

Our ref: MH200039

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Date: 30 August 2021

Senior Planning Administration,
Wicklow County Council,
Wicklow Municipal District,
Town Hall, Market Square,
Wicklow Town,
Co. Wicklow
A67 YO18

RE: SUBMISSION FOR THE DRAFT WICKLOW DEVELOPMENT PLAN 2021-2027.

Dear Sir / Madam,

RPS Group Ltd has been instructed by Quanta Capital to lodge this submission in respect of the *Draft Wicklow Development Plan 2021-2027* (herein referred to as the ‘Draft Plan’) in which the public consultation period began on 04 June 2021.

Quanta Capital is an asset manager acting on behalf of Fane Investments Limited who acquired 82 acres of development land at Newtownmountkennedy in January 2021 (the ‘subject lands’ – refer to **Figure 1**). The lands benefit from a 10-year permission for data centres and associated development.

The objective of the acquisition is to develop a leading data centre project on this fully serviced site to meet the growing demand for services in this sector. The site also has capacity to develop ancillary uses and infrastructure to support the ever-expanding nature of data storage and development. It is believed that this project can greatly enhance and support the wider residential and business community by generating new employment, improve the jobs ratio and helping Newtownmountkennedy becoming self-sustaining.

Quanta Capital manages a large real estate portfolio in Ireland of 350+ properties. The portfolio includes large logistics facilities, international IT operators, and range of office accommodation located throughout the Greater Dublin Area, Galway City and Cork City. Through an established diverse international network Quanta Capital has identified key operators for this site and are working with them to develop this project and to enhance job opportunities in County Wicklow.

1.0 NATIONAL AND REGIONAL POLICY CONTEXT

Policy drivers with respect to the economic policy objectives of the Draft Plan come from *Project Ireland 2040* (comprising the *National Development Plan* (NDP) and *National Planning Framework* (NPF)) and the *Regional Spatial and Economic Strategy for the Eastern and Midlands Region* (RSES).

National Strategic Outcome 6 of the NPF is to deliver ‘A strong economy supported by enterprise, innovation and skills’. Harnessing the potential of the data economy is identified as bringing considerable benefits in terms of productivity, new services and knowledge creation. The ‘promotion of Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities’ is seen as key to deliver on the National Strategic Outcome 6 ‘.

A relevant and related National Policy Objective is National Policy Objective 21 to ‘Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT based industries and those addressing climate change and sustainability’.

The *Regional Spatial and Economic Strategy for the Eastern & Midland Region 2019 – 2031* identifies economic growth as a growth enabler for the region and outlines a growth strategy for the Region based upon consideration of the availability of land, resources, environment and infrastructure capacity.

The RSES acknowledge that regional assets and resources need to be fully realised to enable all places to reach their full potential. Such an asset-based approach to spatial development is intended to ensure that settlements identified for significant population and / or employment growth are supported by the requisite investment in infrastructure and provision of employment, amenities and services.

Particular asset-based criteria are outlined in Table 3.1 Asset / Potential Based Criteria Approach to Growth Strategy of the RSES and include ‘Global / national / regional connectivity’ which includes ICT, transport and infrastructure (Hard) and networks and collaborations (Soft).

The RSES acknowledge that sustainable economic development requires balance in terms of location and diversity of economic activity. The preferred Economic Strategy for the region promotes “*smart specialisation strategies based on identified strengths and competitive advantages, combined with cluster policies that promote economies of scale and network effects in certain locations. The Strategy should also support diversification of local economies and development of innovation and entrepreneurial ecosystems for sustained national growth that can withstand external shocks.”[our emphasis].*

The RSES at (Section 6.4) set out other important considerations for local authorities in considering their economic zoning objectives of development plans to anticipate and respond to the needs of existing enterprise and realise sectoral opportunities. Those of particular relevance to Wicklow and the subject lands at Newtownmountkennedy include:

- There are place-specific needs from particular industries including *inter alia* proximity to high energy services infrastructure, proximity to public transport, and access to international markets through airports and ports.
- The pervasiveness of digitisation across all sectors compounds the complexity of sector development, and it provides for constant and rapid evolution of emerging technologies.
- The need for promotion in rural places of new economic opportunities arising from digital connectivity and indigenous innovation and enterprise as well as more traditional natural and resource assets (e.g. food, energy, tourism), underpinned by the quality of life offering.
- New business formation and innovation in rural areas depend on drivers such as the presence of human capital, proximity and access to higher education institutions, ICT infrastructure including broadband, transport infrastructure and the presence of a wide sectoral mix.

