

An Bord Pleanála
64 Marlborough Street
Dublin 1

Our Ref: 20005

3rd November 2020

Re : Planning and Development Act 2000-2019 and the statutory regulations (as amended). Application by UBC Properties LLC for planning permission for the provision of two no. 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation compound along with associated and ancillary works and is described as follows: The proposed 110kV GIS Substation Compound is to be located on lands to the east of the 3 no. data centres permitted under South Dublin County Council Reg. Ref. SD20A/0121, and within an overall landholding bound to the north by the R134 / New Nangor Road; to the west by the realigned Baldonnel Road; to the south by the Grange Castle South Business Park access road; and to the east by the Grange Castle Motor Company within Baldonnel, Dublin 22. The site of the proposed development has an area of c. 7.7 hectares. The proposed 110kV Gas Insulated Switchgear (GIS) Substation Compound includes the provision of a two storey GIS Substation building (with a gross floor area of 1,447sqm) (known as the Clutterland Substation), four transformers, a Client Control Building (with a gross floor area of 380sqm), lighting masts, car parking, associated underground services and roads within a 2.6m high fenced compound and all associated construction and ancillary works. A proposed underground single circuit 110kV transmission line will connect the proposed Clutterland 110kV GIS Substation to the existing 220kV / 110kV Castlebaggot Substation to the immediate south. The proposed transmission line covers a distance of approximately 180m within the townlands of Ballybane, and Aungierstown and Ballybane. A proposed underground single circuit 110kV transmission line will connect the proposed Clutterland 110kV GIS Substation to the existing 110kV underground Kilmahud-Corkagh circuit to the north-west. The proposed transmission line covers a distance of approximately 1.1km within the townlands of Ballybane and Grange and will include 3 joint bays along its length. The development includes provision of a unit substation and 49kVa electricity connection (approximately 300m in length to the Grange Castle South Business Park access road to the south of the proposed substation) for the proposed GIS substation building. The development includes the connections to the two substations (existing and proposed) as well as to the Kilmahud-Corkagh circuit, changes to landscaping permitted under SDCC Reg. Ref. SD20A/0121 and changes to planting within Grange Castle Business Park and all associated construction works, and all ancillary works.

Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by UBC Properties LLC (herein referred to as the 'applicant') and further to a determination received from An Bord Pleanála confirming the proposed development constitutes Strategic Infrastructure Development (SID) pursuant to Section 182A of the Planning and Development Act 2000, as amended (hereinafter referred to as 'the Act')., we hereby submit this planning application in respect of the Proposed Development for the project as outlined in the Statutory Notice that accompanies this application.

1. INTRODUCTION

The Proposed Development comprises:

- the provision of two no. 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation compound along with associated and ancillary works and is described as follows:
- The proposed 110kV GIS Substation Compound is to be located on lands to the east of the 3 no. data centres permitted under South Dublin County Council Reg. Ref. SD20A/0121, and within an overall landholding bound to the north by the R134 / New Nangor Road; to the west by the realigned Baldonnel Road; to the south by the Grange Castle South Business Park access road; and to the east by the Grange Castle Motor Company within Baldonnel, Dublin 22. The site of the proposed development has an area of c. 7.7 hectares;

- The proposed 110kV Gas Insulated Switchgear (GIS) Substation Compound includes the provision of a two storey GIS Substation building (with a gross floor area of 1,447sqm) (known as the Clutterland Substation), four transformers, a Client Control Building (with a gross floor area of 380sqm), lighting masts, car parking, associated underground services and roads within a 2.6m high fenced compound and all associated construction and ancillary works;
- A proposed underground single circuit 110kV transmission line will connect the proposed Clutterland 110kV GIS Substation to the existing 220kV / 110kV Castlebaggot Substation to the immediate south. The proposed transmission line covers a distance of approximately 180m within the townlands of Ballybane, and Aungierstown and Ballybane;
- A proposed underground single circuit 110kV transmission line will connect the proposed Clutterland 110kV GIS Substation to the existing 110kV underground Kilmahud-Corkagh circuit to the north-west. The proposed transmission line covers a distance of approximately 1.1km within the townlands of Ballybane and Grange and will include 3 joint bays along its length;
- The development includes provision of a unit substation and 49kVa electricity connection (approximately 300m in length to the Grange Castle South Business Park access road to the south of the proposed substation) for the proposed GIS substation building. The development includes the connections to the two substations (existing and proposed) as well as to the Kilmahud-Corkagh circuit, changes to landscaping permitted under SDCC Reg. Ref. SD20A/0121 and changes to planting within Grange Castle Business Park and all associated construction works, and all ancillary works.

The details of the proposed development are discussed at Section 5 of this report and illustrated in the accompanying architectural and engineering drawings.

An Environmental Impact Assessment (EIA) Report has been prepared by Marston Planning Consultancy and other EIA contributors and accompanies this SID planning application submitted to An Bord Pleanála.

The proposed development is designed to support power demand for the Permitted Development of three data centres that received its Final Grant of permission on the 3rd September 2020 under Reg. Ref. SD20A/0121.

