



March 2016

SUBMISSION TO AN BORD PLEANALA RE:

**Galway County County Pl. Ref. 15/488 and currently the
subject of an appeal before An Bord Pleanála under Ref. PL
07.245518**

APPLE DATA CENTRE

DERRYDONNELL, ATHENRY, CO. GALWAY

PLANNING APPLICATION

Galway Chamber is a member organisation representing 400 multi-sectoral, member companies, with approximately 20,000 employees in Galway City, Galway County and the region. It has been in existence for 200 years representing the interests and views of its member companies.

Galway Chamber fully endorses and strongly supports the plans for the establishment the proposed Data Centre by Apple at Athenry, Co. Galway.

It is the view of Galway Chamber as articulated by President of Galway Chamber Frank Greene that we welcome the proposed data centre and this that is good news for Athenry, Galway and the West NUTS 111 Region.

Apple evaluated many sites across Ireland and selected Derrydonnell as it was the only one to meet several important criteria including the size of the location, being close to a power supply, access to plentiful renewable energy resources, great local weather conditions for an extremely efficient data centre and well screened in terms of the surrounding trees.

Also, in terms of location, it is sited on existing and developing strategic communication corridors running between Galway and Dublin and Galway and Cork.

The commitment by Apple to Ireland and to the West of Ireland is welcomed and ties in with our partnership with other Chambers in the Region forming the Atlantic Economic Corridor to promote the region. The West NUTS 111 region is the only NUTS region where the number employed has decreased over the past four years by 4,000 while the other seven NUTS Regions had a total growth of 139,000 (CSO stats.). Having the world's most innovative company located in the Region will give the promotion of the area a very significant boost.

It is our belief that this development ties in with a good regional enterprise strategy, which is something that we have been vocal on and we see it as hugely positive for the region.

We also welcome the pan European nature of this project.

The proposed investment of €850 million in the new data centre is significant to the local and wider region.

It is the view of Galway Chamber that the following elements regarding development of the Apple Data Centre at Athenry must be taken into consideration in the context of the planning application for the overall project:

- Policy Context
- Socio Economic Benefits of the Proposed Development

POLICY CONTEXT

The proposed development is supported by National, Regional and Local planning policy. This includes the National Spatial Strategy 2002 – 2020, the Regional Planning Guidelines 2010 – 2022, and successive Galway County development plans since 2006.

National Planning Policy Context

The National Spatial Strategy 2002-2020 (NSS) is an 18-year national planning framework designed to achieve a better balance of social, economic and physical development and population growth between regions. The NSS identifies the five main cities Dublin, Cork, Limerick, Galway and Waterford as ‘Gateways’ or engines of regional and national growth. The Strategy recognises that these Gateways have considerable potential for further development and expansion to achieve more balanced regional development.

The NSS recognises that, with regard to revitalisation in the West and Southwest, a number of areas, primarily along the coast in parts of Cork, Kerry, Clare and Galway, have been experiencing economic growth and revitalisation based on the diversification of an economy previously centred on agriculture.

In reference to electrical energy, the NSS places particular emphasis on the reinforcement of the grid in western counties, with strengthening energy networks in the West, North West, Border and North Eastern areas prime considerations in terms of spatial policies relating to energy. The NSS also recognises that reliable and effective electricity to power industry is a key prerequisite for effective regional development (P64, NSS).

Regional Planning Policy Context

The Regional Planning Guidelines have been prepared by the West Regional Authority for the period 2010 – 2022. The aim of the Guidelines is to provide a framework for long term strategic development of the West Region for the period 2010 – 2022 which is consistent with the National Spatial Strategy 2002 – 2020.

A key aspect of the Guidelines is integrating sustainable development with the protection and enhancement of the environment. The economic development

strategy for the West Region examines the regional economic context, trends, key growth settlements and acknowledges the current economic climate. It also examines the future potential of the West Region. The goals of the Guidelines include a balanced development of the West Region.