Relevant considerations from a national and regional policy perspective of the subject lands include:

- Lands zoned for enterprise and employment within the County need to be considered from an asset-based perspective in terms of connectivity and enabling infrastructure.

In the case of the subject lands, they are already served by hard infrastructure such as high energy high voltage transmission lines (220kV and 110kV) which run across the site (including fibreoptics)); and are accessible to the strategic roads infrastructure (proximity to national and international markets from the N11 / M11).

The extant permission also provides for localised servicing including a temporary wastewater treatment plant and percolation area; upgrading of the Ballyronan Interchange and a new road from the south western roundabout of the Ballyronan Interchange to the site entrance. The proposed road will include a two-way cycle track and a footpath.

- Lands zoned for enterprise and employment within the County needs to acknowledge the place specific needs of particular industries.

In the case of the subject lands the potential of the lands should acknowledge the place-specific needs of particular industries including *inter alia* proximity to high energy services infrastructure and access to international markets through ports via the strategic road network.

- Land use zoning and development objectives need to consider flexibility to adapt to the constant and rapid evolution of emerging technologies – especially relevant for the ICT and data centre sector.
- Land use zonings should also foster cross-industry linkages and related diversification rather than promoting narrow specialisation.

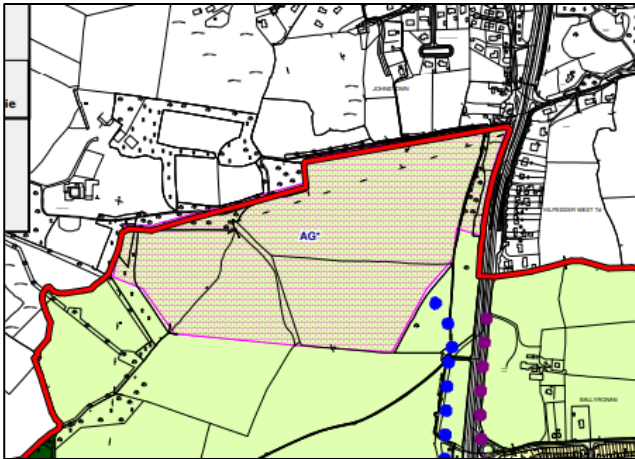
3.0 DRAFT DEVELOPMENT PLAN

3.1 Self-sustaining Plans – Newtownmountkennedy

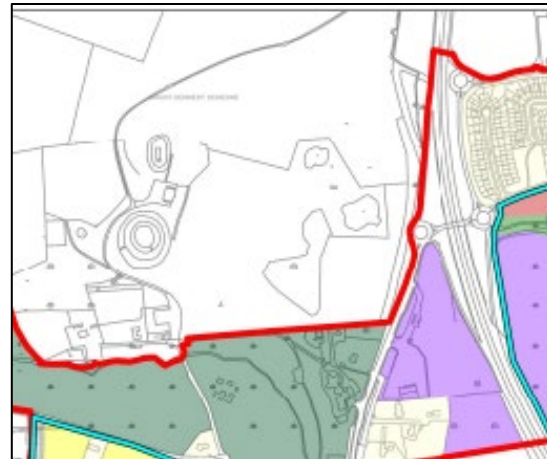
Volume 2, Part 1 of the *Draft Wicklow County Development Plan 2021-2027* comprises land use plans for the Level 4 towns of Baltinglass, Newtownmountkennedy and Rathdrum. Level 4 towns are ‘Self-Sustaining Towns’ i.e., towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery. There is a strong emphasis on aligning population growth with employment growth to make these towns more self-sustaining and capable of accommodating additional growth in the future.

