

File With _____

SECTION 131 FORMAppeal NO: PL ABP - 305948-19Defer Re O/H ☐

TO: SEO

Having considered the contents of the submission dated/ received 18/12/19
fromapplicant I recommend that section 131 of the Planning and Development Act, 2000
be/not be invoked at this stage for the following reason(s): no new issuesE.O.: Nikhil MukherjeeDate: 16/1/20

To EO: _____

Section 131 not to be invoked at this stage. ☐Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached
submission

to: _____

Allow 2/3/4weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: PLAAT-305948-19M ChiforescuPlease treat correspondence received on 18/12/19 as follows:

- | | |
|--|--|
| 1. Update database with new agent for Applicant/Appellant <u>Marston Manning Consulting</u>
2. Acknowledge with BP <u>20</u>
3. Keep copy of Board's Letter <input type="checkbox"/> | 1. RETURN TO SENDER with BP _____
2. Keep Envelope: <input type="checkbox"/>
3. Keep Copy of Board's letter <input type="checkbox"/> |
|--|--|

Amendments/Comments

4. Attach to file

- | | |
|---|---|
| (a) R/S <input type="checkbox"/> | (d) Screening <input type="checkbox"/> |
| (b) GIS Processing <input type="checkbox"/> | (e) Inspectorate <input type="checkbox"/> |
| (c) Processing <input type="checkbox"/> | |

RETURN TO EO ☐EO: JP TrecheaDate: 20/12/19Plans Date Stamped ☐Date Stamped Filled in ☐AA: ChiforescuDate: 31/12/19

Stephen Sutton

From: Bord
Sent: Wednesday 18 December 2019 16:24
To: procbordemail
Subject: FW: South Dublin County Council Reg. Ref. SD19A/0042 / An Bord Pleanála Ref. ABP-305948-19
Attachments: Appeal response.pdf

From: Anthony Marston <anthony@marstonplanning.ie>
Sent: Wednesday 18 December 2019 16:05
To: Bord <bord@pleanala.ie>
Subject: South Dublin County Council Reg. Ref. SD19A/0042 / An Bord Pleanála Ref. ABP-305948-19

TO WHOM IT MAY CONCERN

Please find attached response of the first party (Edgeconnex Ireland Ltd) response to a third party appeal in relation to the above planning application.

I would be grateful if you could confirm receipt of this formal response and if you need any hard copies of the response.

We look forward to a favourable decision in due course.

Regards

Anthony Marston
Marston Planning Consultancy

m:086-3837100

23 Grange Park, Foxrock, Dublin, D18 T3Y4.

www.marstonplanning.ie

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PLANNING CONSULTANCY

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

Our Ref: 16008

14th December 2019

Re: Planning and Development Act, 2000 (as amended), and the Statutory Regulations thereunder. First party response to third party appeal by Mr. John Power, The Grange, Lucan, County Dublin in relation to permission granted by South Dublin County Council for permission that will consist of a phased development that will include 4 no. single storey data halls all with associated plant at roof level; 32 no. standby generators with associated flues (each 15m high); associated office and service areas; service road infrastructure and car parking; as well as ESB sub-station / transformer yard with an overall gross floor area of 17,685sqm. The development will also include a temporary gas powered generation plant within a walled yard containing 19 no. generator units with associated flues (each 17m high) to be located to the west of the proposed data halls. The development will also include ancillary site works, connections to existing infrastructural services as well as fencing, signage, and will include new vehicular access off the realigned R120 to provide a new vehicular access into the site as well as internal service roads and entrance gate, and a car park for 39 car parking spaces (including 4 disabled car parking spaces) and sheltered bicycle parking to serve the development. The development will be enclosed with landscaping to all boundaries of the overall site of 22.1ha. An application for enabling works to facilitate this development has been made under Reg. Ref. SD19A/004. An Environmental Impact Assessment Report (EIAR) has been submitted with this application.

An Bord Pleanála Ref. ABP-305948-19

South Dublin County Council Reg. Ref. SD19A/0042

Four week period for making response to appeal: on or before the 19th December 2019

Dear Sir/Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by the applicant, EdgeConneX Ireland Limited, 6th Floor, South Bank House, Barrow Street, Dublin 4 to lodge this first party response to the third party appeal made by Mr. John Power, The Grange, Lucan County Dublin.

