

Intended for  
**Vantage Data Centers DUB11 Limited**

Date  
**November 2022**

Project Number  
**1620014883**

# **VANTAGE DUBLIN DATA CENTER**

## **VOLUME 1: MAIN ENVIRONMENTAL IMPACT ASSESSMENT REPORT**



# 1 INTRODUCTION

## 1.1 Introduction

- 1.1.1 This Environmental Impact Assessment Report (EIAR) has been prepared for Vantage Data Centers DUB11 Limited (the 'Applicant') – in accordance with the statutory procedures set out in the Planning and Development Act 2000 (as amended)<sup>1</sup> (the 'Act') and the Planning and Development Regulations 2001 (as amended)<sup>2</sup> (the 'Regulations') – to accompany an application (the 'application') seeking permission (also known as 'full permission') for a data centre building and associated development (the 'proposed development') on the Profile Park Site, Kilcarbery (the 'site'), situated within the jurisdiction of South Dublin County Council (SDCC).
- 1.1.2 The proposed development is not listed under Annex I of the EIA Directives<sup>3,4</sup> and the site is below the 15 hectare (ha) threshold under Part 2, Schedule 5 of the Regulations at 3.31 ha in size. However, the Applicant has recognised that the scale and nature of the proposed development has the potential for significant effects on the environment and therefore commissioned an environmental impact assessment (EIA) for the proposed development, the findings of which are presented within this EIAR.
- 1.1.3 The EIAR comprises the following:
- Non-Technical Summary (NTS);
  - Volume 1: Main Environmental Impact Assessment Report (this document);
  - Volume 2: Landscape and Visual Impact Assessment (LVIA) and Cultural Heritage Assessment; and
  - Volume 3: Technical Appendices.
- 1.1.4 EIA is a formal process in which the likely significant effects of certain types of development projects on the environment are identified, assessed and reported upon. For certain types of development, the process must be followed in order for such effects to be taken into account before a decision is made on whether planning permission should be granted.
- 1.1.5 This EIAR presents the results of the EIA that has been undertaken of the proposed development. In accordance with the Regulations, the EIAR reports on the potential environmental impacts and likely significant environmental effects of the proposed development during the demolition and construction stage, and the operation stage.
- 1.1.6 The EIA has taken into account mitigation measures that are being proposed by the Applicant, including those measures that have been integrated into the planning and design of the proposed development (i.e. 'embedded mitigation') and 'additional mitigation' to prevent and, where prevention is not possible, reduce and/or mitigate likely significant adverse effects. It then evaluates the significance of the residual effects.
- 1.1.7 Further information on how the scope of the EIA was formulated and on the structure of this EIAR, is provided in Chapter 2: EIA Process and Methodology of this Volume.
- 1.1.8 SDCC is the 'relevant planning authority' for the purposes of the Regulations and will determine the application taking into account the likely significant environmental effects of the proposed development as determined through the EIA process.
- 1.1.9 This chapter provides a general description of the site, the relevant planning context, planning application details, as well as the content and structure of the EIAR. More detailed information on the application site

is provided in the technical assessment chapters (6-15) of this Volume, as well as the landscape, visual and heritage assessments in Volume 2.

- 1.1.10 A description of the proposed development is provided in Chapter 4: Proposed Development Description and details of the demolition, and construction works are provided in Chapter 5: Demolition and Construction Environmental Management of this Volume.

## 1.2 Development Context

### Site Location and Context

- 1.2.1 The site is located at Irish grid reference O 03911 30784, within Profile Park, as shown in Figure 1-1.
- 1.2.2 Geographically, the site is located in Profile Park, approximately 10 kilometres (km) to the south-west of Dublin city centre, within South Dublin County.
- 1.2.3 Profile Park largely comprises commercial and industrial development, with numerous data centres in the vicinity (Figure 1.2). The site's surrounding context predominantly comprises Profile Park and industrial development to the north, Grange Castle Golf Club to the east beyond which are residential properties, agricultural land and industrial development to the south and the permitted Vantage data center development to the west, beyond which is Bolands Car Garage and further data centers.
- 1.2.4 In terms of public transport, the closest railway station to the site is at Clondalkin/Fonthill approximately 2.8 km to the north-east from which frequent commuter services to/from Dublin city centre can be accessed. Citywest Campus Luas Tram Stop is approximately 3.5 km to the south-east of the site from which frequent tram services to Dublin city and beyond can be accessed.
- 1.2.5 Bus stops are located adjacent to the site's northern boundary as well as east and west along New Nagnor Road (R134) within 300 metres (m) of the site from which frequent routes operate between the site and Dublin city centre.
- 1.2.6 The pedestrian and cycle environment in the vicinity of the site is of a high standard, with wide, well-lit lengths of dedicated and segregated off-road cycle and pedestrian routes.

<sup>1</sup> Government of Ireland, 2000. Planning and Development Act 2000 (as amended). ISB. S.I. No. 30/2000.

<sup>2</sup> Government of Ireland, 2001-2022. Planning and Development Regulations 2001 (as amended). S.I. No. 600 of 2001. ISB.

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Figure 1-3: Representative Photographs of the Site (left upper image looking north-west across the site, left lower image looking south-west across the site, right upper image looking north-east across the site, and right lower image looking south-east at the residential dwelling on site)

## Environmental Sensitivity

- 1.2.11 The environmental sensitivity's surrounding the site are presented in Figure 1-4.
- 1.2.12 The site is located within an established mixed-use area, comprising both industrial and agricultural land uses. The proposed development would be built upon agricultural land. Under the South Dublin County Development Plan 2022-2028<sup>5</sup> the site is allocated within Zone EE: Enterprise and Employment. The stated aim is to provide for enterprise and employment related uses. The proposed use is a permitted use under this 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 northward from City West to Grange and Grange Castle.
- 1.2.13 The site benefits from good road network structure within Profile Park connecting to the local road network. The site is directly bordered to the north by New Nangor Road (R134) and to the east and south by Falcon Avenue.
- 1.2.14 The nearest surface water feature is the Baldonnell stream, located adjacent to the sites southern boundary which enters into the southern section of the site.
- 1.2.15 The Grand Canal is located approximately 2 km directly north of the site and is classified as a proposed Natural Heritage Area (NHA). No other ecologically protected sites (such as Special Protection Areas (SPA),

<sup>5</sup> SDCC, 2022. South Dublin County Council Development Plan 2022-2028 [online]. Available at: <https://www.sdcc.ie/en/devplan2022/adopted-plan/county-development-plan-written-statement/county-development-plan-written-statement.pdf> [Accessed on 23/08/2022].

- Special Areas of Conservation (SAC), National Parks or Nature Reserves) are located within 1 km of the site.
- 1.2.16 There are no structures included in the statutory Register of Protected Structures or assets on the Record of Monuments and Places or the Register of Historic Monuments within the site. The closest statutory designated heritage asset is Grange Castle (RPS, RM) located 1 km to the north.
  - 1.2.17 The location of the site within a range of land types contributes to its fragmented character. Its proximity to the urban area of Dublin gives the area an 'urban fringe' or 'transitional' character as you move from the urban to limestone farmland character type.
  - 1.2.18 The surrounding landscape context is predominantly industrial to the north and west, agricultural to the south, with commercial and residential properties to the east and the Grange Castle Golf Club to the south-east (refer to Figure 1-2).
  - 1.2.19 Although the surrounding context of the site is largely industrial and agricultural, the site is surrounded by some residential properties primarily located to the east and west of the site. The nearest existing residential properties are located approximately 600 m to the south of the site along Baldonnell Road. There is a hotel 200 m north-east of the site boundary. Grange Castle Golf Club is an outdoor amenity space located immediately east of the site.



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# Volume 1: Main Environmental Impact Assessment Report

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# 1 INTRODUCTION

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Figure 1-1: Site Location

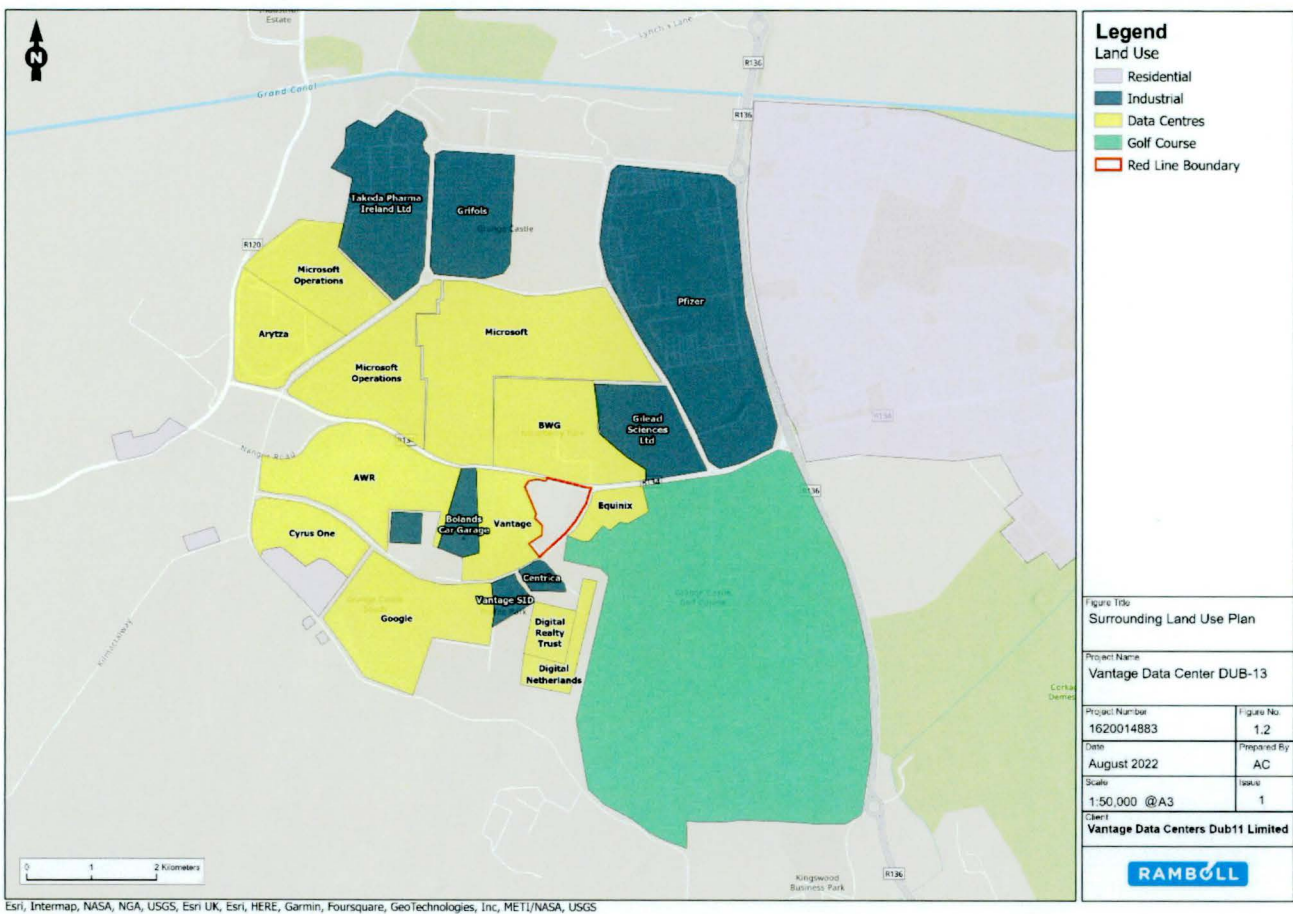


Figure 1-2: Surrounding Land Use Plan

Site Description

- 1.2.7 The site boundaries are defined by:
- New Nangor Road (R134) to the north;
  - Falcon Avenue, Equinix and Grange Castle Golf Club to the east;
  - Falcon Avenue to the south; and
  - The permitted Vantage data centre development (planning reference SD21A/0241) to the west, currently agricultural fields.
- 1.2.8 The site is a triangular parcel of agricultural land, with a residential dwelling located in the north-west corner of the site, and an area of hardstanding within the south-west of the site. The site covers a total area of 3.31 ha and lies at an elevation between approximately 74 and 75 m Above Ordnance Datum (m AOD).
- 1.2.9 The existing Baldonnell stream flows through the south of the site, orientated in a south-east to north-west direction, and entering in the south-east and flowing west.
- 1.2.10 The site can currently be accessed from three access points, two from the north off New Nangor Road (R134), and one from Falcon Avenue on the eastern border, which leads to a roundabout on the R134 New Nangor Road.





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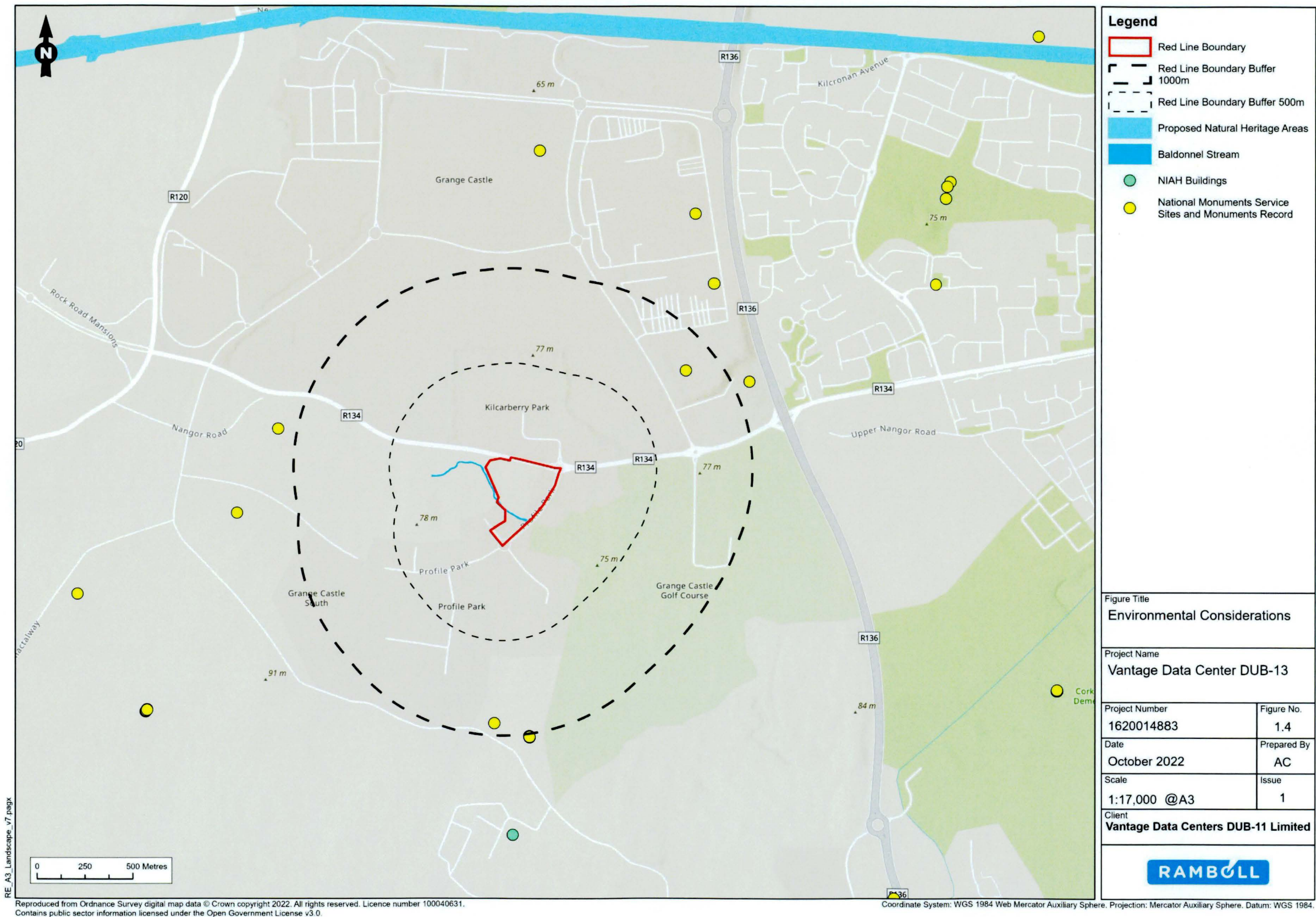


Figure 1-4: Environmental Considerations



# 1.3 Planning Context

## Planning Policy Context

1.3.1 It is necessary to consider the proposed development against relevant policies and guidance at national, regional and local levels.

### National Planning Policy

#### National Planning Framework (2018)

1.3.2 At the national level, planning policy is contained within the National Planning Framework (NPF) 2018<sup>6</sup>. The Department of Housing Planning and Local Government, on behalf of the Government of Ireland, published the NPF in February 2018 and is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

#### National Development Plan 2021-2030 (2021)

1.3.3 Additionally, the National Development Plan 2021-2030 (NDP)<sup>7</sup> sets out the investment priorities that will underpin the implementation of the NPF, through a total investment of approximately €165 billion.

1.3.4 Finalisation of the NPF alongside the ten-year NDP will culminate one plan to guide strategic development and the infrastructure investment at the national level.

#### Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy (2022)

1.3.5 The Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy (2022)<sup>8</sup> view data centres as core digital infrastructure that can play an indispensable role in our economy and society.

1.3.6 National Climate Action Plan 2021

1.3.7 The National Climate Action Plan<sup>9</sup> for Ireland published in November 2021 is materially relevant to this EIAR and is considered within the relevant technical assessments.

### Regional Planning Policy

#### Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly (2019)

1.3.8 The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA)<sup>10</sup> 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 storage facilities and associated economic activities at appropriate locations.
  - Promote Dublin as a demonstrator of 5G information and communication technology."

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

### Local Planning Policy

#### South Dublin County Council Corporate Plan 2020-2024

1.3.10 The SDCC Corporate Plan 2020-2024<sup>11</sup> identified SDCC's objectives and strategies for each of the councils' principal activities. The plan builds in flexibility to meet the demands of a changing environment over the plan period.

#### South Dublin County Council Development Plan 2022-2028 (2022)

1.3.11 The relevant statutory development plan for the site is the SDCC Development Plan 2022-2028<sup>5</sup>, adopted in August 2022. The core strategy, included within the Development Plan, provides an overarching strategy for the spatial development of the County over the medium to longer term and will form the basis for policies and objectives throughout the Development Plan. It translates the strategic planning framework set out in the National Development Plan and the Regional Planning Guidelines for the Greater Dublin Area, to County level.

1.3.12 As outlined in the Development Plan, the site is classified under Objective EE: to provide for enterprise and employment related uses.

<sup>6</sup> Government of Ireland, 2018. National Planning Framework (NPF) – Ireland 2040 Our Plan (February 2018) [online]. Available at: <https://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf> [Accessed on 23/08/2022].

<sup>7</sup> Government of Ireland, 2021. National Development Plan 2021-2030 (last updated 4 October 2021) [online]. Available at: <https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/> [Accessed on 23/08/2022].

<sup>8</sup> Government of Ireland, 2022. Government Statement of the Role of Data Centres in Ireland's Enterprise Strategy [online]. Available at: <https://enterprise.gov.ie/en/publications/publication-files/government-statement-on-the-role-of-data-centres-in-irelands-enterprise-strategy.pdf> [Accessed 23/08/2022].

<sup>9</sup> Government of Ireland, 2021. Climate Action Plan. Department of the Environment, Climate and Communications (last updated 2 June 2022) [online]. Available at: <https://www.gov.ie/en/publication/6223e-climate-action-plan-2021/> [Accessed 23/08/2022].

<sup>10</sup> Eastern & Midland Regional Assembly, 2019. Regional Spatial & Economic Strategy 2019-2031 [online]. Available at: [https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA\\_RSES\\_1.4.5web.pdf](https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA_RSES_1.4.5web.pdf) [Accessed on 23/08/2022]

<sup>11</sup> SDCC, 2019. South Dublin County Council Corporate Development Plan 2020-2024, [online]. Available at: [corporate-plan-2020-24.pdf](https://corporate-plan-2020-24.pdf) (sdcc.ie) [Accessed on 23/08/2022]



## Planning History

1.3.13 There are no relevant historical planning applications at the site in the last five years.

1.3.14 The Applicant submitted a full planning application (planning reference SD21A/0241) in March 2022 for the "construction of 2 no. two storey data centers with plant at roof level of each facility and associated ancillary development that will have a gross floor area of 40,589 sqm" on land adjacent to the site's western boundary. The application was granted permission on 19 July 2022 (hereafter referred to as the 'July 2022 DUB-1 permitted development'). The application was accompanied by an EIAR which reported on the outcomes of the EIA undertaken in accordance with the Regulations (hereafter the 'DUB-1 EIAR'). The proposed DUB-13 development is an extension to, and final phase of, the July 2022 DUB-1 permitted development and would be operated as part of the wider co-ordinated data center campus. The site boundary of the proposed development and the DUB-1 permitted development are shown in Figure 1-5 below.