The core economic strategy for Self-Sustaining Towns is to “*become more self-sustaining by concentrating on local enterprise and employment growth and catch-up facilities. This will include attracting investment in a mixture of ‘people’ and ‘product’ intensive industries that will generate new employment opportunities and improve the jobs ratio*”.

The subject lands are located to the north of Newtownmountkennedy town and were included in the settlement boundary of the town in the *Newtownmountkennedy LAP 2008 – 2018*. The lands are not included in the settlement boundary of the town in the Self-Sustaining Town Plans (Level 4) included in the Draft Plan 2021-2027. Refer to **Figure 1**.



Newtownmountkenny LPA 2008-2018



Self-Sustaining Town Plans (Level 4) including Baltinglass, Newtownmountkenny and Rathdrum 2021-2027

Figure 1: The subject lands and the Newtownmountkenny Settlement Boundary

Submission Request No. 1: Having regard to the following it is requested that settlement boundary of the *Newtownmountkenny LPA 2008-2018* is reinstated to include the subject lands and that the lands are zoned for employment development in Map No. 1 Land Use Zoning Objectives of the Newtownmountkenny Town Plan. In this regard:

- The lands are subject to a Policy Objective CPO.15 in respect of Economic Development in the Draft Plan. For consistency and clarity this employment development objective should be reflected within the Land Use Zoning Objectives of the Newtownmountkenny Town Plan.
- The inclusion of the subject lands within the settlement boundary will play an important complementary role in the sustainable development of Newtownmountkenny from an economic perspective. The lands can serve as an important economic driver complementing other employment sites identified within the town plan. Each are at different stages of development; some are already in existence with existing characteristics and momentum to build upon and with potential to extend into adjoining lands (e.g, Moneycarroll); others are greenfield lands the nature of use, design and intensity of use has yet to be determined - including AA2 Garden Village which is to be guided by criteria outlined in the Draft Plan.

These locations have the potential to create a series of dynamic employment locations off a strong north-south axis – revitalising, fostering and promoting the economy within the town and the nearby settlement of Kilpedder.

- In the Draft Plan, the Council acknowledges that the factors to make a town economically viable and attractive to investors and visitors are numerous and often hard to predict and influence. It is therefore important that a range of employment locations are promoted within the town to allow for an element of choice for investors and employers to meet their individual requirements acknowledging, as recommended by the RSES, the place specific needs of particular industries.

This would assist in meeting the “*the quality and range of employment opportunities by facilitating developments that involve foreign and local investment in a variety of forms, including ‘people’ and ‘product’ intensive industries.*”

The reinstatement of the subject lands within the settlement boundary and their zoning for employment development in Map No. 1 Land Use Zoning Objectives of the Newtownmountkenny Town Plan is illustrated in **Figure 2**.