We respectfully submit that the third party makes a number of inaccurate and unsubstantiated statements throughout their appeal, all of which have been dealt with comprehensively in both the application; the Further Information response; the decision of the Planning Authority; and now this response.

The proposal does not amount to a piecemeal approach to development but contrary to the claims of the appellant has taken a best practice approach to the development in terms of the content and assessments under the EIAR, as well as the mitigation proposed. In fact the complete opposite to what is raised by the appellant is in fact the case in that the proposal includes the landscape master planning of the entire site; appropriate and adequate attenuation for the site; and the phased development of four single storey data halls on the site.

This proposal, contrary to the claims of the appellant, does not amount to any amendments of previous applications with the sole permission for the site relating to an enabling application permitted under Reg. Ref. SD19A/0004. The enabling application and its impacts were fully considered under the EIAR.

We respectfully submit that the applicant has employed best practice in the planning and design of the subject application and its constituent parts. The proposal has been developed in a phased basis that will enable the applicant to ensure that the proposed data centres are designed in a manner that provides their clients with their specific requirements.

This approach has also been taken to the overall planning and environmental impact assessment process. The application has addressed both in terms of attenuation, flooding and environmental impact the individual and cumulative impact of all applications that includes the applicants data centre campus to the east of the R120. This also applies to the current application.

We refer the Board to all the previous applications, and their accompanying reports that comprehensively and based on good practice have addressed all issues relating to the proper planning and sustainable development of the site.

Prior to addressing all elements of the third party appeal it is important given the number of permissions relating to the overall development of the adjacent site that the appeal is set in context.

1. The appeal in context

The location and description of subject site

The proposed Data Centre development is to be located on a site of 22.1ha. to the immediate west of the recently realigned R120 within the townland of Ballymakilly, Lucan, Dublin 22. The site in terms of its current use can be split into two areas with the majority of the land forming open grassland; and a former farmhouse and associated barns as well as similar buildings forming a small element of the northern part of the site to the immediate south of the Grand Canal.

The majority of the site that remains in grassland contains field boundaries in the form of hedgerow and small trees along its southern and western boundary that forms the townland boundary between Ballymakilly and Gollierstown to the west and Grange to the south. The site also contains five enclosed fields to the north-east and a larger L-shaped field that extends from the realigned road at the south-east to the canal to the north-west. An agricultural access road leads from the realigned R120 to the north-east of the overall site to the former agricultural buildings.

The eastern boundary of the site has been subject to a compulsory purchase order by South Dublin County Council to facilitate the Adamstown / Newcastle Road improvement scheme. This has resulted in a significant length of hedgerow being removed by the Council to facilitate the road works for some 430m of the eastern boundary with lengths of hedgerows remaining of 100m to the south-east, and 130m to the north-east along the realigned road. The former road remains in situ at the south-east corner of the site.

The site is bounded by the Grand Canal, and a lane along part of its south side and planting, to the north. An abandoned dormer type property and both the original and new bridge over the Grand Canal lie to the north-eastern corner of the site. The realigned R120 bounds the site to the east with a number of residential properties bounding the road to its east. The data centre campus of the applicant granted and implemented that allows for future expansion under Ref. SD16A/0214, SD16A/0345 and SD17A/0141/SD17A/0392 as well as SD18A/0298 is located to the rear of these residential properties to the east of the R120. The site is bounded by further agricultural land zoned for development to the south and west. A traveller site is located some 180m to the south-west of the site.

A large electricity pylon is situated in the northern portion of the site to the immediate south of the disused farm buildings and in the north-west corner of the site. The power cables run across the site on a west-north-west to east-south-east axis across the site. The eastern part of the site has been subject to a compulsory purchase order by South Dublin County Council to facilitate the R120 improvement scheme, which is nearing completion. This resulted in a temporary land take of some lands that will revert back into the ownership and control of the applicant some 12 months following completion of the road scheme, and therefore is usable and will form part of the mitigation landscape master plan for the proposed development.

The site is relatively flat though there is a slope towards the north-east corner. The site is currently accessed only via an agricultural access points from the east off the R120 and from the north off the access road to the abandoned agricultural buildings.

