

Senior Executive Officer
Planning and Strategic Infrastructure Department
Fingal County Council
County Hall, Main Street,
Swords,
County Dublin,
K67 X8Y2

Thursday, 22 December 2022

[Submitted Online via Fingal County Council Consultation Portal]

Dear Sir/Madam,

Re: Draft Fingal County Development Plan 2023-2029 'Material Amendments' – Orion Business Park, Ballycoolin, Dublin 15

1.0 INTRODUCTION

South Dublin Routing 4 Limited¹ has retained Tom Phillips + Associates² (TPA), Town Planning Consultants, to prepare this Submission in relation to the 'Material Amendments' of the *Draft Fingal County Development Plan 2023-2029*, currently out for public consultation.

This Submission relates specifically to our client's site at Orion Business Park, Ballycoolin, Dublin 15.

Under Fingal County Council planning ref. FW17A/0167 (and subsequent amendment FW18A/0114), our client's obtained planning permission for the demolition of an existing warehouse building and the construction of 3 No. two storey data centres at the former Brian Daly Transport Services Building at Orion Business Park. This permission is currently being acted on.

Our client also owns the land to the north of land benefitted by the above referenced planning permission (ref fig 2 below).

¹ 27 Merrion Square, Dublin, Ireland.

² 80 Harcourt Street, Dublin 2, D02 F449.

2.0 REASON FOR SUBMISSION

At the outset we wish to make it clear that we are supportive of data centres no longer being 'not permitted' in the 'High Technology' land use zoning, as was proposed in the *Draft Fingal County Development 2023-2029*, published in February 2022.

However, we are writing again at this 'Material Amendments' stage because we seek the subject site to have the full support of a land use zoning that includes data centres within the 'permitted in principle' zoning class.

The lack of a data centre 'permitted in principle' land use zoning has the potential to significantly restrict the future development of the subject site, which currently enjoys planning permission for 3 No. data centre buildings (FW17A/0167 (and subsequent amendment FW18A/0114)).

We contend that there has been no justification given for this downgrade to 'open for consideration', and consider there to be far more of a justification for data centres being 'permitted in principle'.

This chief justification is that data centres form a critical part of Ireland's high technology industry, and have and continue to play a key role in Ireland's economy.

Research by Grant Thornton (*A Study of the Economic Benefits of Data Centre Investment in Ireland*, commissioned by the IDA (2018)) found that, between the 16 No. data centres that were established at the time of the report since 2010, data centres have invested an estimated €7.13 Billion in direct and stimulated (indirect) expenditure and have employed a total of 5,700 individuals in construction and operational roles.

In addition to the economic benefits quantified in that report, the analysis identified that data centres generate significant broader economic effects, which provide further long-lasting benefits to the Irish economy.

These qualitative effects are dynamic in nature and drive enhancements in a number of areas outside of the direct data centre industry.

This is in line with the *Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy* (July 2022):

*"Data centres are not a separate or optional economic infrastructure – **they are integrated into our data-driven knowledge economy and information society.** Digital infrastructure should be assessed in the context of the **total economic value** it gives rise to, including employment across the value chain, as well as its role in underpinning the evolving data economy. **Our data-driven technology sector drives innovation, productivity, and overall economic activity.** The data stored in Irish data centres underpins an increasing **base of employment intensive businesses.** Much like transport or energy infrastructure, data infrastructure **facilitates activity and the commercial ecosystem around it.***

*According to IDA Ireland, companies that operate data centres in Ireland, including hyperscale data centres and smaller colocation providers, account for approx. **16,000 direct employees.** However, when contractor numbers are factored in, that number*



reaches 27,000. Between hyperscale and colocation data centre providers, they provide hosting capability to a range of software, services and consumer companies that create tens of thousands of additional jobs here. In many cases, the ability to host data here and use Irish data centres to sell product or services is a critical part of their presence in Ireland.

These companies are responsible for very substantial economic value through payroll taxes, exports, corporation taxes and other expenditures such as capital expenditure, materials and services' inputs sourced in the Irish economy. In addition, the tech company presence here enables a substantially greater number of companies that require hosting infrastructure in Europe. Data centre investment and the wider technology multinational company base in Ireland has had a positive and supportive influence on the development of the indigenous technology sector. The strong presence of these companies in Ireland has had the effect of developing a cadre of senior technology executives in Ireland, some of whom have gone on to start or work in early-stage indigenous companies. A strong brand of Ireland as a technology-led economy gives indigenous companies credibility as they engage in international business opportunities. This includes high tech construction companies that build data centres in Ireland and have now grown into large export-oriented businesses constructing data centres across Europe."

[Our emphasis.]

Further to this, the inclusion of 'data centre' uses within the 'permitted in principle' category of the HT Zoning in FCC aligns with the National Planning Framework and Regional Spatial and Economic Strategy. In this regard RPO 8.25 of the RSES states that Local Authorities shall:

"Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations."

To effectively meet this objective and continue to promote FCC and Ireland as a sustainable international destination for ICT infrastructure, including data centres, and unlock the full development and economic potential of the site and surrounding HT lands, we request that Fingal County Council amends the 'permitted in principle' uses for the 'High Technology' zoning to include for data centres.

In our professional town planning opinion, this will ensure that the HT zoning within FCC is aligned with the objectives within the NPF and RSES.

3.0 CONCLUSION

Tom Philips + Associates have carefully reviewed the 'Material Amendments' of the *Draft Fingal County Development Plan 2023-2029* on behalf of our client South Dublin Routing 4 Limited who are currently constructing a data centre at Orion Business Park, Ballycoolin.

Our client is supportive of data centres no longer being 'not permitted' in the 'High Technology' land use zoning, as was proposed in the *Draft Fingal County Development 2023-2029* published in February 2022; however, we seek the subject site to have the full support



of a land use zoning that includes data centres within the 'permitted in principle' zoning class final adopted *Fingal County Development 2023-2029*.

This submission requests that Fingal County Council review this approach. It is specifically requested that data centres are removed from 'open for consideration' uses in 'High Technology' zones and instead included as 'permitted in principle' within these zones.

In closing, it is respectfully requested that the Planning Authority positively consider this Submission for the reasons outlined above.

Yours sincerely,



Brian Minogue
Associate
Tom Phillips + Associates