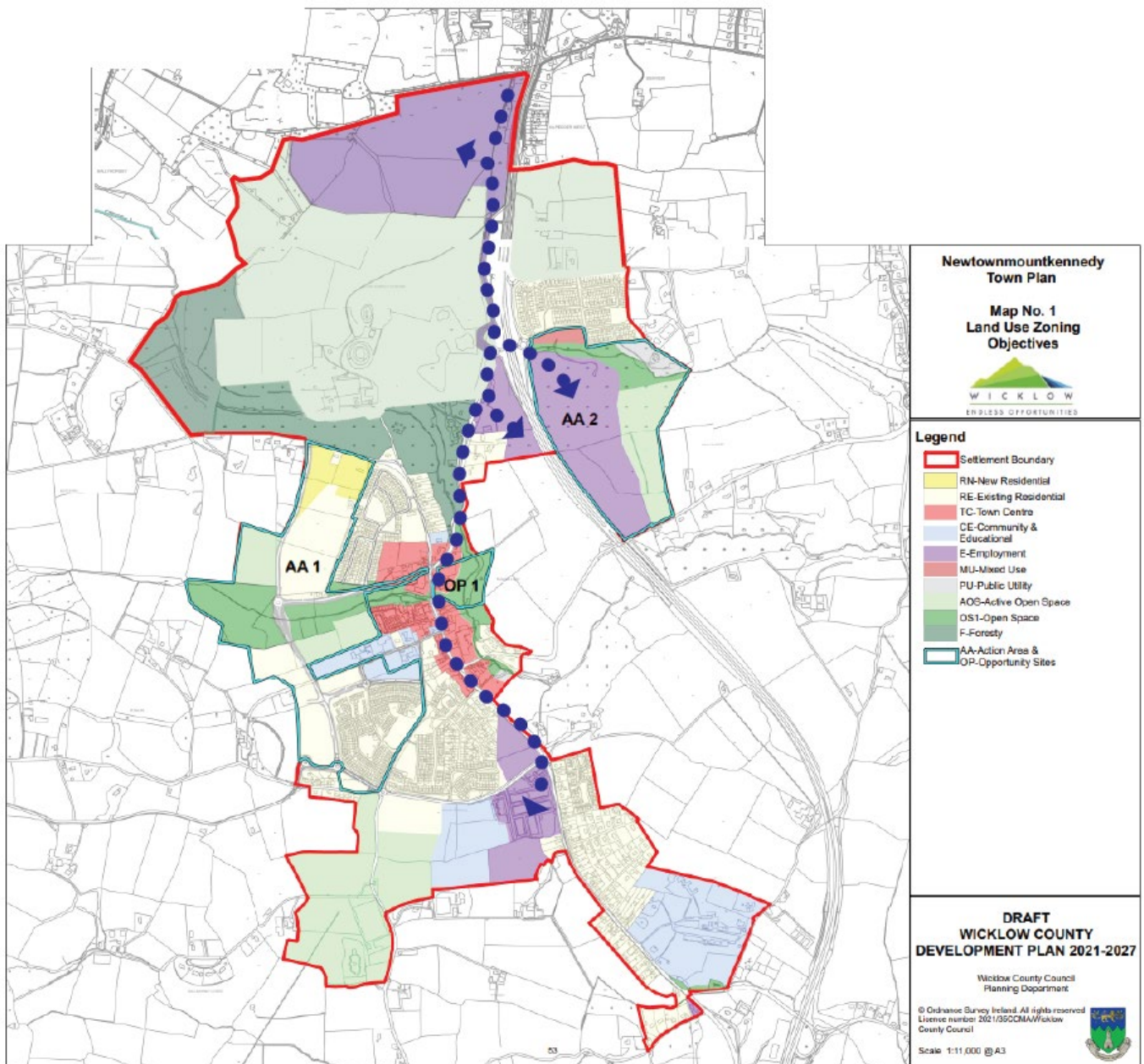


Figure 2: Proposed amendment to Map No 1 – Land Use Zoning Objectives (and showing potential for dynamic employment Locations off a strong north-south axis)

3.1 Economic Policy

Wicklow’s Economic Development policy is set out in Chapter 9 of the Draft Plan. Section 9.1 considers the strategic policy drivers of the NPF and RSES including the preferred Economic Strategy and five principles for economic opportunity (as set out above).

The Chapter identifies several sectors as being key for the County including the Film Industry, Food Sector, Bioeconomy, Tourism & Recreation, Maritime and Forestry sectors. Two key sectors of particular note are considered below:

- Wholesale, retail trade, transportation and storage sector:** The Draft Plan considers there to be significant opportunities for the expansion of the transportation and storage sector because of the County’s positioning along the east coast ‘strategic transportation corridor’ made up of the N11 / M11

and connectivity between Dublin and Rosslare ports. These connections are identified as ensuring “Wicklow’s role as a key entry point to the Greater Dublin Region with the potential to facilitate the expansion of existing or create new spin off industries within this sector”.

The promotion of the Leinster Outer Orbital Route connecting the N11 and the east of the County (Arklow town/port) to the west of the County and the major national primary routes within Kildare namely the M9 and M7 is also identified as creating potential for the expansion of the transportation and storage sector with ease of accessibility to the north and south of the Greater Dublin Region.