Archaeology

Prior to the submission of the application a geophysical survey (Licence no. 18R0257) was carried out in January 2019 by Joanna Leigh of JM Leigh Surveys. This identified some potential archaeological features

on the site. An archaeological test excavation following Archaeological works were conducted by AMS-CRDS between the 29th January and 12th February 2019 by AMS-CRDS under licence (Licence no. 19E0038). The report concluded that archaeological excavation would be required of the features confirmed by testing, and that a programme of archaeological monitoring of groundworks should also be undertaken at construction phase.

Archaeological work and excavations under licence have now been completed on the application site. A report attached to the Additional Information submission detailed the assessment of the excavations and the need for further and for a full excavation of the areas of greatest sensitivity that has now been fully completed. These works identified an area of 100m by 100m around the enclosure and a 180m by 20m strip to be topsoil stripped.

These works have been completed under licence and all mitigation measures complied with the National Monuments Act 1930 (as amended). Preservation by record was done under excavation licence issued under section 26 of the National Monuments Act 1930 (as amended) and be in accordance with the Framework and Principles for the Protection of the Archaeological Heritage (SAHGI, 1999).

All of the above, and further measures recommended has ensured that an archaeological impact assessment has been fully undertaken of the archaeological remains. The above were all considered and addressed within the EIAR.

2. Compliance with County Development Plan

The South Dublin County Development Plan is the statutory planning document that covers the entire South Dublin administrative area. The Plan was adopted in June 2016. The proposed data centre and temporary plant is to be located within an area zoned EE (Enterprise and Employment) under the County Development Plan with the stated aim:

"To provide for enterprise and employment related uses."

The northern part of the lands within which it is proposed to locate attenuation ponds, mitigation landscaping and wildflower meadows is zoned RU with the objective *"to protect and improve rural amenity and to provide for the development of agriculture"*. The RU zoning provides a natural buffer that is 80-100m in width between the canal and the EE zoned lands.

The proposal is a permitted use under the EE zoning. The proposed landscape mitigation, attenuation and wildflower meadows are acceptable in principle within the RU zoning. Significant precedent exists for the establishment of this use on other EE zoned lands in the area. EE zoned areas are established economic industrial areas running essentially in an arc northwards from City West to Grange and Grange Castle. This EE zoning has been recently expanded to what is known as Grangecastle West to the west of the site under Variation no. 1 of the County Development Plan. These lands were zoned as EE prior to this Variation.

It is the policy of the Council to support sustainable enterprise and employment growth in South Dublin and in the Greater Dublin Area, whilst maintaining environmental quality. A number of objectives relate to EE zoned lands that include ET3 Objective 2 that states:

"To prioritise high tech manufacturing, research and development and associated uses in the established Business and Technology Cluster to the west of the County (Grange Castle and Citywest areas) to maximise the value of higher order infrastructure and services that are required to support large scale strategic investment."

Policy ET3 Objective 5 requires that *"all business parks and industrial areas are designed to the highest architectural and landscaping standards and that natural site features, such as watercourses, trees and hedgerows are retained and enhanced as an integral part of the scheme"*.

In conclusion it is considered that the subject proposal is in accordance with the policies and objectives of local, regional and national land use planning policy.

3. Positive decisions of the Planning Authority on adjacent site and application site

The single enabling application on the subject site; and all applications on the adjoining site to the east of the R120 have been subject to positive decisions from the Planning Authority with only one being subject to a third party appeal that was granted by An Bord Pleanála.

These decisions set a clear precedent for the assessment of this application, which is already subject to a positive decision from the Planning Authority. Each application has carefully considered attenuation, flooding and environmental impact both individually and cumulatively. In all instances the decision of the Planning Authority has been positive that reflects the carefully considered, designed and engineered proposals that are detailed below.

Reg. Ref. SD19A/0004

A separate planning application was lodged with South Dublin County Council for enabling works on the southern part of the site to carry out the required earthworks and site preparation works to facilitate the development proposed under this application. This application received a request for Further Information on the 28th February relating to drainage, Irish Water requirements, surface water run-off, details on the cut and fill, and archaeology. The response was submitted to the full requirements and satisfaction of the Council who issued a decision to grant on the 16th April 2019 and with the Final Grant of permission issued on the 28th May 2019. No appeal was lodged against this decision.

