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The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

BB/COC

4th October 2023

Re: Our Clients: John Conway and Louth Environmental Group of 91 St. Nicholas Avenue, Dundalk, Co. Louth
Re: Third Party Appeal against Grant of Permission
Fingal County Council Planning Application Reference Number: FW22A/0308
Applicant: Universal Developers LLC
Address: Site at Cruiserath Road, Dublin 15

Dear Sir/Madam,

On behalf of the above-named Client, we¹ wish to lodge the within Third Party Appeal on the proposed Data Centre buildings development the subject matter of Planning Application Ref No. FW22A/0380 on a site at Cruisearath Road, Dublin 12. The Planning Authority granted permission for the development on 18th September 2023 and our client made an observation on the planning application to the local authority – a letter of acknowledgement for which is at Appendix 1.

The grounds and reasons for our submission/observations are detailed hereinafter.

- (a) Section 15 of the Climate Action and Low Carbon Act 2015, as amended (the Act) requires that relevant bodies shall perform their functions in a manner consistent with:
 - (a) the most recent approved climate action plan, (b) the most recent approved national long term climate action strategy, (c) the most recent approved national adaptation framework and approved sectoral adaptation plans, (d) the furtherance of the national climate objective, and (e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

In the course of the processing of the planning application the applicant submitted a response to a request for further information concerning electricity consumption where it was stated (at pg 36 of the Further Information Response Report prepared by AWN) that the development will consume 1925 GWh annually which “translates to approximately 456,592 tonnes of C02eq per year (including generator testing) based

¹ BKC Solicitors, 252 Harold’s Cross Road, Harold’s Cross, Dublin, D6W T384

on the likely 2025 electricity mix". Our client is concerned that not only are estimated GHG emissions and energy usage high it is unclear from the application documentation if any off site renewable energy that is to be relied on is additional to existing renewable development that has been in operation for a number of years, if it will be generated domestically, or if it will be purchased on the international carbon markets. If the applicant intends to rely on renewables generation there should be proof of additionality lest that energy be taken from other users already connected to the grid which would otherwise need to fall back on reliance on conventional high emission generation. It is therefore unclear how the development is consistent with s15 of the Act (see comments at ground b) below in relation to Condition 13 regarding the terms of any CPPA).

It is further unclear how permitting any additional energy intensive data centre development in the State is consistent with the criteria set out in s15 of the Act in circumstances where there are a disproportionate number of Data Centres permitted or already in operation in the State (relative to other EU states), where SDCC recently granted planning permission (Ref. SD22A/0460) for an energy intensive data centre/repository (under appeal) or the Climate Action Plan 2023 generally and specifically where it states (at pg 139) in that Plan that: "In the short- and medium-term, new demand growth from large energy users, such as data centres, will have to be moderated to protect security of supply and ensure consistency with the carbon budget programme". This particular phrase is considered on pg 15 in the amended Chapter 9 of the EIAR that was submitted to the planning authority but we respectfully consider it is not properly dealt with. For example, the response refers to research reports that indicate that at lower a carbon intensity of 38-84gCO₂/kWh is achievable. It also refers to a speech by the ESBs chief executive about reducing emissions per kWh. With respect research reports and statements by the ESB this does not mean that reductions will actually be achieved on the ground. Furthermore, given the very significant energy consumption of the proposed development even if a lower carbon intensity were to be achieved per kWh it is unclear how permitting such an energy hungry development would mitigate against climate change where such a significant volume of electricity (which will produced through consumption of conventional fuel generating carbon or through carbon associated with the manufacture of wind turbines etc.).

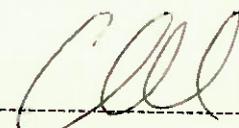
Further insofar as compliance with section 15 of the Act is considered at pg 44-47 of the further information response it is noted that reliance is placed on CPPAs, which for the reasons set out at (b) below, is not evidence of mitigation against GHG generation in the State.



