

Planning Department,
South Dublin County Council
County Hall Tallaght,
Dublin 24,
D24 A3XC

Online submission

BB/COC

4th July 2022

**Re: Our Clients: John Conway and Louth Environmental Group of 91 St.
Nicholas Avenue, Dundalk, Co. Louth Re:
Submission/Observation Planning Application Reference Number: SD22A/0156
Applicant: Equinix (Ireland) Ltd**

Dear Sir/Madam,

On behalf of the above-named Client, we wish to lodge the within written submissions/observations on the proposed development the subject matter of Planning Application Ref No. SD22A/0156, comprising an application for 10 year permission on a site is bounded to the east and south by Grange Castle G.

The grounds and reasons for our submission/observations are detailed hereinafter.

- (a) The planning application does not comply with the requirements of the Planning and Development Act 2000 (as amended) and associated Regulations. The applicant has failed to notify the Commission for Regulation of Utilities – which is so required in circumstances where the proposed development will have an impact on energy infrastructure.
- (b) The proposed development does not comply with the objectives of the South Dublin County Council Development Plan (2016-22), including in relation to E2 Objective 3; E4 Objective 1 and national climate actions obligations and the Climate Action and Low Carbon Development (Amendment) Act 2021 (having regard to the utilisation of gas and diesel as power sources); or the aspirations of the South Dublin County Council Climate Action Plan.
- (c) The planning application does not comply with the requirements of the 2001 Regulations (as amended), the EIA Directive or the Habitats Directive in

circumstances where there insufficient information and detail presented, including in relation to how the proposed development would operate via linkage/connection to the national grid.

- (d) The proposed development should be subject to a complete Environmental Impact Assessment in accordance with the provision of national law and the EIA Directive (as amended), having regard to the nature of the project.
 - (e) The Proposed Development does not comply with the requirements of the Planning and Development Act 2000 (as amended) (*under Part XAB of the 2000 Act (ss.177R-177AE)*) and the Habitats Directive. Due to inadequacies and lacunae in the AA Screening Report and NIS prepared by the Developer the Board does not have sufficient and/or adequate information before it to carry out a complete AA Screening and AA in relation to the proposed development.
 - (f) Inadequate information has been provided in the NIS to screen out the potential impact of the proposed development on birds – reference to generic statements is not a substitute for expert scientific opinion as to the potential impact of the proposed development, during both construction and operational phases on birds, including bird flight lines and collision risks.
 - (g) The AA Screening assessment, included in the NIS, does not provide sufficient reasons or findings, as required under Art.6(3) of the Habitats Directive and national law, to the requisite standard – the conclusions/statements made therein do not identify any clear methodology and no analysis is offered in respect of the AA Screening conclusions in respect of the protected sites “screened out” at the said AA Screening stage.
 - (h) The “Zone-of-Influence” referred to in the NIS is not reasoned or explained – it is unclear how such a zone was so determined – the criteria for determining a “zone-of-influence” has no basis in law. Furthermore, the limitation of the consideration of protected sites to a 15km radius is not explained and it is unclear how such a limitation was determined.
 - (i) No regard and/or inadequate regard has been given to the cumulative effects of the proposed development, in combination with other development in the vicinity, on the protected sites.
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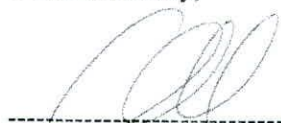
- (j) The extremely high electricity consumption will increase Ireland's carbon emissions at a time when we urgently need to reduce them. Gas will be burnt to power this data centre during a climate emergency, when Ireland is supposed to be reducing national emissions by 51% under the Climate Action and Low Carbon Development (Amendment) Bill. The proposed development will increase our fossil fuel emissions and is incompatible with this Bill. The Environmental Agency announced last year that Ireland has already overshoot its 2018 greenhouse gas emissions ceiling of 60.93 million tonnes of carbon dioxide equivalent (Mt CO₂eq) by 5.59Mt. Due to the inevitable leakage of methane during extraction, processing and transportation, using gas to generate power releases more methane into the atmosphere than using coal or oil. Methane has a global warming potential 87 times higher than carbon dioxide in the first 20 years after emission. [Prof Robert Howarth: Ideas and perspectives: is shale gas a major driver of recent increase in global atmospheric methane? <https://bg.copernicus.org/articles/16/3033/2019/>]
- (k) There is already a disproportionate number of Data Centres in the South Dublin Area. Dozens of centres have opened in recent years,
- (l) Water usage. Peak demand of water usage stands at around 1,000,000 litres of water per day. Rainwater collection cannot be relied upon, due to uneven patterns of precipitation which will become even more erratic as the climate changes. Cooling the data centre will divert a valuable resource away from the local community, a situation which is likely to get worse as water scarcity becomes more of a problem and population increases. A region with ample water today may become water-stressed in 10 to 30 years. We have recently witnessed that protracted periods of temperatures above 26 C with no precipitation are becoming more frequent in Ireland. The UN expects water demand to outpace supply by almost 40% as soon as 2030. Greater consideration needs to be given to how available resources are going to be used.
- (m) As per South Dublin County Council's Development Plans (2016-2022) E2 Objective 8 and the landscape plan for this site has no provision for Green Roofs in terms of promoting and encouraging biodiversity.
- (n) The Government has set a target that 70 percent of Ireland's electricity will come from renewable sources by 2030. In its Generation Capacity Statement 2020-2029, EirGrid projects that demand from data centers could account
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for 27 percent of all electricity demand in the country by 2029, up from 11 percent in 2020.