The route alignment of both routes has been the subject of discussions and agreement with the relevant landowners / Planning Authority prior to lodgement (see letters of consent submitted herewith from ESB Networks [ESBN] and South Dublin County Council [SDCC]).

The main stakeholders for the development are as follows:

- EirGrid, is responsible for operating and developing the national high voltage electricity grid in Ireland;
- ESB Networks, (Asset Owner) is responsible for carrying out maintenance, repairs and where works are not contestable, the construction of the national high voltage electricity grid in Ireland; and
- UBC Properties LLC's role for this project is to act as the Developer/Applicant.

Development method

The development of the proposed Clutterland 110kV GIS Substation building and 2 no. underground single circuit transmission lines will be a contestable development. The meaning of this, is the developer will be responsible for the design, construction, fit-out and pre-commissioning of the proposed Clutterland 110kV GIS Substation building and the 2 no. underground single circuit 110kV transmission lines to the Castlebaggot 220kV / 110kV Substation and to the existing 110kV underground Kilmahud-Corkagh circuit.

Upon completion of the works by the Developer, the proposed Clutterland 110kV GIS Substation building and 2 no. underground single circuit 110kV transmission lines will be handed over to EirGrid, whom in conjunction with ESB Networks (ESBN) will carry out the final commissioning and energisation of the proposed Clutterland 110kV GIS Substation and 110kV transmission lines.

Once energised, the proposed Clutterland 110kV GIS Substation and the 2 no. underground single circuit transmission lines will form part of the ESBN infrastructure, which EirGrid will be responsible for operating.

Applicant

The Applicant is the same as for the Permitted Development where they have been granted permission to build 3 no. data centres within the Permitted Development site. The Applicant has a registered address at 251 Little Falls Drive, Wilmington, New Castle County, DE, 19808, USA.

The main agent acting on behalf of the Applicant is Marston Planning Consultancy Ltd., with an address at 23 Grange Park, Foxrock, Dublin 18.

2. SITE LOCATION AND CONTEXT

The Proposed Development is to be located on a site of c. 7.7 hectares that consists of a primarily greenfield site within the Grange Castle South Business Park. The proposed 110kV GIS Substation Compound; the transmission line to the existing 110kV underground Kilmahud Corkagh circuit and the 49kVa (MV) cable installation are located on lands that at the time of making this application are in the control or ownership of SDCC. The transmission line to the existing 220kV / 110kV Castlebaggot Substation to the immediate south is located on lands that are in the control or ownership of SDCC and ESNB. Letters of consent are included within this submission.

Proposed 110kV GIS Substation

The proposed 110kV GIS substation is located on lands that are bounded by the realigned Baldonnel Road to the west; by the old and new Nangor Road to the north; by agricultural fields and the Grange Castle Motor Company to the east; and by the Grange Castle South Access Road that provides access off the Baldonnel Road into Grange Castle South Business Park and the Castlebaggot Substation to the south.

110kV transmission line to the Castlebaggot Substation

The route of the underground 110kV transmission line to the Castlebaggot Substation passes around the northern and part of the western boundary of the Castlebaggot Substation before passing into the Substation approximately half way along its western boundary with the Proposed Development site. The length of the 110kV cable route is c. 180m.

110kV transmission line to the Kilmahud-Corkagh circuit

The route of the underground 110kV transmission line to the Kilmahud-Corkagh circuit passes to the north of two of the permitted two storey data centre buildings (Buildings A and C) as permitted under Reg. Ref. SD20A/0121. It then passes under the former Nangor Road (now cut off at either end) before passing across SDCC owned land before passing under the culverted Griffeen River and under the realigned Nangor Road (R134) and passing along the wayleave on the east side of the Grange Castle Business Park internal access road before looping around to connect to the Kilmahud-Corkagh circuit. The length of the 110kV cable route is c. 1.1kms. A proposed joint bay is to be installed at the connection to the Kilmahud-Corkagh circuit as well as two joint bays along this route.

Proposed 49kVa cable installation

The route of the proposed 49kVa cable installation will link from the proposed Clutterland Substation and pass within the SDCC wayleave to the west of the Castlebaggot Substation before connecting into existing MV cabling infrastructure within the SDCC wayleave along the Grange Castle South Business Park access road. The estimated length of the 49kVa cable route is c. 300m.

The Proposed Development is not located directly adjacent to any areas of national or local environmental sensitivity/designation.

3. PRE-APPLICATION CONSULTATIONS

The Applicant has had 1 no. pre-application consultation meeting with An Bord Pleanála on the 3rd of September 2020, in response to a pre-application consultation request received by An Bord Pleanála on the 15th of June 2020.

The purpose of the consultation meeting was to provide further information to An Bord Pleanála to inform their determination as to whether or not the proposed development might constitute strategic infrastructure.

Consultation has also been undertaken with Eirgrid and ESB Networks to ensure the Proposed Development design meets their requirements.

A request to conclude the pre-application process was submitted to An Bord Pleanála on the 15th September 2020.

An Bord Pleanála determination

An Bord Pleanála have confirmed in a letter dated the 5th of October 2020 that the proposed development constitutes Strategic Infrastructure Development within the meaning of section 182A of the Act.