- **Information & Communications Technology (ICT):** The ICT sector is identified as the second largest industrial group in the County with potential for significant opportunities to develop the sector further. Wicklow’s highly educated workforce is identified as key to maximising the potential of the County.

The Draft Plan notes a number of large-scale data centres are either under construction or have permission in the County (the latter especially relevant in the context of the subject site).

The objectives for Economic Development are set out in Section 9.5 of the Draft Plan, and include:

- CPO 9.2 To support and encourage proposals that maximise economic opportunities and strengthen the economic structure of the south and west of the County by facilitating economic diversification and new enterprise development including remote working opportunities.
- CPO 9.6 To promote the development of employment generating uses at locations which comply with sustainable transportation objectives, including *inter alia* promoting the development of ‘product’ intensive industries (typically manufacturing and logistics based uses) at locations that are accessible to strategic roads infrastructure.
- CPO 9.8 To promote and facilitate the development of employment generating uses that maximise Wicklow’s locational strengths along the east coast ‘strategic transport corridor’ and the potential of the ‘Leinster Outer Orbital Route’.
- CPO 9.14 To require employment-based developments to be of the highest standard of architectural design and layout and comply with the Development & Design Standards set out in this plan.

Of particular relevance to the subject site is Objective CPO 9.15 To provide for employment development at the following locations as shown on maps 09.01, 09.02 and 09.03, which sets out:

Location	Map No.	Size (ha)	Zoning Objective
Mountkennedy Demesne, Kilpedder	09.01	34.7	To provide for a data centre facility ⁸ and associated related industries set in open parkland with extensive landscaping, a high architectural standard of layout and building design with low site coverage. Employment types other than those strictly related to data storage shall show a clear process related requirement to locate in proximity to a data centre.

Footnote 8 advises “A data centre is a facility used to house computer systems and associated components, such as telecommunications and storage systems. It generally includes redundant or backup power supplies, redundant data communications connections, environmental controls (e.g., air conditioning, fire suppression) and security devices.”

Also of relevance is Rural Employment Objective CPO 9.32 Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability.

Relevant considerations the Draft Plan context of the subject site include:

- The potential of the site in terms of developing the potential of the ICT sector in the County further through economic diversification and opportunities for new enterprise development. The permitted development of data centres on the site provides backbone for further ICT and related industries.
- The potential of the site in terms of delivering opportunities for expansion of the transportation, storage and logistics-based sector because of the sites accessibility to strategic roads infrastructure and in particular the 'strategic transportation corridor' made up of the N11 / M11 and connectivity between Dublin and Rosslare ports.
- The potential synergies with other nearby employment opportunities within the town to foster a dynamic axis of employment generating uses.
- The need to allow for an element of choice for investors to meet their individual requirements and to ensure that an element of competition is facilitated in the land market.
- The importance of placemaking and the highest standard of architectural design and layout.

4.0 SUBJECT LANDS

The subject site has a number of unique site characteristics, not just in the context of Wicklow, but also regionally, in terms of its accessibility and proximity to strategic infrastructure and utilities including:

- The profile and accessibility of the site to the N11 linking Dublin with Rosslare (part of the strategic Eastern Corridor (Dublin - Belfast Economic Corridor to Rosslare Europort)), and Junction 17 with the M50 which accesses to the rest of the country. The potential for improved access from Junction 12 as permitted / required as part of the consented scheme (WCC Reg. Ref 102123) including wayleave agreements in place.
- High Voltage Transmission Lines (220kv) running across the site (including fibreoptics).
- Low Voltage Lines (38kV) running from the N11 close to the site's northern boundary.
- High pressure gas transmission pipeline alongside the N11.

