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23 June 2025

Office of Environmental Sustainability
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford

RE: EPA Industrial Emissions Licensing Application P1186-02

Dear Sir/Madam,

On behalf of the applicant, Amazon Data Services Ireland Limited, and further information requested 28 May 2025 by the EPA, we submit further information and clarifications in respect of the licence application P1186-02.

The following revised attachments and documents are submitted with this response:

- Attachment-1-2-Non-Technical Summary_Rev
- Attachment-4-6-1-Water Energy Usage_Rev
- Attachment-4-6-2-Raw Materials Interim Products_Rev
- Attachment-4-7-3-BREF-Emissions from Storage_Rev
- Attachment-4-7-4-BREF-Industrial Cooling Systems_Rev
- Attachment-4-8-1-Operational Report_Rev
- Attachment-4-8-3-Complete Baseline Report_Rev
- Attachment-4-8-4-Site Condition Report_Rev
- Attachment-6-1-Stakeholder Engagement_Rev
- Attachment-6-3-1-Planning Decision Oct 2019
- Attachment-6-3-1-Planning Report Oct 2019
- Attachment-6-3-4-AA Screening Licence Jun '25_Rev
- Attachment-7-1-3-1-Emissions Compliance Report_Rev
- Attachment-7-1-3-2-Air Emissions Impact Assessment_Rev
- Attachment-7-1-3-2-Noise Emissions Impact_Rev
- Attachment-7-1-3-2-Soil and Water Impact Assessment_Rev
- Attachment-7-4-2-Emissions to Air Minor Potential_Rev
- Attachment-7-5-Noise Emissions_Rev
- Attachment-7-7-Storm Water Discharges_Rev
- Attachment-7-7-1-Stormwater Monitoring_Rev
- 257501.0094TR01 Stormwater Impact Assessment_Rev
- Drawing-Noise Monitoring Locations_Rev
- Revised Drawings:

    - 21_123F-CSE-00-XX-DR-C-0002 SITE LAYOUT PLAN (Rev. C06)
    - 21_123F-CSE-00-XX-DR-C-1100 SURFACE WATER LAYOUT PLAN (Rev.06)
    - 21_123F-CSE-00-XX-DR-C-1200 FOUL WATER LAYOUT PLAN (Rev.06)
    - 21_123F-CSE-00-XX-DR-C-2000 EMISSION LAYOUT PLAN (Rev.06)

1. AIR EMISSIONS

Request:

1. In Attachment-7-1-3-2 the results provided in the Executive Summary and Assessment Summary differ to those in the Results section of the report. The following are examples of discrepancies, note this is **not an exhaustive list**;

a. The Executive Summary and Assessment Summary state that the installation will lead to ambient NO_x concentrations (including background) at Santry Demesne pNHA and Baldoyle Bay SAC of 27% and 14% respectively of the annual limit values, however the Results section state 58% and 37%.

b. The Executive Summary and Assessment Summary state that the installation will lead to ambient SO_2 concentrations (including background) at Santry Demesne pNHA and Baldoyle Bay SAC of 7% and 5% respectively of the annual limit values, however the Results section state 9%.

c. The process contribution of the installation to NH_3 concentrations and SO_2 concentrations (cumulative) at South Dublin Bay & River Tolka Estuary SPA are also inconsistent throughout the report.

Applicants Response:

A comprehensive review of Attachment 7-1-3-2 has been undertaken to ensure that all results and conclusions are consistent throughout the report.

The assessment of ecological impacts due to emissions to air has been fully revised to present the dispersion modelling results for all European Sites within 10km. The assessment considered the impacts of emissions of NO_X, NH_3, SO_2 and nutrient and acid deposition from the installation, as well as the impact of cumulative emissions. The assessment was carried out in line with the draft EPA guidance *Licence Application Instruction Note 2 (IN2) (DRAFT): Assessing the Impact of Ammonia Emissions to Air and Nitrogen Deposition from EPA licensable activities on European Sites* (hereafter referred to as IN2).

The Assessment Summary (Section 9) and the Executive Summary of the revised Attachment 7-1-3-2 now presents an overview of the ecological impacts only – the dispersion modelling results for all European sites within 10km of the installation are presented in Section 8 of the revised Attachment 7-1-3-2.

