sprinkler Pumphouse associated with Building X: 2 no. 0.337 MW_{th} diesel powered emergency back-up fire pumps.
- Sprinkler Pumphouse associated with Building X and Y: 2 no. 0.423 MW_{th} diesel powered emergency back-up fire pumps.

In order to reduce the risk to health from poor air quality, national and European statutory bodies have set limit values in ambient air for a range of air pollutants. Air dispersion modelling has been undertaken and is included in the License Application as Attachment-7-1-3-2-Air Emissions Impact to ensure that the appropriate ambient air quality limits are met. The modelling has been undertaken using the AERMOD air dispersion model in line with EPA Guidance Note AG4.

The stack heights of the emergency back-up generators have been designed to ensure that an adequate height was selected to aid dispersion of the emissions and achieve compliance with ambient air quality limits at off-site locations (including background concentrations). There is no SCR abatement or treatment systems installed.

The results on the air dispersion model undertaken for the Installation is set out in Attachment-7-1-3-2-Air Emissions Impact of the Licence Application. In summary, emissions to atmosphere of NO_2, as the main polluting substance (as defined in the Schedule of EPA (Industrial Emissions) (Licensing) Regulations 2013, S.I. No. 137 of 2013) from the standby generators, will be in compliance with the ambient air quality standards which are based on the protection of the environment and human health. Therefore, no significant impacts to the ambient air quality environment are predicted.

In reality and based on recent experience over the past number of years, generators are rarely used other than during testing and maintenance. During normal operations at the facility, the electricity will be supplied from the national grid so there will be no direct emissions of CO_2 or transboundary pollutants from the Site.

On the basis that the Installation will consume an average of 202,794 MWh of power. This translates to approximately 60,027 tonnes of CO_2eq per year which will have an ***indirect***, ***long-term, negative*** and ***slight*** impact on climate. This is based on the 2020 CO2 intensity of electricity of 296 gCO2/kWh.

Taking into account the designed measures (characteristics) of the Installation the potential impact on Air Quality as a result of the Project is ***long-term***, ***localised***, ***negative*** and ***slight.***

5.5 NOISE IMPACT

All planning permissions for the data storage facilities that are relevant to this Licence application under Class 2.1 of the EPA Act 1992 (as amended) have been granted on site (refer to Section 6 of this licence application). The Installation is existing, and requires no further development works, and as such the Project is subject the existing planning permissions and any conditions that relate to noise.

The primary source of noise is expected to arise from the Installation building service plant (i.e. the AHU air intake and the AHU air exhaust) as well as the operation of the emergency back-up generators during testing and emergency scenarios (i.e. generator air intake, generator air exhaust and generator engine exhaust).

An assessment of the noise emission impacts in line with the EPA *Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)* has been conducted by AWN and included with the Licence Application as Attachment-7-1-3-2-Noise Emissions Impact Assessment.

Based on the EPA NG4 guidance, the following noise criteria are appropriate at the nearest NSL's to the facility:

- Daytime (07:00 to 19:00hrs) 55dB $L_{Ar,15min}$
- Evening (19:00 to 23:00hrs) 50dB $L_{Ar,15min}$
- Night time (23:00 to 07:00hrs) 45dB $L_{Aeq,15min}$

During the night period, no tonal or impulsive noise from the facility should be clearly audible or measurable at any NSL. The applicable noise criteria identified are in line with the typical limit values for noise from licensed sites.

There are certain plant items proposed for the development site that are designed to be used in emergency situations, for example, when grid power supplies fail. It is common practice to allow a relaxation of noise limits associated with emergency plant operations. Section 4.4.1 of EPA NG4 contains the following comments in relation to emergency plant items:

> *"In some instances, licensed sites will have certain items of emergency equipment (e.g. standby generators) that will only operate in urgent situations (e.g. grid power failure). Depending upon the context, it may be deemed permissible for such items of equipment to give rise to exceedances in the noise criteria/limits during limited testing and emergency operation only. If such equipment is in regular use for any purposes other than intermittent testing, it is subject to the standard limit values for the site".*

It is therefore considered that the proposed noise criterion of 55dB $L_{Aeq,(15mins)}$ is appropriate in emergency scenarios for daytime, evening and night-time periods.