- (b) A detailed submission on the response to the request for further information was submitted by Colin Doyle (PhD Climate Science) which challenges the adequacy and conclusions of the information provided in the response by the applicant. A copy of that submission is at Appendix 2 to this observation and we request that the Board have full regard to its contents in determining this appeal. One matter which Mr Doyle draws particular attention to is the issue of whether the existing and proposed CPPAs actually represent mitigation, which he states "the applicant has failed to demonstrate." He further states that "...This would require the applicant to demonstrate that indirect emissions from electricity generation would be higher in the absence of the contracted CPPA. In other words one would have to prove that the renewable energy was additional, i.e. the renewables project would not have happened without the CPPA. As no supporting evidence has been provided by the applicant, and from a review of the planning history of the wind farms, I submit that there will be no additionality associated with the CPPAs mentioned by the applicant". It therefore appears that entry into CPPAs will not represent mitigation against an increase of GHGs in the State and/or there is no evidence showing this. Whereas a planning condition (no. 13) has been attached to the Grant seeking to address this matter there does not appear to have been an assessment of any environmental impact associated with the new development envisaged to discharge that Condition or what additional interconnector or transmission network upgrade that might be required to service new windfarms etc. Given the importance of this issue this is not a matter which should be left over to be agreed by way of planning compliance (on which the public has no right to make submissions). The Board should consider this issue carefully when assessing whether the development is consistent with proper planning and sustainable development and whether there are lacuna in the EIAR.

For these reasons our Client considers that the development is inconsistent with proper planning and sustainable development and requests that the Board overturn the Councils decision and refuse permission for the development.

Yours faithfully,



Christine O' Connor,
BKC Solicitors

Encl.





€220

Letter of Acknowledgement of Observation
Copy of Observation by Colin Doyle PhD

Planning Department
Fingal County Council

Colin Doyle
12 Cottage Gardens
Ennis
Co. Clare
23/08/2023

Sent by email

Ref: FW22A/0308

Submission on Further Information

Universal Developers LLC Data Centre Development

A Chara,

1. Introduction

The primary concern in my original submission was with regard to the climate impact of the proposed development. I am not in any way reassured by the Further Information provided.

In assessing the sustainability of large energy user projects such as data centres the Planning Authorities are faced with an enormous challenge in attempting to sift through the various sustainability claims of the applicants, while giving due consideration to the critiques of objectors.

A particular difficulty faced by Planning Authorities is that while Ireland now has carbon budgets established in law, there is a lacuna in how emissions from new developments are assessed at a national level in terms of compliance with national targets. It is hard to believe, but it is the case, that there is no national statutory body or authority which can prioritise essential developments, assess proposed mitigations, and ensure equitable allocation of the remaining national carbon budget. This heavy responsibility falls on the Planning Authorities, who have been provided with absolutely no guidance on how to decide these matters.

The proposed development will consume large quantities of electricity which will result in increased emissions of greenhouse gases (GHG) from power plants. These are termed "indirect emissions". Operation of electricity markets is an exceedingly complex area, and GHG offset accountancy procedures are also complex, and open to various interpretations. The applicant has access to vast scientific, engineering and legal resources, and the onus therefore lies squarely on the applicant to provide straight answers to the further information requests. Furthermore, the applicant has the responsibility and the resources to make a clear case regarding the claimed environmental sustainability of the proposed development in terms that both the Planning Authority and the public can readily understand.

For the present application Fingal County Council is entirely reliant on the accuracy and reliability of the EIAR submitted, and in the Further Information to flag potential breaches of national laws and policies on climate impacts. I submit that the EIAR and Further Information submitted is deficient, an in error in many respects. It cannot be relied upon to form a basis for granting planning permission.

I consider that the information sought by Fingal County Council regarding climate impact has not been satisfactorily provided. The applicant's responses are confusing, repetitive, include much unsolicited irrelevant information, and in a number of respects are evasive, and misleading. I summarise here in section 2 the core issues and my significant concerns, which I will discuss further in section 3 of this submission:

2. Summary of Inadequacies in FI Responses Regarding Climate

Item 1(d)

IEMA Climate Impact Assessment

I conclude from the data presented in the AWN report (Table 1.10, P. 43) that the climate impact is at least "minor adverse", and possibly "major adverse". The overall assessment by AWN that the operational impact will be "minor adverse" and "non-significant" is fundamentally flawed, and cannot be justified based on the information presented.