The site has the benefit of a 10-year permission for, *inter alia*, 6 no. data centres, an access road from the Ballyronan Interchange, 250 no. car parking spaces and a temporary wastewater treatment plant (WCC Reg. Ref. 102123). The extant permission expires on 23rd February 2024. While the principle of what is permitted remains broadly valid the following is noted:

- The layout and building typology of the extant permission was conceived and designed before 2010 and there is potential for significant efficiencies with modern datacentre design.
- Data centres co-locate with other industrial, warehousing, logistic and enterprise uses.
- There is a growing role for renewable energy sources and generation (solar, offshore / onshore wind) associated with data centres.

In this regard, it is noted that ICT, logistics and high technology employers and investors generally look to locate near to businesses with similar interests (clustering) to foster cross-industry linkages and related diversification. In terms of land use planning, clustering can leverage development resources through the encouragement of synergies. This should be considered in the context of all the employment generating land in Newtownmountkennedy.

It is also noted, that in April 2021, the Government published its *Draft National Strategy for Ireland to transition to a Circular Economy*. It has five key objectives including “*To support and promote increased investment in the circular economy in Ireland with a view to delivering sustainable, regionally balanced economic growth and employment*”.

These matters are considered further below.

4.1 ICT AND DATA CENTRES

In 2018, the *Government Statement on The Role of Data Centres in Ireland’s Enterprise Strategy* was published. It outlines the Government’s position in terms of promoting Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities

Data centres are acknowledged as being central to the digital economy; as providing support functions for other firms which themselves undertake production, research and development, marketing, sales, service, and support activities; as facilitating many other sectors across the economy by enabling data storage, e-payments, securities transactions, banking, fraud protection, cloud telephony, inbound and outbound Intellectual Property (IP) traffic, and disaster recovery services; they are also involved in a range of activities including data analytics, customer experience services, technical support and software development.

Demand for data centre services will continue to be driven by media streaming (including video and gaming) and emerging technologies such as artificial intelligence, virtual reality, 5G and blockchain technology.

The Government Statement acknowledges that digital technologies are now a reality for all businesses, especially post Covid, as well as opening opportunities to deliver customised products and services, to reach new markets, to develop new business models and to embed efficiencies.

4.1.1 ICT and Data Centres and Renewables

The ICT sector and data centres are also now major investors in renewable energy, protecting themselves from volatile power prices, reducing their environmental impact and improving brand reputation

According to the IDA, data centres are an important customer of Ireland’s renewable electricity sector (e.g. onshore wind) and their growth is and will continue to be necessary for supporting advancement of that sector. All large multinationals with data centres in Ireland have committed to becoming fully renewably powered. Data centres have demonstrated significant interest in being ‘part of the solution’ and in playing a positive role in Ireland’s electricity system. The proximity of Wicklow to the offshore windfarm potential of the Irish Sea is relevant in this context.

In addition is a real ‘green’ opportunity to reuse the captured thermal energy from data centres elsewhere be it onsite, or for nearby business and homes; creating a district heat network and thereby helping to improve our circular economy. Thus, the waste heat is converted and utilized as a source of energy.

4.1.2 LOGISTICS

There is heightened demand from logistics and distribution operators for modern accommodation following Brexit and Covid with many occupiers requiring a facility in the Greater Dublin Area, this includes:

- Facilitating last mile delivery.
- Facilitating delivery route planning and load pooling.

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Logistics and distribution occupiers in Ireland are actively seeking out strategically located locations with ready access to the strategic road network, markets and ports.

A recent report by Savills advises the following:

- In terms of Brexit, we have entered a period of “major structural change” with shifts in the composition of goods being traded, stockpiling and alterations to transit routes.
- From an e-commerce perspective, Ireland is likely to see a greater need for warehousing and associated logistics infrastructure as goods previously stored and distributed via Britain are on-shored to Ireland.
- A slow-down in market activity of industrial and logistics space this quarter is reflective of the lack of suitable stock for occupiers, rather than pandemic-related factors with occupier demand remaining strong.

The strategic attributes of Newtownmountkennedy with ready access to the strategic road network (i.e., N11/M11 and M50), markets (i.e., the Greater Dublin Area (set to grow to 2.2m by 2031)) and ports (i.e., Rosslare, Dublin and Belfast) makes the location especially attractive to the industrial and logistics and Wicklow County Council is recommended to be proactive in facilitating the sector.