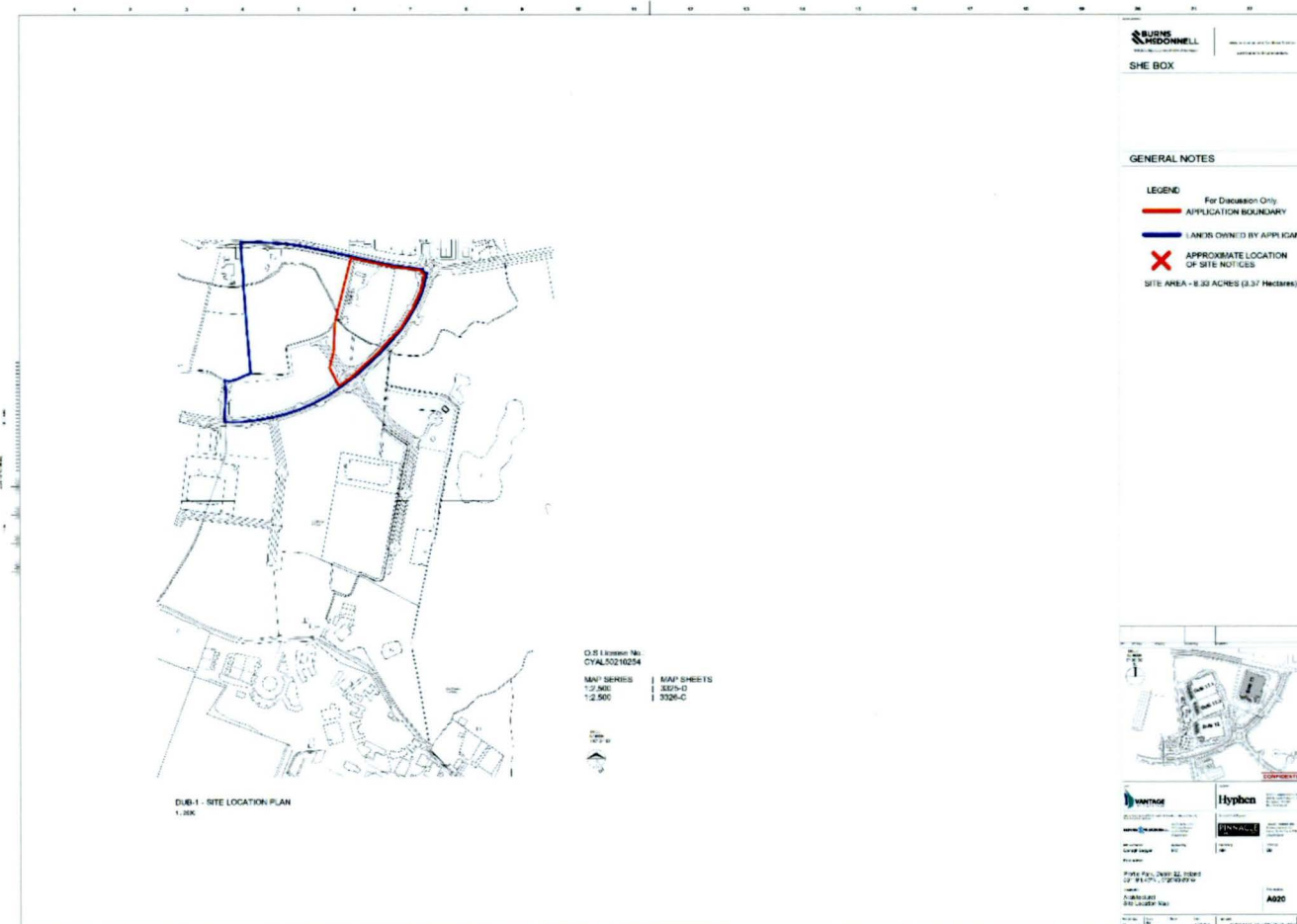


Figure 1-5: The proposed development (red) adjacent to the DUB-1 permitted development, all under ownership of the Applicant (blue)

## 1.4 Application Details

1.4.1 The description of the proposed development as stated on the application form is:

1.4.2 "Vantage Data Centers DUB11 Ltd. are applying for permission for development at this site that includes a two storey residential property on lands to the south of the New Nangor Road (R134), Dublin 22; and on land within the townlands of Ballybane and Kilbride within Profile Park, Clondalkin, Dublin 22 on an

overall site of 3.79 hectares. The development will consist of the demolition of the two storey dwelling (207.35sqm) and associated outbuildings and farm structures (348.36sqm); and the construction of 1 no. two storey data center with plant at roof level and associated ancillary development that will have a gross floor area of 12,893sqm that will consist of the following:

- 1 no. two storey data center (Building 13) with a gross floor area of 12,893sqm. It will include 13 no. emergency back-up generators of which 12 will be double stacked and one will be single stacked within a compound to the south-western side of the data center with associated flues that each will be 22.316m in height and 7 no. hot-air exhaust cooling vents that each will be 20.016m in height;
- The data center 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 that will provide emergency power to the admin and ancillary spaces. Each generator will include a diesel tank and there will be a refuelling area to serve the proposed emergency generators;
- The data center will have a primary parapet height of 14.246m above ground level, with plant and screen around plus a plant room above at roof level. The plant room has an overall height of 21.571m;
- Construction of an internal road network and circulation areas, with a staff entrance off Falcon Avenue to the east, as well as a secondary vehicular access for service and delivery vehicles only across a new bridge over the Baldonnell Stream from the permitted entrance as granted under SDCC Planning Ref. SD21A/0241 from the south-west, both from within Profile Park that contains an access from the New Nangor Road (R134);
- Provision of 60 no. car parking spaces (to include 12 EV spaces and 3 disabled spaces), and 34 no. cycle parking spaces;
- Signage (5.7sqm) at first floor level at the northern end of the eastern elevation of the data center building; and
- Ancillary site development works will include footpaths, attenuation ponds that will include an amendment to the permitted attenuation pond as granted to the north of the Baldonnell Stream under SDCC Planning Ref. SD21A/0241, as well as green walls and green roof. 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 internal road network within Profile Park. Other ancillary site development works will include hard and soft landscaping that will include an amendment to the permitted landscaping as granted under SDCC Planning Ref. SD21A/0241, lighting, fencing, signage, services road, entrance gates, and sprinkler tanks."

An Environmental Impact Assessment Report (EIAR) has been submitted with this application. This application and EIAR may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of South Dublin County Council during its public opening hours of 9am – 4pm, Mon-Fri, and a submission or observation may be made to South Dublin County Council in writing and on payment of the prescribed fee (€20.00) within the period of 5 weeks beginning on the date of receipt by South Dublin County Council of the application."



1.5 Applicant

- 1.5.1 The Application is submitted on behalf of the following entity:
- Vantage Data Centers DUB11 Limited,  
1-2 Victoria Buildings,  
Haddington Road,  
Dublin 4,  
Dublin,  
Ireland

1.6 Project Team

- 1.6.1 The Applicant has appointed a consultant team to assist in the development of the application and concurrently appointed an EIA team to undertake the EIA and prepare this EIAR in accordance with Regulations aforementioned. The team members and their respective roles are presented in Table 1-2: Design and EIA Team.

Table 1-2: Design and EIA Team	
Company	Role
Vantage Data Centers DUB11 Ltd	Client/Development Manager
Turner & Townsend	Project Manager
Burns & McDonnell	Principal Architect/Project Manager/Project Manager (Power plant development and substation)/Mechanical Engineer/BIM 360 Coordinator/GFS Power and Energy Project Manager and Engineer
Hyphen Architects	Local Architect
Kevin Fitzpatrick Landscape Architecture	Landscape Architects
Marston Planning	Planning Consultant
Ramboll	EIA Project Manager and Coordinator; Environmental Consultants for Population and Human Health, Transport, Air Quality, Noise and Vibration, Water Resource and Flood Risk, Ground Conditions, Climate Change, Waste, Material Assets and Landscape and Visual Assessment.
Neo Environmental	Ecology Consultant
Terence O'Rourke	Cultural Heritage Consultant
Geraghty Energy Consultants	Sustainability and Energy Consultant
Jensen Hughes Fire Consultants	Fire Engineering Consultant
O'Herlihy Access Consultants	Disability Access Consultant
Pinnacle	Structural and Civil Engineer and Flood Risk Consultant
Punch Consulting	Health and Safety Consultant
Found Digital	Fibre and Power Consultant

- 1.6.2 The EIA has been carried out by Ramboll UK Limited ('Ramboll') and a number of technical specialists. The technical specialists appointed are regarded as being competent experts within their relevant fields.

1.7 Structure of the Environmental Impact Assessment Report

- 1.7.1 The EIAR comprises the following documents:
- Non-Technical Summary (NTS);
  - Volume 1: Main Environmental Impact Assessment Report, comprising the following chapters:
    - Table of Contents, List of Figures, List of Tables
    - Chapter 1: Introduction
    - Chapter 2: EIA Process and Methodology
    - Chapter 3: Alternatives and Design Evolution
    - Chapter 4: Proposed Development Description
    - Chapter 5: Demolition and Construction Environmental Management
    - Chapter 6: Population and Human Health
    - Chapter 7: Transport and Accessibility
    - Chapter 8: Air Quality
    - Chapter 9: Noise and Vibration
    - Chapter 10: Water Resources and Flood Risk
    - Chapter 11: Ecology
    - Chapter 12: Ground Conditions
    - Chapter 13: Climate Change
    - Chapter 14: Waste
    - Chapter 15: Material Assets
    - Chapter 16: Cumulative Effects
    - Chapter 17: Residual Effects and Mitigation
    - Glossary of Terms and Abbreviations
  - Volume 2: Landscape and Visual Impact Assessment and Cultural Heritage Assessment
  - Volume 3: Technical Appendices
    - Technical Appendix 1.1: IEMA Quality Mark Checklist
    - Technical Appendix 7.1: Traffic Flow and Distribution Diagrams;
    - Technical Appendix 7.2: Accident Data;
    - Technical Appendix 7.3: Cumulative Schemes Daily Traffic Flow Diagrams;
    - Technical Appendix 7.4: Proposed Development Trip Generation;
    - Technical Appendix 8.1: Air Quality Modelling Inputs;
    - Technical Appendix 8.2: Air Quality Detailed Results;
    - Technical Appendix 9.1: Acoustic Terminology;
    - Technical Appendix 9.2: Construction Noise Calculations;
    - Technical Appendix 10.1: Engineering Planning Strategy;
    - Technical Appendix 10.2: Site-Specific Flood Risk Assessment;
    - Technical Appendix 11.1: Ecological Impact Assessment Report;
    - Technical Appendix 11.2: Appropriate Assessment Screening Report;
    - Technical Appendix 11.3: Biodiversity Management Plan;
    - Technical Appendix 12.1: Ground Investigation & Geotechnical Report; and



– Technical Appendix 12.2: Contaminated Land Interpretative Report.

# 1.8 Environmental Impact Assessment Report

## Content of the EIAR

1.8.1 The required content of the EIAR is set out in Schedule 6 of the Regulations (2001 to 2022)<sup>2</sup> as presented in Table 1-3 indicating where in this EIAR the requirements have been met.

Table 1-3: Information which is required in an EIAR (Schedule 6 of the Planning and Development Regulations (2001 to 2022))		
Required Information		Section of EIAR
1	Description of the project, including in particular: (a) a description of the location of the project; (b) a description of the physical characteristics of the whole project, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases; (c) a description of the main characteristics of the operational phase of the project (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used; (d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, and soil and subsoil pollution, noise, vibration, light, heat, radiation, etc.) and quantities and types of waste produced during the construction and operation phases.	Volume 1: EIAR Chapter 1: Introduction, EIAR Chapter 4: Proposed Development Description, EIAR Chapter 5: Demolition and Construction Environmental Management. EIAR Chapters 6-15, Volume 1 EIAR Volumes 2 and 3
2	A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	Volume 1: EIAR Chapter 3: Design Evolution,
3	A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the project as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	Volume 1: EIAR Chapter 1: Introduction, EIAR Chapter 4: Proposed Development Description, EIAR Chapter 5: Demolition and Construction EIAR Chapters 16 and 17, Volume 1. EIAR Volumes 2 and 3.
4	A description of the factors specified in Article 3(1) likely to be significantly affected by the project: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas	EIAR Chapters 6-15, Volume 1

Table 1-3: Information which is required in an EIAR (Schedule 6 of the Planning and Development Regulations (2001 to 2022))		
Required Information		Section of EIAR
	emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape	
5	A description of the likely significant effects of the proposed project on the environment resulting from, inter alia: (a) the construction and existence of the project, including, where relevant, demolition works; (b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources; (c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste; (d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters); (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources; (f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change; (g) the technologies and the substances used. The description of the likely significant effects on the factors specified in Article 3(1) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the project. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project.	EIAR Chapters 6-15, Volume 1 Volume 1: EIAR Chapter 16: Intra-Cumulative Effects Volume 1: EIAR Chapter 17: Summary of Residual Effects
6	A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	Volume 1: EIAR Chapter 2: EIA Process and Methodologies EIAR Chapters 6-15, Volume 1
7	A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.	EIAR Chapter 4: Proposed Development Description, EIAR Chapter 5: Demolition and Construction EIAR Chapters 6-15, Volume 1
8	A description of the expected significant adverse effects of the project on the environment deriving from the vulnerability of the project to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to Union legislation such as Directive 2012/18/EU of the European	EIAR Chapter 4: Proposed Development Description, EIAR Chapter 5:



Table 1-3: Information which is required in an EIAR (Schedule 6 of the Planning and Development Regulations (2001 to 2022))		
Required Information		Section of EIAR
	Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.	Demolition and Construction EIAR Chapters 6-15, Volume 1
9	A non-technical summary of the information provided under points 1 to 8.	Non-technical Summary
10	A reference list detailing the sources used for the descriptions and assessments included in the report.	EIAR Volume 1 and 2, all chapters EIAR Volume 3, all technical appendixes.

Good Practice

1.8.2 As with EIA, good practice in the preparation of the EIAR is defined in a number of sources, with more specific issues covered by EIAR review checklists. Many of these checklists are very detailed and go to some length. In terms of widely applicable and practical guidance, the recent IEMA Quality Mark indicator check has been referenced in producing this EIAR as described in Appendix 1.1: IEMA Quality Mark Checklist. Ramboll UK Ltd is a Registrant on the IEMA Quality Mark. Accordingly, as part of Ramboll’s QA procedures and Quality Mark Commitments, this EIAR and EIA has been undertaken to meet the Quality Mark Commitments as set out in Appendix 1.1: IEMA Quality Mark Checklist. Additional detail on relevant guidance is provided within Volume 1, EIAR, Chapter 2: Process and Methodology.



# 2 EIA PROCESS AND METHODOLOGY

## Introduction

- 2.1 This chapter of the Environmental Impact Assessment Report (EIAR) sets out the general approach to the process and to the methodology that is adopted when undertaking an Environmental Impact Assessment (EIA). It describes the legislative framework in which the EIA for the proposed development has been undertaken and identifies the key guidance that was considered. The EIA Scoping and consultation process that was adopted to identify the key environmental topics for inclusion in the EIA is outlined, as well as the overall EIA methodology adopted.
- 2.2 While the approach and methodology to the EIA are described in this chapter, further detail on how the methodology was tailored to each technical aspect of the EIA is presented in the relevant technical assessment chapters of the EIAR. Other supporting assessments for environmental aspects that were scoped out of the EIA are included as technical appendices to this EIAR.

## Environmental Impact Assessment

- 2.3 Since the adoption of Directive 85/337/EEC<sup>1</sup> (on 27 June 1985) on the assessment of the effects of certain public and private projects on the environment, both the law and EIA practices have evolved significantly. The 1985 Directive was amended by Directives 97/11/EC<sup>2</sup>, 2003/35/EC<sup>3</sup> and 2009/31/EC<sup>4</sup>, and the Directive and its amendments were codified in 2011 by Directive 2011/92/EU<sup>5</sup>. The current Directive 2014/52/EU<sup>6</sup> amends the 2011 codified Directive but does not replace it. The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018<sup>7,8</sup> transpose the requirements of the 2014 Directive into existing planning consent procedures.
- 2.4 EIA provisions in relation to planning development consents are contained in the Planning and Development Act 2000 (as amended)<sup>9</sup> (the 'Act') and in the Planning and Development Regulations 2001 (as amended)<sup>10</sup> (the 'Regulations').
- 2.5 The Regulations set out the statutory process and minimum requirements for EIA and the contents of the EIAR. Specifically, they prohibit the grant of planning permission for developments likely to have significant effects on the environment (defined in the Regulations as 'EIA development') unless information on those effects is considered by the relevant planning authority in reaching its decision on a planning application. That information includes both the EIAR, which is the Applicant's own assessment, and any other information provided by consultees, the public, and any other persons about the proposal's environmental effects. This EIAR has been prepared pursuant to (and in accordance with) the Regulations.
- 2.6 In addition to the Regulations, there is guidance available on EIA and the application of the Regulations that has been considered in undertaking this EIA, including:

- Environmental Protection Agency's (EPA) Guidelines on Information to be Contained in an Environmental Impact Statement (2002)<sup>11</sup>;
- EPA's Advice Notes on Current Practice in the Preparation of Environmental Impact Statements (2003)<sup>12</sup>;
- EPA's Advice Notes on Current Practice in the Preparation of Environmental Impact Statements (2015)<sup>13</sup>;
- EPA's Guidelines on the information to be contained in Environment Impact Assessment Reports (2022)<sup>14</sup>;
- European Commission's (EC) Environmental Impact Assessment of Projects – Guidance on the Preparation of the Environmental Impact Assessment Report (2017)<sup>15</sup>;
- EC's Environmental Impact Assessment of Projects – Guidance on Scoping (2017)<sup>16</sup>; and
- Department of Housing, Local Government and Heritage's Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)<sup>17</sup>.

2.7 Guidance of relevance to individual technical assessments have been set out in Chapters 6-15 of this EIAR Volume, as well as in Volume 2.

2.8 In accordance with the Regulations, this EIA has been undertaken based on the proposed development as described in Chapter 4: Proposed Development Description and details of the demolition and construction works in Chapter 5: Demolition and Construction Description of this EIAR Volume.

## EIA Process

- 2.9 EIA is a process that identifies the likely significant environmental effects (both positive and negative) of a proposed development. The process aims to avoid, off-set and/or reduce any significant negative environmental effects, where these are identified, and to enhance any positive effects. Proposed developments to which EIA is applied (i.e., 'EIA development') are those that are likely to have significant effects on the environment by virtue of factors such as their nature, size, or location.
- 2.10 The process and outcomes of the EIA are presented in an EIAR. The contents of an EIAR are prescribed by the Regulations and should be a clear and concise summary of a proposed development and its likely environmental effects (including direct, indirect, and cumulative effects) on the natural, built and human environments. The EIAR is submitted to a relevant planning authority to accompany an application for planning permission. In this way, the aim of EIA is to protect the environment by ensuring that a local planning authority, when deciding whether to grant planning permission for a project which is likely to have significant effects on the environment, does so in the full knowledge of the project's likely significant effects and takes this into account in the decision-making process. Alongside this, an EIA's objective is

<sup>1</sup> European Union, 1985. Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment. Document 31985L0337.

<sup>2</sup> European Union, 1997. Council Directive 97/11/EC of 3 March 1997 amending Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment. Document 31997L0011.

<sup>3</sup> European Union, 2003. Directive 2003/35/EC of the European Parliament and of the Council of 26 May 2003 providing for public participation in respect of the drawing up of certain plans and programmes relating to the environment and amending with regard to public participation and access to justice Council Directives 85/337/EEC and 96/61/EC - Statement by the Commission. Document 32003L0035.

<sup>4</sup> European Union, 2009. Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, European Parliament and Council Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC, 2008/1/EC and Regulation (EC) No 1013/2006 (Text with EEA relevance). Document 32009L0031.

<sup>5</sup> European Union, 2011. Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment Text with EEA relevance Official Journal of the European Union. Document 32011L0092.

<sup>6</sup> European Union, 2014. Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment Text with EEA relevance. Official Journal of the European Union. Document 32014L0052.

<sup>7</sup> Government of Ireland, 2018. European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018. S.I. No. 296/2018. ISB.

<sup>8</sup> Later amended to: Government of Ireland, 2018. European Union (Planning and Development) (Environmental Impact Assessment) (Amendment) Regulations 2018. S.I. No. 646/2018. ISB.

<sup>9</sup> Government of Ireland, 2000. Planning and Development Act 2000 (as amended). S.I. No. 30/2000. ISB.

<sup>10</sup> Government of Ireland, 2001-2019. Planning and Development Regulations 2001 (as amended). S.I. No. 600 of 2001. ISB.

<sup>11</sup> Environmental Protection Agency, 2002. Guidelines on the information to be contained in Environmental Impact Statements

<sup>12</sup> Environmental Protection Agency, 2003. Advice Notes on Current Practice in the preparation of Environmental Impact Statements

<sup>13</sup> Environmental Protection Agency, 2015. Advice Notes on Current Practice in the Preparation of Environmental Impact Statements Draft

<sup>14</sup> Environmental Protection Agency, 2022. Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)

<sup>15</sup> European Commission, 2017. Environmental Impact Assessment of Projects, Guidance on the preparation of the Environmental Impact Assessment Report.

<sup>16</sup> European Commission, 2017. Environmental Impact Assessment of Projects, Guidance on Scoping

<sup>17</sup> Government of Ireland, 2019. Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment 2018 (last updated 19 December 2019).



also to ensure that the public and statutory consultees are given early and effective opportunities to participate in decision making procedures and to enable the grant of required licences.

## Screening

- 2.11 EIA Screening is the term in the Regulations used to describe the process by which the need for EIA is considered in respect of a proposed development. Some developments require a mandatory EIA by reason of their size, nature, and effects. These projects, known as 'Schedule 5, Part 1 developments', include mainline railways, airports, waste facilities and large power stations. The proposed development is not such a Schedule 5, Part 1 development.
- 2.12 The need for an EIA for all other projects is determined on the basis of the following set criteria:
- The development is within one of the classes of development stated in Schedule 5 Part 2 of the Regulations; AND
  - EITHER it meets or exceeds the size threshold for that class of development in Schedule 5 Part 2; OR a part of the project is in a sensitive area; AND
  - It is likely to have significant effects on the environment by virtue of factors such as its nature, size, or location.
- 2.13 These are known as 'Schedule 5, Part 2 developments'. The proposed development is below the 15 ha threshold under Part 2 of Schedule 5 (10 (a)) of the Regulations. However, the scale and nature of the proposed development provides the potential for significant effects on the environment and the Applicant has therefore decided to undertake an EIA on this basis. Accordingly, a formal EIA Screening exercise with SDCC was not deemed necessary.

## Scoping and Consultation

- 2.14 EIA Scoping is the term used in the Regulations whereby an applicant can request a formal 'scoping opinion' from the relevant local planning authority on the content of an EIAR and the extent of the information to be considered in the assessments. The purpose of EIA Scoping is to focus the EIA on the environmental issues and potential impacts which need the most thorough attention; to identify those which are unlikely to need detailed study; and to provide a means to discuss methods of impact assessment so as to reach agreement on the most appropriate.
- 2.15 The Applicant has not produced a formal EIA Scoping Opinion Request Report, rather a more informal discussion was held with SDCC at the pre-application meeting on 21 September 2022. SDCC, the Applicant and Ramboll all attended this pre-application meeting. The purpose of this meeting was to discuss the scope of the EIA and the proposed approach that would be adopted for the EIAR.

## Scope of EIA

### Non-Significant Issues

- 2.16 The aim of the EIA Scoping process is to ensure that the EIA is proportionate and focussed only on the likely significant environmental effects of the proposed development. Appraisals for each technical topic were undertaken as part of the informal EIA Scoping process to determine the existing baseline conditions and as a result, the potential for significant effects to arise.
- 2.17 Accordingly, the informal EIA Scoping process identified that the proposed development is unlikely to give rise to significant environmental effects in respect of the following environmental aspects and therefore would not need to be scoped in as discrete technical assessment chapters within the EIAR:
- Daylight, Sunlight, Overshadowing and Wind Microclimate; and
  - Major Accidents and Disasters.
- 2.18 Whilst significant environmental effects in respect of Major Accidents and Disasters is unlikely, consideration has been given to this topic within the following technical chapters in this EIAR:

- Chapter 4: Proposed Development Description;
- Chapter 5: Demolition and Construction Description;
- Chapter 10: Water Resource and Flood Risk; and
- Chapter 13: Climate Change.

