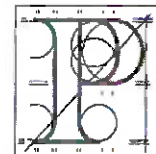


# Validation Checklist



An  
Bord  
Pleanála

Lodgement Number : **LDG-021414-19**  
Case Number: **ABP-305948-19**  
Customer: **in Power**  
Lodgement Date: **19/11/2019 10:28:00**  
Validation Officer: **Mary Tucker**  
PA Name: **South Dublin County Council**  
PA Reg Ref: **SD19A/0042**  
Case Type: **Normal Planning Appeal PDA2000**  
Lodgement Type: **Appeal**

| Validation Checklist                          | Value               |
|---|---------------------|
| Confirm Classification                        | Confirmed - Correct |
| Confirm PA Case Link                          | Confirmed-Correct   |
| Confirm ABP Case Link                         | Confirmed-Correct   |
| Fee/Payment                                   | Valid – Correct     |
| Name and Address available                    | Yes                 |
| Agent Name and Address available (if engaged) | Not Applicable      |
| Subject Matter available                      | Yes                 |
| Grounds                                       | Yes                 |
| Sufficient Fee Received                       | Yes                 |
| Received On time                              | Yes                 |
| 3rd Party Acknowledgement                     | Yes                 |
| Eligible to make lodgement                    | Yes                 |
| Completeness Check of Documentation           | Yes                 |
| Valid Lodgement Channel                       | Yes                 |

BPO1, BPO5 + BPO7

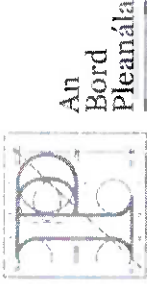
to issue ✓

dc 22/11/19

Run at: 21/11/2019 10:32

Run by: Mary Tucker

# Lodgement Cover Sheet - LDG-021414-19



## Details

|                                  |            |
|----------------------------------|------------|
| Lodgement Date                   | 19/11/2019 |
| Customer                         | John Power |
| Lodgement Channel                | In Person  |
| Lodgement by Agent               | No         |
| Agent Name                       |            |
| Correspondence Primarily Sent to |            |
| Registered Post Reference        |            |

|                                 |                 |
|---------------------------------|-----------------|
| Lodgement ID                    | LDG-021414-19   |
| Map ID                          |                 |
| Created By                      | Anna Rychlinska |
| Physical Items included         | No              |
| Generate Acknowledgement Letter |                 |
| Customer Ref. No.               |                 |
| PA Reg Ref                      |                 |

## Categorisation

|                |            |
|----------------|------------|
| Lodgement Type | Appeal     |
| Section        | Processing |

|                                |                             |
|--------------------------------|-----------------------------|
| PA Name                        | South Dublin County Council |
| Case Type (3rd Level Category) |                             |

## Fee and Payments

|                        |        |
|------------------------|--------|
| Specified Body         | No     |
| Oral Hearing           | No     |
| Fee Calculation Method | System |
| Currency               | Euro   |
| Fee Value              | 0.00   |
| Refund Amount          | 0.00   |

|                                |               |
|--------------------------------|---------------|
| Observation/Objection Allowed? |               |
| Payment                        | PMT-014239-19 |
| Related Payment Details Record | PD-014172-19  |

## Appeal

Date of Dec 23/10/19 :- 19/11/19  
 DD - 005784-19 ✓  
 ABP - 305948-19  
 Notify PA - Michelle



Run at: 20/11/2019 10:34

Run by: Anna Rychlinska

M 22/11/19

Land Use, Planning & Transportation Department  
Telephone: 01 414 9000

Fax: 01 414 9104

Planánóg Talamhúsáide, Pleanála agus Iompair  
Email: [planning.dept@sdbulincoco.ie](mailto:planning.dept@sdbulincoco.ie)

Mr. John Power  
'Lock Cottage'  
The Grange  
Lucan  
Co. Dublin

**AN BORD PLEANÁLA**  
LDG- \_\_\_\_\_  
ABP- \_\_\_\_\_  
**19 NOV 2019** *DOT*  
Fee: € 220 Type: cash  
Time: 15:25 By: hand

Date: 25-Oct-2019

Dear Mr. Power,

Register Ref. No:  
Development:

SD19A/0042

Phased development that will include 4 single storey data halls all with associated plant at roof level; 32 standby generators with associated flues (each 15m high); associated office and service areas; service road infrastructure and car parking; ESB sub-station/transformer yard with an overall gross floor area of 17,685sq.m; temporary gas powered generation plant within a walled yard containing 19 generator units with associated flues (each 17m high) to be located to the west of the proposed data halls on a site within the townland of Ballymakilly; Phase 1, 2 single storey data halls (6,950sq.m.) with roof plant and 16 stand-by generators with associated flues (each 15m high) as well as associated water tower and pump room and other services; single storey goods receiving area/store and single storey office area (1,522sq.m.) located attached and to the north-east of the data halls; temporary gas powered generation plant with 15 generators with associated flues (each 17m high) to be located within a compound to the west of the proposed data halls; attenuation pond; two storey ESB sub-station (494sq.m) with associated transformer yard and single storey transformer building (247sq.m) within compound; Phase 2, 2 single storey data halls (6,950sq.m.) with roof plant and 16 stand-by generators with associated flues (each 15m high) as well as associated water tower and pump room and other services; single storey goods receiving area/store and single storey office area (1,522sq.m) located attached and to the east of the data halls under this Phase and attached and to the north of the offices proposed under Phase 1; 4 additional generators with associated flues (each 17m high) to be constructed within the temporary gas powered generation plant; also ancillary site works; connections to existing infrastructural services as well as fencing; signage; vehicular access off the realigned R120 to provide a new vehicular access into the site as well as internal service roads and entrance gates; car park for 39 car parking spaces (including 4 disabled car parking spaces); sheltered bicycle parking to serve the development. The development will be enclosed with landscaping to all boundaries of the overall site of 22.1ha. Application for enabling works to facilitate this development has been made under Reg. Ref. SD19A/0004. An Environmental Impact Assessment Report (EIAR) has been submitted with this application. An EPA-Industrial Emissions (IE) licence will be applied for to facilitate the operation of Phase 2 of the permission.

Location: Newcastle Road, Lucan, Co Dublin  
Applicant: EdgeConnex Ireland Ltd.  
App. Type: Permission

Date Recd: 29 Aug 2019



I wish to inform you that by Order dated 23-Oct-2019 it was decided to **GRANT PERMISSION** for the above proposal.

This decision together with the conditions/reasons attached to the decision is recorded in the Planning Register kept at this office in accordance with Article 7 of the Planning & Development Act 2000.

This Register may be inspected during office hours 9.00 a.m. – 4.00 p.m. and interested parties may obtain a certified copy of an entry therein on payment of a fee of €9.00 in respect of each entry. Alternatively, the information can be accessed on-line at [www.sdublincoco.ie](http://www.sdublincoco.ie) by selecting “**Planning Applications**” and conducting a search using available information such as the Planning Application number, Applicant Name or Location. Scanned planning files can be downloaded at this site.

It should be noted that any person who made a submission within 5 weeks of the date of receipt of the application by the Planning Authority and which was accompanied by the appropriate fee of €20.00 may appeal to An Bord Pleanála against the decision or any conditions attached to the Council's decision **within 4 weeks** beginning on (and including) the date of the Council's decision. Interested parties are advised to consult An Bord Pleanála to ascertain if an appeal has been lodged by the applicant.

In cases where the Planning Authority is notified of an appeal having been lodged, this information is published on a weekly basis on the Council's website [www.sdublincoco.ie](http://www.sdublincoco.ie), under the heading “**Weekly Lists**”.

All appeals against decisions of the Planning Authority and all correspondence in relation to new and existing appeals should be addressed to The Secretary, An Bord Pleanála, 64 Marlborough Street, Dublin 1 (Tel. 8588100 – LoCall: 1890 275 175).

Any appeal made to An Bord Pleanála will be invalid unless it is fully complete and the correct fee is received by An Bord Pleanála within the statutory appeal period. The fee in respect of an appeal by an applicant for permission relating to commercial development is €1,500; unauthorised commercial development is €4,500; other unauthorised development €660; any other appeal is €220.

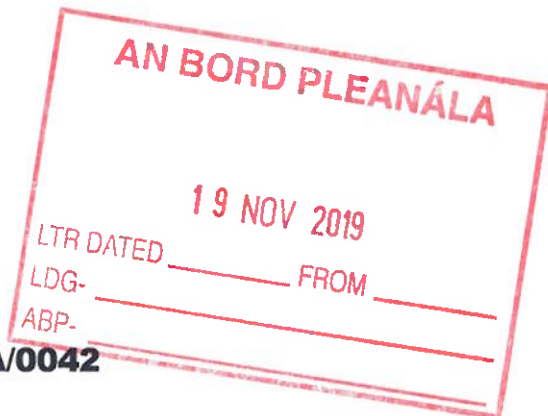
Submissions or observations made to An Bord Pleanála by or on behalf of a person (other than the applicant) as regards an appeal made by another person must be accompanied by a fee of €50 and must be received within four weeks from and including the date of the receipt of the appeal by An Bord Pleanála.