Therefore, the current application is required to be submitted directly to An Bord Pleanála under section 182A(1) of the Act. The determination from the Board that the development constitutes a SID was accompanied by an Inspector's Report, which recommended that the applicant be informed that the proposed development constitutes Strategic Infrastructure.

4. RELEVANT PLANNING HISTORY

This section sets out relevant Planning History within the Permitted and Proposed Development site as well as the immediate local area.

Reg. Ref. SD20A/0121

The application site received a Final Grant Permission from SDCC on the 3rd September 2020. This permission was subject to 23 standard conditions and work commenced on site on the 23rd September 2020 following a compliance submission that addressed all prior to commencement conditions.

The Permitted Development under this permission is for three no. two storey data centres with a gross floor area of 80,269sqm to be built over a ten year period. The development consists of various works that can be summarised as follows:

- Demolition of abandoned dwelling and associated buildings known as Ballybane, Old Nangor Road, Clondalkin, Dublin 22;
- Construction of three no. two storey data centre buildings (Buildings A, B and C) with mezzanine floors at each level and ancillary elements with a gross floor area of 80,269sqm;
- 1 no. two storey data centre (Building A) that will be located to the south-west of the site and will have a gross floor area of 28,573sqm. It will include 26 no. emergency generators located at ground floor level within a compound to the northern side of the data centre with associated flues that will be 25m in height. The facility will also include 26 no. ventilation shafts that will be located above the northern end of each emergency generator that will measure 20m in height;
- 1 no. two storey data centre (Building B) that will be located to the north-west of the site, and to the immediate north of Building A and will have a gross floor area of 21,725sqm. It will include 18 no. emergency generators located at ground floor level within a compound to the northern side of the data centre with associated flues that will be 25m in height. The facility will also include 18 no. ventilation shafts that will be located above the southern end of each emergency generator that will measure 20m in height;
- 1 no. two storey data centre (Building C) that will be constructed last and will be located to the eastern part of the site on a north-south axis and will have a gross floor area of 28,573sqm. It will include 26 no. emergency generators located at ground floor level within a compound to the western side of the data centre with associated flues that will be 25m in height. The facility will also include 26 no. ventilation shafts that will be located above the western end of each emergency generator that will measure 20m in height;
- Each of the three data centres will include data storage rooms, associated electrical and mechanical plant rooms, loading bays, maintenance and storage spaces, office administration areas, and plant including PV panels at roof level as well as a separate house generator for each facility that will provide emergency power to the admin and ancillary spaces. Each data centre will also include a diesel tank and a refuelling area to serve the proposed emergency generators;
- The overall height of each data centre apart from the flues and plant at roof level is c. 19.85m above the finished floor level;

- Construction of internal road network and circulation areas, security hut (30sqm) at entrance; footpaths, provision of 150 no. car parking spaces, and 78 no. cycle parking spaces, with 50 no car parking spaces and 26 no. cycle parking spaces being provided for each building;
- single storey and temporary substation (29sqm);
- 3 no. single storey MV buildings (each 249sqm - 747sqm in total) that manage the supply of electricity from the Substations to each data centre and are located to the immediate west of the generator compound within Buildings A and B, and to the south of the generator compound within Building C;
- 8 no. prefabricated containerised electrical rooms (65sqm each and 520sqm overall) that are stacked in pairs to the immediate south of the temporary substation; and
- Ancillary site development works, that will include attenuation ponds and the installation and connection to the underground foul and storm water drainage network, and installation of utility ducts and cables, that will include the drilling and laying of ducts and cables under the Baldonnel Stream. Other ancillary site development works will include hard and soft landscaping, lighting, fencing, signage, services road, entrance gate, sprinkler tank house (72sqm), security hut (30sqm) and 150 no. car parking spaces, and 78 no. sheltered bicycle parking spaces. The development will be enclosed with landscaping to all frontages including a wetland to the west.

Castlebaggot substation

An Bord Pleanála Reg. Ref. 06S.VA0019

An order to grant permission dated the 27th June 2016 was issued by An Bord Pleanála for the development of a 220kV /110 kV Substation & Associated Works on land within the Grange Castle South Business Park, Baldonnel, Dublin 22.

The development description for the application as outlined in the Board's own Inspector's Report was a 220/110 kV Gas Insulated Switchgear (GIS) substation compound, on an approximately three hectare site (including associated landscaped space). The main elements of the substation comprise:

- a 220 kV substation building of approximately 720sqm, rising to approximately 16.6m over ground level;
- a 110 kV substation building of approximately 528sqm, rising to approximately 14.5m over ground level;
- four no. associated 220 kV to 110 kV transformers sited within transformer bunds;
- associated external over ground electrical equipment and apparatus including cable sealing ends, surge arrestors, conductor support structures, post insulators, lightning monopoles (approximately 15m over ground), lighting and associated underground cabling;
- associated ancillary drainage works;
- associated site development and landscaping works;
- associated substation car parking (12 spaces), vehicular circulation route, and other hard surfacing; and
- associated 2.6m (approximately) high metal palisade substation perimeter fence, including substation entrance gates approximately 5.1m wide.