The Assessment Summary (Section 9) summarises which European sites are most impacted in terms of both process contributions (PC) and predicted environmental concentrations (PEC), for NO_X, NH_3, SO_2 and nutrient and acid deposition in both the Licenced Operational and the Cumulative Assessment scenarios.

The following sections of the revised Attachment 7-1-3-2 have been amended as part of the review of ecological impacts:

- Section 2.3
- Section 3.2
- Section 4.7
- Section 7
- Section 8.2
- Executive Summary.

Request:

2. It is stated in the Air Impact Assessment that Forest Laboratories Ireland Ltd (Licence No. P0306) has been omitted from the cumulative assessment as it does not have NO_x emissions points. It is noted that P0306-04 has licenced boilers, each with a Nitrogen Oxides (NO_2) emission limit value. Ensure all relevant sites are included in the cumulative assessment.

Applicants Response:

A review of cumulative assessment in Attachment 7-1-3-2 has been undertaken to ensure it aligns with Appendix E of AG4 – Air Dispersion Modelling From Industrial Installations Guidance Note (EPA, 2020) which helps determine which nearby installations should be included in the cumulative assessment. Please see Section 6.3 of the updated Attachment 7-1-3-2 for further details.

The guidance indicates that a cumulative assessment should be considered if annual NO_X emissions from the nearby installation are greater than 100 tonnes/annum. However in regard to Forest Laboratories Ireland Ltd (Licence No. P0306), as shown in Table 6-8 of Attachment 7-1-3-2, based on assuming all emission points operate continuously for a full year the annual tonnage is 31.5 tonnes (in reality most of these emission points are duty/standby). Thus, as this is below the 100 tonnes threshold, the installation has been excluded from the cumulative assessment for NO_X.

All relevant sites are included in the cumulative assessment. Annual emission totals of NO_X, CO, SO_2, NH_3 and PM_{10} have been determined for the ADSIL installation to the north-west of the installation (P1171-01) in order to determine which pollutants should be considered in the cumulative assessment. The guidance in AG4[1] states that a cumulative assessment should be considered if annual emissions of each of these pollutants are greater than 100 tonnes/annum from each nearby installation. However, as shown in Table 6-9 of Attachment 7-1-3-2, all pollutants except NO_X are well below the assessment threshold and thus have been excluded from the human health cumulative assessment.

A cumulative assessment including P1171-01 has been undertaken for NO_X as it is above the 100 tonnes threshold. Two other smaller data centres (Dataplex and Digital Realty) have also been included in the NO_X cumulative assessment for completeness as these were included in the air impact assessment during the original planning permission for the Installation. Emissions of CO, SO_2, NH_3 and PM_{10} from these two facilities will be a small fraction of the P1171-01 emission tonnages and thus will be well below the cumulative assessment threshold.

Request:

3. Similar to the information provided in Tables 9, 10 and 11, provide the process emission information for all other sites which were considered in the cumulative assessment.

Applicants Response:

Attachment 7-1-3-2 has been updated to include process emissions for all other relevant sites which are included in the cumulative assessment (see Table 5.4 and 5.5 of Attachment 7-1-3-2). Note Tables 9, 10 and 11 have been renumbered as Tables 5-1, 5-2 and 5-3.

[1] Appendix E of AG4 – Air Dispersion Modelling From Industrial Installations Guidance Note (EPA, 2020)

Request:

4. Provide the cumulative results for CO, SO_2, NH_3, PM_{10} and $PM_{2.5}$ or a rationale for their omission. Ensure that the relevant pollutants for other sites included in the cumulative assessment are considered.

Applicants Response:

A review of cumulative assessment in Attachment 7-1-3-2 has been undertaken to ensure it aligns with Appendix E of AG4 – Air Dispersion Modelling From Industrial Installations Guidance Note (EPA, 2020) which helps determine which pollutants and nearby installations should be included in the cumulative assessment.

All relevant sites are included in the cumulative assessment. Annual emission totals of NO_X, CO, SO_2, NH_3 and PM_{10} have been determined for the ADSIL installation to the north-west of the installation (P1171-01) in order to determine which pollutants should be considered in the cumulative assessment. The guidance in AG4[2] states that a cumulative assessment should be considered if annual emissions of each of these pollutants are greater than 100 tonnes/annum from each nearby installation. However, as shown in Table 6-9 of Attachment 7-1-3-2, all pollutants except NO_X are well below the assessment threshold and thus have been excluded from the human health cumulative assessment. Please see Section 6.3 of the updated Attachment 7-1-3-2 for further details.

