

6 Wilkins Court,  
Limekiln Lane,  
Dublin,  
D12 AR00.  
23<sup>rd</sup> of March, 2021.

**Ref; Planning Application - SD21A/0042**

Dear sir/madam,

I wish to lodge an objection to the planning application as referenced above for the reasons below;

1. Under the Planning and Development Act (2000) (as amended) the designated entity when it comes to developments which may have an impact on energy infrastructure is the Commission for Energy Regulation (now the Commission for Regulation of Utilities (CRU)). As noted by Eirgrid in the report referenced below "*data centre capacity could account for 29% of total demand by 2028. This Statement identifies that a generation deficit could occur by 2025."<sup>1</sup> Given that the construction of additional data centres may potentially impact the stability of the national grid going forward, it is evident that that the CRU has not been notified of the proposed planning permission given its potential impact on national energy infrastructure and the input of the CRU has not formed part of this planning application despite the CRU being the designated entity for energy and energy infrastructure, which would encompass the national grid, under the relevant legislation.*
2. There is a disproportionate concentration of data centres in the environs of SDCC already and additional permissions may lead to dangerous planning precedent in this regard.
3. Eirgrid are currently proposing to ban any additional data centres in the GDA given the over-concentration of same in the area and the impact that data centres are having on the national grid as part of a public consultation underway at present. It could be argued to be premature to consider additional planning permissions for data centres until such a consultation period has concluded and the intentions of the national grid operator are known.
4. It is disappointing to note that there is no intention by the applicant to supplement the significant energy demands of the data centre with any renewable energy sources, particularly given the scale of the buildings under consideration. Renewables will never provide the required energy to fully power a building of this scale but should make a contribution to the energy needs of this facility. As noted in the SDCC Development Plan (2016-2022) "South Dublin County should aspire to becoming as carbon neutral as possible and make every effort to increase energy efficiency and unlock renewable energy potential."<sup>2</sup> This would appear to be in contrast to the stated goals of the existing SDCC development plan and the future Development Plan (2022-2028), which is currently in the process of being prepared,
5. Should SDCC consider such a development to be merited, a condition of grant of planning should be that all energy utilised, other than the back-up gas generator system, are sourced from 100% renewable energy sources at all times in order to meet SDCC's and the states climate action obligations, where the intention of same are to be enshrined in law.

Kind regards,



Proinsias Mac Eithríocháin

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<sup>1</sup> Eirgrid - Consultation on Data Centre Connection Offer Process & Policy (July, 2020)

<sup>2</sup> South Dublin County Council – Climate Change Action Plan (2019 – 2024), pg 56



Mr. Proinsias Mac Fhlannchadha  
6 Wilkins Court  
Limekiln Lane  
Dublin 12  
D12 AR00

Date: 23-Mar-2021

Dear Sir/Madam,

**Register Ref:**  
**Development:**

SD21A/0042

Construction of two single storey data centres with associated office and service areas; and three gas powered generation plant buildings with an overall gross floor area of 24,624sq.m that will comprise of the following: Demolition of abandoned single storey dwelling, remaining agricultural shed and derelict former farm building; Construction of 2 single storey data centres (12,797sq.m), both with associated plant at roof level, with 24 standby diesel generators with associated flues (each 25m high) that will be attached to a single storey goods receiving area/store and a single storey office area (2,404sq.m) located to the west of the data centres as well as associated water tower and sprinkler tank and other services; Amendments to the internal access road and omission of access to loading bay permitted under SDCC planning Ref. SD19A/0042/ABP Ref. PL06S.305948 that include the relocation of permitted, and new, internal security gates; and new internal access roads to serve the proposed development that will provide access to 39 new car parking spaces (including 4 electric and 2 disabled spaces) and sheltered bicycle parking to serve the new data centres; The development will also include the phased development of 3 two storey gas powered generation plants (9,286sq.m) within three individual buildings and ancillary development to provide power to facilitate the development of the overall site to be located within the south-west part of the overall site. Gas plant 1 (3,045sq.m) will contain 20 generator units (18+2) with associated flues (each 25m high) will facilitate, once operational the decommissioning of the temporary Gas Powered Generation Plant within its open compound as granted under SDCC Planning Ref. SD19A/0042/ABP Ref. PL06S.305948. Gas plant 2 (3,045sq.m) will contain 20 generator units (18+2) with associated flues (each 25m high). and, Gas plant 3 (3,196sq.m) will contain 21 generator units (19+2) with associated flues (each 25m high). These plants will be built to provide power to each data centre, if and, when required. The gas plants will be required as back up power generation once the permitted power connection via the permitted substation is achieved; New attenuation pond to the north of the site; Green walls are proposed on the southern elevation of each power plant, as well as to the northern elevation of the generator compound of the data centres, and enclosing the water tower/pump room compound, and a new hedgerow is proposed linking east and west of the site; Proposed above ground gas installation compound to contain single storey kiosk (93sq.m) and boiler room (44sq.m). The development will also include ancillary

site works, connections to existing infrastructural services as well as fencing and signage. The development will include minor modifications to the permitted landscaping to the west of the site as granted under SDCC planning Ref. SD19A/0042/ABP Ref. PL06S.305948. The site will remain enclosed by landscaping to all boundaries. The development will be accessed off the R120 via the permitted access granted under SDCC planning Ref. SD19A/0042/ABP Ref. PL06S.305948. An EPA-Industrial Emissions (IE) licence will be applied for to facilitate the operation of the gas powered generation plant. An Environment Impact Assessment Report (EIAR) has been submitted with this application. All on a site of 22.1hectares.

**Location:** Site within the townland of Ballymakaily, West of Newcastle Road (R120), Lucan, Co. Dublin  
**Applicant:** EdgeConneX Ireland Limited  
**Application Type:** Permission  
**Date Rec'd:** 24-Feb-2021

I wish to acknowledge receipt of your submission in connection with the above planning application. The appropriate fee of €20.00 has been paid and your submission is in accordance with the appropriate provisions of the Planning and Development Regulations 2001(as amended). The contents of your submission will be brought to the attention of the Planning Officer during the course of consideration of this application.

This is an important document. You will be required to produce this document to An Bord Pleanala if you wish to appeal the decision of the Council when it is made. You will be informed of the decision in due course. Please be advised that all current applications are available for inspection at the public counter and on the Council's Website, [www.sdublincoco.ie](http://www.sdublincoco.ie).

You may wish to avail of the Planning Departments email notification system on our website. When in the **Planning Applications** part of the Council website, [www.sdublincoco.ie](http://www.sdublincoco.ie), and when viewing an application on which a decision has not been made, you can input your email address into the box named "**Notify me of changes**" and click on "**Subscribe**". You should automatically receive an email notification when the decision is made. Please ensure that you submit a valid email address.

**Please note:** If you make a submission in respect of a planning application, the Council is obliged to make that document publicly available for inspection as soon as possible after receipt. Submissions are made available on the planning file at the Planning Department's public counter and with the exception of those of a personal nature, are also published on the Council's website along with the full content of a planning application.

Yours faithfully,

Mary Crowley  
for **Senior Planner**