The application also included two interface compound sites (approximately 0.1ha each) to connect the existing Inchicore-Maynooth 220 kV double-circuit overhead line to the proposed substation by means of underground cable. These interfaces were located to the west of the Lucan Sarsfields GAA Club sports grounds and to the north-western side of Lynches Lane (L-5218- 1).

The development also included various infrastructural changes to the alignment of the Inchicore-Maynooth 220 kV double-circuit overhead line; and the implementation of 4 no. 220 kV underground cables connecting the two interface compound sites with the new substation; and one 110 kV underground cable connecting the proposed substation with the existing 110 kV Corkagh substation located within the existing Grange Castle Business Park. The decision to grant permission was made on the 27th June 2016 and was subject to 14 conditions.

CyrusOne Data Centre development

Reg. Ref. SD18A/0134 / ABP Ref. ABP-302813-18

Permission was granted by South Dublin County Council, which was upheld following a third party appeal, by An Bord Pleanála, for a two storey data centre with associated three storey office block and services that had a gross floor area of 35,426sqm on an overall site of 9.2 hectares on the lands to the immediate south of the application site. The data centre and office has a general dimension of being 292.2m in length by some

65.2m in width. The development had an overall height of 15.9m to the top of the parapet level and contained 64 exhaust flues (two per generator), grouped into 16 towers of four flues that are each 20m in height from the proposed ground floor level. This site is currently under construction for the first building and offices of this permitted development.

Google Data Centre development

Reg. Ref. SD14A/0023

A decision to grant planning permission for a two storey data centre (30,361sqm) and associated facilities including 83 car parking spaces was made on the 14th April 2014. Google were the applicant and operate the data centre that has now been constructed to the immediate south-east of the Proposed Development site. The highest point of any of the buildings is within 20m of the original ground level with the 25 no. stacks at 25m.

5. DESCRIPTION OF THE PROPOSED DEVELOPMENT

The Proposed Development will consist of:

- the provision of two no. 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation compound along with associated and ancillary works and is described as follows:
- The proposed 110kV GIS Substation Compound is to be located on lands to the east of the 3 no. data centres permitted under South Dublin County Council Reg. Ref. SD20A/0121, and within an overall landholding bound to the north by the R134 / New Nangor Road; to the west by the realigned Baldonnel Road; to the south by the Grange Castle South Business Park access road; and to the east by the Grange Castle Motor Company within Baldonnel, Dublin 22. The site of the proposed development has an area of c. 7.7 hectares;
- The proposed 110kV Gas Insulated Switchgear (GIS) Substation Compound includes the provision of a two storey GIS Substation building (with a gross floor area of 1,447sqm) (known as the Clutterland Substation), four transformers, a Client Control Building (with a gross floor area of 380sqm), lighting masts, car parking, associated underground services and roads within a 2.6m high fenced compound and all associated construction and ancillary works;
- A proposed underground single circuit 110kV transmission line will connect the proposed Clutterland 110kV GIS Substation to the existing 220kV / 110kV Castlebaggot Substation to the immediate south. The proposed transmission line covers a distance of approximately 180m within the townlands of Ballybane, and Aungierstown and Ballybane;
- A proposed underground single circuit 110kV transmission line will connect the proposed Clutterland 110kV GIS Substation to the existing 110kV underground Kilmahud-Corkagh circuit to the north-west. The proposed transmission line covers a distance of approximately 1.1km within the townlands of Ballybane and Grange and will include 3 joint bays along its length;
- The development includes provision of a unit substation and 49kVa electricity connection (approximately 300m in length to the Grange Castle South Business Park access road to the south of the proposed substation) for the proposed GIS substation building. The development includes the connections to the two substations (existing and proposed) as well as to the Kilmahud-Corkagh circuit, changes to landscaping permitted under SDCC Reg. Ref. SD20A/0121 and changes to planting within Grange Castle Business Park and all associated construction works, and all ancillary works.

110kV GIS Substation Compound

The proposed 110kV Gas Insulated Switchgear (GIS) Substation Compound is to be located on lands which are currently greenfield in nature, to the east of Permitted Development granted under SDCC Planning Reg. Ref. SD20A/0121, and within an overall landholding bound to the north by the R134 / New Nangor Road; to the west by the realigned Baldonnel Road; to the south by the Grange Castle South Business Park access road; and to the east by the Grange Castle Motor Company within Baldonnel, Dublin 22.

The proposed 110kV GIS Substation Compound includes the provision of a two storey GIS Substation building (with a gross floor area of 1,447sqm) (to be known as the Clutterland Substation), four transformers, a Client Control Building (with a gross floor area of 380sqm), Lighting Masts, Car Parking, associated Underground Services and Roads within a 2.6m high fenced compound and all associated construction and ancillary works.

The two storey 110kV GIS Substation building (with a gross floor area of 1,447sqm) will accommodate a cable room, control room, mess room, generator room, battery room and workshop at ground floor level, with a storeroom and substation room at first floor level. The 110kV GIS substation building will also include a small (less than 1MWth) generator and 1,000 litre diesel tank within a bunded room of the GIS Substation building to provide back-up emergency power to the GIS substation.