Adjoining Edgeconnex site to east of the R120

The Edgeconnex site to the east of the R120 has been subject to several permissions that provide for the master planning of the site and include two single storey data centres of 4,176sqm and 4,435sqm and single storey office of 1,341sqm permitted and built under Reg. Ref. SD16A/0214 and Reg. Ref. SD16A/0345. This later permission also included for a temporary gas generation plant within walled yard measuring 2,811sqm and containing 12 no. 1.875 MVA sized container units to be located within the Takeda lands to the east of the site. This temporary plant is currently subject to a further two year extension application under Reg. Ref. SD19A/0342 that will be determined in early 2020.

Permission was subsequently granted for the relocation of the temporary gas generator plant permitted under Reg. Ref. SD16A/0345 on lands owned by Takeda, to lands within the applicant's control on the 15th May 2017. This permission will only be implemented if there is a need to relocate the temporary generator plant from the Takeda lands.

A third stand-alone data centre was granted and implemented under Reg. Ref. SD17A/0141 and Reg. Ref. SD17A/0392 / ABP Ref. ABP-300752-18 for a data centre of 1,640sqm on lands bounding the R120. The later permission was granted and dismissed a third party appeal on similar grounds as raised under the current appeal by the same appellant. This was granted by the Board on the 26th July 2018.

The final part of the build out of the master planning of the site to the east of the R120 was granted under Reg. Ref. SD18A/0298 on the 27th November 2018. This permission was for the development of 2 no. new single storey data halls and associated office areas, and plant, with a gross floor area of 5,823sqm. This permission will not be implemented until such time as the upgrade of power can be provided to the site and the temporary gas powered generation plant on the Takeda lands can be decommissioned.

4. Nature and extent of permitted development

The application was made to the Council on the 5th February 2019, and resulted in a request for Additional Information being issued on the 29th March 2019. This was comprehensively addressed and submitted to the Council on the 29th August with a decision to grant permission being issued on the 23rd October 2019. The decision was subject to 31 relatively standard conditions for a data centre development such as this.

Originally submitted application

The nature of the overall design was informed by a detailed site analysis. The enhancement and creation of new bio-diversity corridors to fully integrate the scheme into the surrounding environment ensuring direct and cumulative impacts on biodiversity are addressed in the overall design. This mitigation of design also increases native tree planting within the site from its current position. The design incorporates SUDS fully in accordance with policies of the County Development Plan so that all attenuation is addressed within the site.

The application as originally submitted is located at its nearest point (substation) some 240m and the nearest data centre some 340m from the northern boundary of the site close to the Grand Canal. The proposal was to construct a phased data centre development that will include 4 no. single storey data halls all with associated plant at roof level; 32 no. standby generators with associated flues (each 15m high); associated office and service areas; service road infrastructure and car parking; as well as ESB sub-station / transformer yard with an overall gross floor area of 17,685sqm. The development was to also include a temporary gas powered generation plant within a walled yard containing 19 no. generator units with associated flues (each 17m high) to be located to the west of the proposed data halls (reduced in scale as part of the AI submission). The development will be constructed across two distinct phases that will facilitate the future use and take up of space within the data halls. It is intended that Phase 1 will be complete and operational prior to the commencement of Phase 2 of the development.

