

An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department

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

Date: 05-Oct-2021

Dear Sir/Madam,

Register Ref: SD21A/0241

Development: Demolition of the abandoned single storey dwelling and associated outbuilding (206sqm); construction of 2 two storey data centers with plant at roof level of each facility and associated ancillary development which will have a gross floor area of 40,589sq.m consisting of 1 two storey data center (Building 11) which will be located to the south of the site and will have a gross floor area of 24,667sq.m. including 22 emergency generators located at ground floor level within a compound to the western side of the data center with associated flues that will be 22.3m in height; 1 two storey data center (Building 12) which will be located to the north of the site, and to the immediate north of Building 11 and will have a gross floor area of 12,915sq.m including 11 emergency generators located at ground floor level within a compound to the western side of the data center with associated flues that will be 22.3m in height; each of the two data centers will include data storage rooms, associated electrical and mechanical plant rooms, loading bays, maintenance and storage spaces, office administration areas, and plant including PV panels at roof level as well as a separate house generator for each facility which will provide emergency power to the admin and ancillary spaces; each generator will include a diesel tank and there will be a refuelling area to serve the proposed emergency generators; the overall height of each data center apart from the flues and plant at roof level is c. 14.23m above the finished floor level; the overall height of each data center apart from the flues and plant at roof level is c. 14.23m above the finished floor level; single storey step-up substation (38sq.m) as well as 2 single storey switch substations (121sq.m); AGI Gas Regulator compound that include 3 single storey buildings (134sq.m); construction of a gas powered generation plant in the form of a 13m high single storey building with a gross floor area of 2,714sq.m that will contain 10 gas generators with associated flues that will be 25m in height, and grouped in pairs and threes; the Gas Plant will be located to the west of Building 11; ancillary site development works, that will include reorientation of the Baldonnell Stream, biodiversity management initiatives, attenuation ponds and the installation and connection to the underground foul and storm water drainage network, and installation of utility ducts and cables, that will include the drilling and laying of ducts and cables under the internal road network within Profile Park; other ancillary site development works will include hard and soft

sprinkler tanks and pump room; a temporary gas powered generation plant within a fenced yard containing 21 generator units in containers. each with associated flues (each 25m high), 12 transformers and 10 containers of controls to be located to the west of, and associated with the first phase of Building 11, and will be required for a period of up to 2 years if connection to the national grid is delayed; this temporary plant will not be built if the connection to the national grid is in place prior to the operation of Building 11 at this site that includes an abandoned single storey residential property on the New Nangor Road (R134), Dublin 22; and on land within the townlands of Ballybane and Kilbride within Profile Park, Clondalkin, Dublin 22 on an overall site of 8.7 hectares.

Location: In the townlands of Ballybane & Kilbride within Profile Park, Clondalkin, Dublin 22

Applicant: Vantage Data Centers Dub 11 Ltd.

Application Type: Permission

Date Rec'd: 31-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. Furney
for Senior Planner

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

1st of October, 2021.

Ref; Planning Application – SD 21A/ 0241

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, it is evident that that the CRU has not been notified of the proposed planning permission given its potential impact on national 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. Action 20 of Ireland's Climate Action Plan (2019) states that a goal of the plan is to *"Implement energy actions under the Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy to ensure that large demand connections are regionally balanced to minimise grid reinforcements."* This application, when combined with other Data centres in the area, must be considered contrary to Action 20 of Irelands Climate Action Plan given the concentration of same in the Greater Dublin Area (GDA).
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. The utilisation of Gas power generation plant with 10 gas generators and diesel as a backup system for no 33 diesel generators for this development, must be considered contrary to the Climate Action and Low Carbon Development (Amendment) Act 2021, The SDCC Development Plan (2016-2022) Objectives E2 Objective 2, E4 Objective 1 and the SDCC Climate Action Plan (2019-2024). Chapter 10 of SDCC Development Plan states that *"South Dublin should aspire to becoming as carbon neutral as possible."* These objectives are mirrored at a national level in National Strategic Outcome 8 of the National Planning Framework and at regional level of Chapter 7 of the Eastern and Midland Regional Assembly RSES. The construction of these generators due to the fact that there is a severe shortage of excess electricity availability to service this development, must be considered contrary to national, regional and local objectives and policy with regard planning and energy and particular.
5. There is no information on proposals to connect the power plant and site to the national grid and the source of gas proposed nor the feasibility of same with for electricity, gas and waste water. It is also not clear whether is site is already serviced.

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

6. 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) Objectives E2 Objective 3. and EN13. 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.
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 by way of Corporate Power Purchase Agreement.
8. It is disappointing to note that there is no provision for waste heat recovery to facilitate a District heating system for the development and the surrounding environs.
9. 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.
10. The requirement to realign Baldonnell stream must be considered contrary to SDCC Development Plan (2016-2022) Objective ET3 Objective 5 where *"natural site features such as watercourses are to be retained and enhanced."*

Kind regards,



Proinsias Mac Ehléiríocháin