The single storey Client Control Building (with a gross floor area of 380sqm) will accommodate 4 number electrical switchrooms and a control room. The 110kV GIS Substation building and the Client Control building are rectilinear in form, and finished in metal cladding to compliment the Permitted Development (SD20A/0121).

The proposed transformers will be located centrally within the substation compound, set out in a row running north-south within the compound area. The Substation compound will be accessed from the permitted internal circulation roads and infrastructure permitted under SDCC Planning Reg. Ref. SD20A/0121. A main access gateway to the compound will be provided on the southern side of the substation compound, providing for vehicular and pedestrian access to the substation area.

110kV transmission line to the Castlebaggot substation

The proposed southern underground single circuit 110kV transmission line will run through private lands between the proposed 110kV GIS Substation and the existing 220kV / 110kV Castlebaggot Substation that is located on lands to the north of the Grange Castle South Business Park access road. The proposed transmission line covers a distance of approximately 180m within the townlands of Ballybane, and Aungierstown and Ballybane. This underground transmission line will follow a route originating at the proposed 110kV GIS Substation, and extending around the northern and part of the western boundary of the 220kV / 110kV Castlebaggot Substation before passing into the Substation approximately half way along its western boundary.

110kV transmission line to the Kilmahud-Corkagh Circuit

The proposed northern underground single circuit 110kV transmission line will run through private and public lands between the proposed 110kV GIS Substation and the existing 110kV underground Kilmahud-Corkagh circuit to the north-west. The proposed transmission line covers a distance of approximately 1.1km within the townlands of Ballybane and Grange and will include 3 joint bays along its length.

This underground transmission line will follow a route originating at the proposed 110kV GIS Substation, and extending to the north of the permitted development under Reg. Ref. SD20A/0121. It then passes under the former Nangor Road (now cut off at either end) before passing across SDCC owned land before passing under the culverted Griffeen River and under the realigned Nangor Road (R134) and passing along the wayleave on the east side of the Grange Castle Business Park internal access road before looping around to connect to the Kilmahud-Corkagh circuit.

Associated / Ancillary Works

The Proposed Development includes the creation of three joint bays along the length of the underground single circuit 110kV transmission line to the Kilmahud-Corkagh circuit. The joint bays are used for the jointing of cables to allow installation of cables into the ducting network, the joint bays also allow for maintenance works including periodic testing of the circuits.

The development includes changes to landscaping and berms permitted under SDCC Planning Reg. Ref. SD20A/0121. These changes result from the design and routing of the proposed transmission line to the Kilmahud-Corkagh circuit and are minor in the context of the overall landholding and the Permitted Development.

The development also includes the provision of a unit substation and 49kVa electricity connection (c. 300m in length) to the Grange Castle South Business Park access road to the south of the proposed substation. This connection is separate from the 110kV transmission line, and is required to provide a 'house connection' for the substation building. The development includes all associated construction and ancillary works.

6. NATIONAL AND REGIONAL POLICY CONTEXT

Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy

The Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy was published by the Department of Business, Enterprise and Innovation in June 2018. The Statement notes the role which data centres play in Ireland's ambition to be a digital economy hot-spot in Europe.

The Statement includes a section dealing with electricity infrastructure (page 8 onward refers). The Statement includes the following statement in relation to the electricity infrastructure requirements of planned and projected data centre development:

"Currently, a large portion of existing and planned data centres that are due to connect to the electricity system are expected to be in the Dublin area. Based on existing data centres, committed expansion and expected growth, total demand could treble within the next ten years. A consistent and supportive whole of government approach will be brought to the realisation of the transmission and distribution assets required to support the level of data centre ambition that we adopt."

The current Strategic Infrastructure Development proposal constitutes the provision of transmission infrastructure required to provide electricity for development within the Grange Castle South Business Park, including three permitted data centres.

National Planning Framework

The National Planning Framework (NPF) was published in February 2018 setting out a vision for Ireland in land use and planning terms to 2040. The NPF replaced the National Spatial Strategy once it was adopted as the long term land use and planning vision for Ireland.

National Strategic Outcome 6 of the NPF relates to the creation of "A Strong Economy Supported by Enterprise, Innovation and Skills". This strategic outcome is underpinned by a range of objectives relating to job creation and the fostering of enterprise and innovation. The following objective, relating to Information and Communications Technology (ICT) infrastructure (including datacentres) is included under National Strategic Outcome 6:

"Promotion of Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities."

The Proposed Development comprises the provision of a permanent power supply for the Permitted Development, in a location which is well suited and serviced to accommodate such a use. The NPF also states under National Strategic Outcome 5, A Strong Economy Supported by Enterprise, Innovation and Skills:

"Ireland is very attractive in terms of international digital connectivity, climatic factors and current and future renewable energy sources for the development of international digital infrastructures, such as data storage facilities. This sector underpins Ireland's international position as a location for ICT and creates added benefits in relation to establishing a threshold of demand for sustained development of renewable energy sources."