Yours faithfully,

Mary Crowley  
for Senior Planner

|                         |            |
|-------------------------|------------|
| <b>AN BORD PLEANÁLA</b> |            |
| 19 NOV 2019             |            |
| LTR DATED _____         | FROM _____ |
| LDG- _____              |            |
| ABP- _____              |            |

18 November 2019  
The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.



RE:      **Planning Application Ref: SD19A/0042**

Applicant: EdgeConneX Ireland Ltd.

Location: Site within the town land of Ballymakailly, Newcastle Road, Lucan, Co. Dublin

Dear Sir/Madam,

I appeal this application as detailed below.

Appellant:      John Power B.E. (Civil)

Address:      The Grange, Lucan, County Dublin

Please find attached (a) a copy of the decision of South Dublin County Council - the subject matter of this appeal and (b) the relevant fee for this appeal.

I hereby submit my objection to the above planning application and state that it is my view EdgeConneX Ireland Ltd (ECXI) has not included best practice in the planning of this proposed data centre. This application for alterations and previous applications have been proposed on a piecemeal basis. This does not allow for best planning practice for the development of the overall site.

**Planning the development in a piecemeal method can cause problems as follows:**

- As part of Phase 1 (SD19A/0042) ECXI is applying for both (a) Electricity Substation and (b) Temporary Gas Generator Compound. Is there a problem with the electricity supply that a temporary gas supply is also needed. I cannot find any indication in this application from where this electricity power supply is sourced.
- When the Proposed Variation No. 1 - Zoning Amendment to Lands at Grangecastle West was brought to my attention I responded to the consultation programme carried out, by pointing out that (a) map of Griffeen River Catchment was not available, and also (b) corrections regarding drainage items on the map attached to the proposed variation. In section 6.6 of the Chief Executive's Report on the Public Consultation Item no. 1 refers to items raised in my submission and is followed by the Chief Executive's Response. (See Appendix I)

**Further Additional Information (AI) needed as follows:**

- In the Irish Times (IT) of 31/10/2016 Dick Ahlstrom, Science Editor, wrote an article "Water, water everywhere: the future for Ireland" he reports that the EPA commissioned a major climate modelling exercise that would help predict what our weather future holds. It was carried out by Dr. Paul Nolan who found that:

There would be "significant decreases" of up to 13% in average rainfall amounts over most of the year or up to 20% assuming less action on controlling climate change. But there would be a 20% increase in those driving, near tropical-type rainfall events that are becoming more familiar to us.

- There is a lack of information provided as part of this new planning application. Data Centres are located here to avail of our mild climate. Cool air outside is used to extract heat from this facility which is then discharged into the atmosphere as waste heat. This type of operation is now accepted to be contributing to the global climate change. Heat emitted should have a 'value' to the local area which could benefit horticulture, aquaculture, local food production and district heating. Although some data centres will/do use wind energy for increased efficiency as it comes available, this does not impact on the amount of waste heat dispersed to the atmosphere.

In the meantime progress has occurred in other relevant fields and are noted below:

- In the Irish Times (IT) of 18/08/2016 Karlin Lillington, Technology Journalist, wrote an article "Data centre growth comes at price for Irish infrastructure". Again on 12/07/2018 she wrote an article "Net Results: Data centres need to power down their energy requirements".
- EIRGRID Group in their All-Island Generation Capacity Statement 2017-2026 in sections:
  - 2.2(d) Data Centres in Ireland and in 2.2(e) Forecast Scenarios and Data Centres (see Appendix III). Under the Paris Climate Agreement (COP21) our Government is facing large financial fines if it does not meet its targets. Will we the people of Ireland be held responsible for these fines?
- In the Sunday Independent of 27/01/2019 Ailish O'Hora, Journalist, wrote an article "Brexit is just one of the challenges facing the Irish electricity market" and she wrote "A no-deal Brexit could mean stakeholders having to renegotiate deals under new trading rules".
- Codema (Dublin's Energy Agency) is project partner with South Dublin County Council to develop the Tallaght District Heating Scheme (TDHS), which will establish a sustainable district heating solution in the Tallaght area to provide low-carbon heat to public sector, residential and commercial customers. The objective of this project is to decrease the GHG emissions associated with the use of fossil fuels for heating in Tallaght in order to contribute to national level renewable energy, energy efficiency and CO<sub>2</sub> targets and establish Tallaght as a leader in innovation in the area of climate change."
- "This project delivers a high level of innovation in the heating sector, with the first Irish data centre to be used to supply waste heat to heat nearby buildings, and will be the only such system in Ireland. This project will allow transfer of knowledge and replication of solutions for other heat networks based around the growing number of data centres in Ireland. This ability to utilise indigenous heat sources helps to reduce Ireland's dependence on imported fossil fuels and ensure security of supply for customers into the future." "The heat network will be supplied by a local low-grade waste heat source from a data centre, utilised through a centralised large-scale heat pump, housed in an on-site pump house. The pump house will include thermal storage facilities to take advantage of off-peak electricity and possibly demand response services, while also providing a source of back-up. The energy centre will include full peak load back-up to ensure heat supply can be met at all times in the event of any possible primary heat supply failures."