- 2.19 Standard best practice, mitigation and enhancement measures identified during the course of preparing these chapters were integrated into the proposed development as described in Chapter 4: Proposed Development Description and in Chapter 5: Demolition and Construction Description of this EIAR Volume.

## Potentially Significant Issues

- 2.20 The potentially significant environmental issues that were identified during the informal EIA Scoping process and that have been addressed within discrete technical assessment chapters are as follows:
- Population and Human Health (Chapter 6, EIAR Volume 1);
  - Transport and Accessibility (Chapter 7, EIAR Volume 1);
  - Air Quality (Chapter 8, EIAR Volume 1);
  - Noise and Vibration (Chapter 9, EIAR Volume 1);
  - Water Resources and Flood Risk (Chapter 10, EIAR Volume 1);
  - Ecology (Chapter 11, EIAR Volume 1);
  - Ground Conditions (Chapter 12, EIAR Volume 1);
  - Climate Change (Chapter 13, EIAR Volume 1);
  - Waste (Chapter 14, EIAR Volume 1);
  - Material Assets (Chapter 15, EIAR Volume 1); and
  - Landscape, Visual and Cultural Heritage (EIAR Volume 2).

## EIA Approach

### Consideration of Alternatives

- 2.21 The Regulations require that an applicant provides a summary description of reasonable alternatives studied and to provide a description of their specific characteristics, as well as an indication of the main reasons for selecting the preferred option, including a comparison of the environmental effects. The Regulations do not define the term 'alternative' and EIA practice tends to consider alternative design proposals and to explain the process through which the proposed development has evolved.
- 2.22 Chapter 3: Design Evolution and Alternatives of this EIAR Volume explores the objectives of the proposed development and describes how the development proposals have evolved in response to environmental and planning opportunities and constraints.
- 2.23 For the proposed development, the following alternatives have been considered:
- The 'Do-Nothing' alternative where the existing site condition remains in its underutilised state with no redevelopment; and
  - Alternatives considered in the course of the design process (such as layouts and design) taking into account environmental and other relevant planning and design constraints as part of the design evolution.
- 2.24 In respect of the 'Do-Nothing' alternative, it is considered that, should the proposed development not be brought forward, the Applicant would implement the adjacent July 2022 DUB-1 permitted development.

## Baseline & Future Baseline

- 2.25 The purpose of the EIA is to predict how environmental conditions may change as a result of a proposed development and to specify any investigative measures to be taken and/or required. This requires that



the current environmental conditions and those in the future, are established. This is referred to as the 'baseline' and is usually established through a combination of desk-based research, site surveys and empirical studies and projections. Together, these describe the existing and future character of a site and the value and vulnerability of key environmental resources and receptors, against which any changes or effects resulting from a proposed development can be identified, understood and assessed.

- 2.26 For the EIA of the proposed development, the existing baseline represents the existing environmental conditions of the site and the surrounding study areas at the time of the assessments as described in Chapter 1: Introduction of this EIAR Volume.
- 2.27 When completed the proposed development would operate as an extension to the July 2022 DUB-1 permitted development campus and would utilise the wider campus for power provision. As the Applicant owns both sites there is certainty that power provision from the proposed development placed upon the July 2022 DUB-1 permitted development, would be delivered. Due to this relationship between the proposed development and the adjacent July 2022 DUB-1 permitted development, for the purpose of the EIA, a future baseline has been established for all technical assessment chapters based on the implementation of the permitted DUB-1 scheme. The future baseline for each chapter is described in each respective chapter.
- 2.28 Where linkages exist between the proposed development and the July 2022 DUB-1 permitted development, there is the potential for effects to be duplicated as the effects for the July 2022 DUB-1 permitted development have been reported on within the DUB-1 EIAR. Therefore, the proposed development has been assessed against a future baseline which represents the projected environmental conditions in the future in 2025, which is the projected year when the July 2022 DUB-1 permitted development would become fully operational.
- 2.29 With specific reference to power generation, the proposed development would utilise both the EirGrid connection and the multifuel generation plant proposed as part of the July 2022 DUB-1 permitted development. For the operational air quality, noise and vibration and climate assessments consideration has been given to the modelling scenarios adopted for the DUB-1 EIAR which are outlined in Table 2-1, with information provided on the relevant scenarios which are to be taken forward to the assessment of effects for the proposed development. The timeframes provided in Table 2-1 are indicative, but they provide a basis for assessment, including a reasonable 'worst case' at a particular point in time.
- 2.30 Further information on the linkages between the proposed development and the July 2022 DUB-1 permitted development are described in Chapter 4: Proposed Development Description.

**Table 2-1: Air Quality, Noise and Vibration and Climate Operation Modelling Scenarios used for DUB-1**

Assessment Scenarios described in the EIAR for the July 2022 DUB-1 permitted development		Proposed Development EIAR Scenarios
Scenario 1 (~from Q4 2023 to Q1 2025)	<ul style="list-style-type: none"> <li>DUB 11 powered by northern block of MFGP using HVO as the fuel source.</li> <li>MFGP running 24/7.</li> <li>Emergency scenario below applies if there is the MFGP fails.</li> </ul>	Not relevant as the proposed development would become operational in 2025.
Scenario 2 (reasonable worst case from Q1 2025)	<ul style="list-style-type: none"> <li>DUB 11 and 12 powered from the EirGrid connection across Falcon Avenue.</li> <li>MFGP powered by gas from GNI. In a reasonable worst case this is assessed to be operational 24/7 using natural gas.</li> <li>Emergency scenario below applies if the gas connection from GNI to the</li> </ul>	Would form the operation assessment scenarios for DUB-13 with the emissions from DUB-13 assessed against these future baseline scenarios.

**Table 2-1: Air Quality, Noise and Vibration and Climate Operation Modelling Scenarios used for DUB-1**

	MFGP fails and there is a local grid network failure from EirGrid.	
Scenario 3 (reasonable best case from Q1 2025)	<ul style="list-style-type: none"> <li>DUB 11 and 12 powered from the EirGrid connection across Falcon Avenue</li> <li>MFGP not in operation.</li> <li>Emergency scenario below applies if there is a local grid network failure from EirGrid.</li> </ul>	
Emergency Scenario	<ul style="list-style-type: none"> <li>Diesel used for day tanks for emergency backup generators for the data center in the unlikely event of an outage of the MFGP and grid connection (depending on scenario). MFGP and emergency generators would not be operational at the same time.</li> </ul>	Would form the emergency scenario for the proposed development.

- 2.31 As such, the following scenarios will be used for Air Quality, Noise and Vibration and Climate modelling for the proposed development.

**Table 2-2: EIAR Air Quality, Noise and Vibration and Climate Operation Modelling Scenarios for Proposed Development**

Scenario 1 (reasonable worst case)	<ul style="list-style-type: none"> <li>DUB-13 powered from the EirGrid connection through wider DUB-1 campus.</li> <li>MFGP on wider DUB-1 campus powered by gas from GNI. In a reasonable worst case this is assessed to be operational 24/7 using natural gas.</li> <li>Emergency scenario below applies if the gas connection from GNI to the MFGP fails and there is a local grid network failure from EirGrid.</li> </ul>
Scenario 2 (reasonable best case)	<ul style="list-style-type: none"> <li>DUB-13 powered from the EirGrid connection through wider DUB-1 campus.</li> <li>MFGP on wider DUB-1 campus not in operation.</li> <li>Emergency scenario below applies if there is a local grid network failure from EirGrid.</li> </ul>
Emergency Scenario	<ul style="list-style-type: none"> <li>Diesel used for day tanks for emergency backup generators for the data center in the unlikely event of an outage of the MFGP and grid connection (depending on scenario). MFGP and emergency generators would not be operational at the same time.</li> </ul>

- 2.32 The existing and future baseline conditions have been characterised by means of desk studies, site visits, surveys and modelling.
- 2.33 The technical assessments in EIAR Volume 1 (6 to 15), EIAR Volume 2 (1 and 2) and EIAR Volume 3 provide a description of topic specific existing and future baseline conditions against which the proposed development has been assessed.

## Receptors

- 2.34 Receptors that may be sensitive to potential environmental impacts as a result of the proposed development, can be summarised as follows, with further detail provided in respective technical assessments:
- Existing underlying geology and hydrogeology;
  - Existing soils;
  - Existing water resources, in particular ground water, surface water features and public potable water supplies;
  - Existing utilities;
  - Existing ecological receptors, in particular the Baldonnel Stream;



- Future users of and visitors to the site and surrounding study area;
- Future pedestrians at and around the proposed development;
- Existing community facilities in proximity to the site;
- Existing landscape character areas;
- Existing visual receptors and local and strategic views from publicly accessible locations such as roads, footpaths and open spaces;
- Existing above ground heritage assets such as archaeology and built heritage;
- Potential existing buried heritage assets on-site;
- Existing transport facilities, such as Nangor Road; and
- Demolition and construction workers.

## Impact Assessment

### Basis of the EIAR

- 2.35 In accordance with the Regulations, the EIA has been undertaken based on the:
- site, as shown and described in Chapter 1: Introduction, as well as the individual technical assessments (Chapters 6 to 15) of this EIAR Volume and EIAR Volume 2; and
  - proposed development and proposed demolition and construction works, as shown and described in Chapter 4: Proposed Development Description and Chapter 5: Demolition and Construction Description, respectively, of this EIAR Volume.
- 2.36 The proposed development has been assessed in the EIAR, as defined by the following documents and materials:
- Detailed planning application drawings;
  - Design Statement;
  - Planning Statement;
  - Engineering Planning Report; and
  - 3D model.

### Sources of Proposed Development Information

- 2.37 In addition to the above, information on the proposed development has been drawn from the following application documents, as appropriate:
- Site notice;
  - Additional information response letter;
  - RFI individual responses from relevant consultants;
  - Architectural drawings;
  - Screening Report for Appropriate Assessment;
  - Landscape masterplan and drawings;
  - Site Lighting Plan, modelling and details;
  - Engineering Planning Report;
  - Flood Risk Assessment;
  - Engineering drawings; and
  - Environmental Impact Assessment Report, Appendices and Non-technical Summary.

## Assessment Methodology

### General

- 2.38 The aim of the EIAR is not to assess the proposed development's compliance/performance against planning policy as this is considered within the Planning Statement that accompanies the application. Instead, reference has been made to national, regional and local policy (where appropriate) to inform the scope of the technical assessments, assessment methodologies applied and existence of any sensitive receptors to be considered. Detailed methodologies for the assessment of each of the environmental aspects scoped into the EIA as discrete technical assessment chapters are provided within each technical chapter of this EIAR Volume and EIAR Volume 2; however, in general terms, the assessments have been based upon the following approach:
- Review of the existing conditions at and surrounding the site for the environmental topic area under consideration via various sources of existing information, data and reports;
  - Desk-top studies;
  - Site surveys;
  - Consideration of relevant legislation;
  - Consideration of relevant planning policies (national, regional and local), guidance and standards;
  - Consultations with stakeholders and consultees as appropriate;
  - Consideration of potentially sensitive receptors that could be affected by the proposed development;
  - Use of published technical guidance and best practice;
  - Use of quantitative and qualitative assessment methods, professional judgement and expert opinion;
  - Identification of potential environmental impacts and likely effects, with an evaluation of their likely duration, magnitude and scale, taking into consideration embedded mitigation (where relevant); and
  - Recommendation for additional mitigation and/or enhancement measures, followed by an assessment of the significance of the residual effects.
- 2.39 How the proposed development might affect the environment relies on predictions about what impact a certain action would have. Some predictions can be made using mathematical or simulation models, particularly where there are well known relationships between cause and effect. For example, the degree to which noise levels may increase as a result of additional traffic flows can be predicted using a mathematical equation; or the level of air pollution from a known traffic flow can also be predicted from a computer-based simulation model; or the visibility of a building can be predicted by accurately superimposing its outline and position over a photograph. Other impacts are less easy to predict in quantitative terms; for example, whilst the extent of a loss of a habitat on the abundance of individual species is more difficult to predict. In such cases, the EIA attempts to quantify the anticipated scale of impact using empirical experience, literature and professional judgement.
- 2.40 In all cases, the overall approach and specific methods of predicting the likely nature and magnitude of impact, as well as the scale of effect is set out in each of the technical assessments. Where used, recognised specific predictive methods are referenced. Any assumptions or limitations to knowledge are stated. In either case, the thought process leading to the conclusions is based on reasonably reliable data and so is considered to be prudent and robust.
- 2.41 Where detailed information on the proposed development has not been available, reasonable assumptions have been made, and clearly set out, based on experience of other developments of similar type and scale to enable assessment of likely significant effects.



2.42 The proposed development has not yet been approved so the conditional tense ('would') has been used to describe the development proposals, situations, potential impacts and likely effects that could/would arise from the introduction of the proposed development, as well as the mitigation measures that would be delivered or would be required upon approval of the proposed development. This approach does not lessen the Applicant's commitment to deliver the proposed development as presented within this EIAR. Furthermore, each technical assessment (and in particular summary tables at the conclusion of each chapter) clearly sets out the means by which any required mitigation measures relied upon, would be secured.

**Proposed Development Stages**

2.43 The EIA considers the following stages of the proposed development:

- Demolition and Construction stage;
- Operation stage; and
- Cumulative stage

2.44 Although the demolition and construction programme of the proposed development would be sequenced over an 11 month period, the EIA has assessed and reported on the environmental effects of the construction stage as a whole. The demolition and construction stage assessment is based on the information provided in Chapter 5: Demolition and Construction Description of this EIAR Volume. The development programme and demolition and construction methods presented in this chapter have informed the identification of on- and off-site receptors for assessment, as well as potential 'worst-case' scenarios.

**Assessment Scenarios**

2.45 As noted earlier, the assessment of the proposed development has been carried out against the future baseline conditions as described in Chapter 1: Introduction of this EIAR Volume, this Chapter and technical assessment chapters (6-15) of this volume and supplemented by relevant existing and updated surveys.

2.46 The 'future baseline' is a projection of likely environmental conditions in the future with the July 2022 DUB-1 permitted development constructed and operational.

**Demolition and Construction Stage**

2.47 The future baseline for the demolition and construction stage is the year of the most intensive demolition and construction works for the proposed development, in terms of traffic flows and the equivalent year of the construction and operation stages of the July 2022 DUB-1 permitted development. This is set out in Chapter 5: Demolition and Construction Description of this EIAR Volume.

2.48 Accordingly, the following assessments scenarios have been considered:

- Scenario 1: Existing Baseline (2022);
- Scenario 2: Future Baseline (2024) Construction and Operation Stage flows for 2024 associated with the July 2022 DUB-1 permitted development;
- Scenario 3: Future Baseline (2024) Construction and Operation Stage flows for 2024 associated with the July 2022 DUB-1 permitted development + Year of Peak Demolition and Construction Works of Proposed Development (2024);
- Scenario 4: Future Baseline (2024) Construction and Operation Stage flows for 2024 associated with the July 2022 DUB-1 permitted development + Year of Peak Demolition and Construction Works of Proposed Development (2024) + Cumulative Development.

**Operation Stage**

2.49 The future baseline for the operation stage comprises the July 2022 DUB-1 permitted development year of full operation and the year in which the proposed development would be fully completed, occupied and operational.

2.50 Accordingly, the following assessment scenarios have been considered:

- Scenario 1: Existing Baseline 2022;
- Scenario 2: Future Baseline (2025) July 2022 DUB-1 permitted development Operational;
- Scenario 3: Future Baseline (2025) July 2022 DUB-1 permitted development Operational + Operational Year Baseline of the Proposed Development (2025); and
- Scenario 4: Future Baseline (2025) July 2022 DUB-1 permitted development Operational + Operational Year Baseline of Proposed Development (2025) + cumulative development.

**Mitigation**

2.51 Mitigation is the term used to refer to the process of avoiding where possible and, if not, reducing, controlling and/or off-setting the likely significant negative effects of a development. Mitigation measures relate to the design stage; the demolition and construction stage; or the activities associated with the operation stage.

2.52 As part of the EIA, an iterative approach has been adopted where significant environmental effects have been avoided where possible in the first instance through the design refinements and iterations (referred to as 'embedded' mitigation'), as reported upon within Chapter 3: Alternatives and Design Evolution of this EIAR Volume. Where negative environmental effects were identified through early assessment work, opportunities to reduce or control impacts and effects, or in some cases, to compensate for impacts and effects, were identified and incorporated into the proposed development. In addition, opportunities to enhance the positive environmental effects of the proposed development have also been sought and incorporated into the proposed development.

2.53 Within each technical chapter of this EIAR, the assessment of the effects that are likely to arise as a consequence of a potential impact/change to environmental receptors from the proposed development is initially presented. If any 'additional mitigation' measures are required, further to that already embedded into the proposed development throughout its design evolution, these are proposed, and the proposed development is reassessed to ascertain the likely residual effects and the likely significant environmental effects. This is reported on within each technical assessment chapter of the EIAR.

2.54 In all cases, mitigation measures are presented as embedded, specific commitments or statements of fact. It is anticipated that the implementation of mitigation identified throughout the EIAR, would be secured by means of approval of the planning drawings, appropriately worded planning conditions or planning obligations. Where the need for mitigation is identified, each assessment confirms how the mitigation will be secured.

**Impacts and Effects**

2.55 Unless otherwise required by published assessment guidance, the EIA has made distinction between:

- **Impacts:** the change or action; and
- **Effects:** the result/consequence/outcome of the change.

2.56 As a general rule, the EIA assesses the effects that are likely to arise as a consequence of a potential impact to environmental receptors following the application/consideration of embedded mitigation measures.

2.57 The quality, magnitude and duration or potential effects are defined in accordance with EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports<sup>14</sup>. These are summarised below.

Table 2-3: Description of Effects	
Effect Characteristic	Description
Quality	
Positive	A change which improves the quality of the environment (for example, by increasing species diversity; or the improving reproductive capacity of an ecosystem, or by removing nuisances or improving amenities).



**Table 2-3: Description of Effects**

Effect Characteristic	Description
Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.
Negative	A change which reduces the quality of the environment (for example, lessening species diversity or diminishing the reproductive capacity of an ecosystem; or damaging health or property or by causing nuisance).
<b>Significance</b>	
Imperceptible	An effect capable of measurement but without significant consequences.
Not significant	An effect which causes noticeable changes in the character of the environment but without significant consequences.
Slight	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.
Moderate	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.
Significant	An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.
Very Significant	An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.
Profound	An effect which obliterates sensitive characteristics.
<b>Duration of Effects</b>	
Momentary	Effects lasting from seconds to minutes.
Brief	Effects lasting less than a day.
Temporary	Effects lasting less than a year.
Short-term	Effects lasting one to seven years.
Medium-term	Effects lasting seven to 15 years.
Long-term	Effects lasting 15 to 60 years.
Permanent	Effects lasting over 60 years.
Reversible	Effects that can be undone, for example through remediation or restoration.
<b>Probability of Effects</b>	
Likely	The effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented.
Unlikely	The effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.
<b>Type of Effects</b>	
Indirect effects	Impacts on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway.
Cumulative effects	The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects.

**Table 2-3: Description of Effects**

Effect Characteristic	Description
'Do-nothing' effects	The environment as it would be in the future should the subject project not be carried out.
'Worst case' effects	The effects arising from a project in the case where mitigation measures substantially fail.
Indeterminant effects	When the full consequences of a change in the environment cannot be described.
Irreversible effects	When the character, distinctiveness, diversity or reproductive capacity of an environment is permanently lost.
Residual effects	The degree of environmental change that will occur after the proposed mitigation measures have taken effect.
Synergistic effects	Where the resultant effect is of greater significance than the sum of its constituents, (e.g. combination of SOx and NOx to produce smog).

- 2.58 There are some exceptions to the conventions and terminology described above for certain topic specific assessments. This is set out in the relevant technical assessment chapter.
- 2.59 The scale of effects is typically determined through the use of the terminology above and the application of professional judgement and discretion of the particular technical specialist. Accordingly, a fixed/set/generic matrix has not been adopted for the EIA as a whole.
- 2.60 The specific benchmarks have been established by the project team using available national, regional and local policy together with other relevant guidance, recognised best practice and expert judgement. The development of these benchmarks is explained in more detail in each assessment or technical appendix.
- 2.61 Throughout the EIAR, residual effects have been predicted as either '**Significant**' or '**Not Significant**'. Significant effects are considered material to the planning decision process. Residual effects of moderate, significant, very significant and profound are typically considered '**Significant**', but would be dependent on the relevant technical assessment, as well as the existence of published assessment guidance. Where published assessment guidance is not definitive in respect of categorising/determining significant environmental effects, professional judgement has been applied, taking into account the duration, extent and context of the effect, to determine significant effects.

#### Cumulative Assessment

- 2.62 The Regulations require that all likely significant effects of a development are taken into account, including cumulative effects.
- 2.63 There is no prescriptive guidance on the methodology for the assessment of cumulative effects in Ireland. However, the Institute of Environmental Management & Assessment (IEMA) Guidelines<sup>18</sup> identifies two types of cumulative effects:
- Type 1 – **Intra-Project Effects**: Combined effects of different types of impact or 'impact interactions', for example the multiplying effects arising from noise, dust and visual impacts during the construction of the proposed development on a particular sensitive receptor; and
  - Type 2 – **Inter-Project Effects**: Combined or additive effects generated from the proposed development together with other planned or likely foreseeable developments and also referred to as 'in-combination effects'. These other developments may generate their own individually insignificant effects but when considered together could amount to significant cumulative effects, for example,



combined transport and accessibility impacts from two or more (proposed) developments. Additive effects were considered where relevant.

- 2.64 As Stated in Table 3-3 of the EPA Guidance, under 'Describing the Types of Effects' synergistic effects should be considered. Synergistic effects are considered within the inter-project cumulative effects, also known as additive effects. Where the proposed development would likely result in additive effects, these will be identified within the relevant EIAR chapter.