The NPF is favourably disposed to the location of ICT infrastructure in Ireland, and the Proposed Development, which comprises of such ICT infrastructure, is therefore considered to be wholly in accordance with this key body of national planning policy.

Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA) includes Regional Policy Objective (RPO) 8.25 which states the following:

“Local Authorities shall:

- *Support and facilitate delivery of the National Broadband Plan.*
- *Facilitate enhanced international fibre communications links, including full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland.*
- *Promote and facilitate the sustainable development of a high-quality ICT network throughout the Region in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.*
- *Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations.*
- *Promote Dublin as a demonstrator of 5G information and communication technology”*

The site is therefore considered to be an appropriate location for the development of data centres and associated ancillary development under this Strategy.

The RSES recognises the need to facilitate the provision of sufficient electricity to meet increasing demand in the region. In terms of Energy Infrastructure it is noted that Regional Policy Objective (RPO) 10.20 states the following:

“Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. Including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.”

The proposed development constitutes a transmission project which is required to serve the electricity needs of permitted and potential future development in the Grange Castle South Business Park in accordance with the foregoing objective.

The strategy goes on to state the following:

“The Dublin Region is the major load centre on the Irish electricity transmission system. Approximately one third of total demand is located here, similarly the Eastern Region is a major load centre on the Irish transmission system. The main urban demand centres are composed of a mix of residential, commercial and industrial demand, which is expected to grow up to 2025 and beyond. Developing the grid in the Region will enable the transmission system to safely accommodate more diverse power flows from renewable generation and also to facilitate future growth in electricity demand. These developments will strengthen the grid for all electricity users, and in doing so will improve the security and quality of supply. This is particularly important if the Region is to attract high technology industries that depend on a reliable, high quality, electricity supply.”

The current proposal seeks to provide for the development of the grid via a new transmission line which will supply inter alia high technology industry in the area, which is dependent on a reliable, high quality electricity supply.

The RSES provides for a series of principles, pursuant to which Local Authority Development Plans will “facilitate the provision of energy networks in principle”:

- *“The development is required in order to facilitate the provision or retention of significant economic or social infrastructure.*
- *The route proposed has been identified with due consideration for social, environmental and cultural impacts and address issues of climate resilience, biodiversity, impact on soils and water quality.*
- *The design is such that it will achieve least environmental impact.*
- *Where impacts are inevitable mitigation features have been included.*

- *Where it can be shown that the proposed development is consistent with international best practice with regard to materials and technologies and that it will ensure a safe, secure, reliable, economic and efficient high-quality network.*
- *In considering facilities of this nature that traverse a number of counties or that traverse one county in order to serve another, planning authorities should consider the proposal in light of the criteria outlined above. It is important that planning authorities are engaged in early consultation and discussion with the relevant Transmission System Operator.*
- *Corridors for energy transmission or pipelines should avoid creating sterile lands proximate to key public transport corridors, particularly rail routes, and in built up urban areas.*
- *Regard for any National or Regional Landscape/ Seascap Character Assessment.”*

In response to the above it is considered that the proposed, comparatively short, electricity transmission infrastructure is required to facilitate significant economic infrastructure in the area. It is also considered that the route for the proposed transmission line has been identified with due consideration for social, environmental and cultural impacts (as set out in detail within the EIA Report). The design selected has been predicated on the need to minimise environmental impact and includes mitigation measures as set out within the EIA Report submitted herewith. The design of the project has been undertaken in accordance with best practice by the project engineers, and the corridor selected will avoid the sterilisation of lands proximate to key public transport corridors or built-up urban areas.

Regional Planning Guidelines – Greater Dublin Area, 2010-2022

The Regional Planning Guidelines (RPGs) sets out a strategic planned direction for growth in the Greater Dublin Area encompassing Dublin City, Dún Laoghaire-Rathdown, South Dublin, Fingal, Meath, Kildare and Wicklow. A number of policies and recommendations support the economic development of this region by developments similar to the Proposed Development on sites such as this. These include Strategic Policies EP2, ER9 and ER10.

The RPGs identify the prevalence of converging sectors in particular the connection between Information and Communications Technology (ICT) and Green Technology. This convergence of sectors has led to new emerging sectors such as the prevalence of data centres in Ireland and on strategic sites such as this. The Proposed Development is considered to be in compliance with regional planning policies as they are strategically zoned employment land in South Dublin County Council.

7. LOCAL PLANNING CONTEXT

South Dublin County Development Plan 2016-2022

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 Development 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 County Development Plan (s. 10.2.9) supports the provision of transmission and energy infrastructure with the appropriate service providers such as ESB Networks and Eirgrid that facilitates the economic development and expansion of the County. Energy (E) Policy 11 of the County Development Plan specifically states that *“It is the policy of the Council to ensure that the provision of energy facilities is undertaken in association with the appropriate service providers and operators, including ESB Networks, Eirgrid and Gas Networks Ireland. The Council will facilitate the sustainable expansion of existing and future network requirements, in order to ensure satisfactory levels of supply and to minimise constraints for development”*. The service providers and operators have been fully consulted in formulating this SID application.