Request:

5. Identify the location of each registered Medium Combustion Plant and ensure they have been included in the air impact assessment.

Applicants Response:

Table 5.1 shows the registered Medium Combustion Plant (MCP) at the extended Installation. All MCP are included in the air impact assessment and shown on Drawing 21_123F-CSE-00-XX-DR-C-2000 Emission Layout Plan. A3-41 to A3-50 are the 6.49 MWth emergency back-up generators, A3-51 is the 2.19 MWth emergency back-up generator. And A3-52 is the emergency back-up generators.

There are no MCP registered on the existing Installation as these are all included in the existing IEL.

Table 5.1 Registered Medium Combustion Plant

Reg No.	MCP Reference	Size (MWth)
M0997-01	EGSL12	3.6 MW
M0996-01	EGH11	2.19 MW
M0995-01	EG10	6.49 MW
M0994-01	EG9	6.49 MW
M0993-01	EG8	6.49 MW
M0992-01	EG7	6.49 MW
M0991-01	EG6	6.49 MW
M0990-01	EG5	6.49 MW
M0989-01	EG4	6.49 MW
M0988-01	EG3	6.49 MW
M0987-01	EG2	6.49 MW
M0986-01	EG1	6.49 MW

[2] Appendix E of AG4 – Air Dispersion Modelling From Industrial Installations Guidance Note (EPA, 2020)

2. APPROPRIATE SCREENING

Request:

6. According to Table 2, the AA screening has assessed the potential impacts of the installation on Baldoyle Bay SAC (000199), South Dublin Bay SAC (000210), Baldoyle Bay SPA (004016) and South Dublin Bay and River Tolka Estuary SPA (004024), however in the previous AA screening (dated 11 March 2025), North Dublin Bay SAC (000206) and North Bull Island SPA (004006) were also considered. Update the AA screening report and ensure that all potential **direct** and **indirect** impacts of the installation (alone and in-combination with other projects and developments) on **all** relevant European Sites are considered and detailed in the updated AA screening report.

Applicants Response:

The new AA Screening report includes all potential direct and relevant indirect impacts of the Installation on all relevant European sites considered. This includes North Dublin Bay SAC (000206) and North Bull Island SPA (004006), see Attachment-6-3-4-AA Screening Licence Jun 2025.

Request:

7. Ensure that the ecological sites assessed are consistent throughout the AA screening e.g. page 18 states that the sites to be brought forward for further assessment include Santry Demense pNHA (000178), South Dublin Bay SAC (000210) and South Dublin Bay and River Tolka Estuary SPA (004024), however Table 2 includes Baldoyle Bay SAC (000199) and Baldoyle Bay SPA (004016). Additionally Table 2 lists sites which are considered further in the screening and to refer to Table 3, however Baldoyle Bay SPA (004016) is not included in Table 3.

Applicants Response:

A review of the ecological sites assessed has been undertaken. The full list of sites assessed are included in the AA screening report (Attachment-6-3-4-AA Screening-Licence-Apr 2025) prepared by Moore Group. Refer to Table 2 of the AA Screening report.

Request:

8. Again the Agency notes the continuous inconsistences in the information provided as part of the response to the RFIs and the inaccuracies of the data which is submitted across various documents within the application. For example, Table 3 of the AA screening contains data from the Executive Summary of the Air Impact Assessment which is contradictory to the Results section of the Air Impact Assessment.

Applicants Response:

A review of the Air Impact Assessment has been undertaken and all inconsistencies have been rectified. A new AA screening report prepared by Moore Group has been included with this submission.

3. SEWER

Request:

9. There are a number of discrepancies between the RFI response, the updated documentation and revised drawings as submitted to the Agency on the 04 March 2025. The following are examples of such discrepancies, this is **not an exhaustive list**;
    a. The RFI response (dated 04 March 2025) states *"The emission to sewer from the extended site (Buildings U and V) is comprised of domestic effluent only."* However, page 15 of the **updated** Complete Baseline Report (submitted to the Agency on 04 March 2025) states *"Drainage of rainwater from the fuel tank farm and associated fuel unloading bay to the south of the Site is directed to foul sewer and connects to the foul main at emission point SE5."* Additionally, it is noted that "domestic effluent" will discharge through a Class 2 Full

retention hydrocarbon interceptor as shown on *DWG 21_123F-CSE-00-XX-DR-C-1200 – Foul Water Layout Plan (Rev. C05)* (also submitted 04 March 2025). Clarify the discrepancies in the drawings, RFI response and supporting documentation.