Plant items have been selected in order to achieve the required noise levels in order that the plant noise emission levels are achieved on site during operations. Each emergency generator is contained within an acoustic container to dampen the noise, and in line attenuators for the generator stacks and exhausts are used where necessary. With due consideration that has taken place during the design process, this approach ensures that the Site operates within the constraints of the best practice guidance noise limits that have been adopted as part of the detailed assessment.

With regard to the assessment documented in Attachment-7-1-3-2-Noise Emissions Impact Assessment, it is anticipated that the noise abatement measures are sufficient to ensure that the noise levels comply with the daytime, evening and night-time noise limits at the nearest noise sensitive receptors.

Taking into account the designed measures (characteristics) of the Installation the potential impact due to Noise as a result of the Project is ***neutral, imperceptible, long-term***.

5.6 LANDSCAPE AND VISUAL

The Installation is existing, and requires no further development works, and as such the Project is predicted to have a ***long-term, neutral*** and ***imperceptible*** impact on the landscape.

5.7 CULTURAL HERITAGE

The Installation is existing, and requires no further development works, and as such the Project is predicted to have a ***long-term, neutral*** and ***imperceptible*** impact on cultural heritage.

5.8 MATERIAL ASSETS

Resources that are valued and that are intrinsic to specific places are called ‘material assets’. They may be of either human or natural origin. The objective of the assessment is to ensure that these assets are used in a sustainable manner, so that they will be available for future generations, after the development of the project. Material assets is taken to mean built services and infrastructure, roads and traffic, and waste management.

All planning permissions for the data storage facilities that are relevant to this Licence application under Class 2.1 of the EPA Act 1992 (as amended) have been granted on site (refer to Section 6 of this licence application). The Installation is existing, and requires no further development works, and as such the Project is subject the existing planning permissions and any conditions that relate to Material Assets.

Utilities: Foul Sewer, Stormwater and Potable Water

Water supply and wastewater is provided via the existing public mains network adjacent to the Site. The disposal of foul water from the Site is separated from that of surface water. The predicted impact of the Project on the environment in respect of foul sewer, stormwater and potable water, will be ***long-term, neutral*** and ***imperceptible***

Waste and Waste Management

The Installation will give rise to a variety of waste streams. The majority of waste will be generated from packaging for equipment deliveries to the facility.

During the operational phase, a structured approach to waste management as set out in Attachment-8-2-1-Waste-Hierarchy of the Licence Application will promote resource efficiency and waste minimisation. The implemented measures and the high rate of reuse, recycling and recovery is achieved. The predicted impact of the Project on the environment in respect of waste and waste management will be ***long-term, neutral*** and ***imperceptible***.

Traffic and Transportation

Vehicles access the Installation via the existing Business and Technology Park Estate Road. This road is a private road, approximately 1 km in length. It forms a T-junction with The R104 at its south end and is a dead-end at its north end. Security barriers are provided approximately 100 metres from its south end.

The Installation is existing, and the Project requires no further development works nor will result in any additional generation of Traffic than what is already existing and permitted under the DCC planning permissions for the Installation. Therefore, the any impact from Traffic has already been accommodated and accounted for within the surrounding road network/

The predicted impact of the Project on the environment in respect of Traffic and Transportation will be ***long-term, neutral*** and ***imperceptible***.

5.9 ASSESSMENT OF POTENTIAL FOR IMPACTS FROM INTERACTIONS

This section discusses the potential interactions and inter-relationships between the environmental factors discussed in the preceding sections. In accordance with the guidance, not only are the individual significant impacts required to be considered when assessing the impact of a development on the environment, but so must the interrelationships between these factors be identified and assessed.

All planning permissions for the data storage facilities that are relevant to this Licence application under Class 2.1 of the EPA Act 1992 (as amended) have been granted on site (refer to Section 6 of this licence application). The Installation is existing, and requires no further development works, and as such the Project is subject the existing planning permissions and any conditions.

The only potential interaction is that which relates to Hydrology and Biodiversity. There is an indirect discharge to coastal zones and the marine environment via the business park storm sewer to the Santry River. The storm sewer outfalls into the Santry River that is located to the south of the Site; the Santry River flows 5.15 km east, to the North Bull Island transitional water body, and ultimately the Dublin Bay. However, the design set out in Section 5.3 ensures that the Project will not have any potential effect on these areas.