Codema has, just this month, published a booklet called:

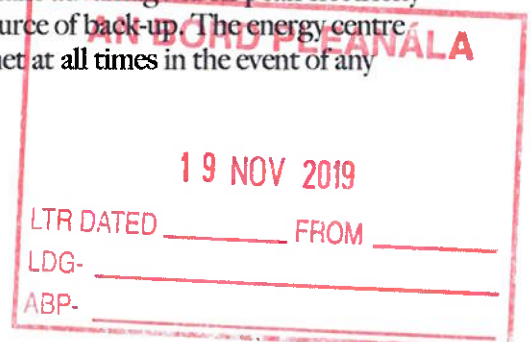
The Tallaght District Heating Scheme (TDHS)

A Guide to Connecting for Developers

(see <https://www.codema.ie/images/uploads/docs/>

TDHS Marketing Brochure for Developers.pdf)

- In the meantime, major European cities are moving ahead with their plans for smart cities. According to a BBC News article by their Technology reporter Jane Wakefield (see <http://www.bbc.com/news/technology-38404884>) Sweden's capital, Stockholm has garnered over seven million euros of EU money and become a leading example of how to do "smart". It has been designated as an EU





"lighthouse" city - alongside Barcelona and Cologne - meaning the projects it implements, if successful, can then be copied in other European towns.

- In an article titled "Heat from data centres to be used to warm homes in Stockholm" by John Kennedy (see <https://www.siliconrepublic.com/enterprise/stockholm-heat-data-centres>) he ends up by saying:

Stockholm's example is one that other cities around the world should consider. Dublin, for example, has more than 30 data centres, mostly clustered along the western fringes of the city. If all 30 - supposing they were of 10 MW capacity - were harnessed in the same way that Stockholm is proposing, excess heat from the data centres could potentially be used to heat up to 600,000 homes. But that, of course, would require joined-up thinking.

- Use Grange Castle Business Park with ECXI as a potential energy source and develop a masterplan for Clonburris as an end-node for waste heat reuse in district heating systems.
- Note there are smaller vacant infill plots still left to be sold in Grange Castle Business Park that could and also should be targeted for use by developers willing to reuse ECXI's waste heat. For SDCC to attract these new developers, ECXI should be pressurised to dispose of their waste heat on the basis of THE POLLUTER PAYS PRINCIPLE so that it would be attractive for the new developers to commit.

In the meantime progress has occurred in other relevant fields and are noted below:

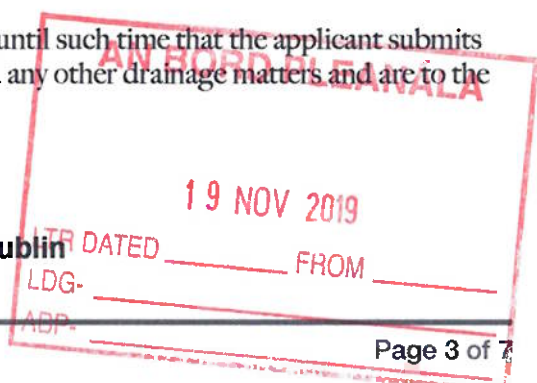
- An Editorial from the Irish Times newspaper dated 8/11/2017 stated: An environmental legal milestone: The recognition for the first time in an Irish court of a constitutional right to environmental protection "that is consistent with the human dignity and well-being of citizens at large" is a legal milestone. It is to be commended as a provision for the public good. The High Court decision last week arose in a case brought by the environmental group Friends of the Irish Environment (FIE), and emerged in spite of their challenge to planning permission for a new runway at Dublin Airport being dismissed. The right will add to the legal armoury for those living with the consequences of persistent environmental damage; citizens experiencing long-term pollution that is often a threat to their health; and people living with negative impacts of climate change where legally-binding measures and targets for reducing carbon emissions are not being adhered to.