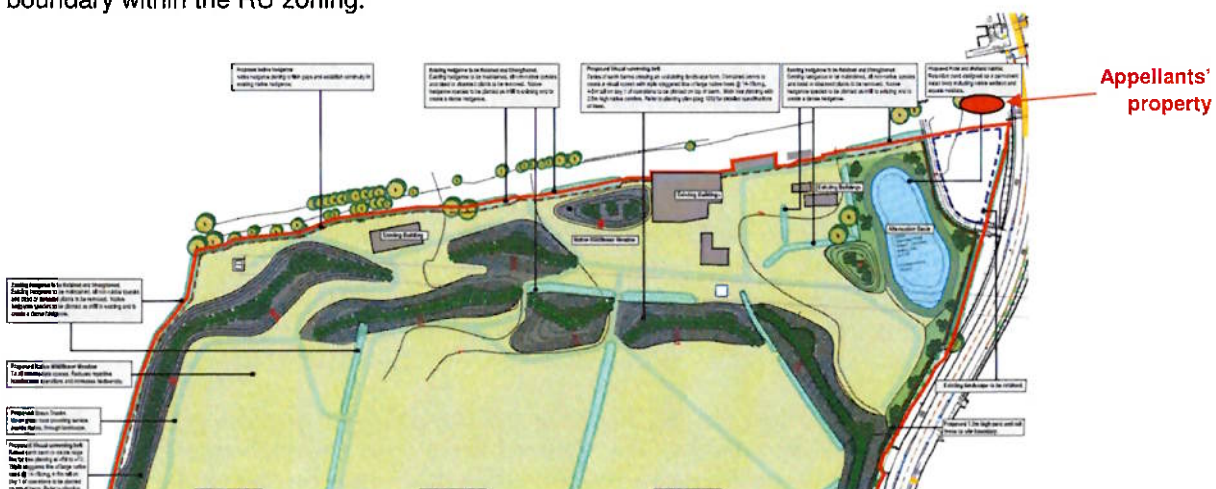
Phase 1

- 2 no. single storey data halls (6,950sqm) with roof plant and 16 no. 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 (1,522sqm) located attached and to the north-east of the data halls;
- Temporary gas powered generation plant with 15 generators (12 operating and 3 standby) with associated flues (each 17m high) to be located within a compound to the west of the proposed data halls;
- Attenuation pond; and
- Two storey ESB sub-station (494sqm) with associated transformer yard and single storey transformer building (247sqm) within compound.

Phase 2

- 2 no. single storey data halls (6,950sqm) with roof plant and 16 no. 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 (1,522sqm) 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; and
- 4 no. additional generators (all operating) with associated flues (each 17m high) to be constructed within the temporary gas powered generation plant that will mean that the overall temporary gas powered generation plant will operate on the basis of 17 operating and two on standby.

The temporary gas generation plant is required as a result of the limited capacity available on the electrical utility network in the area. The development will also include ancillary site works, connections to existing infrastructural services as well as fencing, signage, and will include new vehicular access off the realigned R120 to provide a new vehicular access into the site as well as internal service roads and entrance gate, and a car park for 39 car parking spaces (including 4 disabled car parking spaces) and sheltered bicycle parking to serve the development. The development will be enclosed with landscaping to all boundaries of the overall site of 22.1ha. that includes a high degree of landscaping and an attenuation pond along the northern boundary within the RU zoning.



Landscape boundary treatment and attenuation relative to appellants property and northern boundary along Grand canal within RU zoning

Under the originally submitted application only a maximum of 24 of the 32 standby generators would be in operation until such time as the temporary generator farm is decommissioned and the development is fully connected to the national grid. The proposed development on the connection to the national grid will see the removal of the temporary gas generation compound and the proposed development will have 4 data halls with 32 no. standby diesel generators. This future connection will be assessed at the time once routes etc. are known in terms of the cumulative impact with the data centre development. The new data centres will operate 24 hours per day, 7 days per week, on a 3 shift cycle.

Additional information

The scheme as presented as part of the Additional Information response fully addressed the concerns of the Planning Authority in terms of all elements but particularly in relation to noise mitigation and reduction to the nearest noise sensitive receptors. This led to the positive decision of the Planning Authority on the 23rd October 2019. As part of the response the temporary generator gas plant was reduced in scale to address the cumulative noise impacts under SD18A/0298 as well as the cumulative noise impacts under the current application at all noise sensitive residential property. Under any scenario considered the cumulative noise generated remains below 46.2dB(A) at each noise sensitive receptor. The reduction in the number of temporary generators was the only and sole design change proposed as part of this FI response. This reduction in noise was achieved by the following changes in terms of the design of the temporary plant:

- Reselection of plant associated with the Phase 5 Data centre development;
- A reduction in the number of temporary generators from 15 to 8 that also reduces the size of its compound;
- A reduction in the likely lifespan of the proposed temporary generator gas from 5 years to 2 years; and
- Remodelling of phase 4 permission under Reg. Ref. SD18A/0298 of the development to include adjustments to parapet heights which will provide increased acoustic screening.