There is a potential interaction between Air Quality and Biodiversity and impacts in nearby ecologically sensitive areas, however the ambient level of NO_X in the Santry Demesne Proposed NHA (000178); c. 1km south-west, due to emissions from the subject site, will be a small fraction of the ambient air quality standard for the protection of vegetation. Similarly, cumulative emissions will lead to ambient NO_X levels which will be a small fraction of the ambient air quality standard for the protection of vegetation. The nearest European site is South Dublin Bay and River Tolka Estuary

SPA c. 4.3km south-east. The increased distance of this designated area from the subject site means that it is highly unlikely that airborne pollution could affect any European site.

There is a potential interaction between Noise and Biodiversity. Based on the separation distance from the facility to the nearest ecologically sensitive area and European site, it is highly unlikely that noise arising from the facility under any scenario would have any impact on these sites. Therefore, the noise impact on ecologically sensitive areas has been scoped out of any further assessment.

It is considered that there will be no likely significant interactions as a result of the Project which would warrant preparation of an EIAR.

5.10 ASSESSMENT OF POTENTIAL FOR CUMULATIVE IMPACTS

As part of the assessment of the Project, account has been taken of permitted developments in the area. The Cumulative Impact Assessment has been compiled on the basis of information which was publicly available at the time of assessment, and which could be confirmed by a review of public planning records. Projects for which no information is publicly available for the purpose of cumulative impact assessment have been screened out.

Following an assessment, of the potential impact of the Project it has been concluded that the only likely cumulative impacts that may be significant relate to Air Emissions from the emergency backup generators.

Attachment-7-1-3-2-Air Emissions Impact considered the potential for cumulative impacts in respect of Air Quality in regards to nearby sites within a 1 km radius. Sites which hold an IED licence from the EPA were assessed for relevant air emissions. There are 2 no. IE licenced sites within 1 km of the facility, these are Global Switch Property (Dublin) Ltd (Licence No. P0109) and Forest Laboratories Ireland Ltd (Licence No. P0306) within Clonshaugh Business & Technology Park. However, neither of these facilities have licenced NO_X emission points and thus have not been included in the cumulative air modelling assessment.

The model includes operational emissions from the existing and proposed datacentres located in the northwest of the Clonshaugh Estate. The Licence Attachment-7-1-3-2-Air Emissions Impact considered the Applicants separate data storage facility to the north-west of the subject site which is referred to as Building A through Building F. Because the Applicant has sufficient information about the emissions associated with emergency back-up generator testing, maintenance and emergency operations at this second facility, these emission sources have been included in the cumulative assessment. An additional data centre, referred to as the Dataplex data centre (located at the eastern boundary of the Building A to Building F facility) was identified within the study area. The operational details of this facility is known and sufficient information about the emissions associated with emergency back-up generator testing, maintenance and emergency operations at this facility are available and thus this has been included in the cumulative assessment.

As outlined in the EPA “Air Dispersion Modelling from Industrial Installations Guidance Note (AG4)” (EPA, 2020), a cumulative assessment should be undertaken where a nearby facility emits greater than 100 tonnes per annum of any pollutant. Thus, provided a nearby facility emits less than 100 tonnes of NOX per annum, a cumulative assessment is not required under the EPA AG4 guidance. To note, a standard back up emergency generator operating for 72 hours per year will emit about 1 or 2 tonnes

of NOX per year so there would need to be greater than 50 generators operating for 72 hours/year before this requirement is triggered. Based on our review of aerial photographs of the area, while other sites existing within the vicinity of the project, these sites would not be large enough to exceed this guidance. Additionally, the model has considered the largest datacentre cluster in the estate together with the proposed development (and has considered the operation of emergency generators in compliance with AG4) and the resultant impact, following EIA guidelines for description of effects has a *slight* significance only. It is therefore not considered likely that the addition of any of the aforementioned smaller datacentres with significantly lower emission volumes would result in any change to the conclusion of the EIA Screening report.

The operational impact for the Project is stated as *long term, neutral* and *imperceptible*. Considering that the overall environmental impact is minor, this will have a correspondingly minor impact on the environment with the adjacent and surrounding permitted developments. Therefore, the cumulative environmental impact as a result of Air Emission is also considered *long-term, neutral* and *imperceptible.*

Any future development proposed on the surrounding lands should be cognisant with the zoning and will be subject to EIA and/or planning conditions which include appropriate mitigation measures to minimise environmental impacts.