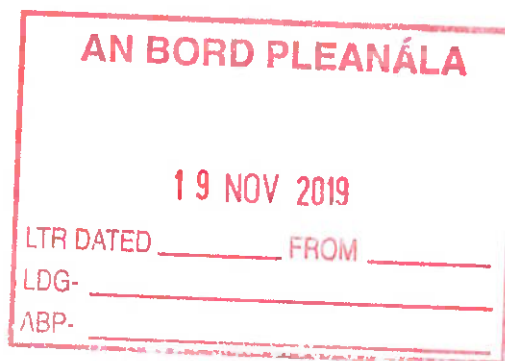
FIE had argued the proposed runway would result in additional greenhouse gas emissions which would increase the pace of climate change. Mr Justice Max Barrett said: "A right to an environment that is consistent with the human dignity and well-being of citizens at large is an essential condition for the fulfilment of all human rights". It is an indispensable existential right that is enjoyed universally, yet which is vested personally as a right under article 40.3.1 of the Constitution, he found. "It is not so utopian a right that it can never be enforced." The State had argued there was no unenumerated, or unwritten, right to an environment in the Constitution.

The Environmental Pillar - an alliance of environmental groups - had called for a referendum to give a constitutional right to environmental protection to the people of Ireland in its submission to the Citizens' Assembly on climate change. But this was not taken up in that body's recommendations to the Government. Instead, the right has become available via a different channel. It is a progressive move that will greatly assist those seeking to hold the Government and State accountable for their responsibilities on the environment and climate change.

I kindly request that the 'Precautionary Principle' be applied until such time that the applicant submits the requested Additional Information on the attenuation and any other drainage matters and are to the satisfaction of South Dublin County Council.

  
John Power B.E. (Civil)      The Grange, Lucan, Co. Dublin





#### **Chief Executive's Response**

The Chief Executive acknowledges the submission and the concerns raised in relation to the Strategic Flood Risk Assessment as part of Proposed Variation No. 1.

A number of specific technical comments raised relate to areas outside of the remit of the Proposed Variation or the County Development Plan process. All mapping displayed within the Strategic Flood Risk Assessment (SFRA) report for Proposed Variation No.1 was harvested from the following sources/websites, which were deemed to be the most up-to- date information available at the time of writing the SFRA report;

- RPS - Strategic Flood Risk Assessment for SDCC Development Plan 2016 - 2022
- Eastern CFRAM Study - [www.maps.opw.ie](http://www.maps.opw.ie)
- National Flood Hazard Mapping Web Site - [www.floodmaps.ie](http://www.floodmaps.ie)
- National CFRAM Programme - Interactive Mapping - [www.cfram.ie](http://www.cfram.ie)

Regarding specific comments in relation to the Grand Canal and its overflow water discharge and the culvert of the Tobermaclugg Stream, further investigative works will be carried out prior to development proceeding on these lands, as part of the Development Management process. SDCC will fully engage with Waterways Ireland where appropriate.

#### **Chief Executive's Recommendation**

No alteration(s) to the proposed variation to the South Dublin County Council Development Plan 2016-2022.

## **Appendix I**



19 NOV 2019

LTR DATED \_\_\_\_\_ FROM \_\_\_\_\_  
LDG- \_\_\_\_\_ Robin Whitlock  
ABP- \_\_\_\_\_

Thursday, 28 March 2019

**Recycling Waste Heat: How data centres are using waste heat to heat domestic homes  
– an interview with Lex Coors from Interxion****Courtesy Interxion**

Data centres have developed a notorious reputation as a wasteful industry. However, Interxion has been developing green technology that not only conserves energy but provides heat for the surrounding communities. For data centre providers, much of the daily operations involve ensuring the equipment is kept cool to ensure customers' mission critical applications are kept running 24/7/365.

Interxion is one of the companies operating data centres in Stockholm, Sweden, where waste heat is being used to heat domestic homes instead of being blown out into the atmosphere, thereby adding to climate change.

REM talked to Interxion's Chief Data Centre Technology & Engineering Officer, Lex Coors, to find out more.

**Tell me about the company**

Interxion is a European company. Although we are on the New York Stock Exchange, we are in 11 countries and 13 cities. We operate over 50 data centres. We've doubled our footprint over the last 4-5 years and we are in the process of doubling our footprint again. We design, build and operate these data centres and then we rent the space to the large platforms, the hyperscales and also the EO2 platforms like IBM and also to the customers who like to connect to these hyperscales through cloud access. Interaction is a very important topic. We always have 40 carriers per data centre and so we have these highly dense carrier networks.

**What is the major problem with regard to data centres and the climate?**

It is everyone on the globe who like to make use of data transmission. As this is growing exponentially, our industry is also growing, easily 15 to 20 percent on an annual basis. That comes with pressure, not, per se, on the climate if you design the data centre the right way. If you want to run the data centre solely on fossil fuels and not take into consideration energy efficiency or any sustainability, then obviously you will have a problem with the climate.