b. Page 20 of the Operational Report (revised March 2025) and page 8 of the Non-Technical Summary (revised March 2025) state *"Drainage of rainwater from the fuel tank farm and associated fuel unloading bays to the south of the existing Installation (Building W) is directed to foul sewer and connects to the foul main at emission point SE2 and SE3. The drainage from the fuel tank farm and associated fuel unloading bays to the north of the existing Installation (Building X and Y) is directed to foul sewer and connects to the foul main at emission point SE1."* However, the RFI response (dated 04 March 2025) and *Drawing 21_123F-CSE-00-XX-DR-C-1200 – Foul Water Layout Plan (Rev. C05)* state and show different discharge emissions points. Given the Agency has already queried the accuracy of the information provided in relation to sewer emission points, clarify the continuous inconsistences in the information provided in the RFIs, drawings and documentation.

c. Page 21 of the Operational Report (revised March 2025) states *"There is one* transformer *compound onsite, located at the Newbury GIS Substation. The drainage from the transformer compound is directed to foul sewer and connects to the foul main to discharge at emission point SE1.* However, *Drawing 21_123F-CSE-00-XX-DR-C-1200 – Foul Water Layout Plan (Rev. C05)* shows discharge at SE2.

Review and update, in their entirety, **all** documentation and drawings and ensure that the information provided in support of the licence application is correct and consistent throughout.

Applicants Response:

The Agency's request to review and update all documentation and drawings submitted in support of the licence application has been fully taken on board.

9 (a) There was an error in the Complete Baseline Report (04 March 2025), whereby it stated *"Drainage of rainwater from the fuel tank farm and associated fuel unloading bay to the south of the Site is directed to foul sewer and connects to the foul main at emission point SE5."* This was incorrect. For the extended Installation (Buildings U and V), the rainwater drainage from the fuel tank and associated fuel unloading bay is directed to the storm water drainage system and not to foul. The Complete Baseline Report has been updated and included as Attachment-4-8-3-Complete Baseline Report_Rev.

Domestic effluent will not discharge through a Class 2 full retention hydrocarbon interceptor. For the extended Installation, there is a foul line with a Class 2 full retention interceptor (FR4), however this serves the fire sprinkler pumphouse to the south of Building U. This is connected to the internal floor gully. The foul line and interceptor act as a tertiary containment measure for unplanned emergency events, such as spillages associated with the pump and fuel tank. Under normal operating conditions, there is no discharge to the foul sewer.

This can be seen on Drawing *DWG 21_123F-CSE-00-XX-DR-C-1200 – Foul Water Layout Plan*.

9 (b) NTS and the Operational Report has been reviewed and updated where necessary to confirm the foul water drainage pathways. *Drawing 21_123F-CSE-00-XX-DR-C-1200 – Foul Water Layout Plan* included with this submission shows the correct emission points.

9 (c) The drainage from the transformer compound is directed to foul sewer and connects to the foul main and discharges at emission point SE2, as per *Drawing 21_123F-CSE-00-XX-DR-C-1200 – Foul Water Layout Plan.* The error in the Operational Report has been corrected and is included as Attachment-4-8-1-Operational Report.

Request:

10. For **each** of the hydrocarbon interceptors shown on *Drawing 21_123F-CSE-00-XX-DR-C-1200 – Foul Water Layout Plan (Rev. C05)* describe the type of alarm system **in place** and **proposed** (i.e. level / capacity gauges, oil/ hydrocarbon detectors, etc).

Applicants Response:

All hydrocarbon interceptors **in place** and **proposed** on *Drawing 21_123F-CSE-00-XX-DR-C-1200 – Foul Water Layout Plan* have the following alarms:

- high level liquid sensors, which indicates when the liquid level in the hydrocarbon interceptor rises excessively and triggers an alarm: and
- oil level detection systems, which detects the oil level based on conductivity and triggers an alarm.

Should the level alarms activate, an alarm signals to the Building Management System (BMS) to alert Engineering Operations Technicians (EOTs). The onboard controller for individual generators is connected to the BMS.