Reliance on Mitigation Measures Outside Control of Applicant

Maximum assumptions have been made with respect to mitigation measures being achieved at national level which are completely outside of the control of the applicant.

Reliance on Corporate Power Purchase Agreements (CPPAs) as a Mitigation

The climate impact assessment hinges critically on the credibility of the mitigation measures proposed by the applicant. The three wind farm projects mentioned by the applicant have been many years in the planning system, have been approved, and would have proceeded in any event. Claiming these projects as offsets is invalid.

Item 1(e)

Carbon Emissions During Construction

Regarding carbon emissions during the construction phase, the applicant has taken a minimalist interpretation of the Further Information request, and has excluded embodied carbon in the very large quantities of concrete and steel used in the construction. This greatly underestimates the carbon impact of the project.

Item 3(b)

Use of Renewables by Existing Development

The applicant has explicitly refused to answer the question regarding renewables used by the existing development, on the dubious basis that as the Government policy is "forward looking" only, i.e. they do not have to address the energy use of the existing development.

Irrelevant Unsolicited Further Information

There are repetitive references in the Further Information to the commitment of the applicant's parent company to powering its worldwide operations from renewable energy. This is not relevant in the Irish planning context and just serves to confuse and evade provision of specific relevant information sought by Fingal County Council in the Irish context.

3. Discussion of Misrepresentations and Errors in Further Information Provided

IEMA Climate Impact Assessment

I conclude from the data presented in the AWN report (Table 1.10, P. 43) that the climate impact is at least “minor adverse”, and possibly “major adverse”. The overall assessment by AWN that the operational impact will be “minor adverse” and “non-significant” is fundamentally flawed, and cannot be justified based on the information presented.

The updated EIAR provided in the AWN report includes useful additional quantitative information which enables the impact of the development to be assessed according to IEMA methodology. Referring firstly to Table 1.9, and leaving aside for the moment the very ambitious underlying assumptions for renewables on the national grid, we see that the cumulative emissions of the overall project are projected to be 195,729 tonnes CO_{2eq} per year in 2030 (overall project = existing + proposed + future).

Ireland has a target to reduce emissions by 51% by 2030, so in accordance with IEMA guidelines any projected increase in emissions is considered a significant adverse climate impact. The judgement of the environmental practitioner is used to determine if the adverse impact is “moderate” or “major”. Table 1.10 of the AWN report restates the projected emissions as a percentage of the European Emissions Scheme (ETS) emissions, and as a percentage of the national emissions ceiling for the Electricity Sector. The percentage as a fraction of the ETS is not relevant in the Irish context, as the ETS is governed centrally in the EU, with no specific national targets. The percentage of the national emissions ceiling is however quite relevant to consider.

The assessed significance of impact is given as “moderate adverse”. Note this column is headed “Significance (prior to mitigation)”. This is highly misleading as maximum assumptions of national mitigation in terms of renewable electricity have already been factored into the analysis. The assessed “moderate adverse” impact therefore represents the residual impact of the project, allowing for assumed achievement of national renewables targets for electricity in 2030. The final column of this table reduces the assessed impact to “minor adverse, non-significant” based on the list of mitigation measures presented in pages 42 and 43 of the AWN report. The only listed mitigation measure that could explain the reduction from “moderate” to “minor” is the claimed CPPA. However, no evidence has been provided that the existing or proposed CPPA would result in additional renewables which could off-set the projected emissions. It must therefore be concluded that the residual impact is at best “moderate adverse”. Given that the overall project is projected to consume 6.5% of the national emissions ceiling for the Electricity Sector in 2030 a good case can be made for classifying the impact as “major adverse”.

Reliance on Mitigation Measures Outside Control of Applicant

Maximum assumptions have been made with respect to mitigation measures being achieved at national level which are completely outside of the control of the applicant.