#### Intra-Project Cumulative Effects

- 2.65 As mentioned above, there is no established EIA methodology for assessing and quantifying the intra-project cumulative effects of individual effects on sensitive receptors. Therefore, Ramboll has developed an approach which uses the defined residual effects of the proposed development to determine the potential for effect interactions and so the potential for intra effects of individual effects.
- 2.66 Intra-project cumulative effects from the proposed development itself on existing off-site and future on-site sensitive receptors during the demolition and construction stage and operation stage have been considered. It is possible, however, that depending on the predicted individual 'completed developments' effects, only the demolition and construction stage effects would actually be considered as often they generate the greatest likelihood of interactions occurring and hence significant effects. Indeed, demolition and construction stage effects are usually more negative (albeit on a temporary basis) than effects as a result of the operation stage.
- 2.67 Dependent on the relevant sensitive receptors, the assessment focusses either on key individual receptors or on groups considered to be most sensitive to potential interacting effects. The criteria for identifying those receptors which are considered to be potentially sensitive include existing land uses, proximity to the demolition and construction works and the site, and likely duration of exposure to impacts.
- 2.68 It should be noted that only residual effects that are slight, moderate, significant, very significant or profound in scale have been considered within this assessment. Imperceptible and not significant effects are not considered in the assessment. Due to the 'cross-boundary' and 'overlapping' nature of these effects across various environmental topics, and the assessment approach adopted, the results of intra-project cumulative effects are holistically presented within a discrete assessment chapter (Chapter 16: Cumulative Effects of this EIAR Volume) and not within each of the technical assessment chapters. This avoids unnecessary duplication and repetition and presents a proportionate approach.
- 2.69 With regard to the potential for cumulative effects to occur, it is anticipated that standard mitigation measures as detailed in Chapter 5: Demolition and Construction Description of this EIAR Volume can be applied to prevent temporary significant effects from the interaction of effects occurring on-site. It is also anticipated that a site-specific Construction Environmental Management Plan (CEMP) would be secured by SDCC by means of an appropriately worded planning condition.

#### Inter-Project Cumulative Effects

- 2.70 The Regulations require an assessment of potentially significant cumulative effects of a proposed development along with other 'existing and/or approved projects'. There are no legislative or policy requirements which set out how an inter-project cumulative impact assessment should be undertaken.
- 2.71 Accordingly, inter-project effects arising from the proposed development in combination with, or in addition to, 'cumulative development' during the demolition and construction stage and operation stage, have been considered in the EIA.
- 2.72 Each technical EIAR chapter presents the assessment of combined effects of the proposed development with certain other cumulative developments. Schedule 6 of the Regulations states that only developments which are existing and/or approved should be considered, i.e. developments built or under construction or with a planning permission.

- 2.73 Spatial considerations and scale of development criteria has been developed based on professional judgement to determine whether cumulative developments have the potential for cumulative effects when combined with the proposed development's effects. The criteria applied to the cumulative developments are those which are either:
- Data centres that are permitted/approved or have resolution to grant or are currently at early stage of demolition and enabling/construction; and
  - are within 1km of the application site.
- 2.74 The cumulative developments have been quantitatively assessed on a topic by topics basis, subject to the availability of development information in the public domain. Where information is not available, or cumulative developments do not comply with the above criteria, qualitative approaches have been adopted based on professional judgement.
- 2.75 The location of the cumulative developments considered in the EIAR is shown in Figure 2-1 overleaf and the description of each cumulative developments, is summarised in Table 2-4.
- 2.76 Where possible, the status of cumulative developments' construction works have been taken into account. For example, where construction has progressed to a material degree, such as to affect local views, traffic flows and air quality, such schemes have been considered as part of the existing baseline.

**Table 2-4: Cumulative Development Descriptions**

No.	Address (Application Reference)	Planning Application Description	Application Status
1	Microsoft - Grange Castle Business Park, Nangor Road, Clondalkin, Dublin 22 [SD20A/0283]	Demolition of existing single-storey vacant house, garage and outhouse (total gross floor area (GFA) approximately 291.2sqm) and removal of existing temporary construction car park; construction of a single one- to four-storey central administration building and two two-storey (with mezzanine) data centres (DUB14 & DUB15) all to be located west of data centres DUB9, DUB10, DUB12 & DUB13 within the MS campus.	Grant Permission - 29/03/2021 Enabling works in progress
2	UBC Properties - Townlands within Grange Castle South Business Park, Baldonnel, Dublin 22 [SD20A/0121]	The development will consist of the demolition of the existing two-storey dwelling of Ballybane and associated farm buildings (565sqm) and the construction of three two-storey data centres with mezzanine floors at each level of each facility and associated ancillary development that will have a gross floor area of 80,269sqm on an overall site of 16.5 hectares (ha).	Grant Permission - 09/09/2020 Construction in progress
3	UBC Properties -Grange Castle South Business Park, Dublin 22 [An Bord Pleanála Reference - 308585]	Clutterland 110 kilovolt (kV) GIS Substation building and two underground single circuit transmission lines.	Approved 07/05/21
4	Digital Reality Trust - Profile Park, Baldonnel, Dublin 22, D22 TY06 [SD17A/0377]	Revisions and alterations of the permitted development of a data processing facility under planning Ref: SD12A/0002 on a 3.85ha site. The revised application consists of alterations to the DUB14 (previously DUB12) data centre/warehouse structure, granted in the previous application. The alterations to the DUB14 (Previously DUB12) include: (i) two data halls 2137sqm (increase of 180sqm), (ii) offices/reception 478sqm (decrease of 190sqm), (iii) support space/staff facilities and	Grant Permission - 15/12/2017 Constructed



**Table 2-4: Cumulative Development Descriptions**

No.	Address (Application Reference)	Planning Application Description	Application Status
		internal plant with a floor area of 953sqm (increase of 84sqm), (iv) external plant of 1,777sqm (footprint increase of 35sqm).	
5	Cyrus One - Grange Castle Business Park, Clondalkin, Dublin 22 [SD18A/0134]	Demolition of the existing single-storey house of 'Erganagh' and the construction of a two-storey data centre and delivery bays with associated three-storey office block and services that will have a gross floor area of 35,426sqm on an overall site of 9.2 ha.	Grant Permission - 24/09/2018
6	Cyrus One Townlands within Grange Castle South Business Park, Baldonnel, Dublin 22 [SD20A/0295]	Amendments and modifications to the permitted data centre development granted under Registration Ref SD18A/0134 - ABP Ref. ABP-302813-18 and the temporary substation	Grant Permission under SD19A/0300
7	Cyrus One - Grange Castle South Business Park, Baldonnel, Dublin 22 [An Bord Pleanála Ref - 309146]	Two 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation	Grant Permission with conditions - 19/07/2021
8	Centrica Business Solutions - Profile Park, Baldonnel, Dublin 22 [SD21A/0167]	Construction of a gas fired power plant with an electrical output of up to 125MW with associated balance of plant, equipment and buildings.	Grant Permission - 19/07/2022
9	Equinix (Ireland) Ltd - Plot 100, Profile Park, Nangor	Construction of a three-storey (part four-storey) data centre known as 'DB8' to include data halls, electrical/plant rooms including internal generators,	Grant Permission - 05/05/2022

**Table 2-4: Cumulative Development Descriptions**

No.	Address (Application Reference)	Planning Application Description	Application Status
	Road, Clondalkin, Dublin 22 [SD21A/0186]	offices, lobbies, ancillary staff areas including break rooms and toilets, stores, stair/lift cores throughout and photovoltaic panels at roof level.	
10	Equinix (Ireland) Ltd - Plot 100, Profile Park, Nangor Road, Clondalkin, Dublin 22 [SD22A/0156]	10 year permission on a site for modifications to the permitted data centre granted under SDCC Reg. Ref. SD21A/0186 comprising the f reconfiguration and alterations to the data centre building and associated development.	Request Additional Information - 25/07/2022
11	Digital Netherlands VIII B.V - Profile Park, Nangor Road, Clondalkin, Dublin 22 [SD21A/0217]	10 year permission for development consisting of removal of an existing unused waste water treatment facility on site and the erection of two data centre buildings, gas powered energy generation compound, and all other associated ancillary buildings and works; the two data centre buildings, DUB 15 and DUB 16, will comprise a total floor area of c. 33,577sq.m over two storeys.	Grant Permission - 02/08/2022
12	Vantage Data Centers Dub 11 Limited - Profile Park Business Park and partly within Grange Castle Business Park, Dublin 22 [An Bord Pleanála Ref - 312793]	110kV Gas Insulated Switchgear (GIS) Substation compound and 110kV transmission lines along with associated and ancillary works.	Due to be decided - 18/10/2022



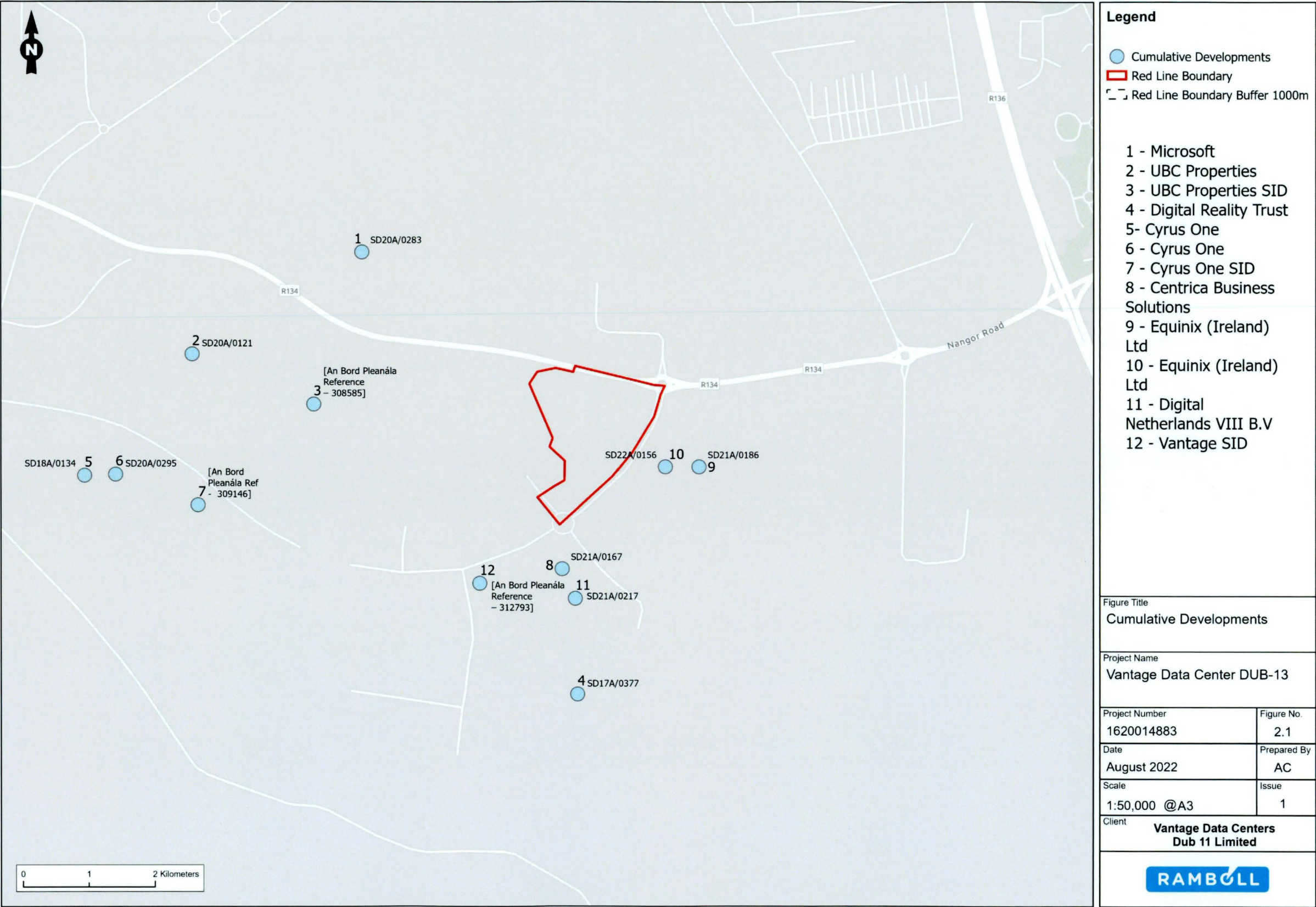


Figure 2-1: Cumulative Development Locations



## Assumptions and Limitations

2.77 The principal assumptions that have been made, and any limitations that have been identified, in undertaking the EIA are set out below. Assumptions specifically relevant to each environmental topic have been set out in each technical assessment of the EIAR.

- Baseline conditions have been established from a variety of sources, including historical data, but due to the dynamic nature of certain aspects of the environment, conditions at the site and surrounding land uses may change.
- The future baseline has been established based on the July 2022 DUB-1 permitted development as described within the EIAR which was prepared as part of that planning application.
- The assessments contained within each of the technical assessments of this EIAR Volume and within EIAR Volume 2 are based on the current legislative and policy framework, having regard to emerging policies and legislative changes.
- It is assumed that information received from third parties is accurate, complete and up to date.
- The assessments contained within each of the technical assessments of EIAR Volume 1 and within EIAR Volume 2 are based upon the application drawings submitted.
- The assessments contained within each of the technical chapters are based on the assumption that embedded mitigation measures set out in the application drawings, through regulatory regimes or via the management controls as set out in Chapter 4: Proposed Development Description and Chapter 5: Demolition and Construction Description of this EIAR Volume are implemented.
- The assessments contained within the Chapter 8: Air Quality and Chapter 9: Noise and Vibration of this EIAR Volume are based on industry-average specifications for construction, mechanical and services plant as project-specific details will be finalised during the construction planning and procurement stages.
- Demolition, enabling and construction works across the site would take place substantially in accordance with the programme of works described in Chapter 5: Demolition and Construction Description of this EIAR Volume.
- Cumulative developments would be implemented substantially in accordance with information that is publicly available or that has been provided to the Applicant, and subject to the same regulatory regimes and good practice management controls.
- Assessments have assessed the existing baseline conditions at the time of EIAR preparation (mid-2022) and the future baseline as described above unless otherwise stated in the technical assessment chapter. In respect of transport baseline traffic flows have been taken from the July 2022 DUB-1 Permitted Development and have been pro-rated based on MW values.
- The EIAR does not include assessment of the decommissioning stage effects of the proposed development due to the long design life of the proposed development. It is assumed that an appropriate assessment of the potential decommissioning effects, and relevant mitigation proposed, would be undertaken prior to such works progressing.

## Technical Assessment Chapters

2.78 A consistent approach to the presentation of EIA findings in the EIAR has been adopted for each of the technical assessments, including:

- explanation of the information gathering and assessment methodology, including a review of policy and legislative requirements of relevance to the specific technical area;
- description of the existing and future baseline conditions;
- description of mitigation that has been embedded into the proposed development's design;

- the identification and assessment of the potential impacts and likely effects arising during the demolition, construction and operation stages of the proposed development taking into account any embedded mitigation measures;
- description of additional opportunities for mitigation or enhancement to reduce the significance of any negative environmental effects, including the requirements for post-development monitoring; and
- assessment of the residual environmental effects and an evaluation of their significance against defined criteria.

2.79 Each environmental topic considered in the EIA has been assigned a separate chapter in EIAR Volume 1 (Chapter 6-15) with the exception of the landscape, visual and cultural heritage impact assessment which is presented separately in EIAR Volume 2. Within each technical chapter the assessment is presented and reported in the following format:

- Introduction – a brief introduction to the assessment;
- Methodology – an overview and review of policy and legislative requirements of relevance to the specific technical area, an outline of the technical, spatial and temporal scope of the assessment, a description of the methods undertaken to characterise the baseline, as well as an explanation of the approach to defining the significance of likely environmental effects;
- Baseline Conditions – a description of the existing and future baseline conditions;
- Assessment of Effects – an assessment of the likely significant effects of the proposed development and an evaluation of their significance against defined criteria taking into account embedded mitigation;
- Assessment of Residual Effects – a description of the additional mitigation, if required and then an assessment of the likely residual effects of the proposed development;
- Summary of Residual Effects – tabulated summary of the residual effects;
- Cumulative Effects – cross reference to the intra-cumulative effects assessment in Chapter 16: Cumulative Effects (of this EIAR Volume) and an assessment of inter-project cumulative effects; and
- Summary of Assessment– brief summary of the technical assessment.



# 3 ALTERNATIVES AND DESIGN EVOLUTION

## 3.1 Introduction

- 3.1.1 The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018<sup>1,2</sup> requires that information provided by the developer in an EIAR shall include a description of the reasonable alternatives studied by the developer<sup>3</sup>. These are reasonable alternatives which are relevant to the project and its specific characteristics (e.g., in terms of design, technology, location, size and scale), studied by the Applicant and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.
- 3.1.2 This chapter of the EIAR therefore explores the objectives of the proposed development, its design evolution and the reasonable alternatives considered. In doing so, the chapter considers the analysis of the site and existing environmental conditions which informed the design evolution of the proposed development.
- 3.1.3 The following three alternatives were considered:
- The 'Do-Nothing' alternative;
  - Alternative locations and uses; and
  - Alternative design/layouts of the proposed development.
- 3.1.4 Further details can be found in the Design Statement which accompanies the application.

## 3.2 Development Objectives

- 3.2.1 The proposed development aims to develop the existing low grade agricultural land to meet development aspirations set out within local and regional policies.
- 3.2.2 The specific development objectives for the proposed development are to deliver:
- Add to Ireland's national IT and data storage infrastructure;
  - Generation of employment;
  - Provision of 4 data modules;
  - Create a high-quality Business Park environment;
  - Provision of SuDs and green infrastructure;
  - Increased biodiversity;
  - Increase the ecological value of the Baldonnel stream; and
  - Reduced climate impact of the proposed development and increase climate resilience.

## 3.3 Development Considerations

### Policy Considerations

- 3.3.1 The development considerations for the site are set out in the following planning policy and guidance documents at national, regional and local levels:
- National Planning Framework (NPF) (2018)<sup>4</sup>;
  - National Development Plan (NDP) 2021-2030 (2021)<sup>5</sup>;
  - National Climate Action Plan 2021<sup>6</sup>;
  - Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA)<sup>7</sup> – in particular Regional Policy Objective (RPO) 8.25: "Support the national objective to promote Ireland as a sustainable international destination for ICT [information and communications technology] infrastructures such as data centres and associated economic activities at appropriate locations";
  - South Dublin County Council Corporate Plan 2020-2024<sup>8</sup>;
  - South Dublin County Council (SDCC) Development Plan 2022-2028<sup>9</sup> – in particular Objective EE: "To provide for enterprise and employment related uses".

### Site Considerations

- 3.3.2 The following site considerations informed the design process:
- Sensitive residential receptors located 600 m south of the site boundary, north of Baldonnel road and a hotel 200 m north-east of the site boundary;
  - Site allocations under aforementioned planning policies;
  - On-site environmental features, such as Baldonnel stream and existing trees and hedgerows.

### Environmental Considerations

- 3.3.3 The design has considered the following primary environmental constraints:
- Baldonnel Airfield Height Limit for the area;
  - On-site trees and hedgerows;
  - The surrounding landscape and visual character;
  - Greenhouse gases;
  - Flood risk at the site (primarily from the blocked downstream culvert) and infiltration associated with the Baldonnel stream;
  - Biodiversity of the site and Baldonnel stream; and

<sup>1</sup> Government of Ireland, 2018. European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018. S.I. No. 296/2018. ISB.

<sup>2</sup> Later amended to: Government of Ireland, 2018. European Union (Planning and Development) (Environmental Impact Assessment) (Amendment) Regulations 2018. S.I. No. 646/2018. ISB.

<sup>3</sup> See Article 5(1)(d) of Directive. See Schedule 6(1)(d) to the Regulations.

<sup>4</sup> Government of Ireland, 2018. National Planning Framework (NPF) – Ireland 2040 Our Plan (February 2018) [online]. Available at: <https://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf> [Accessed on 26/09/2022].

<sup>5</sup> Government of Ireland, 2021. National Development Plan 2021-2030 (last updated 4 October 2021) [online]. Available at: <https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/> [Accessed on 26/09/2022].

<sup>6</sup> Government of Ireland, 2021. Climate Action Plan. Department of the Environment, Climate and Communications

<sup>7</sup> Eastern & Midland Regional Assembly 2019. Regional Spatial & Economic Strategy 2019-2031 [online]. Available at: [https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA\\_RSES\\_1.4.5web.pdf](https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA_RSES_1.4.5web.pdf) [Accessed on 26/09/2022]

<sup>8</sup> SDCC, 2020. South Dublin County Council Corporate Development Plan 2020-2024, [online]. Available at: <https://www.sdcc.ie/en/services/our-council/policies-and-plans/corporate-plan/corporate-plan-2020-24.pdf> [accessed on 26/09/2022]

<sup>9</sup> South Dublin County Council, 2021. South Dublin County Development Plan 2022-2028 [online]. Available at: <https://consult.sdblincoco.ie/en> [Accessed 26/09/2022]



- Water quality of the Baldonnel stream.

## Consultation

### Pre-Submission Consultation

- 3.3.4 As part of the pre-submission design process, pre-application consultation was held with SDCC on 21 September 2022, in which the design evolution of the proposed development was discussed. SDCC commented relating to design and policy expectations for the proposed development. The proposed development is considered to meet the design expectations and requirements and therefore no additional design changes have occurred following pre-application consultation.

## 3.4 Alternatives

### Do-Nothing Alternative

- 3.4.1 The 'Do Nothing' scenario is a hypothetical alternative conventionally considered, albeit briefly, in EIA as a basis for comparing the development proposal under consideration.
- 3.4.2 For the purposes of the EIAR, the 'Do Nothing' scenario is where no development occurs on the site and therefore remains vacant and unchanged. Should the proposed development not be brought forward, the Applicant would implement the July 2022 DUB-1 consented development.
- 3.4.3 When considering the 'Do-Nothing' alternative, the following is noted:
- Whilst the site currently includes a single residential property it is largely unused agricultural land and the site needs to be re-purposed;
  - The site is located within Profile Park, on land which is designated in the SDCC Development Plan 2022-2028 as Objective EE to provide for enterprise and employment uses. This gives the encouragement for development which seeks to provide alternative uses to those that have recently occupied the site. Furthermore, the provision of the proposed data center would support RPO 8.25 to promote Ireland as a sustainable international destination for ICT infrastructures (such as data centres);
  - The Applicant owns the site and the adjacent site for which planning consent was secured in July 2022 for the development of two data centers (SDCC planning reference: SD21A/0241) (refer to Chapter 1: Introduction of this EIAR Volume for further information);
  - The proposed development, consisting of one data center building, would sit within a cluster of data centres within Profile Park;
  - The Profile Park area has excellent fibre connectivity; and
  - The 'Do-Nothing' alternative does not meet any of the developers objectives for the site.
- 3.4.4 In the event the proposed development at the site, or any other development, did not come forward, a number of negative effects and lost opportunities would result:
- Loss of opportunity for further economic and employment growth;
  - Loss of opportunity to maximise the productive use of the site;
  - Loss of national and international data storage capacity and IT infrastructure;
  - Loss of opportunity to further establish Profile Park and the surrounding area as a data center hub; and
  - Loss of opportunity to improve on-site biodiversity.
- 3.4.5 The Applicant has therefore not considered the 'Do Nothing' alternative further.