Request:

11. Confirm the leak detection measures in place for the back-up generators located within Building X.

Applicants Response:

The emergency backup generators for Building X are located internally within the building. The emergency back-up generators serving Building X have leak detection systems within the external skin of the storage tanks.

Should the leak detection alarms activate, an alarm signals to the Building Management System (BMS) to alert Engineering Operations Technicians (EOTs). The onboard controller for individual generators is connected to the BMS.

Request:

12. Confirm if the containerised back-up generators in Building U and Building V will have leak detection systems installed.

Applicants Response:

Yes, the containerised backup generators for Buildings U and V have leak detection systems installed. The individual double skinned day tank, and belly tanks have leak detection alarms in place within the external skin of the storage tank. The containerised emergency back-up generator housing includes retention bunding in the base of the container, there are leak detection systems within the bund.

Should the leak detection alarms activate, an alarm signal is sent to the BMS to alert EOTs. The onboard controller for individual generators is connected to the BMS.

4. STORMWATER

Request:

13. For **each** of the hydrocarbon interceptors shown on *Drawing 21_123F-CSE-00-XX-DR-C-1100 – Surface Water Layout Plan (Rev. C05)* describe the alarm system **in place** and **proposed** (i.e. level / capacity gauges, oil/ hydrocarbon detectors, etc).

Applicants Response:
All of the hydrocarbon interceptors **in place** and **proposed** on *Drawing 21_123F-CSE-00-XX-DR-C-1100 – Surface Water Layout Plan* have the following alarms:

- high level liquid sensors, which indicates when the liquid level in the hydrocarbon interceptor rises excessively and triggers an alarm: and
- oil level detection systems, which detects the oil level based on conductivity and triggers an alarm.

Should the level alarms activate, an alarm signals to the Building Management System (BMS) to alert Engineering Operations Technicians (EOTs). The onboard controller for individual generators is connected to the BMS.

Request:

14. Update Attachment 7.7 with the current trigger levels for SW1 and SW2.

Applicants Response:
Attachment 7-7-Stormwater Discharges has been updated with the current trigger levels for SW1 and SW2. It should be noted that these trigger levels are under review in respect of the new 2025 Agency guidance.

The current trigger levels are as follows:

pH	6-9 pH Units
TOC	50 mg/l
Temperature	25 Deg.C
Conductivity	2000 µS/cm

Request:

15. It is stated in the RFI (dated 04 March 2025) "The Drawing 21_123F-CSE-00-XX-DR-C-1100 – Storm (Rev. C05) has been updated to identify the location of the top up tank bunds on the relevant drawing." Confirm that the top up tank bunds have been labelled as "Fuel tank."

Applicants Response:
It is confirmed that the top-up tank for Buildings U and V is the "fuel tank" marked on Drawing 21_123F-CSE-00-XX-DR-C-1100 – Storm. All drawings have been updated to re-label the tank as the Top-up Fuel Tank. Attachment-4-8-1-Operational Report and Attachment-1-2-Non-Technical Summary have also been updated for consistency.

Request:

16. Confirm if the storm sewer, which the installation will discharge to, is public or private. It is stated in the document submitted to OEE entitled Condition 3.17 "It should be noted that there is no direct discharge from any ADSIL licensed facility to a receiving waterbody, rather there is an indirect discharge via the public stormwater drainage network which subsequently discharges to their respective surface waterbody. A flow control system at the outlet of the site stormwater attenuation system is used to achieve the controlled discharge rate to this public stormwater sewer." However, the Operational Report (revised March 2025) refers to the Clonshaugh Business and Technology Park storm sewer.

Applicants Response:
The storm water is discharged to the Clonshaugh Business and Technology Park (IDA Park) storm sewer, which is in the ownership of the IDA.

The relevant documents and attachments have been updated to clarify the storm water discharges to the IDA Park storm sewer.

5. EVAPORATIVE COOLING WATER

Request:

17. It is noted in Section 4.1 of the Technical Note on Stormwater Impact Assessment (dated 04 March 2025) that "it has been assumed for the purpose of this assessment that the discharge occurs 5 days a month" however Section 5.2 of the same technical note says, "This assessment represents a maximum flow and maximum concentrations, which are only likely to occur under very high temperatures generally seen less than 5 days a year (> 30o C) as set out in Section 4.1." Additionally Section 4.3.2.1 of the Operational Report (revised March 2025) states "The recirculated evaporative cooling water in the humidified water storage tanks is drained down typically every 7 days to the storm water drainage network to prevent legionella growth in the system." Describe the evaporative cooling water process for the entire installation (i.e. Buildings X, Y, W, U and V).