Based on the assessment of the environmental sensitivities in the existing environment and consideration of potential cumulative impacts, it is concluded that there are no likely cumulative environmental impacts which would warrant preparation of an EIA.

6.0 FINDINGS AND CONCLUSIONS

The purpose of this EIA Screening Report has been to consider whether there is a requirement for the preparation of an Environmental Impact Assessment Report (EIAR) to accompany the Licence Application to the EPA, and to provide the EPA with the information, to enable the Agency to determine whether the Project is likely to have significant effects on the environment.

If the EPA determines that the Project is not likely to have significant effects on the environment, the Licence Application can be determined without an Environmental Impact Assessment Report (EIAR) having been submitted.

The Project and component parts have been considered against the thresholds outlined in Schedule 5, Part 2 Class 10 (a) to (m). The most relevant project type in the context of the Project is Class 10 (a) and Class 10 (iv):

10. Infrastructure projects

(a) Industrial estate development projects, where the area would exceed 15 hectares.

On the basis of the evaluation set out in Section 2.0 of this document, an EIA for the Project is not mandatory as the Project is considered to be a sub-threshold development.

The EPA is required to assess whether the Project is likely to have significant effects on the environment in order to determine whether the submission of an EIAR is required. The information necessary to enable this screening assessment has been

provided in this report and the methodology used has been informed by the available guidance, legislation and directives.

It is concluded having regard to the nature, scale and location of the subject site, that the Project is not considered to have likely significant effects on the environment (direct, indirect or cumulatively with other development) and therefore it is considered that an EIAR is not required in this instance.

AWN has considered the Project and assessed the potential for significant environmental effects and the need for an EIAR. This evaluation is documented in Sections 3.0, 4.0 and 5.0 and is summarised below:

- There are no Annexed habitats or species within or adjacent to the Site. The Site habitats using the Fossitt's Guide to Habitats in Ireland as mainly of Buildings and Artificial Surfaces (BL3) with areas of area of Ornamental / Non-native Shrub (WS3). The Site, due to its build environment and surroundings has a low local ecological value.
- The Appropriate Assessment Screening (Attachment-6-3-4-AA Screening-Licence-Apr-2022) concludes that an Appropriate Assessment is not required. It is considered that the Project alone or in combination with other developments will have no likelihood of direct or indirect effects on European sites in view of their conservation objectives.
- Surface water runoff from roads and car parking areas, and bulk fuel storage areas can potentially contain elevated levels of contaminants such as hydrocarbons. In the unlikely event of an accidental release, the onsite control and mitigation measures will ensure there is an there is a negligible potential for impact to the receiving storm or soil/groundwater.
- A detailed Air Quality Impact Assessment Report (Attachment-7-1-3-2-Air Emissions Impact) was completed to assess the impact of the Installation with reference to the protection of the environment and human health. This report concludes, on conservative assumptions, that the Project will not result in any off-site exceedances of the applicable ambient air quality standards (including at the nearest residential receptors).
- The Noise Impact Assessment Report (Attachment-7-1-3-2-Noise Emissions Impact Assessment) has assessed the potential noise impact of the Installation and concludes that the Project, will comply with the relevant noise criteria at noise sensitive locations (including at the nearest residential receptors).
- The Installation is existing, and requires no further development works, and as such the Project will not materially impact on landscape, cultural heritage, or material assets.

AWN has concluded that there are no likely significant effects on the environment for the Project, so the preparation of an EIA is not required.

A mandatory EIA is not required for the Project, and as the potential effects are not significant it is submitted by AWN that there is not a requirement for an EIAR to be submitted with this Licence Application.

7.0 REFERENCES

[1] Office of the Planning Regulator Practice Note PN02 Environmental Impact Assessment Screening. OPR, June 2021

[2] Environment Protection Agency. Guidelines on the Information to be contained in Environmental Impact Assessment Reports (Draft). EPA: 2017.

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European Union. Environmental Impact Assessment of Projects Guidance on Screening. EU Luxembourg: 2017.

European Union. Guidance on the preparation of the Environmental Impact Assessment Report. EU Luxembourg: 2017.

Department of Housing, Planning and Local Government. Guidelines for Planning Authorities and An Bord Pleanala on carrying out Environmental Impact Assessment. DHPLG: 2018.

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