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.

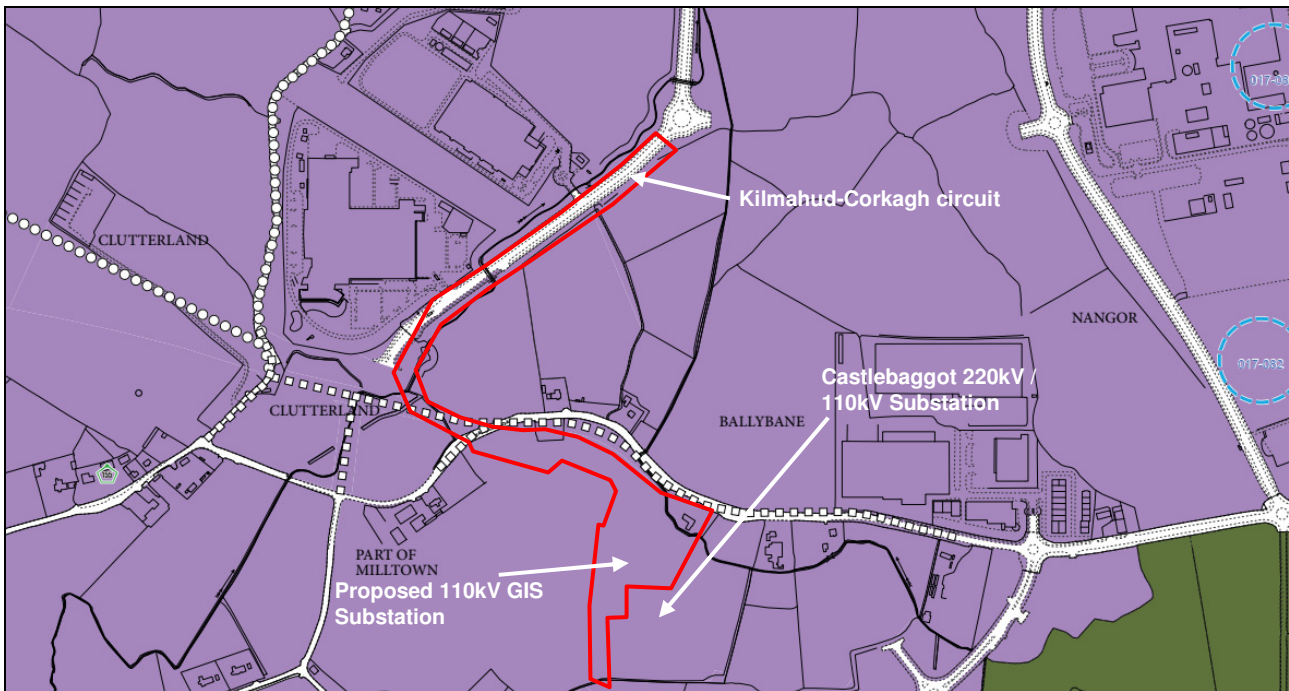


Figure 2 Extract from Zoning Map 4 of the South Dublin County Development Plan 2016-2022 (including Variations 1 & 2) – Red Line Boundary for Illustrative Purposes Only

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”. The Proposed Development retains and enhances natural site features by the use of the highest architectural and landscaping design standards.

Policy ET3 Specific Local Objective 1 supports the conducting of a review of the zoning of lands south of the Grand Canal and west and north of the R120, with a view to preparing a long term plan for the expansion of the Grange Castle Economic and Enterprise Zone, to accommodate strategic investment in the future, while also seeking to provide public open space along the Canal, including a natural heritage area in the vicinity of the historic canal quarries at Gollierstown. This rezoning has formed Variation no. 1 of the County Development Plan and does not relate to these lands.

The nature of the Permitted Development was informed by a site analysis of environmental issues and an EIA Report was prepared and submitted with the application for development under SDCC Planning Reg. Ref. SD20A/0121. This has included noise and air quality objectives. The enhancement and creation of new bio-diversity corridors will fully integrate the Permitted and Proposed Development into the surrounding environment to ensure that direct and cumulative effects on biodiversity are addressed in the overall design. Suitable attenuation and sustainable drainage systems have also informed the design of both the Permitted and Proposed Development. This mitigation of design of the Permitted Development also increases native tree planting within the site from its current position. The Permitted Development incorporates SUDS fully in accordance with policies of the Plan.

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

8. ENVIRONMENTAL IMPACT ASSESSMENT REPORT

An Environmental Impact Assessment Report has been prepared / coordinated by Marston Planning Consultancy and is submitted along with this application.

9. APPROPRIATE ASSESSMENT

An Appropriate Assessment Screening Report has been prepared by Scott Cawley and is submitted along with this application, and is included as a stand-alone document that accompanies the application.

10. FLOOD RISK ASSESSMENT

A Stage 2 Flood Risk Assessment has been undertaken for the site and is submitted along with this application, and is included as an Appendix of the EIA Report.