Other future phases, if they occur, will be subject to a new application, and environmental impact assessment including cumulative impact assessment with the current proposal. The scheme has been designed so that it can be undertaken without further phases in terms of landscape mitigation, design and infrastructure. Its design and positioning has been undertaken to minimise impact on existing hedgerows with the vehicular access utilising an existing wide gap in the hedgerow, and the only hedgerow being required to be removed being that to facilitate the ESB substation and transformer compound. No works are proposed to the abandoned farm buildings under this application. This will be addressed under a future application to enable a full summertime bat and bird survey to be undertaken of all these structures.

5. Response to third party appeal

We respectfully submit that the issues raised by the appellant are dealt with in a comprehensive and coherent manner that outlines how the Council have undertaken a thorough and balanced assessment of the application(s), power supply, zoning, heat recovery; and why the decision of the Planning Authority is robust and should be upheld in this instance.

We have comprehensively addressed each of the three main issues raised by the third party to outline the true and correct assessment of these issues relative to the current application and the enabling application on the subject site.

Power supply

There remains limited capacity available on the existing electrical utility network in the short-term in which the proposal will be constructed and therefore it is proposed to provide the electrical power for the development in the interim period by locating a temporary gas generation plant on the lands to the immediate west of the proposed data halls. The gas generation plant will be constructed within an open compound with 10.15m high walls on all sides.

The data centre element, which generated the request from the Planning Authority for an EIAR, of the proposal is entirely reliant on the operation and function of the temporary gas generation plant in the short-term. Therefore any future MV and HV connections were not cumulatively assessed under the EIAR given their unknown paths, and the unknown scale of works that may or may not be required.

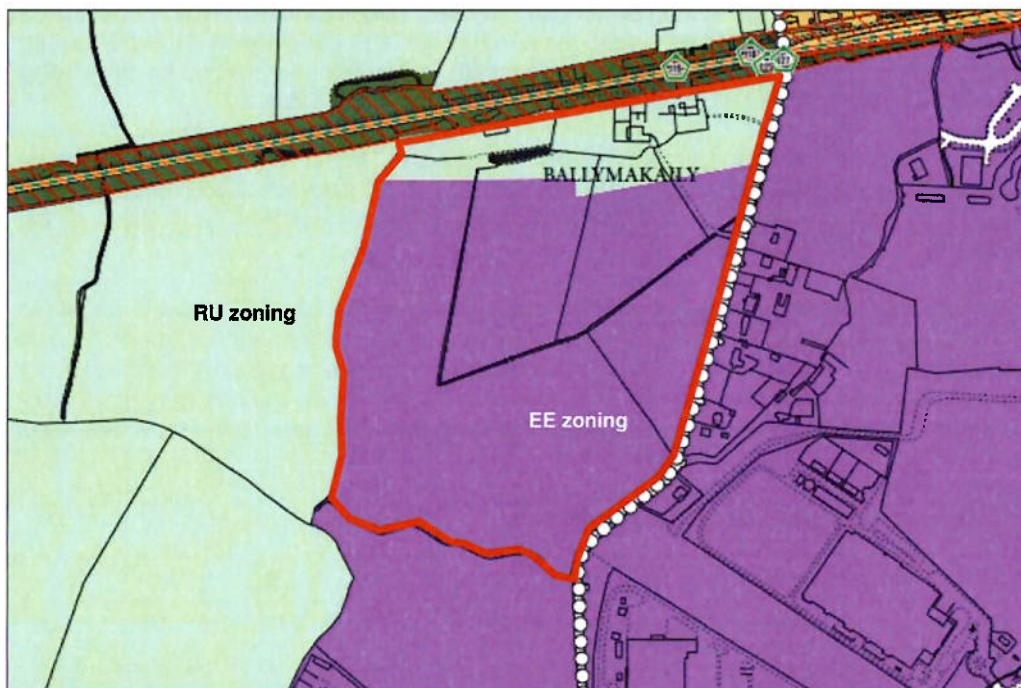
Whilst MV and HV connections will be required in the future once permanent power connections for the data centre are agreed with ESB / Eirgrid it does not form part of the current application or EIAR. Any such connections that require new works will be subject to, where required, new planning applications where the cumulative impact of those works with the data centre and substations will be assessed. This would be covered under a Planning and Environmental Report that has been requested by power providers on other similar projects. Given the urban nature of the site in close proximity to a number of power sources / substations then it would be anticipated that the level of works outside of the site to facilitate such connections would be extremely minor given that existing ducting is largely in place. These works would not, in our considered opinion alter the conclusions of the EIAR, and mitigation measures proposed. The planning of the site is therefore not piecemeal but forms a comprehensive of the current power supply being proposed, and we therefore request the Board to dismiss this element of the appeal as having no grounds in this instance.