We are heavily involved in the EU 2020-2030 programme for energy efficiency and decrease of greenhouse gases, but the major issue we have is resources. It is more the energy resource, in that it is not easy to get any more, for instance we have direct connections for 20 or 40 or 100 MW and that is not as easy as it was a few years ago. What we do to protect the climate as much as we can, and especially with data centres, as we are a newer industry, we are not from the heavy industries like steel or aircraft, from the start, if we are not energy efficient, if we don't look at sustainability, it is very difficult to exist. All of these factors come together, free use of energy is an important topic because the margins are not that, let's say, fat on the bone that we can afford to misuse energy.

## Appendix II

First of all, we like to use the free air instead of compressors. We like to use outside air to cool the IT surfaces. The other thing we do is that we are conscious of water usage, because we all know water is becoming a scarce commodity. We use a lot of water for cooling, but you have to balance that, so you have to make the trade between 'Will I use a lot of water to cool down the IT or will I mix it with air, and on top, maybe in peak temperatures, when you are reaching above 35 celsius, maybe also some compressor motors'. You can't always get it for free. It would be easy to use the water for free but your corporate social responsibility won't allow you to do that.

As I understand it, there are two particular problems, the first being where the electricity comes from and the second being the whole issue of cooling. Data centres operate large fans for cooling and these utilise cold water pumped into the data centre.

Correct. That's the first use. But what we also use, at Interxion, is aquifers, which are salt water aquifers, for instance in The Netherlands and the Nordic region. We drill into 180 metre deep layers and take out that cold water, use it and then put it back into the ground as hot water. When winter comes, we use those big fans you mentioned to recool that hot water back into cold water. We take some of the heat for our offices. We also use sea water, that's in Stockholm. We also decrease the temperature there before we put it back into the sea.

Every time, Interxion is looking at this aspect, because I can put the water back into the rivers at 30 celsius, but we realised over time, especially when it becomes to 40 MW or 100 MW data centres, we would create an issue on the microclimate. Therefore we are always conscious of what we do. We cool back our resources to the original temperature and reuse it again. In the Nordic region, we also use the heated water to support the local community, where we heat up the tap water, and in Copenhagen we do the same. On top of that we buy green energy, because we are connected in Europe to the supergrid. We don't always know where the energy is coming from, but by the use of PPAs, the money from that is used for new solar or tidal or hydro for power production, and this is why at Interxion we look at these things. We don't look at simply what is the cheapest energy we can get.

When we were asked to provide heat for the local community to heat the houses, my first question to them was that it cannot be the case that if we cannot provide the heat for the houses, if we don't provide the heat the people will freeze to death in the wintertime, so we are willing to provide the heat, but not all the heat, and then we found out that with our 4MW to 5MW installation that it was just a small part because the total heat that is used for this is 4000MW. It is easy to say 'I am sustainable, I support that', but you have to think the whole thing through, especially when that is not your core business.

RECORD PLANÁLA

19 NOV 2019

LTR DATED \_\_\_\_\_ FROM \_\_\_\_\_

LDG- \_\_\_\_\_

ABP- \_\_\_\_\_

Appendix II continued



**These heat reuse schemes, are they happening just in the Nordic region or elsewhere as well?**

Every one wants this, but it is happening mainly in the Nordic region. Ever since 2008-10, we offered all the local authorities to take our heat, and what we tell them is that it is free of charge, with the only thing they have to do being connection of the pipes. It is a chicken and egg, because they like to have the heat, but they don't like having to invest to lay the pipes. So they often say it is too expensive because the temperature of the water is not yet high enough. When our industry moves to liquid cool chips, the water temperature will go from 30 celsius to 50 celsius, and then it becomes a really interesting business case for the local authorities to connect to our data centres because there is much more value in the hot water.

**Is that starting to happen now?**

We are at the tipping point. Recently, I have seen designs for open compute connected to liquid cooling so I believe it is starting to happen. Slowly.