The site is located in the economic corridor from Oranmore to Athenry. The Regional Planning Guidelines for the West Region clearly support the development of this corridor as a focus for Foreign Direct Investment. On page 36 it states:

“Economic corridors, particularly industrial corridors such as the Oranmore - Athenry Strategic Corridor must be developed / promoted and serviced to high international standards to attract Foreign Direct Investment, building on strategic location and infrastructure. This corridor should be promoted in a sustainable manner as a centre for major national and international enterprises.”

The Guidelines also recognise the strategic importance of the area in which the lands at Derrydonnell are located and include the following the key economic development priorities on page 24:

- Provide appropriate zoned land with adequate infrastructural service to accommodate enterprise – e.g. Economic Corridor from Oranmore to Athenry.
- Provide the infrastructure required to attract investment into the Region.
- Support all indigenous industry and promote linkages with multi-nationals.

The Guidelines also includes the following key actions to be undertaken in the next few years:

“Ensure key infrastructure such as water, waste, waste-water services, broadband and access are available in zoned serviced industrial sites / corridors in or adjacent to main urban areas in the region, particularly the Galway Gateway, Castlebar, Ballina, Tuam, Westport, West Athlone, Roscommon, Claremorris and Athenry. Make progress on reducing fixed costs and competitive factors...”

The development of the Oranmore – Athenry Strategic Economic Corridor is not just a high level aspiration for future zoning. The guidelines recommend that key infrastructure be focused in both zoned serviced industrial sites and in corridors

in or adjacent to main urban centres. The subject site and surrounding economic corridor is considered to be such a location. The Regional Planning Guidelines are considered to support the development of the subject lands within the Strategic Economic Corridor.

The Regional Planning Guidelines also acknowledge that the West Region can play a significant role in delivering national government and European Union renewable targets but is reliant on the facilitation, development, reinforcement and strengthening of the grid to be able to connect, distribute, import and export the indigenous land and marine renewable energy that will in future be generated (P103, Regional Planning Guidelines for the West Region 2010 – 2022).

Galway County Development Plan 2015-2021

As discussed, the subject lands are located within a regionally significant strategic economic corridor as identified under the Galway County Development Plan, 2015 to 2021. The lands differ from unzoned agricultural lands in that they have been identified as part of a strategic economic corridor, which has been designated as part of the development plan process.

The Strategic Economic Corridor is a fundamental element of the Galway County Development Plan 2015 – 2021 and has been such since it was first incorporated into the Galway County Development Plan 2003 – 2009 by way of variation in July 2006. The Strategic Economic Corridor continues to be an integral part of the overall planning strategy for the County as reflected in Section 2 of the current Plan which sets out the Spatial, Core and Settlement Strategies for County Galway and in Section 4 of the Plan which relates to the economic development of the County.

Section 2 of the plan sets out the Spatial Strategy, Core and Settlement Strategy, for County Galway. The location of the Strategic Economic Corridor is identified on the Core Strategy Map CSM on page 36 of the Plan. Figure 1.1 below shows this map with the position of the subject site shown within the Strategic Economic Corridor.