Zoning and flooding

We note that the application lands did not form the rezoning of lands under Variation no. 1 of the South Dublin County Development Plan as is inferred by the appellant. The drainage and potential flooding of these lands to the west will not be impacted by the proposal. The majority of application site were zoned as EE (Enterprise and Employment) under the County Development Plan when it was adopted in June 2016 with the stated aim:

"To provide for enterprise and employment related uses."

The proposed data centre and temporary plant are to be located within lands zoned solely as EE. The northern part of the lands within which it is proposed to located attenuation ponds, mitigation landscaping and wildflower meadows is zoned RU with the objective *"to protect and improve rural amenity and to provide for the development of agriculture"*. The RU zoning provides a natural buffer that is 80-100m in width between the canal and the EE zoned lands.



Development Plan zoning map excerpt prior to rezoning of further lands to the west under Variation no. 1 of the County Development Plan – indicates land already zoned for development

As the appellant correctly states Variation no. 1 of the County Development Plan extended the EE zoning significantly further to the west of the site to what is known as Grangecastle West. As part of this application we undertook a detailed and thorough Flood Risk Assessment (FRA) that was considered within the EIAR and formulation of the application itself.

The FRA concluded that the proposed development of the site would not pose any flooding issues both in relation to the site itself but also to any lands / properties that lie downstream of the proposed development. The site will be positively drained and surface water will be contained within the overall sites drainage network and managed in a sustainable manner in accordance with all relevant guidelines and specifications. Furthermore, the flood mapping indicates the development site is located within Flood Zone C "Low Probability" and is classified as being "Less Vulnerable" to flooding and the proposal is therefore considered as being fully appropriate in terms of flood risk and in terms of the long standing EE zoning of the site.

Heat recovery

We refer the Board to the heat recovery feasibility report by Ethos Engineering Limited that was submitted with the Further Information response to the Planning Authority. This report demonstrated the arrangements that can be made in relation to the incorporation and connection to any district heating scheme that may be forthcoming in the future fully in accordance with section 11.7.6 of the County Development Plan.

The heat recovery report concludes that the installation of a heat network to recover waste heat is unfeasible due to the limitations of the temperatures available within the return air and subsequently the heat exchanger, particularly during the winter months. The submitted documents indicates a potential connection as per Appendix B of the Ethos report.

6. Conclusion

We respectfully submit that as stated previously, the applicant welcomes the decision of South Dublin County Council to grant permission in respect of this and the enabling application. The appeal is without due grounds and we note that it does not request that the decision of the Planning Authority be overturned. The development of the site is not being proposed in a piecemeal basis but has adopted a landscaping master-planning approach to the site so that the maximum visual and biodiversity mitigation benefits can be achieved through this first main application on these lands.

The application is fully in accordance with the zoning of the site; has provided significant levels of details on the attenuation being proposed; the flood risk and heat recovery to the full satisfaction of the Planning Authority. This has included a comprehensive EIAR on the impact of the proposal, as well as its cumulative impact. The proposal does not form a piecemeal approach to the development of this site.

The applicant has been advised by Pinnacle Consulting Engineers, AWN and Marston Planning Consultancy, and undertaken extensive assessment of the attenuation requirement and flooding potential of the site. It is clear that when this is assessed in a thorough and objective manner that the findings of the applicant's consultants are fully correct and robust.

In conclusion, for all of the foregoing arguments, reason and considerations, An Bord Pleanála is invited to dismiss the claims of the appellant as without due grounds and to assess the subject application on its own individual merits and to uphold the decision of the Planning Authority, and to grant planning permission for this development on the basis that by its nature and extent, the proposal would accord with the proper planning and sustainable development of this area including the preservation and improvement of amenities thereof.

We look forward to an early and favourable response on this matter.

Yours faithfully



Anthony Marston (MIPI, MRTPI)
Marston Planning Consultancy