The emissions data presented in Tables 1.7, 1.8, 1.9 are absolutely best-case estimates, and assume that the state achieves all of its renewable electricity targets by 2030. The projections are based on an assumed emissions factor for the electricity grid of 0.1 kgCO_{2eq}/KWh in 2030, compared with the current emissions factor of 0.35 kgCO_{2eq}/KWh. Considering the high rate of refusal for renewables projects in recent years, this low emission factor in 2030 is by no means guaranteed. It would have been prudent to have made a conservative estimate of the assumed emission factor, in accordance with IEMA guidelines, which state:

“The assessment should seek to present a reasonable worst case” (IEMA Guidelines ,P15).

It is a principle of planning that mitigation measures should either be under the complete control of the applicant to ensure implementation, or if reliant on other parties that there is an absolute irrevocable commitment and guarantee that the measures will be implemented. For example it is unlikely that planning permission could be validly granted for a large residential development with no access to a road or a WWTP, on the basis that there is a plan to have these facilities in place by 2030. Likewise, it would be premature to grant permission for a large energy user such as a data centre in the absence of the required mitigation infrastructure.

Reliance on Corporate Power Purchase Agreements (CPPAs) as a Mitigation

The climate impact assessment hinges critically on the credibility of the mitigation measures proposed by the applicant. The three wind farm projects mentioned by the applicant have been many years in the planning system, have been approved, and would have proceeded in any event. Claiming these projects as offsets is invalid.

Overview of CPPAs

The response from the applicant implies that CPPAs inherently represent a mitigation measure. This is a common misunderstanding. While CPPAs present benefits for the development of renewables, it does not follow that one can claim them as an offset against additional emissions brought about by a development.

Corporate Power Purchase Agreements provide a valuable support for renewable energy projects, and also provide financial security for the corporation purchasing the power. In the case of a wind farm the price paid in the CPPA will be higher than the guaranteed minimum price which would have been secured in an open auction, and if the CPPA is for a long-term contract this contributes to a stable investment return. The power purchaser also benefits in negotiating a fixed future price for its energy, i.e. price hedging. When gas prices are high, as has been the case since the start of the war in Ukraine, the purchaser is insulated from the increasing price of electricity. CPPAs are private contracts so it is not possible to quantify these savings accurately. But just for illustration, at present corporations with CPPAs in place for renewable energy are most likely paying less than 15 cents per unit of electricity, while the rest of the consumers in the state are typically paying in excess of 40 cents per unit. On the other hand if gas prices reduce substantially, the price of renewable energy may drop to the minimum guaranteed price, and the CPPA will result in the purchaser paying more than the market rate. An additional benefit of a CPPA is that the purchaser is exempt from the excise duty known as Electricity Tax, which is a small saving of €1/MWhour.

Irish government policy has promoted CPPAs primarily as a means of reducing the need for public subsidies for renewable electricity generation. These subsidies appear on the consumers' bills as a Public Service Obligation (PSO). However, the costs of renewable generation have been steadily declining in recent years, and the need for PSO is diminishing. In 2022, the PSO was negative, which represented a refund to consumers. For the coming year the PSO will be zero. Thus the benefit of CPPAs in reducing the need for public funding supports for renewables is at present a moot point, as the expectation is that the cost of generating renewables will continue to be substantially lower than gas fired power generation, and there will be no need for public subsidies.

There is no requirement for a CPPA to demonstrate additionality, unless the power purchaser is claiming that the renewables purchased offset other GHG emissions caused by the purchaser. National policy on data centres expresses a preference for projects with CPPAs demonstrating additionality. This means that the CPPA should enable a renewables project to be developed which

otherwise would not happen, and the resulting emissions avoided are equal to or greater than the other emissions caused by the CPPA purchaser.