11. CONCLUSION

This planning application relates to the provision

- the provision of two no. 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation compound along with associated and ancillary works and is described as follows:
- The proposed 110kV GIS Substation Compound is to be located on lands to the east of the 3 no. data centres permitted under South Dublin County Council Reg. Ref. SD20A/0121, and within an overall landholding bound to the north by the R134 / New Nangor Road; to the west by the realigned Baldonnel Road; to the south by the Grange Castle South Business Park access road; and to the east by the Grange Castle Motor Company within Baldonnel, Dublin 22. The site of the proposed development has an area of c. 7.7 hectares;
- The proposed 110kV Gas Insulated Switchgear (GIS) Substation Compound includes the provision of a two storey GIS Substation building (with a gross floor area of 1,447sqm) (known as the Clutterland Substation), four transformers, a Client Control Building (with a gross floor area of 380sqm), lighting masts, car parking, associated underground services and roads within a 2.6m high fenced compound and all associated construction and ancillary works;
- A proposed underground single circuit 110kV transmission line will connect the proposed Clutterland 110kV GIS Substation to the existing 220kV / 110kV Castlebaggot Substation to the immediate south. The proposed transmission line covers a distance of approximately 180m within the townlands of Ballybane, and Aungierstown and Ballybane;
- A proposed underground single circuit 110kV transmission line will connect the proposed Clutterland 110kV GIS Substation to the existing 110kV underground Kilmahud-Corkagh circuit to the north-west. The proposed transmission line covers a distance of approximately 1.1km within the townlands of Ballybane and Grange and will include 3 joint bays along its length;
- The development includes provision of a unit substation and 49kVa electricity connection (approximately 300m in length to the Grange Castle South Business Park access road to the south of the proposed substation) for the proposed GIS substation building. The development includes the connections to the two substations (existing and proposed) as well as to the Kilmahud-Corkagh circuit, changes to landscaping permitted under SDCC Reg. Ref. SD20A/0121 and changes to planting within Grange Castle Business Park and all associated construction works, and all ancillary works.

This Proposed Development is designed to support current power demand and future growth within the area inclusive but not limited to the power requirements for the permitted development (SD20A/0121) within the same landholding, in a location which is well suited and serviced to accommodate such a use within the Grange Castle South Business Park, Baldonnel, Dublin 22.

The proposal is in accordance with the policies and objectives of national and regional planning policy, and the South Dublin County Development Plan 2016-2022.

It has been demonstrated within this report, as well as within the accompanying drawings, documents, and Environmental Impact Assessment Report that the proposal provides a suitable use of the subject lands. The applicant and design team in preparing the application documentation have considered the issues raised within the pre-application consultations undertaken with An Bord Pleanála and their determination issued prior to the lodgement of this application.

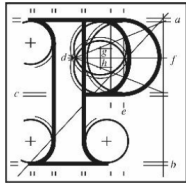
If you require any further information, or clarification on the above, please do not hesitate to contact us. We trust that everything is in order and look forward to a favourable decision in due course.

Yours faithfully,

A handwritten signature in dark ink, reading "Anthony Marston". The signature is written in a cursive, flowing style.

Anthony Marston (MIPI, MRTPI)
Marston Planning Consultancy

APPENDIX 1 EXTRACT OF BOARD ORDER CONFIRMING THAT THE PROPOSED DEVELOPMENT CONSTITUTES STRATEGIC INFRASTRUCTURE DEVELOPMENT



An
Bord
Pleanála

Board Direction
BD-006532-20
ABP-307360-20

At a meeting held on 23/09/2020, the Board considered the report of the Inspector and the documents and submissions on file generally, in relation to the proposed development of a 110kV Gas Insulated Switchgear (GIS) substation and associated works at Grange Castle South Business Park, Dublin 22.

Having regard to the provisions of the Planning and Development Act 2000, as amended, and the nature of the proposed development, as set in the plans and particulars received by An Bord Pleanála on the 15th day of June 2020, it is considered that the proposed development falls within the scope of section 182A of the Planning and Development Act 2000, as amended, and is therefore strategic infrastructure within the meaning of the Act. Accordingly, a planning application should be made directly to the Board.

Board Member:

Dave Walsh

Date: 23/09/2020

APPENDIX 2 COPY OF EIA PORTAL CONFIRMATION

A Chara,

An EIA Portal notification was received on 03/11/2020 in respect of this proposed application. The information provided has been uploaded to the EIA Portal on 03/11/2020 under EIA Portal ID number **2020184** and is available to view at <http://housinggov.ie/maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1>.

Portal ID: 2020184

Competent Authority: An Bord Pleanála

Applicant Name: UBC Properties LLC

Location: Grange Castle South Business Park, Baldonnell, Dublin 22.

Description: Two no. 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation compound.

Linear Development: yes

Date Uploaded to Portal: 03/11/2020

Morgan O Reilly

EU and International Planning Regulation, Planning Division

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage

Teach an Chustaim, Baile Átha Cliath 1. D01 W6X0
Custom House, Custom House Quay, Dublin D01 W6X0

T (+353) 1 8882710

www.tithiocht.gov.ie www.housing.gov.ie