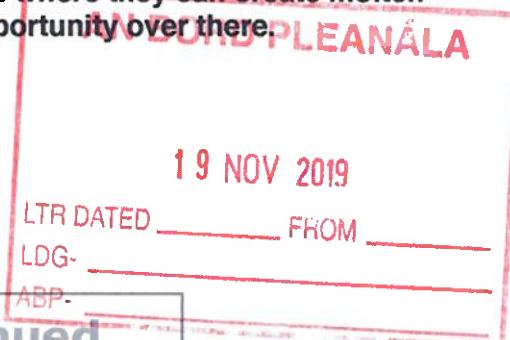
**You said your data centres are using energy from renewables. Is that mainly from wind and solar or are you using other technologies as well?**

Because in Europe we are connected to the supergrid, it can come from a hydro plant, wind, solar. It is not always completely clear. There has been so much demand for clean energy and that until recently the power plants could not produce any more, so now we see that the cost for the green energy is going up. This is a bad thing. We have been doing this for quite some years. We started with 30 percent 5-6 years ago and we reached 70 percent two years ago and we have now been at 100 percent for the past two years.

**What is likely to happen over the near future? How will it progress do you think?**

I think over the next 5-10 years we will see more off-grid solutions with large data centre deployments that will have their own wind farms or solar farms. If you are a company like Microsoft and you are deploying 300MW or 400MW of data centres in a region, you can imagine that it makes sense to participate in developing your own wind farm. I think wind, for Europe, and certainly for Spain, will be one of the best solutions, because solar does not give a large capacity per square metre. Wind is a relatively high capacity for a small footprint.

Also, I haven't seen, in Arab countries, the use of mirrors where they can create molten sand to run a steam turbine, but I think they have the opportunity over there.



**Appendix II continued**



Planning Department,  
South Dublin County Council,  
County Hall, Town Centre,  
Tallaght, Dublin 24.

**AN BORD PLEANÁLA**

**19 NOV 2019**

LTR DATED \_\_\_\_\_ FROM \_\_\_\_\_  
LDG- \_\_\_\_\_  
ABP- \_\_\_\_\_

Re: SD19A/0042 - EdgeConneX Ireland Ltd.

10th March 2019



Dear Sir/Madam,

I hereby submit my objection to the above planning application and state that it is my view EdgeConneX Ireland Ltd (ECXI) has not included best practice in the their planning application(s) for this site:

**Planning the development in a piecemeal method can cause problems as follows:**

- With regard to ECXI's previous application ref. SD19A/0004 for Enabling Works to facilitate the future development of this site the Planning Department has decided to REQUEST ADDITIONAL INFORMATION for this proposal by Order No. 0241 dated 28-Feb-2019. Before this application can be considered under Section 33 of the Planning and Development Act 2000 the following ADDITIONAL INFORMATION must be submitted. (See Appendix I)
- As part of Phase 1 (SD19A/0043) ECXI is applying for both (a) Electricity Substation and (b) Temporary Gas Generator Compound. Is there a problem with the electricity supply that a temporary gas supply is also needed. I cannot find any indication in this application from where this electricity power supply is sourced.
- When the Proposed Variation No. 1 - Zoning Amendment to Lands at Grangecastle West was brought to my attention I responded to the consultation programme carried out, by pointing out that (a) map of Griffeen River Catchment was not available, and also (b) corrections regarding drainage items on the map attached to the proposed variation. In section 6.6 of the Chief Executive's Report on the Public Consultation Item no. 1 refers to items raised in my submission and is followed by the Chief Executive's Response. (See Appendix II)

**Further Additional Information (AI) needed as follows:**

- In the Irish Times (IT) of 31/10/2016 Dick Ahlstrom, Science Editor, wrote an article "Water, water everywhere: the future for Ireland" he reports that the EPA commissioned a major climate modelling exercise that would help predict what our weather future holds. It was carried out by Dr. Paul Nolan who found that:

There would be "significant decreases" of up to 13% in average rainfall amounts over most of the year or up to 20% assuming less action on controlling climate change. But there would be a 20% increase in those driving, near tropical-type rainfall events that are becoming more familiar to us.

- There is a lack of information provided as part of this new planning application. Data Centres are located here to avail of our mild climate. Cool air outside is used to extract heat from this facility which is then discharged into the atmosphere as waste heat. This type of operation is now accepted to be contributing to the global climate change. Heat emitted should have a 'value' to the local area which could benefit horticulture, aquaculture, local food production and district heating. Although some data centres will/do use wind energy for increased efficiency as it comes available, this does not impact on the amount of waste heat dispersed to the atmosphere.