## Alternative Sites

- 3.4.6 No alternative sites have been considered by the Applicant for the following reasons:

- The site is owned by the Applicant and therefore the Applicant did not consider alternative sites which are the property of a third-party;
- The site is adjacent to the July 2022 DUB-1 consented development site which is under the Applicants ownership and provides an opportunity for an extended and co-ordinated data center campus;
- The site is located within an area identified in SDCC's Development Plan 2022-2028 as an area for enterprise and employment uses (as previously stated);
- The site would provide a key development opportunity to contribute to the regeneration of an underutilised site and with the land use identified in ROP 8.25 (as previously stated);
- The site sits within a wider area dominated by data centers which has good network provision and fibre suppliers, that suit the needs of the site and is thus an ideal location for the proposed development to be situated;
- Alternative sites in the Dublin area may lack adequate power provision and alternative sites in the west of Ireland may lack fibre connectivity;
- A new EirGrid substation is to be constructed, located to the immediate south of the site;
- Under the July 2022 DUB-1 consented development, the Applicant will provide on-site power generation to provide support and capacity to ensure that the development would reinforce the grid and not lead to supply disruption in the surrounding area at peak demand;
- Existing trees along the north and east boundaries creates a natural visual screen;
- There is no evidence of site contamination; and
- The level terrain is suitable for large floorplate buildings.

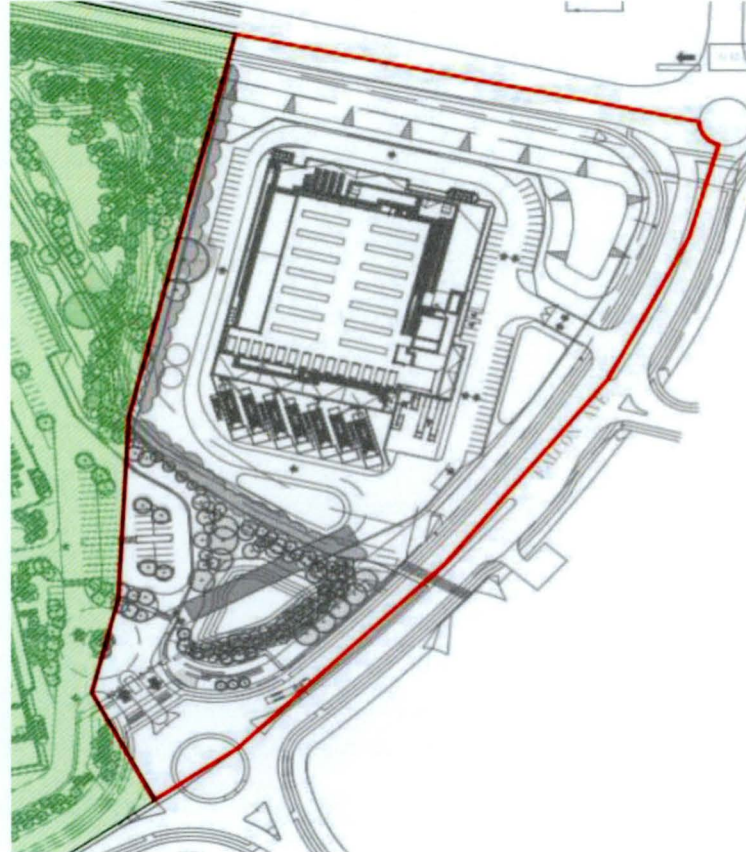
## Alternative Land Uses

- 3.4.7 The proposed land use has been informed by prevailing local and regional policy (as previously stated). Accordingly, no other land uses were considered outside of the proposed development. Additionally, due to the site utilities connections and the surrounding uses the Applicant does not propose any other form of development.
- 3.4.8 The site shape and area meet the Applicants requirements for the viability of building the data center due to the developable floorspace and space for the number of required data modules.

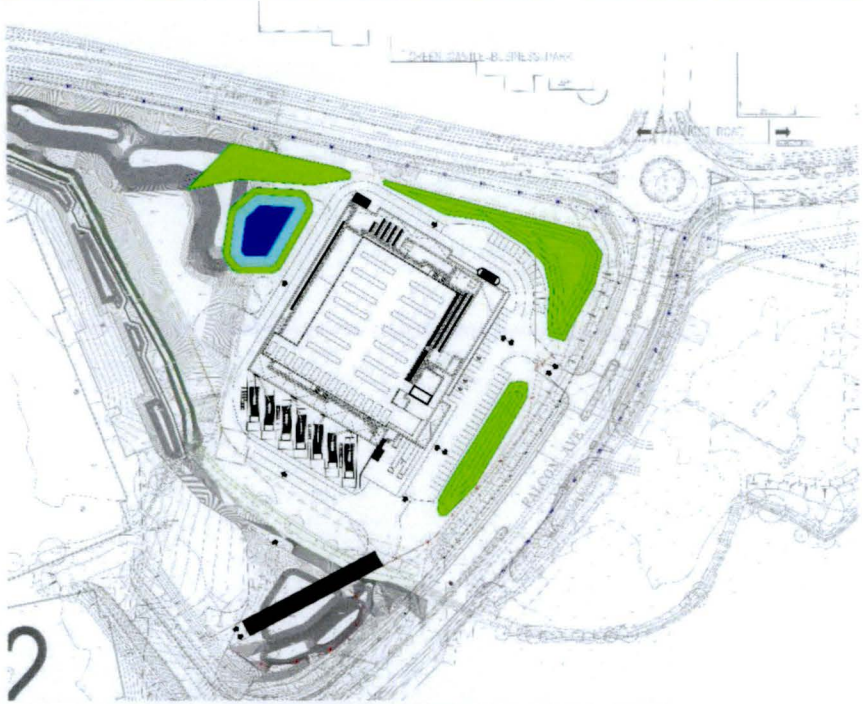
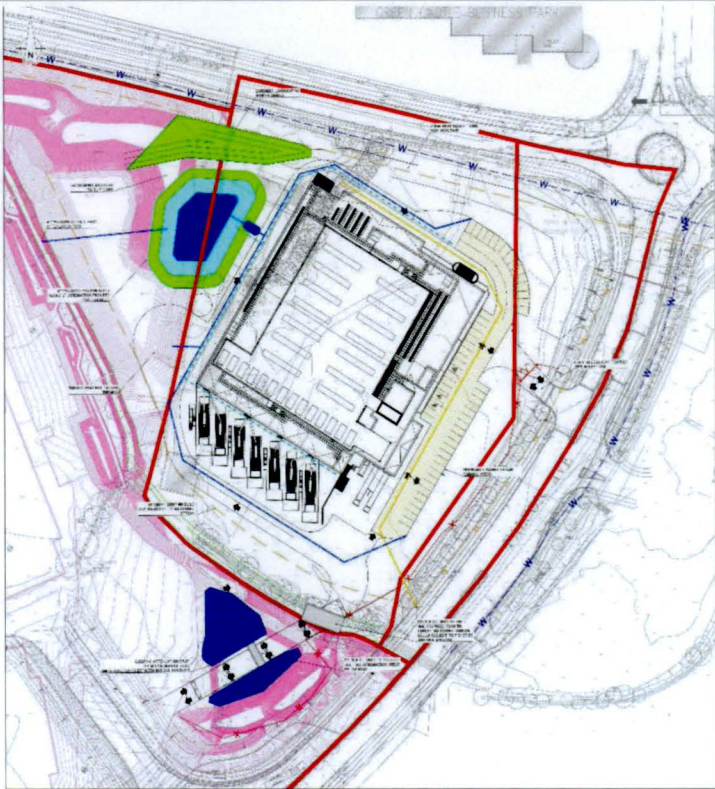
## Alternative Layouts, Designs and Design Evolution

- 3.4.9 The following sub-sections of this chapter describe the design evolution process undertaken by the Applicant's design team. A series of site layout and built form options are presented and described along with an explanation of the decisions that have informed the evolution of the alternatives considered.
- 3.4.10 A series of concept options were explored throughout the design development process. These sought to define the most appropriate design response for the site. The alternative layouts, designs and design evolution of the proposed development is presented in Table 3-1.

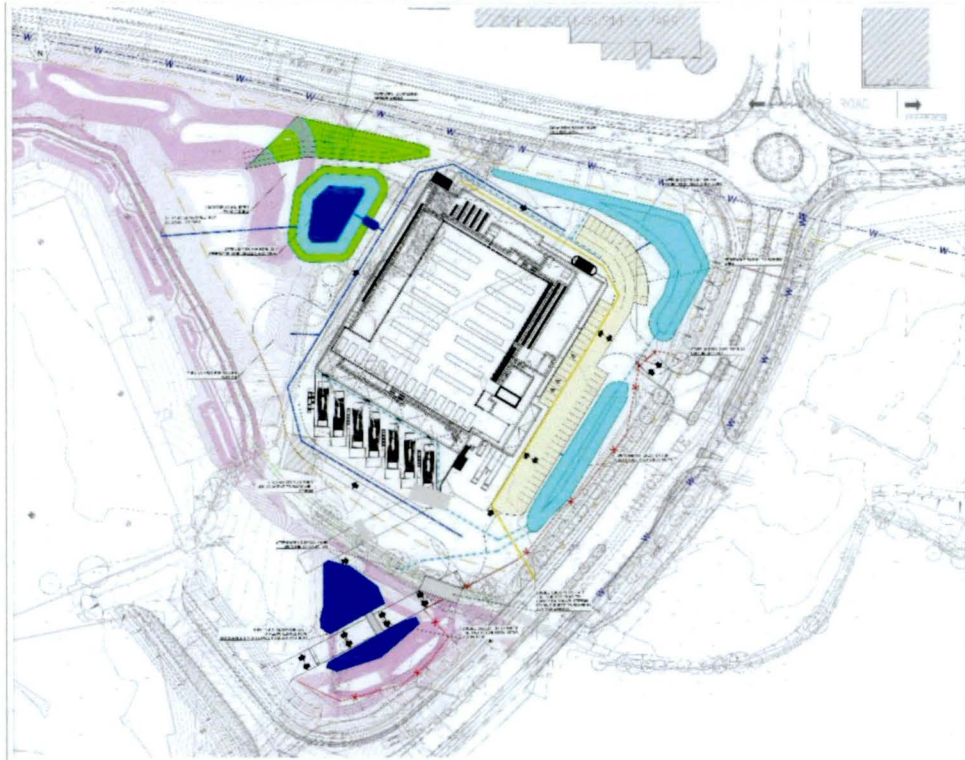



Concept Option	Concept Layout	Environmental Considerations
1 – Early-Stage Design	<p>In the early stages of design and appraisal, DUB-13 was orientated parallel to New Nangor Road with offices facing north.</p> 	<p>This option limits space for natural solutions, SuDS, and green infrastructure to increase stormwater attenuation and reduce flood risk. The drainage strategy would have encroached onto the Baldonnel Stream riparian strip.</p> <p>From a transport perspective an existing access point to the proposed development is located to the south of New Nangor roundabout, along the eastern boundary. A second access point was added to the south of the proposed development in the form of a road crossing over the Baldonnel Stream.</p>
2 – Shift in Orientation	<p>A change in the size and shape of DUB-13, and a shift in orientation.</p>	<p><b>Landscape and Visual</b></p> <p>The clockwise shift in DUB-13 allows the more “aesthetically pleasing” face of DUB-13 to be seen from New Nangor Road. This alignment reduced the visual impact along the northern frontage, particularly the view from New Nangor Road roundabout.</p> <p>Berms and landscaping, consistent with the that implemented for the July 2022 DUB-1 consented development, were implemented along the northern and eastern boundaries to provide screening of the proposed development from New Nangor Road and Falcon Avenue, respectively.</p> <p><b>SuDS and Ecology</b></p> <p>This orientational shift resulted in the proposed development building footprint avoiding the riparian strip which runs adjacent to the site’s western boundary and enters the southern section of the site. An attenuation pond was proposed in the north western corner of the site.</p> <p>Berms and landscaping creation along the northern and eastern boundaries would act as a green infrastructure corridor linking new habitats and would act as an extension to the existing habitat created through the July 2022 DUB-1 consented development.</p> <p><b>Transport and Access</b></p> <p>. The access strategy was refined to allow service and maintenance vehicles to cross between the July 2022 DUB-1 consented development and the proposed development. The aim of the second access was</p>



Concept Option	Concept Layout	Environmental Considerations
		<p>to increase health and safety through segregating service vehicles from the main site entrance proposed east off Falcon Avenue, used for cars, pedestrians, and cyclists.</p> <p>Despite improvements across the environmental factors above, this option was not taken forward because attenuation volume for the site could be improved.</p>
3 – Attenuation Provision		<p>SuDS and Ecology</p> <p>This option incorporates a second attenuation pond to the south of the proposed development to accommodate the required attenuation volume of the site. However, this option does not include landscaping and biodiversity improvements along the northern and eastern boundaries, which would have been detrimental to visual impacts.</p>



Concept Option	Concept Layout	Environmental Considerations
4 – Wetland Provision to the North and East		<p>SuDS and Ecology</p> <p>This option incorporates wetland/attenuation areas in the north and along the eastern frontages of the site. Although a benefit from a flood risk reduction and stormwater attenuation perspective, this limits space for further landscaping and biodiversity improvements which would have been detrimental to visual impacts.</p> <p>An attenuation outfall from wetland would connect to the attenuation pond in the south.</p>
5 – The Proposed Development		<p>This is the preferred outcome and best-balanced key environmental considerations including landscaping biodiversity, and surface water attenuation. The preferred development:</p> <ul style="list-style-type: none"><li>• Incorporates high quality architectural material palette along the dominant facades visible along New Nangor Road and Falcon Avenue;</li><li>• Avoids the riparian strip and will result in a significant improvement to landscaping and biodiversity;</li><li>• Retains existing trees along the site boundary;</li><li>• Additional planting of berm and large trees along the northern and eastern frontages to provide further visual screening;</li><li>• Planting hedgerow is proposed to act as a biodiversity corridor linking habitats and creating ecological connectivity between the July 2022 DUB-1 consented development and the proposed development;</li><li>• Attenuation of surface water is provided through the two attenuation ponds and a permeable paving sub-base; and</li><li>• Wetland meadows in the north west corner of the site are integrated with the landscape strategy for the July 2022 DUB-1 permitted development, providing biodiversity benefits.</li></ul> <p>Further detail on the environmental considerations of the proposed development is presented below.</p>



## Water Resource, Flood Risk and Rainfall

- 3.4.11 The site is at risk of flooding due to the location of the Baldonnell stream and the culvert. The design has sought to minimise flood risk through incorporating natural solutions across the site through:
- Incorporating increased above ground attenuation ponds providing SuDs for flood water compensation and attenuation to aid the downstream culvert to reduce flood risk;
  - Collection of rainwater from roof generator yard areas and discharge of this into a new on-site attenuation pond; and
  - Hardstanding (where required) would be designed to collect and attenuate rainwater from the front road areas of the data halls to reduce flood risk.
- 3.4.12 The proposed development provides above ground surface water attenuation in the north-western section of the site and in the south western section of the site and SuDs to remove the need for below ground attenuation.

## Landscaping

- 3.4.13 The site comprises mature trees and hedgerows. Trees located in the centre of the site would be removed as to not limit the layout of the site and building positions. The design has sought to protect existing trees and hedgerows as far as reasonably possible through:
- Retention of mature trees located near to the border of the site;
  - Implementation of a tree protection strategy; and
  - Achieving a net gain of trees and hedgerow the planting.
- 3.4.14 During the phasing sequence of the proposed development, landscaping would be undertaken at the earliest opportunity in order to help the features to mature ahead of the proposed development being fully built out and operational.

## Biodiversity

- 3.4.15 The design has sought to create areas for biodiversity to thrive and create a network of habitats within an ecologically rich landscape. There will be significant habitat creation through the planting of woodland, hedgerows, wildflower meadow and wetland meadows which will support local flora and fauna, increasing local biodiversity, as well as connect to the existing vegetation around the site, enhancing green infrastructure links.

## Landscape and Visual Impact

- 3.4.16 The built footprint of the proposed development has been orientated to reduce the landscape and visual impact through the reorientation of the data center so that the more "aesthetically pleasing" face of DUB-13 to be seen from New Nangor Road.
- 3.1.5 Additional planting of berm and large trees along the northern and eastern frontages will provide further visual screening. The inclusion of climbers up the stair towers creating 'green walls' contributes to the high quality landscaping along the dominant facades and provides further visual screening.

## Site Access

- 3.4.17 The layout of the site has been developed to allow segregated access for site operators and service HGVs from the data center workers. This would reduce disturbance and ease traffic management to/from the site, minimising impacts on the local road network.

## Climate Change

- 3.4.18 Data centers are typically carbon intensive developments and therefore, the Applicant has looked to reduce climate impact through a variety of energy efficient measures, as well as the incorporation of PV panels to generate renewable electricity.

- 3.4.19 In addition, the applicant has designed the proposed development to incorporate the potential for a district heating provision in the future should there be demand in the area.

## Policy Objective EE

- 3.4.20 During the design of the site, the Applicant looked to maximise efficiency in terms of net floor space and employment gain, further detail on which is contained in the Planning Report which accompanies the application.



# 4 PROPOSED DEVELOPMENT DESCRIPTION

## 4.1 Introduction

- 4.1.1 This chapter of the Environmental Impact Assessment Report (EIAR) provides a description of the proposed development for the purposes of identifying and assessing the potential environmental impacts and likely environmental effects of the proposed development in the technical assessments of EIAR Volume 1 (Chapters 6-15) and EIAR Volume 2.
- 4.1.2 In accordance with the Regulations, this chapter sets out the physical characteristics of the built development, the proposed access arrangements, the landscaping strategy, utility requirements and estimated emissions and arising's.
- 4.1.3 A general description of the site is provided in Chapter 1: Introduction, with more detailed descriptions provided in each technical assessment within EIAR Volume 1 and EIAR Volume 2 and is therefore not repeated here.
- 4.1.4 Further detailed information on the proposed development can be found within the following application documents:
- Design Statement;
  - Planning Report;
  - Architectural Drawings;
  - Landscape Masterplan and Drawings;
  - Engineering Planning Report and Drawings;
  - Energy Statement;
  - Site Lighting Plan; and
  - Flood Risk Assessment.

## 4.2 Planning Application

- 4.2.1 As indicated in EIAR Chapter 1: Introduction, the Applicant is submitting a full planning application for the proposed development, described as follows in the application form:
- 4.2.2 "We, Vantage Data Centers DUB11 Ltd. are applying for permission for development at this site that includes a two storey residential property on lands to the south of the New Nangor Road (R134), Dublin 22; and on land within the townlands of Ballybane and Kilbride within Profile Park, Clondalkin, Dublin 22 on an overall site of 3.79hectares. The development will consist of the demolition of the two storey dwelling (207.35sqm) and associated outbuildings and farm structures (348.36sqm); and the construction of 1 no. two storey data center with plant at roof level and associated ancillary development that will have a gross floor area of 12,893sqm that will consist of the following:
- 1 no. two storey data center (Building 13) with a gross floor area of 12,893sqm. It will include 13 no. emergency back-up generators of which 12 will be double stacked and one will be single stacked within a compound to the south-western side of the data center with associated flues that each will be 22.316m in height and 7 no. hot-air exhaust cooling vents that each will be 20.016m in height;
  - The data center 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 that will provide emergency power to

the admin and ancillary spaces. Each generator will include a diesel tank and there will be a refuelling area to serve the proposed emergency generators;

- The data center will have a primary parapet height of 14.246m above ground level, with plant and screen around plus a plant room above at roof level. The plant room has an overall height of 21.571m;
- Construction of an internal road network and circulation areas, with a staff entrance off Falcon Avenue to the east, as well as a secondary vehicular access for service and delivery vehicles only across a new bridge over the Baldonnel Stream from the permitted entrance as granted under SDCC Planning Ref. SD21A/0241 from the south-west, both from within Profile Park that contains an access from the New Nangor Road (R134);
- Provision of 60 no. car parking spaces (to include 12 EV spaces and 3 disabled spaces), and 34 no. cycle parking spaces;
- Signage (5.7sqm) at first floor level at the northern end of the eastern elevation of the data center building; and
- Ancillary site development works will include footpaths, attenuation ponds that will include an amendment to the permitted attenuation pond as granted to the north of the Baldonnel Stream under SDCC Planning Ref. SD21A/0241, as well as green walls and green roof. 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 internal road network within Profile Park. Other ancillary site development works will include hard and soft landscaping that will include an amendment to the permitted landscaping as granted under SDCC Planning Ref. SD21A/0241, lighting, fencing, signage, services road, entrance gates, and sprinkler tanks.

An Environmental Impact Assessment Report (EIAR) has been submitted with this application. This application and EIAR may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of South Dublin County Council during its public opening hours of 9am – 4pm, Mon-Fri, and a submission or observation may be made to South Dublin County Council in writing and on payment of the prescribed fee (€20.00) within the period of 5 weeks beginning on the date of receipt by South Dublin County Council of the application."

4.2.3 In summary, the proposed development would comprise the following:

- Demolition of the existing double-story dwelling and associated outbuildings and farm structures;
- Erection of DUB-13 along with associated emergency generators and flues with a gross floor area of approximately 12,893 m<sup>2</sup>; and
- Provision of 60 car parking spaces (includes 12 EV spaces and 3 disabled spaces) and 34 bicycle parking spaces provision.

4.2.4 The application redline boundary is shown in Figure 1.1 Chapter 1: Introduction and covers an area of 3.79 ha.

4.2.5 The proposed development site would deliver one data centre building: DUB-13. The detailed layout, scale, appearance, and landscaping of the proposed development are described within this chapter.

4.2.6 Accordingly, the figures that accompany the application are outlined in Table 4-1 and are presented in Figures 4-1 – 4-11.



