

6 Wilkins Court,
Limekiln Lane,
Dublin,
D12 AR00.

30th of August, 2021.

Ref; Planning Application - SD21A/0217

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."¹ Given that the construction of additional data centres may potentially impact the stability of the national grid going forward, as noted in the Planning report, Section 4.2, 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 alternative energy supply to include renewable energy sources, particularly given the scale of the buildings under consideration, contrary to SDCCs Development Plan (2016-2022) E2 Objective 3. 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 Climate Action Plan 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."² 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. There is no information on proposals to connect the power plant and site to the national grid and the source of gas proposed.
6. The utilisation of Gas as a power source and diesel as a backup system for this development, must be considered contrary to SDCCs Development Plan (2016-2022) E2 Objective 2, E4 Objective 1 and national climate action obligations and laws in particular, the Climate Action and Low Carbon Development (Amendment) Act 2021. This not referenced in Section 4.2.3 of the Planning Report
7. Should SDCC consider such a development to be merited, a condition of grant of planning should be that all energy utilised are sourced from 100% renewable energy sources at all times
8. There is no provision for Green roofs as per SDCCs Development Plan (2016-2022) E2 Objective 8 and the Landscape Plan for the site is somewhat deficient in terms of promoting and encouraging biodiversity.

Kind regards,



Proinsias Mac Fhionnchú

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

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

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

Date: 02-Sep-2021

Dear Sir/Madam,

Register Ref: SD21A/0217

Development: 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; the first 2 storey data centre building (DUB15), located to the southwest of the site, will comprise 16,865sq.m data storage use, ancillary office use and associated electrical and mechanical plant rooms, loading bays, maintenance and storage space; a second 2 storey data centre building (DUB16), located to the southeast of the site, will comprise 16,712sq.m data storage areas, ancillary office use and associated electrical and mechanical plant rooms, loading bays, maintenance and storage space; both data centre buildings will reach a height of 20m; emergency generators and associated emission flues and plant are proposed in compounds adjacent to each data centre building; gas powered energy generation is proposed to the north east corner of the site to provide electricity for the proposed development; the application proposes to re-route and widen an existing watercourse constructed following an earlier planning permission; it is proposed to reroute this watercourse along the eastern and southern boundary of the site; landscaping is proposed to the south of the site to screen the buildings; fencing and security gates are proposed around the site; new access roads within the site are proposed along with 71 car parking spaces and 26 cycle spaces, bin stores, site lighting, and all associated works including underground foul and storm water drainage attenuation and utility cables and all other ancillary works; a Natura Impact Statement will be submitted to the planning authority with the application.

Location: Profile Park, Nangor Road, Clondalkin, Dublin 22

Applicant: Digital Netherlands VIII B. V.

Application Type: Permission

Date Rec'd: 04-Aug-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 Pleanála 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.

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, 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 contents of a planning application.

Yours faithfully,

M. Crowley
for **Senior Planner**