Applicants Response:
During peak cooling, the maximum discharge flow from the site is 129 m^3 per day. This maximum discharge quantity is considered to be conservative, as peak discharge is only likely to occur during extremely high ambient temperatures, typically exceeding 30.4°C. Therefore, this is only likely to occur approximately 5 days per year.

The maximum discharge flow and concentrations of cooling water has been revised in the *Technical Note: Stormwater Impact Assessment; Clonshaugh, Dublin 17*. This assessment adopts a conservative worst-case approach, accounting for both (short-term, worst-case) and seasonal conditions (mean flow conditions) are assessed. This revision has removed the mean flow assumption of 5 days per month (21.5 m^3/day) and has now assumed that maximum flow (129 m^3/day) and maximum concentration occurs under all river conditions (dry weather flow 95%ile and mean flow 50%ile).

When cooling water discharge is not occurring, evaporative cooling water within the air handling unit (AHU) sumps is typically drained every 7 days to the stormwater drainage network. This drain-down occurs only when the evaporative cooling system has remained unused for a continuous period of 7 days. The purpose of this regular drain-down is to prevent stagnation and minimise the risk of legionella growth within the system.

The expected worst-case maximum discharge flow and maximum concentrations of peak cooling water discharge has been assessed in the revised Technical Note: Stormwater Impact Assessment; Clonshaugh, Dublin 17. The anti-stagnation drain-down represents a lessor discharge scenario than the assessed worst-case conditions.

More information on the evaporative cooling process is presented in the revised Attachment-4-8-1-Operational Report.

6. ENERGY USE

Request:

18. Confirm the quantities of diesel and HVO as provided in the RFI (dated 04 March 2025) are for the equivalent of 45 no. generators operating for 150 hours per annum.

Applicants Response:

The figures provide previously in RFI response 04 March 2025 are the expected maximum fuel usage for the Installation based on similar operations in Ireland operating under similar conditions taking into account expected generator load.

At the request of the Agency, the quantities of diesel and HVO have been revised for the maximum potential fuel usage aligning with the operations scenarios sought in this IEL review application and are based on the following:

- The equivalent of 45 no. generators operating at 100% load for 150 hours each per annum
- Testing and maintenance of all 52 generators
    - Test 1: Each gen is tested for 0.5 hours x 52 times a year = 26 hours p.a.
    - Test 2: Each gen is tested for 4 hours x 4 times a year = 16 hours p.a.

The fuel amounts are:

- 3,716.32 tonnes (using diesel only)
- 3,655.82 tonnes (using HVO only)

These amounts are considered to be conservative, as the generators are not expected to operate for 150 hours, or at 100% load, however this is the maximum potential fuel use for the overall Installation.

7. NOISE

Request:

19. According to Section 3.7 of the Noise Impact Assessment "The nearest European sites to the facility are the "Norh" Bull Island SPA and North Dublin Bay SAC, c. 5.5 km south-east." and "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 area has been scoped out of any further assessment." However, the updated AA screening states that the closest European sites are South Dublin Bay SAC (000210) and South Dublin Bay and River Tolka Estuary SPA (004024) at 3.9 km. Review and update the entire Noise Impact Assessment and ensure the information is consistent with other referenced documentation.

Applicants Response:

The lands in which the installation is located have no formal designations. The nearest ecologically sensitive area to the installation is the Santry Demesne Proposed NHA (000178) which is 1.3 km west of the installation. The nearest European sites to the Installation (linear distance) are the South Dublin Bay and River Tolka Estuary SPA (Site Code 004024), c. 3.9 km to the south, the North Dublin Bay SAC (Site Code 000206), c. 4.4 km to the southeast and the North Bull Island SPA (Site Code 004006), c. 4.4 km to the southeast.

Request:

20. The Noise Impact Assessment states that "The nearest residential noise sensitive locations are to the east of the development along the Clonshaugh Road at a distance of approximately 140 m from the site boundary." However, in Table 1 the description for noise monitoring location D is "This location is considered to be representative of background noise levels at the noise sensitive location located c. 65m to the east of the site." Update the Noise Impact Assessment accordingly and provide the distances of each of the noise sensitive locations to the site boundary.