Table 4-1: Schedule of Figures

Figure No.	Name	Description
4-1	Masterplan	Figure showing the layout of the Proposed Development
4-2	Proposed Ground Floor General Arrangement Plan	Figure showing the ground floor plan of the Proposed Development
4-3	Proposed First Floor General Arrangement Plan	Figure showing the first floor plan of the Proposed Development
4-4	Proposed Roof General Arrangement Plan	Figure showing the roof plan of the Proposed Development
4-5	Material Palette Detailing	Figure showing the material palette detailing
4-6	DUB-13 North-East and South-East Elevations	Figure showing the north-east and south-east elevations, material palette and façade of DUB-13
4-7	DUB-13 East and West Elevations	Figure showing the east and west elevations, material palette and façade of DUB-13
4-8	DUB-13 South (Generators) Elevation	Figure showing the south elevation with generators, material palette and façade of DUB-13
4-9	Landscape Masterplan	Figure showing the landscaping proposals
4-10	Selected Sections of the Landscape Masterplan	Figure showing selected sections of the landscape masterplan
4-11	Proposed Site Access Arrangement	Figure showing the vehicular, pedestrian and cycle access routes to the site

- Loading bay;
- Maintenance and storage space;
- Office administration areas;
- Plant at roof level;
- Sedum green roofs;
- 13 double stacked standby generators with integral fuel tanks for emergency power to the data halls, admin, and ancillary spaces, and with associate flues, each 22.3 m in height (95.95 m AOD), located to the south of the building;
- A house generator with integral fuel tanks that would provide emergency power to the admin and ancillary spaces; and
- A fuelling area to serve the proposed emergency generators.

4.3.6 The ground and first floor plans are shown in Figure 4-2 and 4-3 respectively, and the roof plan is shown in Figure 4-4.

4.3.7 New pedestrian and vehicle routes would be provided within the site. The proposed development would include the construction of an internal road network and circulation areas, dedicated pedestrian footpaths, provision of 60 car parking spaces (12 of which would be dedicated to electric vehicle (EV) charging, however all parking spaces would be ducted for future EV charging provision, and three for disabled users) and 34 bicycle parking spaces in double-stacked covered racks.

4.3.8 The two main entrances for the site would be from Falcon Avenue. One access/egress point would be from Falcon Avenue on the eastern border, for staff, pedestrians, and cyclists. HGVs, maintenance vehicles and delivery vehicles would access the site via the roundabout on Falcon Avenue, through the July 2022 DUB-1 permitted development, and cross over an attenuation pond and the Baldonnel Stream via a road crossing.

4.3.9 Entry gates would be separated to provide safe division from pedestrian, cycle, and car access from large HGVs and construction traffic during the phased development and ongoing maintenance of the data centers.

### 4.3 Proposed Development

#### Site Arrangement

- 4.3.1 The site masterplan, detailing the site layout, is presented in Figure 4-1, overleaf.
- 4.3.2 As illustrated in Figure 4.1, DUB-13 would be constructed broadly orientated in the center of the site. DUB-13 would be screened by proposed extensive berms, planting, and landscaping to the north and east, to reduce the visual bulk of the data center from New Nangor Road and Falcon Avenue.
- 4.3.3 The proposed development would be oriented to allow the alignment of the Baldonnel Stream, located within the southern portion of the site, to remain as existing whilst also including measures to enhance the ecological value of the Baldonnel Stream. A box culvert would be installed at the proposed road crossing within the site.
- 4.3.4 The proposed landscaping in the north-western corner of the site, within the red line boundary, forms part of the proposed development. Proposed landscaping is consistent with the landscape approach adopted within the July 2022 DUB-1 permitted development, shown in in green to the west of the red line boundary and to the north of the Baldonnel Stream.
- 4.3.5 DUB-13 would comprise a two-storey data center of 12,893 m<sup>2</sup>. The data storage facility would include:
- Data storage rooms;
  - Associated electrical and mechanical plant rooms;



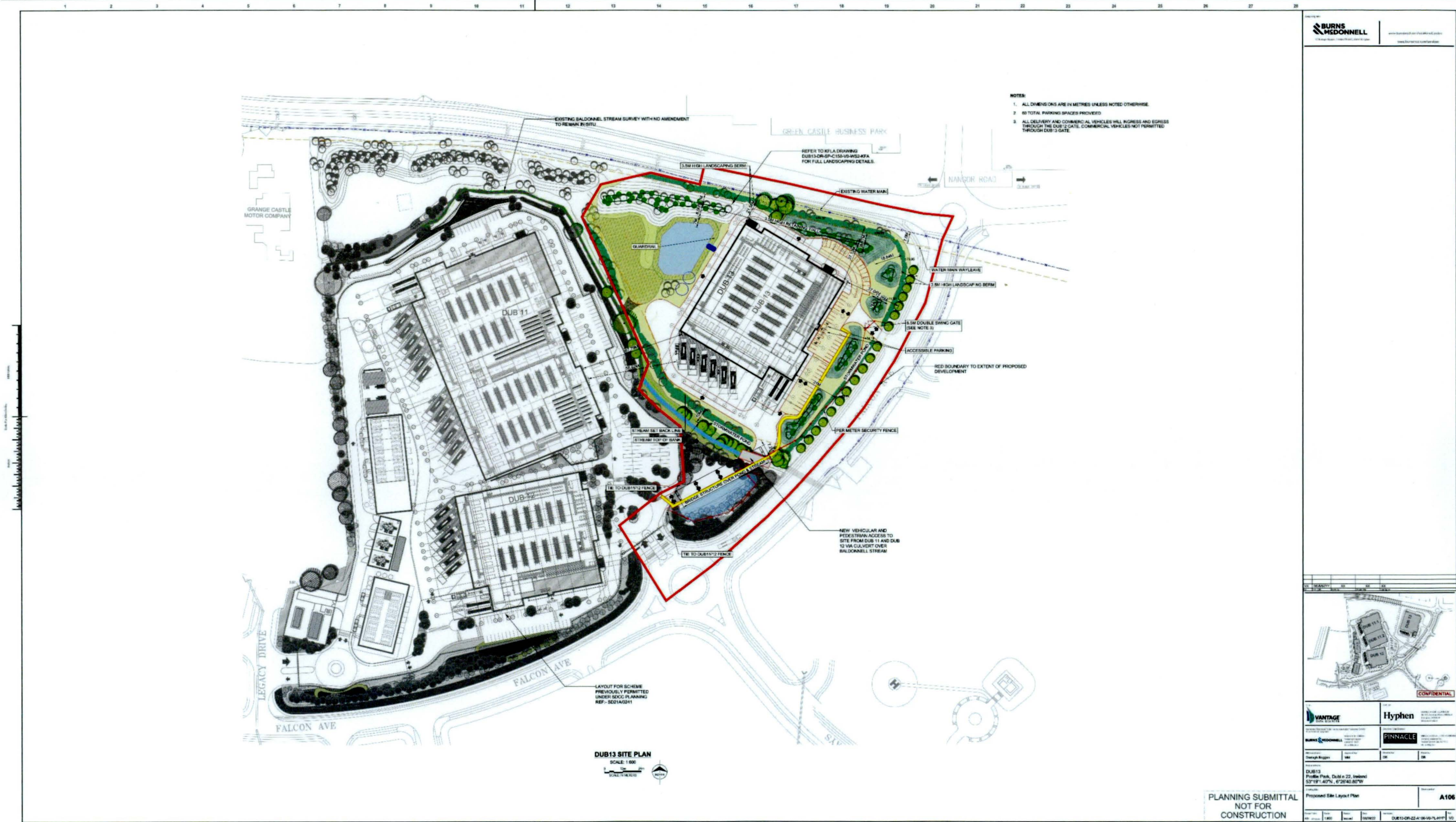


Figure 4-1: Proposed Development Masterplan (Source Burns & McDonnell)































































































## 5.8 Mitigation and Scope of Environmental Management Controls

- 5.8.1 The following mitigation controls would be committed to and delivered pursuant to either planning conditions, obligations contained in a legal agreement and supported as necessary by contractual obligations between the Applicant and the main contractor(s) or regulatory provisions in force from time-to-time.

### Proposed Site Management Controls

#### Construction Environmental Management Plan (CEMP)

- 5.8.2 A CEMP would be prepared, to include a traffic management plan and CDWMP, and submitted for review and approval by SDCC prior to commencement of works on site. It would include:
- A commitment to environmental protection (all consultants and trade contractors would be invited to declare their support for this at tender stage);
  - Documentation of measures to comply with environmental aspects of any planning conditions;
  - Detailed control measures and activities to be undertaken to minimise likely environmental impacts, as well as associated roles and responsibilities;
  - Target criteria for environmental issues, where practical, such as water and energy consumption;
  - Any requirements for monitoring and record keeping;
  - A dedicated point of contact during normal working hours and in emergencies with responsibility to deal with environmental issues if they arise; and
  - A review and monitoring regime of on-site performance against the CEMP provisions by the project team and regular environmental audits of its implementation.
- 5.8.3 The CEMP would provide the necessary level of management and control of demolition and construction practices. This includes advance notice of operations and duration of work that may cause noise, disruption to access, or other effects.
- 5.8.4 The CEMP would form part of tender documentation and contractors would be required to demonstrate how they will work within these provisions, identify communication channels for exchange of information and set out programmes for monitoring and auditing of environmental control systems.
- 5.8.5 Where departures from the CEMP are inevitable, prior identification is required, such that other mitigation measures can be considered.

#### Considerate Constructors

- 5.8.6 All contractors would seek to register the site under the relevant Considerate Constructors Scheme.

#### Principal Contractor (or equivalent) and Management of Subcontractors

- 5.8.7 All contractors would have responsibility for monitoring any subcontractors' environmental performance; acting as a point of contact for consultation and feedback and for developing mechanisms to solve on-site issues as and when required.

#### Environmental and Communication/Liaison Strategy

- 5.8.8 The Applicant would be expected to nominate a manager who would act as the Project Environmental Manager (PEM) (or equivalent), who would be named at all site entrances, with a contact telephone number. The contact name and details would be provided to all the relevant stakeholders by the Applicant prior to the start of the demolition and construction works.

- 5.8.9 The PEM would have primary responsibility for dealing with SDCC and other stakeholders on environmental matters, and all key stakeholders would be notified whenever a change of responsibility occurs for the PEM role. The PEM would keep neighbours, SDCC and other relevant parties informed of the nature of the on-going works, their duration and programme to establish and maintain good relationships with them.
- 5.8.10 It is anticipated that regular meetings would take place between the PEM and SDCC to review progress and to agree any necessary actions. The PEM would also deal with enquiries from the general public, including any complaints. Any complaints would be logged and reported to the relevant individual within SDCC (and vice versa) as soon as practicable.
- 5.8.11 The PEM would coordinate responses to queries and address issues in a timely and satisfactory manner.

#### Emergencies and Environmental Incidences

- 5.8.12 Protocols to be implemented on site in instances of emergencies and environmental incidents would be set out within the CEMP for approval by SDCC.

#### Housekeeping and General Site Management

- 5.8.13 Hoardings/security fencing would be erected around the site to provide a clear and secure demarcation between operational activities and other areas and to provide information regarding the proposed development and its progress. Particular attention would be paid to locations supporting high volumes of pedestrian movement, demolition and construction routes, access gates and security arrangements.
- 5.8.14 A 'clean site' policy would be maintained and contractors and their subcontractors would be expected to maintain a tidy site. A street sweeper would be employed as required during the demolition, foundation, and excavation periods of the construction programme to make sure that the streets around the site would be kept clean during the works.

#### Nearby Residential Properties and Other Neighbours

- 5.8.15 The following mitigation and environmental controls would collectively limit potential visual, noise, vibration, traffic and dust impacts associated with the proposed development's construction works:
- Maintaining aesthetically appropriate site hoardings/fencing;
  - Agreeing working hours with the SDCC;
  - Undertaking regular road sweeping;
  - Arranging and locating potentially high impact site activities and plant away from neighbouring residential receptors;
  - Selecting quiet plant and regularly maintaining plant;
  - Implementing good site housekeeping measures;
  - Directing site lighting away from sensitive receptors;
  - Turning site lighting off outside of normal working hours;
  - Screening scaffolding and active construction activities above hoarding levels, where practical;
  - Implementing construction traffic management measures as agreed with SDCC;
  - Implementing and monitoring dust management measures;
  - Implementing and monitoring noise and vibration measures; and
  - Using temporary acoustic barriers around potentially noisy activities.

#### Population and Human Health

- 5.8.16 If feasible, and available, it is encouraged that the applicant considers using local suppliers for goods and services; demolition and construction stage jobs created should be advertised and made available



in the local area initially in order to maximise this opportunity. This would result in a more positive effect on local employment and the local economy.

## Archaeology

- 5.8.17 There is no potential for impacts on the archaeological resource beneath the ground surface of the site. A detailed scheme of test trenching would be undertaken pre-commencement. Test trenching on the adjacent July 2002 DUB-1 Consented Development failed to reveal any archaeological deposits, finds or features and no further archaeological investigations are necessary prior to the commencement of construction.

## Contaminated Soil

- 5.8.18 The following management and control measures would be included in the CEMP in order to control ground contamination:
- Incorporate the reduction, reuse and recycle approach in terms of on-site soil excavations. The proposed works will be carefully planned to ensure only material required to be excavated will be, with as much material left in situ as possible. Reuse of on-site excavated soil and capping with hardstand will minimise any increase in aquifer vulnerability.
  - Excavation works will be carefully monitored by a suitably qualified person to ensure any potentially contaminated soil is identified and segregated from clean/inert soil. In the unlikely event that any potentially contaminated soils are encountered, the soil should be tested and classified as hazardous or non-hazardous in accordance with the EPA's Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous<sup>3</sup> publication, HazWasteOnline tool<sup>4</sup> or similar approved method. The material will then need to be classified as inert, non-hazardous, stable non-reactive hazardous or hazardous in accordance with EC Decision 2003/33/EC<sup>5</sup>. It should then be removed from site by a suitably permitted waste contractor to an authorised waste facility.
  - The effects of soil stripping and stockpiling will be mitigated against through the implementation of an appropriate earthworks handling protocol during construction within the CEMP. It is anticipated that any stockpiles will be formed within the boundary of the site and there will be no direct link or pathway from this area to any surface water body.
  - Dust suppression measures (e.g. damping down during dry periods), vehicle wheel washes, road sweeping, and general housekeeping will ensure that the surrounding environment is free of nuisance dust and dirt on roads.
  - EPA agreement will be obtained before re-using the spoil as a by-product. However, it is not currently anticipated that any excavated material will be removed offsite or imported onto the site for reuse as a by-product. Where material cannot be reused off site it will be sent for recovery or disposal at an appropriately authorised facility.
  - All fill and aggregate for the proposed development will be sourced from reputable suppliers. All suppliers would be vetted for:
    - Aggregate compliance certificates/declarations of conformity for the classes of material specified for the proposed development;
    - Environmental Management status; and
    - Regulatory and Legal Compliance status of the Company.
  - In order to prevent any spillages to ground of fuels and prevent any resulting soil and/or groundwater quality impacts:

- Designation of a bunded refuelling areas on the site;
  - Provision of spill kit facilities across the site;
  - Where mobile fuel bowzers are used the following measures would be taken:
    - Any flexible pipe, tap or valve would be fitted with a lock and would be secured when not in use;
    - The pump or valve would be fitted with a lock and would be secured when not in use;
    - All bowzers to carry a spill kit;
  - Operatives must have spill response training; and
  - Drip trays used on any required mobile fuel units.
- In the case of drummed fuel or other potentially polluting substances which may be used during the demolition and construction stage the following procedures will be adopted:
    - Secure storage of all containers that contain potential polluting substances in a dedicated internally bunded chemical storage cabinet unit or inside a concrete bunded area;
    - Clear labelling of containers so that appropriate remedial measures can be taken in the event of a spillage;
    - All drums to be quality approved and manufactured to a recognised standard;
    - If drums are to be moved around the site, they would be secured and on spill pallets; and
    - Drums to be loaded and unloaded by competent and trained personnel using appropriate equipment.
  - Run-off from excavations/earthworks cannot be prevented entirely and is largely a function of prevailing weather conditions. Earthwork operations will be carried out with adequate drainage, falls and profile to control run-off and prevent ponding and flowing. Correct management, as set out in the CEMP, will ensure that there will be minimal inflow of shallow/perched groundwater into any excavation.
  - Care will be taken to ensure that exposed soil surfaces are stable to minimise erosion. All exposed soil surfaces will be within the main excavation site which limits the potential for any off-site impacts. All run-off will be prevented from directly entering into any water courses or drainage ditches.
  - Should any discharge of demolition or construction related water be required, discharge would be to foul sewer. Pre-treatment and silt reduction measures on-site would include a combination of silt fencing, settlement measures (e.g. silt traps, 20m buffer zone between machinery and watercourses, off-site refuelling of machinery) and use of hydrocarbon interceptors. Active treatment systems such as Silbusters, or similar, may be required depending on turbidity levels and discharge limits.

- 5.8.19 Construction vehicles would be properly maintained to reduce the risk of hydrocarbon contamination and would only be active when required. Construction materials would be stored, handled and managed with due regard to underlying soil and thus the risk of accidental spillage or release would be minimised.

## Water Resources

- 5.8.20 To ensure that no contaminant-pathway-receptors pathways are created and to reduce the potential for contamination to occur during the demolition and construction stage, all site activities would be undertaken in accordance with the relevant pollution control requirements and guidance. The Applicant would also be responsible for obtaining all necessary consents and ensuring compliance with the conditions of the consents.

<sup>3</sup> EPA, 2018. Waste Classification List of Waste & Determining if Waste is Hazardous or Non-hazardous. July 2018 EPA.

<sup>4</sup> HazWasteOnline, 2012. Waste Assessment Tool [online]. Available at: <https://www.hazwasteonline.com/> [Accessed 28/09/2022].

<sup>5</sup> European Union, 2003. 2003/33/EC: Council Decision of 19 December 2002 establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC. Document 32003D0033.



- 5.8.21 The following procedures will be included in the CEMP in order to prevent any spillages of fuels to the Baldonnel Stream, or groundwater, and to prevent any resulting water quality impacts:
- Designation of a bunded refuelling areas on the site;
  - Provision of spill kit facilities across the site;
  - Where mobile fuel bowzers are used the following measures would be taken:
  - Any flexible pipe, tap or valve would be fitted with a lock and would be secured when not in use;
  - Pumps or valves would be fitted with a lock and would be secured when not in use;
  - All bowzers to carry a spill kit;
  - Operatives must have spill response training; and
  - Drip trays used on any required mobile fuel units.
  - In the case of drummed fuel or other potentially polluting substances which may be used during the demolition and construction stage the following procedures will be adopted:
  - Secure storage of all containers that contain potential polluting substances in a dedicated internally bunded chemical storage cabinet unit or inside a concrete bunded area;
  - Clear labelling of containers so that appropriate remedial measures can be taken in the event of a spillage;
  - All drums to be quality approved and manufactured to a recognised standard;
  - If drums are to be moved around the site, they would be secured and on spill pallets; and
  - Drums to be loaded and unloaded by competent and trained personnel using appropriate equipment.
- 5.8.22 Potential pathways for contamination could be minimised as follows:
- Groundwater would be prevented from entering excavations by dewatering, if required;
  - Surface water would be prevented from entering excavations by using cut-off ditches, covering the excavation, or captured within the groundwater pumping system;
  - Potentially contaminating activities such as concrete preparation, vehicle washing and fuelling etc. are constrained to dedicated protected areas where contaminated water can be collected; and
  - Contaminated water from excavations would be collected within a settlement tank or lagoon to enable treatment prior to release.
- 5.8.23 Subsoil would be excavated to facilitate the proposed development. Such works would be carefully planned to ensure as much material is left in situ as possible. Reuse of on-site excavated soil and capping with hardstand will minimise any increase in aquifer vulnerability. Construction works will require local removal of soil cover where levelling of the site is required and its use for re-instatement elsewhere on the site. It is envisaged that any soil excavated will be retained on site and reused as fill material or landscaping. Excavation works will be carefully monitored by a suitably qualified person to ensure any potentially contaminated soil is identified and segregated from clean/inert soil.
- 5.8.24 Stockpiles have the potential to cause negative impacts on and water quality through increased potential for sediment release to watercourses. The effects of soil stripping and stockpiling would be mitigated against through the implementation of an appropriate earthworks handling protocol during construction within the CEMP. It is anticipated that any stockpiles will be formed within the boundary of the site and there will be no direct link or pathway from this area to any surface water body.
- 5.8.25 In addition, the construction drainage system for the proposed development would be designed and managed to comply with Irish requirements, which details methods that should be considered for the general control of drainage on construction sites.
- 5.8.26 Wherever possible, the Applicant would minimise the amounts of wastewater discharged from the site. Surface drainage and wastewater would pass through settlement tanks and oil interception facilities

before discharge to sewer. The Applicant would ensure that all potentially contaminated water, e.g. dewatering effluent, is disposed of in accordance with relevant pollution control requirement and guidance.

- 5.8.27 An Emergency Incident Plan would be in place for the site to deal with potential spillages and/or pollution incidents. This would include the provision of on-site equipment for containing spillages, such as emergency booms and chemicals to soak up spillages.
- 5.8.28 Any pollution incidents would be reported immediately to SDCC and the regulatory bodies such as the EPA.
- 5.8.29 In order to reduce the flood risk to the proposed development, it is proposed that finished floor levels (FFLs) be raised above the peak modelled flood levels for the Baldonnel Stream. In the absence of mitigation, this could create the potential for the proposed development to displace floodplain storage and thereby increase flood risk elsewhere. To prevent this, it is necessary to provide compensatory storage within the site and the FRA sets out that the proposed development includes embedded mitigation in the form of compensatory storage (provided by reducing the ground level in the landscape area in the northwest of the site) to replace the displaced storage. The volume of compensatory storage exceeds the volume of existing floodplain storage that is being lost and so the proposed development will lead to a slight reduction in flood risk elsewhere.

## Ecology

- 5.8.30 Pollution prevention measures as outlined in the preceding sections.
- 5.8.31 In relation to badgers and otter all excavations are to be securely covered or closed off at the end of each working day to prevent the accidental trapping of badgers. Where this is not possible, a means of escape (for example a ramp) must be included to allow safe exit from the excavation. Checks of any open excavations should be performed by site staff prior to each day's works. The proposed security fencing will have mammal gates or a gap of at least 10cm at the bottom to allow free movement of badgers through the site.
- 5.8.32 Breeding birds are highly susceptible to disturbance, and therefore where works are to commence during the breeding season (March to August inclusive), bird surveys should be undertaken prior to the initiation of construction works. If breeding birds are identified within the site at this time, species-specific buffers will be implemented to protect nesting birds during construction.
- 5.8.33 Dust generated from construction works would be managed by means of 2.4 m high site hoarding and dust suppression measures, such as the use of water sprays, dampening down of roads and covering of storage areas, such that the potential for adverse dust generation is reduced.
- 5.8.34 Construction drainage, air quality and noise management controls would be actively implemented at the site to minimise potential construction impacts.
- 5.8.35 All lighting would appropriately be aimed, controlled and switched off when the site is not operational (where practicable).