GOs

Corporations can additionally support renewables generation through the purchase of Guarantee of Origin certificates (GOs), or simply by sourcing electricity from a supplier who either owns renewables capacity, or who in turn purchases GOs. This is a market mechanism whereby operators of renewable generation can sell these certificates to generate additional revenue. The GOs are tradeable internationally, and there is no requirement for the renewables generation to feed into the purchaser's electricity grid. GOs from mainland Europe or Iceland could for example be purchased by Irish companies, even though there is no physical electricity connection. GOs are simply a market support mechanism to enable customers to express a preference for renewable supplies, and do not imply any measures of GHG offset for the purchaser.

For the existing development (FW17A/0025/ABP PL06F.248544 and FW19A0087), the only mitigation measures volunteered and required were in the form of Guarantees of Origin (GOs). As explained above these GOs do not represent a GHG offset which could validly be claimed by the purchaser.

Claimed Existing Wind Farm CPPA Offsets

As mentioned earlier, the Applicant has adopted a minimalist approach to providing further information. This extends to withholding the identities of the three wind farms mentioned in their FI response, other than they are in Cork, Galway and Donegal. It is left as an exercise for Fingal county Council and the public to find further details.

From a trawl of publicly available information and planning files, I conclude that the three CPPA wind farms referred to are as follows:

Amazon Esk 23MW in Cork
Arderoo 115MW, Galway
Meenbog 91MW, Donegal
Total 229 MW

To claim that these wind farms offset emissions from the proposed development it would need to be demonstrated that these wind farms would not operate without the CPPAs negotiated with the applicant. The planning history for these wind farms indicates that they had all progressed through the planning system prior to any CPPA.

Amazon Esk is an existing operating windfarm in County Cork. Planning for wind generation at this location was in progress over ten years ago. Planning permissions were applied for by Esk Windfarm Ltd. In 2011 and 2014, and granted in 2012 and 2015 respectively (Cork Ref 11/5276, 14/ 5602). I presume that Amazon Esk refers to contracted CPPA generation from one or both of these sites, or that Amazon has perhaps purchased the wind farm. In either case this renewable capacity would have existed in any event and does not represent additional renewables capacity in the national grid which could be claimed as a GHG offset.

Ardderroo Wind farm in County Galway was initially proposed over seven years ago. An application by Ardderroo Windfarm Ltd in 2015 was refused by An Bord Pleanála (ABP) for the reason of a deficient bat and bird survey methodology (07.PA0036). A subsequent application in 2018 by the same applicant was granted by ABP in 2019. Connection contracts were issued by the Transmission System Operator (TSO) in October 2018. It is not credible that this development would have been

reliant on a CPPA or indeed purchase of the windfarm by Amazon or other corporate entity in order to proceed.

Meenbog Wind Farm in County Donegal has been in planning since at least 2013 when initial consultations were held with Donegal County Council. A planning application made in 2015 was refused. A subsequent application by Planree Ltd. on a reduced site in 2017 was granted (ABP-300460-17). I understand from the TSO Contracted Wind Farms list that a grid connection contract was signed in December 2019.

Having received planning permission and grid connection contracts, it is not credible that the developers of the Ardderroo and Meenbog windfarms would have been reliant on a CPPA or indeed purchase of the windfarms by Amazon or other corporate entity in order to proceed. Given the ambitious national targets for renewable electricity there is no doubt but that these projects would have proceeded in the absence of any commercial arrangement with the applicant. There is therefore no additionality represented by these CPPAs.

The applicant has indicated that they will continue to pursue commercial arrangements for renewable energy delivery in Ireland. Presumably this is through CPPAs or perhaps purchase of generating assets. In the response they indicated that they have received submissions totalling 1 GW capacity. Unfortunately they cannot share any details as these are confidential, and therefore it is not possible to analyse this proposal. If, as I strongly suspect they are referring to projects already in the development pipeline then there would be no additionality of renewable energy. According to the Transmission System Operator (TSO) there are approximately 1.4GW of planned wind farm capacity with connection contracts. All of these projects have been in the development pipeline for many years, and the applicant would be free to agree to purchase power from any or all of these projects. This would be commercially beneficial to the applicant, its parent company, and the wind farm developers. But it would make absolutely no difference to overall national GHG emissions, and would not result in a single MW of additional renewables capacity.