Applicants Response:

In the updated Attachment 7-1-3-2 Noise Impact Assessment, Table 11 Noise Sensitive Receptors has been amended with distances to the site boundary, as follows:

Table 7.1 Noise-sensitive receivers

Noise Sensitive Location	Distance to application boundary (m)	National Grid Reference (ITM)	
		North	East
R01	36	718,674	740,333
R02	28	718,707	740,261
R03	136	718,733	740,124
R04	176	718,559	739,929
R05	135	718,392	740,023
R06	156	718,315	740,044
R07	243	718,197	740,073
R08	339	717,951	740,175
R09	307	717,958	740,250
R10	379	717,878	740,322
R11	449	717,815	740,409
R12	570	717,700	740,464
R13	669	717,604	740,495
R14	713	717,569	740,567
R15	779	717,656	741,184
R16	847	717,639	741,274
R17	919	717,632	741,373
R18	352	718,629	741,031
R19	289	718,726	740,857
R20	267	718,739	740,764
R21	202	718,680	740,684
R22	173	718,646	740,649
R23	145	718,607	740,563
R24	121	718,645	740,422

Request:

21. It is noted that the noise monitoring locations as submitted in Attachment 7-7 are the same as those for P1186-01, however the Annual Noise Survey Report (December 2024) and the Annual Noise Survey Report (January 2024) both state "It was not possible to survey at Location D as shown on Figure 2 due to access and the junction of the roundabout being deemed unsafe to pull into at the time of surveying. Location B was relocated to lands outside of the Clayton Hotel due to not being able to access the original survey location during the night time periods." Update Attachment 7-7 with noise monitoring locations which are safe, accessible, and representative of the nearest noise sensitive locations.

Applicants Response:

In the updated Attachment 7-5 Noise Monitoring Locations, the proposed noise monitoring locations have been revised and with final locations based on the recent surveys. One location to the south of the site has been added to address Request 22.

Request:

22. Review the noise monitoring locations selected and confirm what location is representative of the noise sensitive locations located to the south of Buildings U and V.

Applicants Response:

As discussed above, in the updated Attachment 7-5 Noise Monitoring Locations, the proposed noise monitoring locations have been revised adding a location to the south of the site (Monitoring Location H) which is closest to Buildings U and V.

Request:

23. Table 6.1 of the cumulative assessment in the RFI (dated 04 March 2024) provides noise levels for receptors R01 to R10 whereas the Noise Impact Assessment includes receptors R01 to R24. Update the cumulative assessment to include all receptors.

Applicants Response:

This request is addressed in two parts:

1. Consideration of the applicant's other licenced site (i.e. P1171-01), located within Clonshaugh Business and Technology Park), and
2. Addition of the predicted cumulative noise levels to background noise levels.

Cumulative Noise Model

In the updated Attachment 7-1-3-2 Noise Impact Assessment, Section 6.0 addresses the cumulative noise of the application Installation along with IEL P1171-01 in the northwestern area of Clonshaugh Business and Technology Park (IDA Park). Cumulative noise levels for Scenarios A, B and C all comply with the respective noise criteria.

Addition of predicted cumulative noise levels to background noise levels

The methodology considers the addition of the predicted site noise levels to the measured background noise levels and comment on the cumulative impact through discussion of the change in noise levels.

Table 23 and Table 24 of the revised report update the cumulative assessment in the previous RFI response to include all NSLs, R01 to R24. In all cases, the impact is found to be 'not significant'.

Request:

24. List the other sites considered in the cumulative assessment.

Applicants Response:

As discussed in the Response to Request 23, the cumulative assessment has two parts:

- A cumulative noise model including the application installation along with other data centre buildings operated by the applicant: EPA Reg. Ref.: P1171-01 – this is presented in section 6.2 of the updated Attachment 7-1-3-2 Noise Impact Assessment, and
- Combination of the predicted cumulative noise levels with the baseline noise levels to assess the change in noise levels with the cumulative sites operating – this is presented in section 6.3 of the updated Attachment 7-1-3-2 Noise Impact Assessment

Table 7-2 (reproduced from Table 17 in the updated Attachment 7-1-3-2 Noise Impact Assessment) presents the list of sites considered in the cumulative assessment and how they are addressed:

Development	Location	Potential for Cumulative Impact
ADSIL EPA Reg. Ref.: P1171-01 The applicant operates an EPA Licenced data centre campus (EPA Reg. Ref.: P1171-01).	Northern end of Clonshaugh Business and Technology Park.	As the applicant has knowledge and sufficient information to model. This is included in the cumulative noise impact assessment.