## Landscape and Visual

- 5.8.36 Measures would be undertaken to protect existing vegetation (such as trees and hedgerows) throughout the demolition and construction stage, such as exclusion zones around trees to avoid root damage as outlined in the Tree Space Arboricultural Impact Assessment and Tree Protection Plan for the site which accompany the application.
- 5.8.37 The demolition and construction site would be surrounded by 2.4 m high hoarding to reduce negative visual impacts from the activities.



# Transport

- 5.8.38 A Construction Management Plan (CMP) would be prepared by the contractor, when appointed, that would require construction traffic including both construction plant and materials deliveries to be programmed to avoid peak traffic periods on the surrounding local and strategic road network. The Traffic Management Plan would be reviewed and updated in line with the construction programme and would typically include details of the following:
- preferred hours of deliveries and removals (out of peak hours);
  - agreed demolition and construction traffic routing and site access points;
  - road cleaning facility provisioning;
  - temporary traffic control measures;
  - temporary and permanent access to the works – for personnel/vehicles;
  - off-loading and storage areas;
  - traffic management procedures for waste disposal vehicles;
  - personnel and vehicle segregation;
  - equipment, e.g. temporary fencing, signage, etc.;
  - temporary and permanent closures and diversions of footpaths; and
  - site inductions.
- 5.8.39 Wheel cleaning facilities with adjoining hard standings would be located at the access and egress points of the site. These wheel cleaning facilities would be supplemented by regular road cleaning during the excavation and would have appropriate catchment areas.

# Vehicle Routing

- 5.8.40 Vehicles making deliveries to the application site or removing spoil material would travel via designated routes which would be agreed with SDCC as required. The principal contractor would liaise with SDCC to provide directional signage on the principal routes on the highway network surrounding the application site, if required, in order to improve navigation.
- 5.8.41 Where possible vehicle movements would be scheduled out of peak hours (i.e. 08:00-09:00 and 17:00-18:00 during the weekdays.).
- 5.8.42 Vehicles coming to the site would have specific timeslots booked. It would be the responsibility of the driver and company to ensure they arrive on site at the designated time.
- 5.8.43 The construction sequence for the site would be programmed to minimise the need for road closures. However, there may be instances when they are unavoidable. Where this is the case, road closures would be requested weeks in advance and authorised by SDCC.
- 5.8.44 The principal contractor would co-ordinate all deliveries and collections to/from the site, and ensure that as far as possible that:
- all delivery and collection vehicles are aware of the proposed routing;
  - prior to a delivery or collection, haulers would notify the relevant authorities;
  - liaison would be undertaken with occupants of adjacent buildings to avoid delays to service deliveries due to construction vehicles; and
  - deliveries would be made on a 'just in time' basis.
- 5.8.45 Larger vehicle movements would be scheduled to avoid peak hours on the local road network if at all possible. If an alternative construction traffic route is required, this would first be agreed with SDCC.
- 5.8.46 Suppliers would be encouraged to consolidate deliveries where feasible. Where possible all deliveries would be made to designated areas within the application site. If for any reason it is necessary to load

and unload outside site boundaries, the details and procedure for this would be agreed in advance with SDCC.

- 5.8.47 There would be no waiting areas for site vehicles in the roads around the site.

# HGV Management

- 5.8.48 The most intensely used HGVs on the site would be ready mix concrete trucks for the delivery of concrete and articulated lorries for the delivery of fabricated steelwork.
- 5.8.49 It is assumed that HGV construction traffic would be spread evenly over an 8 hour long working day (to avoid peak periods), although there may be slight peaks.
- 5.8.50 Loading and unloading of vehicles, dismantling of equipment such as scaffolding or moving equipment or materials around the site would be conducted in such a manner as to minimise noise impacts to existing surrounding residential properties.

# Parking Management and Staff Travel

- 5.8.51 A key aspect of the demolition and construction process would be the management of demolition and construction worker travel to and from the site. Construction workers would be encouraged to access the site by public transport, walking and cycling in order to reduce the potential impact of vehicle traffic during this temporary period. A series of measures would be implemented to encourage workers to travel using sustainable modes, which would form part of the traffic management plan. These may include:
- Cycle parking would be provided, and this would be covered and secure;
  - Facilities for changing and storing cycling clothes would be provided;
  - The developer would investigate the provision of public transport vouchers to encourage workers to travel to the site by public transport;
  - The contractor would encourage workers to car share where possible and would set up a car sharing database to identify where matches could be made;
  - Incentives such as a free breakfast once a week for those walking, cycling, car sharing or using public transport would be provided; and
  - Travel information packs would be provided to all workers. These would be provided in either paper form or electronically and would include public transport timetables and information on cycling routes.
- 5.8.52 Parking provision would be provided on site; however this would be limited and spaces would be managed.
- 5.8.53 Vehicle movements would be managed to avoid queuing outside the site access points.

# Noise and Vibration

- 5.8.54 Effective co-ordination and time management of demolition and construction activities would be used to avoid adverse effects from noise and vibration to surrounding areas. Early and helpful communications with the surrounding and on-site receptors would assist in managing any complaints arising during the demolition and construction works of the proposed development.
- 5.8.55 Contractors would be required to ensure that works are carried out in accordance with best practicable means. A full explanation of measures to control construction noise would be incorporated within the CEMP and detailed in all construction method statements.
- 5.8.56 As set out in Chapter 9: Noise and Vibration, noise levels from the demolition and construction of the proposed development have been predicted at noise-sensitive properties on site and in close proximity to the site and the impact of the noise assessed. Noise levels likely to be generated by the demolition



and construction works have been predicted based on the type and number of plant likely to be in operation.

5.8.57 The CEMP will include the following Best Available Techniques (BAT):

- Demolition operations will be organised with regard to positioning of plant and movement of vehicles so as to minimise noise adjacent to properties.
- Use of plant conforming with relevant Irish standards, directives or recommendations on noise or vibration.
- Works will only be carried out within agreed working hours. Restricted working hours (including Monday to Friday: 07:00 to 19:00, Saturday: 08:00 to 13:00, and no working on Sundays or Bank Holidays). Planning of working hours to take account of the effects of noise and vibration upon persons in areas surrounding site operations and upon persons working onsite.
- Construction plant will be maintained in good condition with regards to minimising noise output and workers exposed to harmful noise and vibration.
- All drivers to site, including deliveries, will drive vehicles in a considerate manner in accordance with the specified speed limits with any failure to comply addressed as per infringements of the contractor's Project Health and Safety Plan.
- Construction plant will be operated and maintained appropriately, having regard to the manufacturer's written recommendations and maintenance programmes.
- Starting plant and vehicles sequentially rather than all together. Plant, equipment and site vehicles will be switched off when not in use.
- Construction traffic will only use the designated routes as per the construction traffic management plan as outlined in Chapter 5: Construction Description.
- The transport of construction materials, spoil and personnel will be programmed and routed to reduce the risk of increased noise and vibration impacts.
- Adoption of quiet working methods, using plant with lower noise emissions, where reasonably practicable.
- Use of silenced and well-maintained plant conforming with the relevant Irish directives relating to noise and vibration. Vehicle and mechanical plant used for the purpose of the works will be fitted with effective exhaust silencers and/or mufflers, maintained in good working order and operated in such a manner as to minimise noise emissions.
- Construction plant and activities will be positioned to minimise noise at sensitive locations.
- Equipment that breaks concrete by munching or similar, rather than by percussion, will be used as far as is practicable.
- Mufflers will be used on pneumatic tools.
- Avoiding breaking out hard surfaces using percussive techniques, where reasonably practicable. Where practicable, rotary drills actuated by hydraulic or electrical power will be used for excavating hard materials.
- Controlled demolition techniques: In order to reduce the noise and vibration impacts associated with the demolition activities across the site, the works will be undertaken using controlled demolition techniques. This approach requires the demolition methodology to be planned meticulously in advance of works commencing to ensure potential environmental disturbances to surrounding receptors are minimised wherever possible i.e. noise, vibration, dust.
- Adoption of working methods that minimise vibration generation, where reasonably practicable;
- Locating plant away from noise and vibration sensitive receptors, where feasible;
- Use of site hoarding, assumed 2.4m high, and acoustic screening for static items of plant and work areas, where feasible;
- Avoiding unnecessary revving of engines and switch off equipment, when not required;

- Keeping internal haul routes well maintained and avoid steep gradients;
- Use of rubber linings for chutes and dumpers to reduce impact noise;
- Minimisation of drop height of materials;
- Carrying out regular inspections of noise mitigation measures to ensure integrity is maintained at all times;
- Providing briefings for all site-based personnel so that noise and vibration issues are understood, and mitigation measures are adhered to;
- Management of plant movement to take account of surrounding noise sensitive receptors, as far as is reasonably practicable; and
- Carrying out compliance monitoring of onsite noise and vibration levels to ensure that the agreed limits are being adhered to.

5.8.58 An appropriate community awareness campaign will be undertaken to provide information to people residing in properties in the vicinity of the construction works, to reduce the likelihood of negative impacts on the public which could result in complaints. The level of engagement will vary depending upon the expected effects experienced by individual receptors due to the construction works.

5.8.59 It is envisaged that the public awareness campaign will provide local residents with the following items of information:

- The nature of the works being undertaken;
- The expected duration of the works;
- The contractor's working hours;
- Mitigation measures that have been adopted to minimise noise and vibration, as detailed in the CEMP; and
- Contact details in the event of a noise disturbance.

5.8.60 If work is required to extend into periods beyond the agreed hours, separate authorisation will be secured with SDCC via the CEMP or other agreement process.

5.8.61 Best Available Techniques (BAT) as defined in Section 7 of the Protection of the Environment Act will be implemented as part of the working methodology as detailed in the CEMP. This will serve to minimise the noise and vibration effects at receptors in the vicinity of the construction works. The reduction in noise levels provided through the implementation of BAT varies depending on the nature of the works; however, values in excess of 5 dB can be expected through a combination of appropriate measures and the use of site hoardings for noise screening.

## Air Quality

5.8.62 Dust and emission control and mitigation at the application site would be particularly important during earthworks and dry weather periods. To minimise adverse effects due to dust, the site-specific best practice measures described in Table 5-5 would be implemented by the principal contractor.

Table 5-5: Dust Mitigation Measures for Medium Risk Sites	
Phase	Mitigation Measure
Communications	<ul style="list-style-type: none"><li>• Develop and implement a stakeholder communications plan that includes community engagement before work commences on site</li><li>• Display name and contact details of responsible person for dust issues on the site boundary (e.g. hoarding) in addition to head/regional office contact information.</li></ul>



**Table 5-5: Dust Mitigation Measures for Medium Risk Sites**

	<ul style="list-style-type: none"> <li>Display the head or regional office contact information.</li> </ul>
Dust Management Plan	<ul style="list-style-type: none"> <li>Develop and implement a Dust Management Plan (DMP) which is included as part of the CEMP.</li> </ul>
Site Management	<ul style="list-style-type: none"> <li>Record all complaints and incidents in a site log.</li> <li>Take appropriate measures to reduce emissions in a timely manner, and record the measures taken within the log.</li> <li>Make the complaints log available to the Local Authority if requested.</li> <li>Record any exceptional dust incidents on site or off site.</li> <li>Hold regular liaison meeting with other high-risk construction sites within 500 m.</li> </ul>
Monitoring	<ul style="list-style-type: none"> <li>Undertake daily on site and off site visual inspections where there are nearby receptors.</li> <li>Carry out regular inspections to ensure compliance with the DMP and record results in the site logbook.</li> <li>Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.</li> </ul>
Preparing and Maintaining the Site	<ul style="list-style-type: none"> <li>Plan site layout to locate dust generating activities as far as possible from receptors.</li> <li>Use solid screens around dusty activities and around stockpiles.</li> <li>Avoid site runoff of water and mud.</li> <li>Fully enclose the site or specific operations where there is a high potential for dust production and the site is active for an extensive period.</li> <li>Keep site fencing barriers and scaffolding clean using wet methods.</li> <li>Remove dusty materials from site as soon as possible, unless being re-used on site. If they are being re-used on site cover as described below</li> <li>Minimise emissions from stockpiles by covering, seeding, fencing, or damping down.</li> </ul>
Operating Vehicle/ Machinery and Sustainable Travel	<ul style="list-style-type: none"> <li>Enforce an on-site speed limit of 15 mph on surfaced roads and 10 mph on unsurfaced areas.</li> <li>Ensure vehicles switch off engines when stationary.</li> <li>Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable.</li> <li>Produce a Construction Logistics Plan (CLP) to manage the sustainable delivery of goods and materials.</li> </ul>

**Table 5-5: Dust Mitigation Measures for Medium Risk Sites**

	<ul style="list-style-type: none"> <li>Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).</li> </ul>
Operations	<ul style="list-style-type: none"> <li>Only undertake cutting, grinding, or sawing equipment with suitable dust suppression equipment or techniques.</li> <li>Ensure adequate water supply for effective dust and particulate matter suppression.</li> <li>Use enclosed chutes, conveyors, and covered skips.</li> <li>Minimise drop heights of materials.</li> <li>Ensure suitable cleaning material is available at all times to clean up spills.</li> </ul>
Waste Management	<ul style="list-style-type: none"> <li>Avoid bonfires.</li> <li>Avoid explosive blasting using appropriate manual or mechanical techniques.</li> <li>Bag and remove any biological debris.</li> </ul>
Measures Specific to Demolition	<ul style="list-style-type: none"> <li>Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).</li> <li>Ensure effective water suppression during demolition.</li> <li>Avoid explosive blasting, using appropriate manual or mechanical alternatives.</li> <li>Bag and remove any biological debris or damp down such material before demolition.</li> </ul>
Measures Specific to Construction	<ul style="list-style-type: none"> <li>Ensure aggregates are stored in bunded areas and are not allowed to dry out.</li> <li>Avoid concrete scabbling where possible.</li> <li>Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos.</li> <li>For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust.</li> </ul>
Measures Specific to Trackout	<ul style="list-style-type: none"> <li>Use water-assisted dust sweepers to clean access and local roads.</li> <li>Avoid dry sweeping of large areas.</li> <li>Ensure vehicles entering and leaving the site are appropriately covered.</li> <li>Record inspections of haul roads in site log, including any remedial action taken.</li> <li>Implement a wheel washing system.</li> <li>Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit.</li> <li>Access gates to be located at least 10 m from the receptors where possible.</li> </ul>
Measures Specific to Earthworks	<ul style="list-style-type: none"> <li>Re-vegetate earthworks and exposed areas / soil stockpiles to stabilise surfaces as soon as practicable.</li> </ul>



Table 5-5: Dust Mitigation Measures for Medium Risk Sites	
	<ul style="list-style-type: none"><li>• Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil.</li><li>• Only remove the cover in small areas during work and not all at once.</li></ul>

5.8.63 The Applicant would give detailed dust control protocols as part of their contracts for the site.

Waste Management

- 5.8.64 As a principal waste mitigation measure during the proposed development’s construction, the principal contractor would prepare an CDWMP at the site, which would be secured by an appropriately worded planning condition.
- 5.8.65 The scope of the CDWMP would cover the following:
- All excavations would be carefully monitored by a suitably qualified person to ensure that potentially contaminated soil is identified and segregated, if encountered. If any potentially contaminated material is encountered, it will be segregated from clean/inert material, tested, and classified as either non-hazardous or hazardous and further classified as clean, inert, non-hazardous, or hazardous in accordance with the EC Council Decision 2003/33/EC6, which establishes the criteria for the acceptance of waste at landfills. All excavated material would be used.
  - Waste materials generated at the site compound would be stored in suitable receptacles in designated areas of the site compound.
  - On-site segregation of waste materials would be carried out to increase opportunities for off-site reuse, recycling, and recovery, to ensure that the majority of construction materials are either recyclable or recoverable – it is anticipated that the following waste types, at a minimum, would be segregated: made ground, soils and stones and trees/shrubbery. In addition, the following wastes would be segregated at the site compound: organic (food) waste, packaging (paper/card/plastic), mixed dry recyclables and mixed non-recyclable waste.
  - All waste contractors collecting waste from the site would hold a valid collection permit to transport waste, which is issued by the National Waste Collection Permit Office (NWCPO).
  - Construction wastes would be taken to suitably registered/permitted/licenced waste facilities for processing and segregation, recycling, recover and/or disposal. As stated in the baseline section, there are numerous licensed waste facilities in the local region that have sufficient capacity to accept both hazardous and non-hazardous waste materials and could manage C&D waste from the proposed development.
  - All waste leaving site will be reused, recycled, or recovered where possible to avoid material designated for disposal.
  - All waste leaving the site would be transported by suitable permitted contractors and taken to suitably registered, permitted, or licenced facilities.
  - All waste leaving the site would be recorded and copies of relevant documentation maintained.
  - Any hazardous wastes generated (such as chemicals, solvents, glues, fuels, oils) would also be segregated and would be stored in appropriate receptacles (in suitably bunded areas, where required);
  - A waste manager would be appointed by the main contractor to ensure effective management of waste during the excavation and construction works.

<sup>6</sup> European Union, 2003. 2003/33/EC: Council Decision of 19 December 2002 establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC. Document 32003D0033.

- All construction staff would be provided with training regarding the waste management procedures.
- The waste from delivers into the two-bay truck loading bay would be compacted on site.

- 5.8.66 In particular the following measures would be proposed in the CDWMP to minimise waste generation on site:
- Ordering the quantity of materials required for the job, thus reducing over-ordering;
  - Determining when and where materials are required and requesting ‘just in time’ deliveries;
  - Returning damaged goods or incomplete deliveries;
  - Requesting suppliers to minimise packaging and to guarantee a take-back service, especially for pallets;
  - Ordering materials that are cut to size, rather than standard sizes;
  - Where possible and appropriate to do so, using prefabrication off-site;
  - Having appropriate storage areas ready - these should be covered to protect against rain and ideally have a hard standing surface;
  - Determining where special handling is required;
  - Securing the site to avoid theft and vandalism; and
  - Ensuring good on-site segregation of wastes.

5.8.67 Any waste that is not re-used on site and therefore requires off-site disposal would be dealt with in accordance with the Waste Hierarchy, the requirements of the EPA and in line with relevant legislation.

Recycling

- 5.8.68 Segregation (on site or off site) and recycling of cardboard, timber, metal, plastics, plasterboard and gypsum based products will be required by the project team. The segregation of polythene film waste from other plastics would also be considered and local collections investigated.
- 5.8.69 It is proposed that waste would be segregated and stored for collection on site.
- 5.8.70 Where standard sized pallets are used for material storage, then regular collections would be organised for removal and for re-use rather than disposal in timber skips.
- 5.8.71 Where on-site segregation of waste is not deemed possible due to spatial constraints at the site, the waste carriers would be required to ensure off-site segregation for waste and diversion from landfill is undertaken.

Disposal

- 5.8.72 All construction materials that cannot be re-used or recycled or would be disposed of at appropriately licensed disposal facilities. The destination of all waste or other materials from the application site would be notified to the relevant authority for approval. No burning of construction waste would take place on site.

Climate

- 5.8.73 The proposed development has, seek to minimise GHG emissions, wherever possible, to contribute to the achievement of Ireland’s GHG reduction targets and carbon budget. The embedded mitigation measures relevant to the construction and demolition stage of the proposed development have been presented in Table 5-6.



Table 5-6: GHG mitigation measures during construction and demolition stage		
Mitigation measure	Mitigation detail	Method of reduction
Excavation of materials	Material excavated during construction would be processed for use in the works wherever possible to reduce the amount of material disposed of off site as well as imported from other sources, and associated GHG emissions. Possible uses of excavated materials include general fill and other graded materials. Processing of material would take place on site.	Reduce
Sustainable materials	Using sustainability sourced, recycled or secondary materials with lower embedded GHG emissions and water consumption; e.g. Specifying products with a high recycled content and (e.g. Pulverised Fuel Ash (PFA) replacement for up to 30% of the cementitious material (i.e. as replacement for Portland cement); Using recycled crushed concrete in granular sub-base materials in pavements sourced from existing pavements on site to be demolished as part of the works;	Reduce
Reporting	Energy consumption and materials use would be recorded and reported on an ongoing basis during the construction phase of the development;	Reduce
Equipment	Using low-emissions or electric construction plant, including the potential for portable PV for use in powering temporary compound and equipment;	Reduce
Procurement	Procuring materials with Environmental Product Declarations (EPD) to allow for the most informed procurement choices; and procuring materials from suppliers that offer take back schemes, where possible;	Reduce
Reuse	Reusing the materials from the pre-existing building wherever possible.	Avoid/ prevent
Minimising waste during construction	Following measures would be proposed in the CDWMP to minimise waste generation on site;	Reduce

Table 5-6: GHG mitigation measures during construction and demolition stage		
	ordering the quantity of materials required for the job, thus reducing over-ordering.	

- 5.8.74
- In addition, and to reduce GHG emissions associated with vehicles from workers, the following mitigation measures would be implemented:
- Cycle parking would be provided, and this would be covered and secure.
  - Facilities for changing and storing cycling clothes would be provided.
  - The developer would investigate the provision of public transport vouchers to encourage workers to travel to the site by bus or rail.
  - The contractor would encourage workers to car share where possible and would set up a car sharing database to identify where matches could be made.
  - Incentives such as a free breakfast once a week for those walking, cycling, car sharing or using public transport would be provided.
  - Selecting electrically driven equipment where possible in preference to internal combustion powered; hydraulic power in preference to pneumatic; and wheeled in lieu of tracked plant.
  - Operating plant at low speeds where possible and incorporating automatic low speed idling.
  - Switching off vehicle engines where vehicles are standing for extended periods and avoid unnecessary revving of vehicle engines.
- 5.8.75
- Other potential opportunities to reduce GHG emissions during the demolition and construction stage include the following:
- Specification of concrete with increased cement replacement – 40% of none-critical structural elements as a minimum;
  - Specification of reinforcement steel with 100% recycled content of non-critical structural elements;
  - Aluminium windows frames with recycled content >35% or replace with Wood Alu windows frames;
  - Use of glass with recycled content, where available;
  - Substitute raised access floor with timber flooring or RAF with recycled content;
  - Specify aluminium with 20-35% recycled content;
  - Specify plasterboard with 95% recycled content or substitute with gypsum fibreboard; and
  - MEP service elements with recycled content where feasible.

## 5.9 Cumulative Impacts

- 5.9.1
- Site preparation, demolition and construction activities, when undertaken at the same time, have the potential to give rise to combined (cumulative) impacts and effects. Although temporary, these combined impacts, if not managed can give rise to potentially adverse effects on sensitive receptors in proximity to the site, i.e. existing residential, industrial, commercial, community and open space receptors.
- 5.9.2
- Such impacts are typically restricted to temporary periods of time. Even then, not all receptors would experience impact interactions during this time depending on phasing and proximity to the sensitive receptor. The majority of interactions are likely to arise from activities such as demolition works, noise and vibration from construction plant and vehicles, dust from plant and vehicles, the visual impacts of the work and passing HGVs.