Item 1(e)

Carbon Emissions During Construction

Regarding carbon emissions during the construction phase, the applicant has taken a minimalist interpretation of the Further Information request, and has excluded embodied carbon in the very large quantities of concrete and steel used in the construction. This greatly underestimates the carbon impact of the project.

The Report by Henry J Lyons has confined the assessment of impact to Transport and Construction (items A4 and A5 in the assessment methodology). The carbon associated with raw materials and manufacture has been excluded (items A1 to A3 in the methodology). Based on the quantities of concrete and steel listed in the report, and using typical factors for associated emissions, I calculate emissions of over 27,000 tonnes, which would be 664kgCO_{2eq}/m², when added to the approx. 100/m² for A4 and A5 gives a total of 764 kg/m². This is more than seven times the estimate by Henry J Lyons.

Item 3(b)

Use of Renewables by Existing Development

The applicant has explicitly refused to answer the question regarding renewables used by the existing development, on the dubious basis that as the Government policy is "forward looking" only, i.e. they do not have to address the energy use of the existing development.

Regarding renewable electricity for the proposed development, the applicant has provided no proof of additionality. While CPPAs in Ireland are mentioned, the applicant has refused to provide details of renewable energy in Ireland on the basis that:

“We do not release a breakdown of energy use or renewable energy generation in individual regions”.

A plausible reason for refusal to provide this information is that the putative renewables assigned to the existing development, as described in the planning files, derived from Guarantee of Origin certificates (GOs). Such GOs can be purchased at a very low price in the international carbon markets and could represent renewables generation outside of Ireland, with no proof of additionality.

The applicant’s request for a grant of planning based on a condition requiring CPPA should be rejected on the basis that the applicant has already claimed to have this CPPA in place, but refuses to provide proof of additionality. Furthermore, the proposed specific formulation of the condition would enable the applicant to enter into a CPPA with a project which has already been approved and which has a grid connection contract, i.e. it would have happened anyway.

Irrelevant Unsolicited Further Information

There are repetitive references in the Further Information to the commitment of the applicant’s parent company to powering its worldwide operations from renewable energy. This is not relevant in the Irish planning context and just serves to confuse and evade provision of specific relevant information sought by Fingal County Council in the Irish context.

While the FI response contains much general promotional information on Amazon’s laudable commitment to renewable energy worldwide, the core issue is whether the existing and proposed CPPAs in Ireland actually represent mitigation, which the applicant has failed to demonstrate. This would require the applicant to demonstrate that indirect emissions from electricity generation would be higher in the absence of the contracted CPPA. In other words one would have to prove that the renewable energy was additional, i.e. the renewables project would not have happened without the CPPA. As no supporting evidence has been provided by the applicant, and from a review of the planning history of the wind farms, I submit that there will be no additionality associated with the CPPAs mentioned by the applicant.

Conclusion

I ask you to refuse planning permission for the following principal reasons:

- The applicant has not provided the requested further information.
- The claimed CPPAs offer no renewables additionality.
- The revised impact assessment data presented by AWN shows a likely “moderate” to “major adverse” climate impact.

Mise le meas,

Colin Doyle, Ph.D.

Qualifications:

BA (mod) Physics, M.Sc. Physics, PgDip Environmental Pollution, Ph.D. Climate Science



**Ms. Christine O' Connor,
BKC Solicitors
OBO John Conway and Louth Environmental Group
252 Harolds Cross Road
Harolds Cross
Dublin 6w
D6WT384**

Date: 31 January, 2023

ACKNOWLEDGEMENT of RECEIPT of SUBMISSION or OBSERVATION on a
PLANNING APPLICATION

THIS IS AN IMPORTANT DOCUMENT!

KEEP THIS DOCUMENT SAFELY, YOU WILL BE REQUIRED TO PRODUCE THIS ACKNOWLEDGEMENT TO AN BORD PLEANALA IF YOU WISH TO APPEAL THE DECISION OF THE PLANNING AUTHORITY. IT IS THE **ONLY** FORM OF EVIDENCE WHICH WILL BE ACCEPTED BY AN BORD PLEANÁLA THAT A SUBMISSION OR OBSERVATION HAS BEEN MADE TO THE PLANNING AUTHORITY ON THE PLANNING APPLICATION.