Development	Location	Potential for Cumulative Impact
		The potential cumulative effect of this development in conjunction with the Application Installation considered using a cumulative noise model as described in section 6.2.
Forest Laboratories Ireland Limited EPA Reg. Ref.: P0306-04	Located to the west of Building W	A review of the IE Licence documentation associated with the facility confirms that no detailed noise impact assessment was included as part of the application or supporting materials. As the site is regulated under an IE licence, it is expected to operate in compliance with EPA licence noise limits. The results of the 2023 noise survey indicate that noise measurements and assessment at the nearest NSLs indicate a minimal and in most cases negligible noise impact from the facility. No tonal or impulsive noise attributable to the facility was detected at any noise sensitive location. **The potential cumulative effect of this development in conjunction with the Application Installation considered though the methodology in Section 6.3.**
Global Switch Property (Dublin) Limited EPA Reg. Ref.: P0109	Located to the north of Building X	A review of the IE Licence documentation associated with the facility confirms that no detailed noise impact assessment was included as part of the application or supporting materials. As the site is regulated under an IE licence, it is expected to operate in compliance with EPA licence noise limits. There are no noise surveys available of the site activities. **The potential cumulative effect of this development in conjunction with the Application Installation considered though the methodology in Section 6.3.** **Part of background (See section 6.3)**
Planning Ref: 3865/20 Lidl Ireland GmbH	Property adjacent and generally south of "The Range" store, Clonshaugh Road, Coolock, Dublin 17, D17 TY30	A review of the planning documentation associated with the facility confirms that no detailed operational noise impact assessment was included as part of the application or supporting materials. However the development will be expected to be designed and operated to comply with typical Dublin City Council noise guidance and criteria.

Development	Location	Potential for Cumulative Impact
Lidl discount supermarket with ancillary off-licence sales, located immediately south of "The Range". The development includes surface car parking, external plant areas, and delivery access via existing entrances on Clonshaugh Road.		**Taking into account the following: The much smaller scale of noise sources compared to the other sites listed here; the building's use as a neighbourhood supermarket, and the contribution of road traffic noise at nearby noise survey location G during night-time periods (See Section 6.4) This development is scoped out of the cumulative noise assessment.**
Dataplex	Northern end of Clonshaugh Business and Technology Park.	A review of the planning documentation associated with the facility confirms that no detailed operational noise impact assessment was included as part of the application or supporting materials. **The potential cumulative effect of this development in conjunction with the Application Installation considered though the methodology in Section 6.3.**
Digital Realty DUB11 - telecommunications service provider	Located to the north of Building U	A review of the planning documentation associated with the facility confirms that no detailed operational noise impact assessment was included as part of the application or supporting materials. **The potential cumulative effect of this development in conjunction with the Application Installation considered though the methodology in Section 6.3.**
All other existing Clonshaugh Buis Tech park.	Clonshaugh Business and Technology Park	Operating form dated prior to background baseline noise surveys (2018/2019) levels which date from 2018/2019 See section 6.3. **The potential cumulative effect of this development in conjunction with the Application Installation considered though the methodology in Section 6.3.**

Thus each site with the potential for cumulative effect has been addressed in detail in the updated assessment. In the cumulative noise model, predicted noise levels are within criteria for Scenarios A, B and C. Combining the predicted noise levels with the measured baseline noise levels, which is a conservative worst-case assessment, noise effects are found to be 'not significant'.

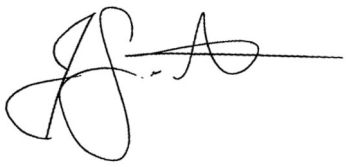
Request:

25. As previously highlighted, given the continuous inconsistences in the information provided as part of the response to RFIs and inaccuracies of the data which is submitted across various documents, review, and update, in their entirety, all documentation and drawings and ensure

that the information provided in support of the licence application is correct and consistent throughout.

Applicants Response:
All documents and drawings have been reviewed, and where necessary, updated and included as part of this response.

Sincerely,



Jonathan Gauntlett

Associate Director

AWN Consulting