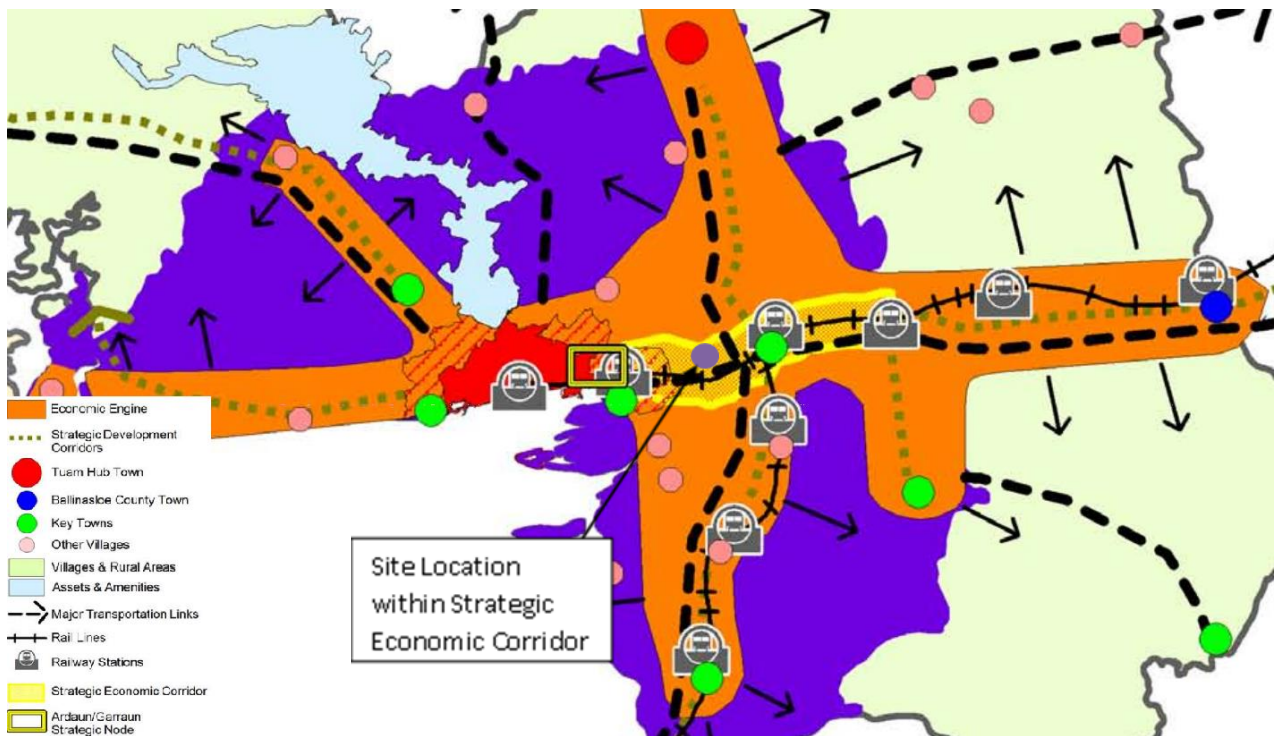


Figure 1.1: Extract from Core Strategy Map CSM illustrating Overall Spatial Strategy & Proposed Development Option - OSS

Source: Galway County Development Plan 2015-2021

Objective DS11 specifically relates to Strategic Development Corridors and reads as follows:

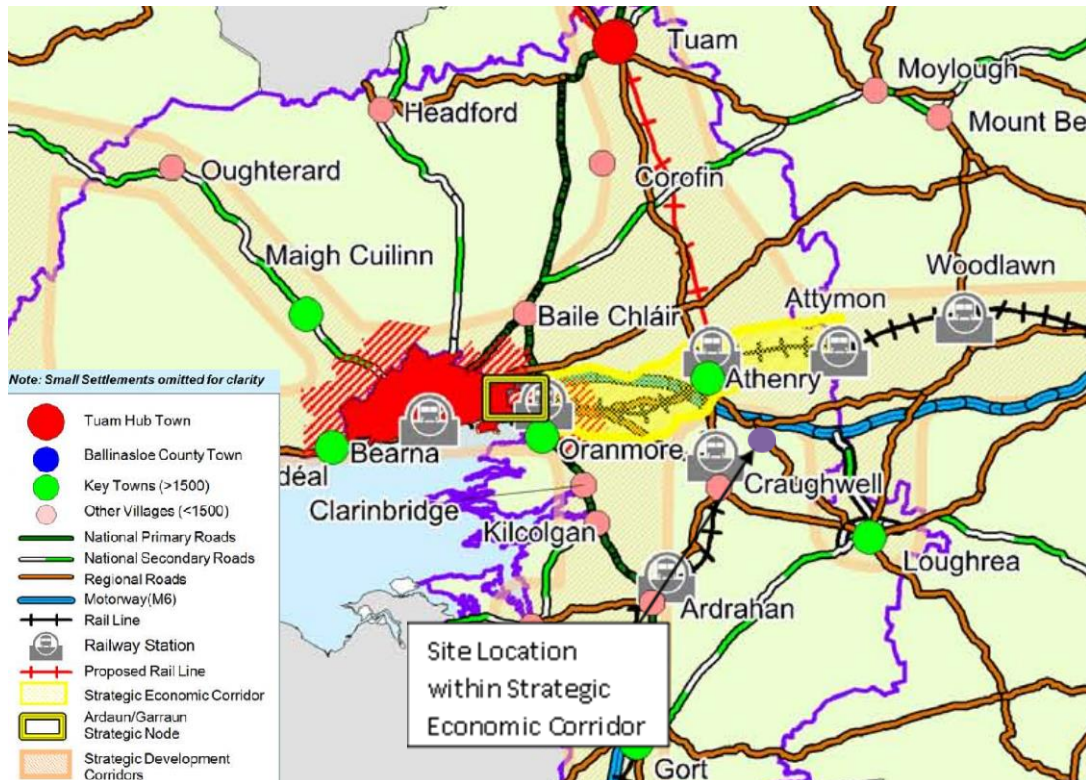
*“Objective DS 11 – Strategic Development Corridors
Co-ordinate new growth within key towns, villages and settlements along the strategic development corridors throughout the County in order to create more sustainable development patterns and to optimise public and private investment made within the County and support the appropriate development of the Strategic Economic Corridors.”*

Section 2.4.15 of the Plan relates to Economic Development and Other Land Uses. The following is stated in relation to the Strategic Economic Corridor:

‘The Spatial and Core Strategy, in line with the Regional Planning Guidelines for the West Region, recognises priority areas in relation to economic development for the County, such as the provisions for a Strategic Economic Corridor to the eastern area of the County, the role of urban areas in sustaining economic buoyancy, the importance of attracting foreign direct investment, promoting indigenous industry, the food and craft sector, tourism, renewable

energy and the smart economy, which are all detailed in Chapter 4 of the Plan and Map ED 1”.

The location of the Strategic Economic Corridor is identified on the Core Strategy Map CSM on page 36 of the Plan. This map below shows the position of the subject site within the Strategic Economic Corridor.



Extract from Core Strategy Map showing Strategic Economic Corridor
Source: Galway County Development Plan 2015-2021

Section 4 of the Plan relates to economic development with Section 4.2 setting out the overall strategic aims. One of the key strengths of County Galway as set out in Table 4.1 of the Galway County Development Plan 2015-2021 is the identified Economic Corridor.

Section 4.7 of the Plan relates to the Strategic Economic Corridor and states as follows:

“Galway County Council in consultation with relevant stakeholders identified a strategic corridor to the east of Galway City which is endowed with a high concentration of valuable infrastructure. The lands concerned are located approximately two kilometres to the north and the south of the Dublin Galway rail line between Attymon station and the N18 level crossing at Oranmore (See Map CSM in

Chapter 2). The designation of the Strategic Economic Corridor was based on a framework plan which was commissioned to address the need to accommodate Regionally Strategic Industrial sites. This framework plan is indicative only and should not be relied upon as an indicator of land uses within the defined corridor”.

In addition, Objective EDT 1 in Section 4.14 of the Plan, which relates to Economic Development and Tourism, is very relevant and is as follows:

“Objective EDT 1 – Strategic Economic Corridor

The objectives for the Strategic Economic Corridor include:

- *To upgrade, improve and maximise the infrastructural facilities available within the corridor;*
- *To seek to reserve lands to support nationally and regionally significant activities and to attract specialist enterprise development that is large scale or high value;*
- *To facilitate opportunities for science and technology based employment;*
- *To ensure development is compatible with the enhancement, preservation and protection of the environment and cultural resources recognised within the corridor;*
- *To identify sites of adequate size and location to accommodate necessary infrastructure or support activities which would not be appropriate in proximity to centres of population or sensitive environments or environmentally sensitive economic activities;*
- *To inform and to aid the preparation of Local Area Plans for strategic areas and those surrounding immediate environs within the corridor.”*