PLANNING AUTHORITY NAME: FINGAL COUNTY COUNCIL

PLANNING APPLICATION REFERENCE NO. **FW22A/0308**

A submission/observation has been received from Ms. Christine O' Connor, BKC Solicitors OBO John Conway and Louth Environmental Group, in relation to the above planning application.

The appropriate fee of €20.00 has been paid. (Fee not applicable to prescribed bodies).

The submission/observation is in accordance with the appropriate provisions of the Planning and Development Regulations, 2001 -2013 and will be taken into account by the Planning Authority in its determination of the planning application.

Catherine Egan

for Senior Executive Officer

Development:

Universal Developers LLC, intend to apply for a seven year planning permission for development on a site at Cruiserath Road, Dublin 15. The application site is located to the north of the data centre permitted / constructed under An Bord Pleanála Reg. Ref.: PL06F.248544 / Fingal County Council Reg. Ref.: FW17A/0025, to the west of the two data centres permitted under Fingal County Council Reg. Ref.: FW19A/0087, and to the north and west of the 220kV Gas Insulated Switchgear substation permitted under An Bord Pleanála Reg. Ref.: 306834-20. The site is within an overall landholding bound to the south by the R121 / Cruiserath Road, to the west by the R121 / Church Road and to the north by undeveloped land and Cruiserath Drive.

The proposed development consists of the following:

- Construction of three data centre buildings (Data Centre E, Data Centre F, and Data Centre G), with a gross floor area (GFA) of c. 1, 425 sq.m, c. 20, 582 sq.m, and c. 20, 582 sq.m respectively, each over two levels (with Data Centre F and G each including two mezzanine levels);
- Data Centre F and G will be located in the north-western portion of the overall landholding, with a primary parapet height of c. 19.8 metres and each will accommodate data halls, associated electrical and mechanical plant rooms, a loading bay, maintenance and storage space, office administration areas, with plant and solar panels at roof level;
- Data Centre E (which will be ancillary to Data Centre F and G) will be located within the south-western portion of the overall landholding, with a primary parapet height of c. 13.1 metres and will accommodate data halls, associated electrical and mechanical plant rooms, a loading bay, maintenance and storage space, office

administration areas, with plant at roof level;

- Emergency generators and associated flues will be provided within compounds adjoining each of the three data centre buildings (1 no. for Data Centre E, 19 no. for Data Centre F, and 19 no. for Data Centre G);
- The development includes one diesel tank and two filling areas to serve the proposed emergency generators;
- Provision of ancillary structures including two MV buildings, water storage tanks and three bin stores;
- Construction of access arrangements and internal road network and circulation areas, footpaths, provision of car parking (105 no. spaces), motorcycle parking (12 no. spaces) and bicycle parking (56 no. spaces), hard and soft landscaping and planting (including alteration to a landscaped berm to the north of proposed Data Centre E), lighting, boundary treatments, and all associated and ancillary works including underground foul and storm water drainage network, and utility cables.

An EPA-Industrial Emissions Directive (IE) licence will be applied for to facilitate the operation of the proposed development. An Environmental Impact Assessment Report (EIAR) will be submitted to the Planning Authority with the planning application and the EIAR will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy at the offices of the Planning Authority.

Location: Cruiserath Road, Dublin 15.

Area: Blanchardstown Mulhuddart

Applicant: Universal Developers LLC

Application Type: Permission

Date Received: 16 December, 2022

THIS IS AN IMPORTANT DOCUMENT!

KEEP THIS DOCUMENT SAFELY, YOU WILL BE REQUIRED TO PRODUCE THIS
ACKNOWLEDGEMENT TO AN BORD PLEANALA IF YOU WISH TO APPEAL THE DECISION OF
THE PLANNING AUTHORITY.

**Please note that all planning applications, including
submissions/objections will be published on the Council's website.**