- 5.9.3 In terms of residential amenity, demolition and construction works would typically be carried out outside of those hours when residents could reasonably expect quiet enjoyment of their properties. Demolition and construction works would typically be carried out between the hours of 07:00 to 19:00 hours, so residents would not be subjected to unreasonable impacts during daytime works periods.
- 5.9.4 Impact interactions that are likely to occur would generally be of a temporary and short-term nature and would be carefully co-ordinated to ensure minimal disruption to sensitive receptors.
- 5.9.5 It is anticipated that the stringent management controls set out in this Chapter would ensure that the potential demolition and construction of the proposed development would be kept to a minimum and as such, would limit the potential for further predicted impacts when considered in conjunction with the development proposals in the surrounding area. It is expected that other schemes in the area would also adopt similar stringent management controls.
- 5.9.6 The CEMP, to be secured by an appropriately worded planning condition, would be implemented during the demolition and construction works and would provide a framework within which activities on site would be managed 'at source' to minimise impacts on all sensitive receptors.

## 5.10 Deconstruction of Proposed Development

- 5.10.1 The deconstruction of the proposed development would follow a demolition method and sequence. Safe working practices would be devised and implemented and would be undertaken according to typical dismantling techniques prevalent at the time.
- 5.10.2 The site would be hoarded and full height scaffold with sheeting would be erected to surround the buildings. Soft stripping works would then commence, removing all fixtures and fittings bringing the structure back to its shell. As well as the buildings, the scaffold protection would be dismantled as the development is lowered. When the development is at an appropriate level, long arm track mounted shear cutters would be used. The site would then be taken down to basement level and temporary works installed to make the perimeter retaining walls stable and the site left safe.

## 5.11 Summary

- 5.11.1 The development programme comprises the demolition of the existing double-storey dwelling on the site and construction of the proposed development as described in Chapter 4: Proposed Development Description. Assuming planning permission is secured, on-site works are projected to start in Q1 2024 and the construction works to be completed in Q4 2024 / Q1 2025. The works are anticipated to be undertaken over an 11-month period.
- 5.11.2 Demolition and construction works have the potential to cause environmental impacts, from subsurface works, noise, wastes, surface water runoff, and emissions to air. Measures to control potential environmental impacts would be set out within the CEMP (including a traffic management statement and CDWMP) to be secured by an appropriately worded planning condition.



# 6 POPULATION AND HUMAN HEALTH

## 6.1 Introduction

- 6.1.1 This chapter of the EIAR reports on the likely significant population and human health effects to arise from the demolition and construction stage and the operation stage of the proposed development.
- 6.1.2 The chapter describes the population and human health policy context; the methods used to assess the potential impacts and likely effects; the baseline conditions at and surrounding the site; the likely population and human health effects taking into consideration embedded mitigation; the need for additional mitigation and enhancement; the significance of residual effects; and cumulative effects.
- 6.1.3 There are no technical appendices associated with this chapter.
- 6.1.4 The assessment has been informed by the following legislation, policies, and published guidance:
- International Legislation:
    - Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (2017)<sup>1</sup>;
  - National Legislation and Policy:
    - Healthy Ireland Framework: A framework for improved health and wellbeing (2013-2025)<sup>2</sup>; and
    - PubMed MEDLINE database of biomedical and life sciences journal literature<sup>3</sup>.
- 6.1.5 The EC guidance on the preparation of an EIAR states that:
- “Human health is a very broad factor that would be highly Project dependent. The notion of human health should be considered in the context of the other factors in Article 3(1) of the EIA Directive and thus environmentally related health issues (such as health effects caused by the release of toxic substances to the environment, health risks arising from major hazards associated with the Project, effects caused by changes in disease vectors caused by the Project, changes in living conditions, effects on vulnerable groups, exposure to traffic noise or air pollutants) are obvious aspects to study. In addition, these would concern the commissioning, operation, and decommissioning of a Project in relation to workers on the Project and surrounding population.”
- 6.1.6 This assessment follows the EC guidelines, and examines the health effects relevant to the proposed development as they relate to a relevant, defined study area.
- 6.1.7 Further consideration for this assessment is given to the findings of the other technical chapters of this EIAR, in particular in relation to air quality, noise and vibration, transport and accessibility, and landscape and visual impact assessment.

## 6.2 Assessment Scope

- 6.2.1 Health, or what constitutes ‘good’ health, is difficult to define and measure in all its aspects for a population because perceptions regarding health and expectations of good health vary. This chapter therefore applies the World Health Organization (WHO) definition<sup>4</sup>, which states: “Health is a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity”.

- 6.2.2 The focus of this assessment is on community health<sup>5</sup> and wellbeing and not on occupational health and safety<sup>6</sup>. The terms ‘health’, ‘human health’, ‘population health’ and ‘health and wellbeing’ are used interchangeably.

### Technical Scope

- 6.2.3 The technical scope of the assessment has considered the following effects during demolition and enabling works and construction stage:
- Generation of employment;
  - Introduction of transient residential population; and
  - Effects from increased traffic, noise and dust on amenity and health.
- 6.2.4 The following effects during the operation stage of the proposed development have been considered:
- Generation of operation employment;
  - Effects from increased traffic noise and air pollutants on health;
  - Effects on amenity.

### Spatial Scope

- 6.2.5 The site lies within the functional area of South Dublin County, which is sub-divided into Electoral Divisions and Small Areas. The site is located within the western end of Clondalkin Village Electoral Division (ED) and is within the Clondalkin Village Small Area (SA) (reference: Sa2017\_267053001), as displayed in Figure 6.1. This Clondalkin Village SA excludes almost all of the residential areas of Clondalkin, with the exception of part of the estate of St. Johns off the Fonthill Road South, and primarily covers the employment zoning and wider area to the west of Clondalkin.

<sup>1</sup> European Commission, 2017. Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU). EU. 2017.

<sup>2</sup> Department of Health, 2013. Healthy Ireland Framework. A framework for improved health and wellbeing 2013-2025. Government of Ireland.

<sup>3</sup> PubMed MEDLINE database of biomedical and life sciences journal literature.

<sup>4</sup> WHO, 1948. WHO remains firmly committed to the principles set out in the preamble to the Constitution [online]. Available at: <https://www.who.int/about/governance/constitution> [Accessed on 06/07/2021].

<sup>5</sup> The health and wellbeing of those communities in the study area who have the potential to experience effects associated with the proposed development.

<sup>6</sup> This refers to the health and safety of workers employment by the proposed development, either during construction or operation.



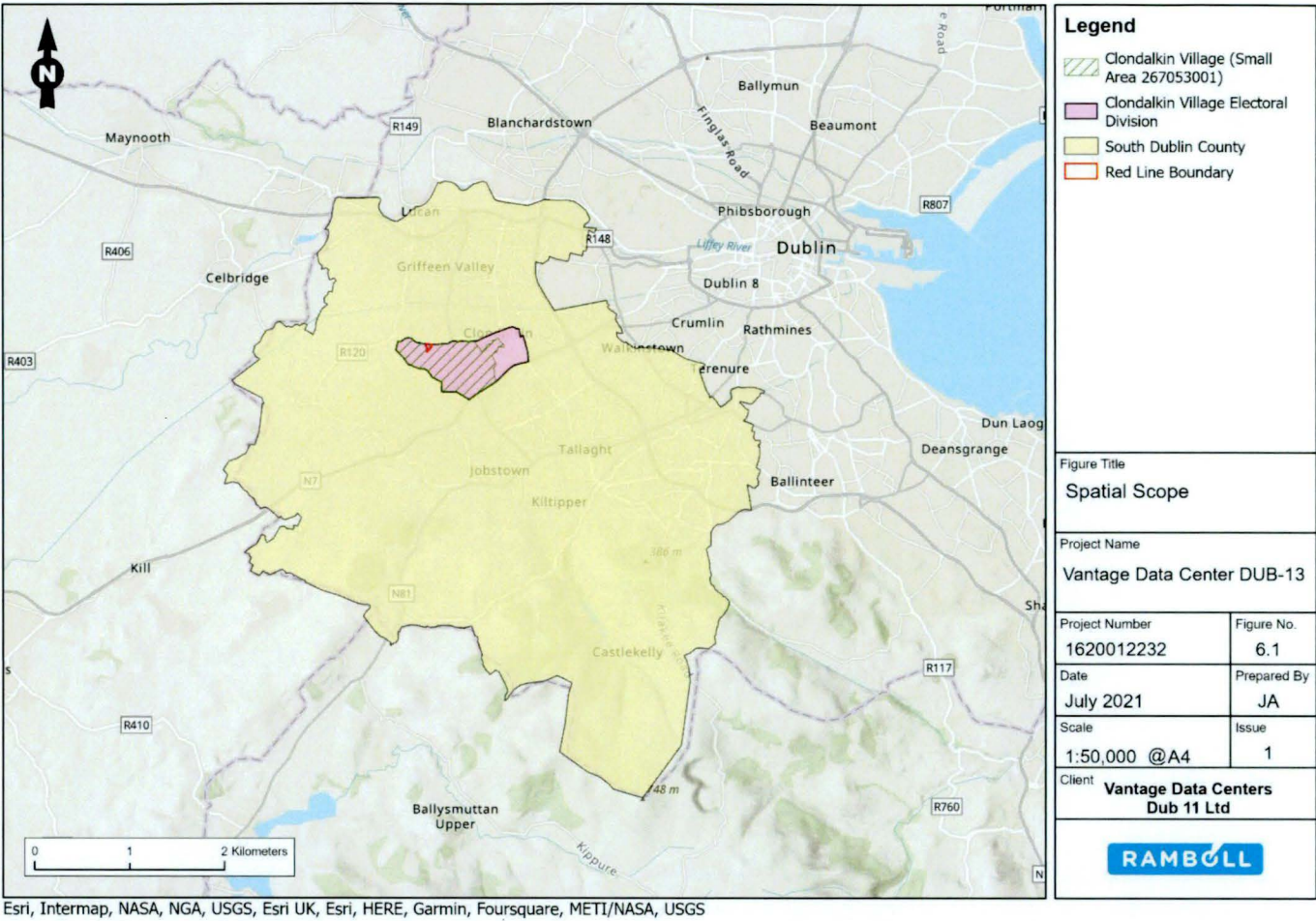


Figure 6-1: Spatial Designations in South Dublin County

Temporal Scope

6.2.6 The assessment has considered impacts arising during the demolition and construction stage which would be of expected to be Temporary (<1 year) and from the operational stage which would be expected to be Long-Term (15-60 years) to Permanent (>60 years).

6.3 Baseline Characterisation Method  
Desk Study

6.3.1 In order to establish baseline population and human health conditions in the study area, relevant data was reviewed and assessed. Data was obtained from a review of demographic characteristics of the area, ascertained from Census of Population data and other statistics released by the Central Statistics Office (CSO), comprising:

- Central Statistics Office, South Dublin County Council, 2022<sup>7</sup>;
- Central Statistics Office, South Dublin County Council, 2016<sup>8</sup>;
- Central Statistics Office, Clondalkin Village ED, 2016<sup>9</sup>; and

<sup>7</sup> Central Statistics Office, 2016. Sapmap Area: South Dublin County Council [online]. Available at: <https://visual.cso.ie/?body=entity/ima/cop/2016&boundary=C03849V04599&guid=2ae19629-14a1-13a3-e055-000000000001> [accessed 09/09/2022]  
<sup>8</sup> Central Statistics Office, 2016. South Dublin County Council [online]. Available at: [https://census.cso.ie/sapmap2016/Results.aspx?Geog\\_Type=CTY31&Geog\\_Code=2AE1962914A113A3E055000000000001#SAPMAP\\_T13\\_1301](https://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=CTY31&Geog_Code=2AE1962914A113A3E055000000000001#SAPMAP_T13_1301) [Accessed 06/09/2022].

- Central Statistics Office, Clondalkin Village SA, 2016<sup>10</sup>.

Field Study

6.3.2 Field study/data collection was not required at the site as the data provided by other sources was deemed to be adequate and representative of the site conditions.

6.4 Assessment Method  
Methodology

6.4.1 Health at the population level (all the persons inhabiting a defined location) is influenced by a number of determinants of health (non-medical factors that influence health outcomes). Many of these are socio-economic in nature. Those determinants of health commonly thought to be important are:

- employment;
- income;
- access to services;
- transport;
- housing;
- education;
- crime and fear of crime;
- social capital; and
- the physical environment.

6.4.2 To determine the potential population and human health impacts of the proposed development on nearby residents, the assessment needs to consider the pathways by which the proposed development might affect the determinants of health and by how much. For example, a development that creates new employment opportunities could contribute positively to health. However, if a development causes degradation in air quality, this could have a negative impact for health.

6.4.3 In terms of assessing the potential human health impacts associated with the proposed development, outputs of the landscape and visual, transport and accessibility, air quality, and noise and vibration chapters have been reviewed and any significant impacts identified in these chapters are considered in terms of their potential implications on population and human health.

6.4.4 The assessment methodology applied to the population and human health assessment is outlined below

6.5 Assessment Criteria

6.5.1 The assessment of significance of effect with regards to population and human health is based on professional judgement of the sensitivity of the receptor and the magnitude of effect.

6.5.2 This is determined by consideration of the sensitivity of the receptor, magnitude of impact and scale of the effect. In considering the significance of an effect, consideration has been given to the duration of the effect, the geographical extent of the effect and the application of professional judgement

<sup>9</sup> Central Statistics Office, 2016. Census 2016 Sapmap Area: Electoral Division Clondalkin-Village ED [online]. Available at: [https://census.cso.ie/sapmap2016/Results.aspx?Geog\\_Type=ED3409&Geog\\_Code=2AE196291D0213A3E055000000000001#SAPMAP\\_T14\\_1401](https://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=ED3409&Geog_Code=2AE196291D0213A3E055000000000001#SAPMAP_T14_1401) [Accessed 06/09/2022].  
<sup>10</sup> Central Statistics Office, 2016. Census 2016 Sapmap Area: Small Area Sa2017\_267053001 [online]. Available at: [https://census.cso.ie/sapmap2016/Results.aspx?Geog\\_Type=SA2017&Geog\\_Code=4c07d11e-0d56-851d-e053-ca3ca8c0ca7f#SAPMAP\\_T14\\_1401](https://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=SA2017&Geog_Code=4c07d11e-0d56-851d-e053-ca3ca8c0ca7f#SAPMAP_T14_1401) [Accessed 06/09/2022].



Receptor Sensitivity/Value Criteria

6.5.3 There is no specific guidance in relation to sensitivity of receptors with regards to population and human health. The baseline below outlines the key population and health vulnerabilities in the study area; however, due to the baseline being desk-based and without in-depth stakeholder engagement at the community level, it is not possible to assign an overall sensitivity classification to the population in the study area. Therefore, the precautionary principle has been adopted for this assessment, which assumes that the population within the Clondalkin Village SA is of high sensitivity and the population in South Dublin County and Clondalkin Village ED is of medium sensitivity.

Impact Magnitude Criteria

6.5.4 The magnitude of impact has been classified as low, medium, or high, in accordance with the criteria set out in Table 6-1.

Table 6-1: Impact Magnitude Criteria	
Magnitude of Impact	Criteria
No effect	The proposed development would not result in a change to the existing baseline conditions.
Low	Change in an environmental and/or socio-economic factor(s) as a result of the proposed development which would result in a minor change to existing baseline conditions (negative or positive).
Medium	Change in an environmental and/or socio-economic factor(s) as a result of the proposed development which would result in a moderate change to existing baseline conditions (negative or positive).
High	Change in an environmental and/or socio-economic factor(s) as a result of the proposed development which would result in a major change to existing baseline conditions (negative or positive).

Scale of Effect Criteria

6.5.5 Impacts have been assessed on the basis of the value/sensitivity of receptors against the magnitude of impact to determine the scale of effect as presented in Table 6-2.

Table 6-2: Scale of Effect Criteria			
Magnitude	Sensitivity of Receptors		
	Low	Medium	High
Low	None	Imperceptible	Not-Significant – Slight
Medium	None-Imperceptible	Not Significant – Slight	Moderate - Significant
High	Not Significant – Slight	Moderate -Significant	Very Significant - Profound

6.5.6 Based on Environmental Protection Agency’s (EPA) Guidelines on the information to be contained in Environment Impact Assessment Reports<sup>11</sup> (2022), as described in Chapter 2: EIA Process and Methodology, effects ranging from ‘moderate’ to ‘profound’ are considered ‘significant’ in terms of EIA.

Nature of Effect Criteria

6.5.7 The nature of the effect has been described as either negative, neutral, or positive as outlined in Chapter 2: EIA Process and Methodology.

<sup>11</sup> Environmental Protection Agency, 2022. Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)  
<sup>12</sup> Results of the 2022 census are preliminary.

6.6 Assumptions and Limitations

6.6.1 The 2022 census has been undertaken however only preliminary county level population data is available and therefore, the assessment has relied on baseline data from the 2016 Census, published by the Central Statistics Office, which is now six years old but is still the most reliable source.

6.7 Baseline Conditions  
Existing Baseline

Land Use

- 6.7.1 The surrounding context of the site is largely industrial and agricultural. The site is surrounded by numerous residential properties. A large proportion of these are no longer in residential use due to the extension of Grange Castle Business Park and road improvement in recent years.
- 6.7.2 The site is located in Profile Park industrial estate and within the functional area of South Dublin County. Under the South Dublin County Council’s (SDCC) Development Plan 2022-2028, the site is allocated under Objective EE: Employment and Enterprise. The stated aim is to provide for enterprise and employment related uses. The proposed land use of a data center is a permitted use under this 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 northward from City West to Grange and Grange Castle.
- 6.7.3 The current land use on the site is agricultural with a residential dwelling located in the north-east corner of the site.

Population

- 6.7.4 Table 6-3 presents the 2016 Census population data for the study area in 2016. The data shows population at county, electoral region, and Small Area level. The Small Area, where the site is located, represents the local area Clondalkin Village SA, which had a decline in population by 13 people between 2011 to 2016.
- 6.7.5 The preliminary 2022 Census results show the total resident population of South Dublin County has increased from 2016 to 299,793<sup>12</sup>.

Table 6-3: Study Area Population (2016)	
Area	Total Population
Clondalkin Village SA	257
Clondalkin Village ED	9,152
South Dublin County	278,767

6.7.6 The population age ranges in the study area are presented in Table 6-4. The data shows that Clondalkin Village SA has a lower-than-average younger population (0-19 years old) compared to the electoral region and county average and a significantly higher elderly population (65-84 years old). The overall averages for Clondalkin Village ED align with the South Dublin County average.



Table 6-4: Population Age Ranges (2016)						
Area	Percentage of Population (%)					
	0-19	20-24	25-44	45-64	65-84	85 and over
Clondalkin Village SA	20.23	3.89	26.46	31.52	17.51	0.39
Clondalkin Village ED	27.80	5.40	31.81	26.31	8.02	0.66
South Dublin County	29.46	5.78	31.40	22.27	10.23	0.86

and construction industry compared with Clondalkin Village ED and South Dublin County as a whole. In comparison only 21 % of employed individuals within Clondalkin Village SA work within the commerce and trade industry compared with the 27.94 % in South Dublin County as a whole.

Table 6-7: At Work by Industry (2016)			
Industry	Percentage of Employment (%)		
	Clondalkin Village SA	Clondalkin Village ED	South Dublin County
Agriculture, Forestry and Fishing	4.10	0.21	0.20
Building and Construction	8.20	5.48	5.10
Manufacturing Industries	8.20	10.12	8.80
Commerce and Trade	21.30	26.42	27.94
Transport and Communications	9.02	11.21	10.57
Public Administration	6.56	5.99	5.82
Professional Services	22.95	19.38	23.12
Other	19.67	21.19	18.45

Table 6-5: Population Ethnicity (2016)			
Ethnicity	Percentage of Ethnicity (%)		
	Clondalkin Village SA	Clondalkin Village ED	South Dublin County
White Irish	72.00	77.75	77.77
White Irish Traveller	0.00	0.39	0.80
Other White	14.40	11.69	9.31
Black or Black Irish	1.20	2.43	3.31
Asian or Asian Irish	3.20	2.04	4.11
Other	1.60	1.42	1.91
Not Stated	7.60	4.28	2.79

Community Facilities

- 6.7.10
- There is one existing residential dwelling located within the site boundary, however this is now vacant and would be demolished as part of the proposed development.
- 6.7.11
- Residential dwellings are primarily located to the south and south west of the site. The closest occupied residential dwelling is located approximately 600 m south from the site boundary, bounding the north side of Baldonnel Road, and to the immediate south of the Digital Netherlands consented data centre. Further residential dwellings are present to the south of Baldonnel Road.

Schools

- 6.7.12
- The population in the surrounding areas of the site (i.e. Clondalkin, Newcastle, Lucan, Tallaght and Rathcode), is serviced by various junior and secondary schools.
- 6.7.13
- The Junior Genius Creche is located in Castlebagot, approximately 1 km south west. Numerous junior schools are located in the wider site area, namely, Nano Junior National School, Our Lady Queen of Apostles, Sacred Heart National School and Scoil Mhuire located approximately: 2 km north east; 2.7 km north east, 2.5 km east; and 3 km east respectively.
- 6.7.14
- The wider site area contains numerous National Schools. Talbot Senior National School, Sacred Heart National School and St Johns National School are 1.9 km north east, 2.5 km and 3 km east, respectively.

Healthcare Facilities

- 6.7.15
- The nearest health centre is the Deansrath Health Centre, located approximately 1.2 km north east. Nangor Medical Center, Boot Road Health Center and Clondalkin Health Center are located approximately 1.8 km, 2.9 km, and 2.9 km east respectively.
- 6.7.16
- The nearest hospital to the site is located approximately 5 km south-east at the Adelaide and Meath Hospital incorporating the National Children’s Hospital, Tallaght, Dublin 24.

Table 6-6: Population General Health (2016)						
Area	General Health Category					
	Not Stated (%)	Very Bad Health (%)	Bad Health (%)	Fair Health (%)	Good Health (%)	Very Good Health (%)
Clondalkin Village SA	7.39	0.00	1.95	12.06	26.46	52.14
Clondalkin Village ED	5.54	0.30	1.19	7.67	28.48	56.82
South Dublin County	3.70	0.29	1.26	7.38	27.23	60.14

Employment

- 6.7.9
- The percentage of employment by industry is presented in Table 6.7. Within Clondalkin Village SA there is a higher proportion of employment within the agriculture, forestry and fishing industry and building