The designation of the Strategic Economic Corridor is based on a Framework Plan, which identified a ‘Regionally Strategic Industrial Corridor’ as far back as 2005 and was subsequently incorporated into the Galway County Development Plan 2003 - 2009, through a variation in July 2006. The Strategic Economic Corridor was also included in the Galway County Development Plan 2009 - 2015 and is currently included in the Galway County Development Plan 2015 - 2021.

The Economic Corridor was specifically designated to provide sites for large scale or high value nationally and regionally significant projects, in accordance with recommendations contained in the Regional Planning Guidelines.

In relation to electricity and the national grid, Section 7.4.1 of the Plan states that:

“A strong transmission grid is essential in order to attract and retain high-tech industrial investment, to ensure competitive energy supplies, to achieve balanced development, to reduce dependency on fossil fuels, and to achieve climate change targets”.

This position is further supported by Objective ER 1 of the Plan, which is as follows:

“Objective ER 1 – Electricity and Renewable Energy Infrastructure

Support the development and expansion of infrastructure for the generation, storage, transmission and distribution of electricity, renewable energy and other renewable energy proposals in suitable locations in County Galway”.

Socio Economic Benefits of the Proposed Development

As stated the development will give effect to key economic development objectives contained within national, regional and local policy for its location and conforms to a number of key economic objectives contained within the Galway County Development Plan 2015-2021 by virtue of its location within the designated Strategic Economic Corridor.

The Strategic Economic Corridor has been a consistent feature of economic planning strategy in County Galway for the last three County Development Plans since its adoption by variation in July 2006. Ley here is Objective EDT 1 of the current County Development Plan which relates to Strategic Economic Corridor objectives including the objective to *“seek to reserve lands to support nationally and regionally significant activities and to attract specialist enterprise development that is large scale or high value”*.

Direct Economic Benefits

In terms of direct economic benefits associated with the power supply project and Phase 1 development, there is likely to be in the region of 300 construction workers on site during construction. The peak construction workforce on the two projects will be 420. At the announcement of the project, IDA Ireland stated that the 300 construction workers would add an estimated €11 million in wages annually to the region. On a pro-rata basis, a peak construction workforce of 420 will equate to €15.4 million in wages annually. The construction of each subsequent data hall will also involve a construction workforce of 300. The full build out of the eight data halls is likely to take ten to fifteen years, as the construction of subsequent phases takes place, and will result in an investment of approximately €850 million.

Once operational, the data centre will also have a positive economic impact both nationally and locally with permanent employees likely to number 150, with each typically having third level qualifications.

Catalyst to create indirect jobs

In addition to the direct economic benefits, the data centre will provide a catalyst for the creation of a number of indirect jobs through off-site construction service providers and material suppliers during the construction phase. These jobs will be a beneficial economic impact in the wider economy, and positive benefits are likely to be seen in local service industries such as hotels, restaurants, shops and bars during both the construction and operation phases.

Moreover, IDA Ireland stated that every permanent job created in a data centre leads to 0.7 additional off-site jobs. This estimation is based upon independent modelling data developed by Indecon Consulting using the latest (2011) CSO Input-Output tables. This research appears to corroborate research conducted by the Washington Research Council (Sigmar www.sigmar.ie, accessed in November 2014). This research states that “*data centres have an astounding impact on the jobs market*”, and are estimated to “*have a multiplier of from 2.0 to 3.54, depending on operational decisions*”, with regard to job creation. In practical terms, a multiplier of 2.0 signifies that for every direct job created at a data centre, an additional job is created elsewhere in the local economy.

Apple’s data centre will also generate annual expenditure on maintenance, security, insurance and various other services, which will be from local or indigenous suppliers where possible.