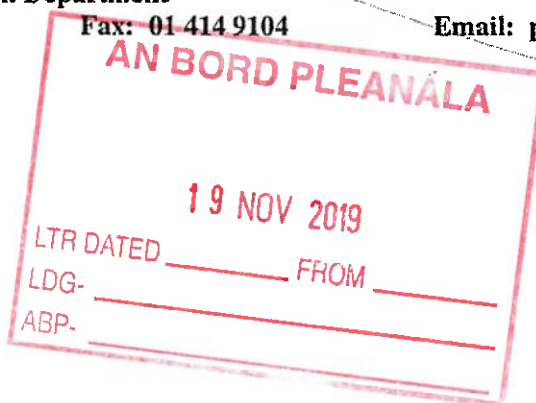
An Rannóg Talamhúsáide, Pleanála agus Iompair  
Land Use, Planning & Transportation Department  
Telephone: 01 414 9000

  
Comhairle Contae  
Átha Cliath Theas  
South Dublin County Council

Fax: 01 414 9104

Email: [planning.dept@sdblincoco.ie](mailto:planning.dept@sdblincoco.ie)

Mr. John Power  
'Lock Cottage'  
The Grange  
Lucan  
Co. Dublin



Date: 11-Mar-2019

Dear Sir/Madam,

**Register Ref:**  
**Development:**

SD19A/0042

Phased development that will include 4 single storey data halls all with associated plant at roof level; 32 standby generators with associated flues (each 15m high); associated office and service areas; service road infrastructure and car parking; ESB sub-station/transformer yard with an overall gross floor area of 17,685sq.m; temporary gas powered generation plant within a walled yard containing 19 generator units with associated flues (each 17m high) to be located to the west of the proposed data halls on a site within the townland of Ballymakailly; Phase 1, 2 single storey data halls (6,950sq.m.) with roof plant and 16 stand-by generators with associated flues (each 15m high) as well as associated water tower and pump room and other services; single storey goods receiving area/store and single storey office area (1,522sq.m.) located attached and to the north-east of the data halls; temporary gas powered generation plant with 15 generators with associated flues (each 17m high) to be located within a compound to the west of the proposed data halls; attenuation pond; two storey ESB sub-station (494sq.m) with associated transformer yard and single storey transformer building (247sq.m) within compound; Phase 2, 2 single storey data halls (6,950sq.m.) with roof plant and 16 stand-by generators with associated flues (each 15m high) as well as associated water tower and pump room and other services; single storey goods receiving area/store and single storey office area (1,522sq.m) located attached and to the east of the data halls under this Phase and attached and to the north of the offices proposed under Phase 1; 4 additional generators with associated flues (each 17m high) to be constructed within the temporary gas powered generation plant; also ancillary site works; connections to existing infrastructural services as well as fencing; signage; vehicular access off the realigned R120 to provide a new vehicular access into the site as well as internal service roads and entrance gates; car park for 39 car parking spaces (including 4 disabled car parking spaces); sheltered bicycle parking to serve the development. The development will be enclosed with landscaping to all boundaries of the overall site of 22.1ha. Application for enabling works to facilitate this development has been made under Reg. Ref. SD19A/0004. An Environmental Impact Assessment Report (EIAR) has been submitted with this application. An EPA-Industrial Emissions (IE) licence will be applied for to facilitate the operation of Phase 2 of the permission.

**Location:** Newcastle Road, Lucan, Co Dublin  
**Applicant:** EdgeConnex Ireland Ltd.  
**Application Type:** Permission  
**Date Rec'd:** 05-Feb-2019

I wish to acknowledge receipt of your submission in connection with the above planning application. The appropriate fee of €20.00 has been paid and your submission is in accordance with the appropriate provisions of the Planning and Development Regulations 2001(as amended). The contents of your submission will be brought to the attention of the Planning Officer during the course of consideration of this application.

This is an important document. You will be required to produce this document to An Bord Pleanála if you wish to appeal the decision of the Council when it is made. You will be informed of the decision in due course. Please be advised that all current applications are available for inspection at the public counter and on the Council's Website, [www.sdublincoco.ie](http://www.sdublincoco.ie).

You may wish to avail of the Planning Departments email notification system on our website. When in the *Planning Applications* part of the Council website, [www.sdublincoco.ie](http://www.sdublincoco.ie), and when viewing an application on which a decision has not been made, you can input your email address into the box named "*Notify me of changes*" and click on "*Subscribe*". You should automatically receive an email notification when the decision is made. Please ensure that you submit a valid email address.

**Please note:** If you make a submission in respect of a planning application, the Council is obliged to make that document publicly available for inspection as soon as possible after receipt. Submissions are made available on the planning file at the Planning Department's public counter and with the exception of those of a personal nature, are also published on the Council's website along with the full content of a planning application.

Yours faithfully,

Mary Crowley  
for **Senior Planner**

|                         |            |
|-------------------------|------------|
| <b>AN BORD PLEANÁLA</b> |            |
| 19 NOV 2019             |            |
| LTR DATED _____         | FROM _____ |
| LDG- _____              |            |
| ABP- _____              |            |