Relevant considerations the Draft Plan context of the subject site include:

- The subject site is uniquely serviced for a number of key sectors including ICT and logistics.
- The subject site will benefit from localised servicing in terms of a temporary wastewater treatment plant and percolation area; upgrading of the Ballyronan Interchange and a new road from the south western roundabout of the Ballyronan Interchange to the site entrance.
- Data centre services and associated uses area a dynamic sector and in recent years there have been significant efficiencies made to datacentre design and in terms of energy source and usage. This presents an opportunity to adapt the permitted scheme and make it more efficient.
- There is a very significant ‘green’ opportunity to co-locate data centre facilities and related logistics to reuse the captured thermal energy onsite, and for nearby employment generating areas and in Newtownmountkennedy helping to improve our circular economy.

Submission Request No. 2: In order to provide clarity in respect of the capacity to develop ancillary uses and infrastructure to support the ever-expanding nature of data storage and development we respectfully request an amendment to the wording of the policy objective.

Under the Draft Plan the subject sites zoning objective remains the same as the *Wicklow County Development Plan 2016-2022* zoning objective:

“To provide for a data centre facility and associated related industries set in open parkland with extensive landscaping, a high architectural standard of layout and building design with low site coverage. Employment types other than those strictly related to data storage shall show a clear process related requirement to locate in proximity to a data centre.”

Below is recommended wording for the Employment Zone objective:

“To provide for data centre and associated uses including enterprise, employment and related logistic uses set in open parkland with extensive landscaping, a high architectural standard of layout and building design with low site coverage. The associated uses will benefit from co-location or clustering with data centres.”

It is considered the amended wording provides greater clarity, but does not materially deviate from the existing policy objective and is consistent with its spirit and intention; however, it is considered it provides

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greater clarity in respect of the capacity to develop ancillary uses and infrastructure to support the ever-expanding nature of data storage and development.

5.0 CONCLUSION:

RPS is instructed by Quanta Capital to submit this observation of the *Draft Wicklow County Council Development Plan 2021-2027* on their behalf to Wicklow County Council.

Our client requests the following for inclusion in the County Plan:

Submission Request No. 1: It is requested that settlement boundary of the *Newtownmountkennedy LAP 2008-2018* is reinstated to include the subject lands and that the lands are zoned for employment development in Map No. 1 Land Use Zoning Objectives of the Newtownmountkennedy Town Plan.

The lands are subject to a Policy Objective CPO.15 in respect of Economic Development in the Draft Plan. For consistency and clarity this employment development objective should be reflected within the Land Use Zoning Objectives of the Newtownmountkennedy Town Plan

Submission Request No. 2: In order to provide clarity in respect of the capacity to develop ancillary uses and infrastructure to support the ever-expanding nature of data storage and development we respectfully request an amendment to the wording of the Policy Objective CPO.15 as follows:

“To provide for data centre and associated uses including enterprise, employment and related logistic uses set in open parkland with extensive landscaping, a high architectural standard of layout and building design with low site coverage. The associated uses will benefit from co-location or clustering with data centres.”

Yours sincerely,
for RPS Group Limited



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APPENDIX

Under the Draft Plan the subject sites zoning objective remains the same as the *Wicklow County Development Plan 2016-2022* zoning objective:

“To provide for a data centre facility and associated related industries set in open parkland with extensive landscaping, a high architectural standard of layout and building design with low site coverage. Employment types other than those strictly related to data storage shall show a clear process related requirement to locate in proximity to a data centre.”

Our client welcomes the employment zoning on the site and supports its primary aim of providing a data centre and other associated related industries. In order to develop the strategically located site to its potential, we respectfully request an amendment to the wording of the zoning objective. This would allow for greater flexibility of land uses within reason to the data centre use, below is suggested wording for the Employment Zone objective:

Recommendation: *To provide for data centre, industrial, warehousing and logistics facilities with associated/related uses set in open parkland with extensive landscaping, a high architectural standard of layout and building design with low site coverage.*