The data centre also incorporates a number of design features, which respect the existing social and community advantages of the site. Apple has a proven track record in other locations in developing and operating its facilities with great regard for the environment and local community.

Improvements to woodland

Apple has a proven commitment to the environment and the plans for the data centre will retain as much of the forest as possible. The company has already engaged experts to carry out a detailed environmental assessment of the site and enhancements have been designed to preserve existing wildlife as well as to encourage more. The woodland will play an important environmental role in reducing the data centre’s energy consumption as the trees will help to naturally provide cooler air to the data halls.

While Derrydonnell wood by its current nature is primarily commercial forestry, informal recreational use of the site also occurs and local residents take great pleasure from the woodland. Apple plans to take land that has been used for harvesting fast growing trees that are not native to this part of Ireland and turn it into a much more bio-diverse native broadleaved woodland in keeping with the character of the area and conducive to wildlife. When this woodland has matured it is expected that the buildings will be almost invisible from beyond the site.

The company also aims to enhance local residents’ enjoyment of the woodland by improving forest trails, creating easier access and providing helpful information on its unique flora and fauna. The woodland amenity trail will cover

a distance of approximately 7 km along the southern perimeter of the site, and will include car parking.

Renewable energy and the environment

Apple's goal is to power all its facilities around the world with 100 percent renewable energy. Today 93 percent of its facilities and 100 percent of its data centres currently in operation run on 100 percent renewable energy sources. That means no matter how much data they handle, there is a zero greenhouse gas impact on the environment from their energy use.

Apple will not generate renewable energy on site, but it will contract with indigenous renewable energy suppliers to generate and supply power from renewable sources equivalent to their annual consumption and this will be transmitted to the new substation on the data centre site via the national grid. Apple intends to go further than just purchasing clean energy from existing sources, by creating new sources in the region that add clean energy to the grid.

The proposed data centre can therefore make a substantial contribution to the achievement of European and national energy targets and policy objectives, an integral part of which is the reduction on the reliance on fossil fuels by switching to energy derived from renewable sources. This approach has been the central feature of European and Irish energy policy since the Kyoto Protocol in 1998.

The proposed Athenry data centre will have the lowest environment impact yet for any Apple data centre. It has been designed from the ground up for energy efficiency and it will meet or exceed LEED standards. It features a unique cooling system based on natural air flows that significantly decreases water and energy consumption. The "spine and cluster" design as it called - a central service corridor housing basic infrastructure combined with clusters of data halls layers in as necessary - helps ensure that what is needed is used, just when it is needed.

In 2015, Apple announced a €1 million fund to support ocean energy testing in Galway Bay, in association with the Sustainable Energy Authority of Ireland (SEAI).

Working with local suppliers

The first supplier fair was held by Apple in Athenry in November 2015, where over 100 potential suppliers met with Apple's data centre and construction teams. The event was held in association with Enterprise Ireland and the IDA in

Galway. Apple was very impressed with the “outstanding calibre” of the suppliers they met and intend to host another supplier fair in the future.

Supporting the local primary school

From the outset, Apple has stated its commitment to working with Scoil Naomh Mhuire, Lisín na Coille (Lisheenkyle National School) on plans for an enhanced Seomra na Coille (outdoor classroom), which is located within the site.

Apple in the community

Apple has been doing business in Cork since 1980. The workforce has grown to over 5,500 employees and 56 percent are Irish nationals. It is hoped that the majority of employees for the data centre will be recruited from Ireland.

Apple have already had discussions with the third and fourth level colleges in Galway to seek their support in identifying suitable candidates among their alumni.

Galway Chamber

Galway Chamber actively campaigns for better facilities and infrastructure and to improve the business opportunities, across all sectors, for the Chamber’s 400 member companies and all who do business in Galway and the West of Ireland.

Because of this and as a result of the matters outlined above, we respectfully present this Submission in the matter of the granting of Planning to the Apple Data Centre, Derrydonnell, Athenry, Co. Galway.