- (o) Ireland is one of the EU's worst carbon emission offenders and faces fines of more than €250 million for missing 2020 targets on reducing greenhouse gas emissions. Missing later targets will trigger steeper fines.
- (p) According to Host in Ireland/Bitpower figures, the data centre industry was responsible for 1.85% of electricity-related carbon emissions in the country during 2020, and this is expected to reach 2.2% by 2025. By 2027, data centres will consume 31% of Ireland's electricity. This rise isn't startling, considering that data centre growth is expected to double over the next five years.
- (q) The climate action plan set an ambition of 70% renewable electricity by 2030. This planning application has no intention to supplement the significant energy demands of the data centre with alternative energy supply. Renewables will never provide all the energy requirement for this large scale data centre, contrary to South Dublin County Councils Development Plan (2016-2022) and the future Development Plan (2022-2028).
- (r) The EIAR, is inadequate and deficient and does not permit an assessment of the potential environmental impacts of the proposed development.
- (s) This application is in breach of Article 19(4) of the Planning and Development Regulations 2001-2006 as amended, as this site notice should be been presented on yellow paper.

We enclose herewith €20.00 being the fee submitted with our Submissions.

Yours faithfully,



Christine O' Connor,
BKC Solicitors

An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department
Telephone: 01 4149000 Fax: 01 4149104

Email: Planningdept@sdblincoco.ie

Ms. Christine O Connor,
BKC Solicitors
Harolds Cross Road
252, Harolds Cross
Dublin 6w
D6WT384

Date: 06-Jul-2022

Dear Sir/Madam,

Register Ref: SD22A/0156

Development: 10 year permission on a site is bounded to the east and south by Grange Castle Golf Club, to the north by Nangor Road (R134) and to the west by an estate road known as Falcon Avenue) for modifications to the permitted data centre granted under SDCC Reg. Ref. SD21A/0186 comprising the following, reconfiguration and alterations to the data centre building to include removal of front of house offices at third floor level, alterations to floor levels at second floor to provide consistency between front of house and data halls, parapet height increase of front of house to c.16.8m, provision of storage at second floor level in lieu of relocated internal generators to the external generator yard and associated elevational alterations; extension of loading dock at ground floor level by c.60sqm in area with minor height increase to c.5.3m; removal of 3 air plenums to the front (north) elevation and provision of screening to generator flues in lieu of omitted plenums; alterations at roof level to include removal of 2m high gantry screening; alterations to the permitted generator plant yard to the north of the data centre to include the removal of fuel tanks, reconfiguration of plant and generators, provision of 2 additional external generators (increase from 5 to 9 external generators), provision of 4 additional external plant rooms, provision of diesel pump tank cabinets and stepover, relocation of generator yard doors and enlarged generator yard to accommodate the proposed modifications; increase in plant areas by c.77sq.m; reconfiguration of plant within the permitted chiller plant yard to the south of the data centre; removal of 1 sprinkler/water tank and removal of stairs and door to the side of the waste compound; reconfiguration of car parking and motorcycle spaces and removal of 1 accessible space. 64 total number of car parking spaces; the proposal also includes provision of on-site gas power generation compound (c.2,604sq.m in area) in the area previously reserved for a future data centre; the compound comprises 7 modular plant rooms (totalling c.180sq.m in area), 10 gas fired generators and associated flues c.14.7m high, gas skid, associated modular plant, boundary treatment surrounding the compound c.6.5m high and 2 vehicular access points including general and emergency access, all associated site development works, services provision, drainage works, access, landscaping and boundary treatment works; no buildings are proposed above the existing ESB and SDCC waveleaves to the west and north of the site: the overall Gross Floor Area

of the development is reduced by c.44sq.m to c.9,795sq.m from previously permitted under SDCC Reg. Ref. SD21A/0186; the application is accompanied by a Natura Impact Statement.

Location: Plot 100, Profile Park, Nangor Road, Clondalkin, Dublin 22
Applicant: Equinix (Ireland) Ltd
Application Type: Permission
Date Rec'd: 30-May-2022

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**