

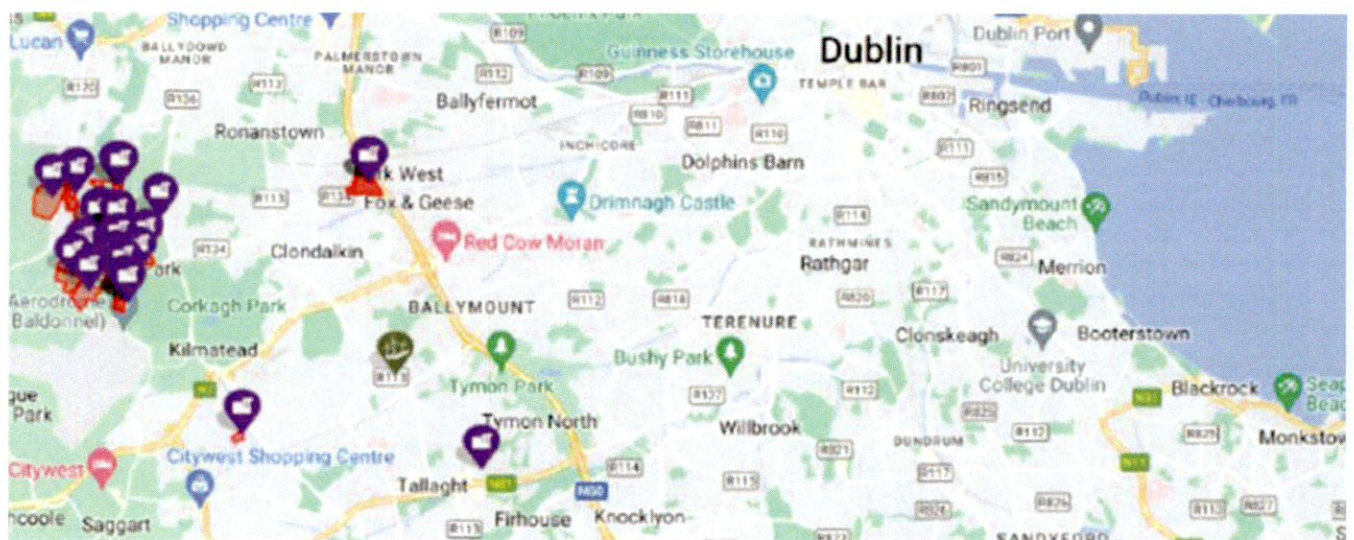
6 Wilkins Court,
Limekiln Lane,
Dublin D12 AR00.
1st of September, 2022.

Ref; Planning Application – SD22A/0333

Dear sir/madam,

I wish to lodge an objection to the proposed planning application as referenced above and with due consideration that SDCC may refuse permission for some of the reasons as outlined 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)). 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. The South Dublin County Development Plan 2022 - 2028 was made by resolution by the Elected Members on June 22nd and came into effect on August 3rd 2022. In accordance with Section 34 (2) of the Planning and Development Act 2000 (as amended), the applicant and its consultants has failed to demonstrate acknowledgement and adherence with the objectives as set out in this plan, particularly.
3. The sectoral emissions under the Climate Action and Low Carbon Development (Amendment) Act 2021 were issued by the Government of Ireland on the 28th of July, 2022 (see <https://www.gov.ie/en/press-release/dab6d-government-announces-sectoral-emissions-ceilings-setting-ireland-on-a-pathway-to-turn-the-tide-on-climate-change/>). Under this plan, electricity is required to reduce its MtCO2eq emissions by 75% to 3 MtCO2eq by 2030. There is no reference made in the EIAR Technical Summary document prepared by Marston how this development would aid the state in achieving its legally mandated Co2 and Nox reduction nor how the 24 diesel generators assist in the national and local environmental polices under the South Dublin County Development Plan 2022 - 2028 for a net zero environment.
4. 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 and create clusters of EE lands devoid of any commercial activity. The below map highlights the impact of same in such a confined location.



5. The EIAR provided as part of this application does not take into account the cumulative effects/ impacts of this proposed development in combination with other similar data centre developments in the greater Dublin area. This is a systemic deficiency of the Environmental Impact Assessment (EIA) process as defined by the Environmental Impact Assessment Directive, which requires that direct, indirect and cumulative impacts be fully assessed and mitigated. To note there are other Data centres in the immediate area and there are many more envisaged in the immediate environs (see Planning references (SD20A/0295, SD20A/0283 and a subsequent number of planning applications lodged since then.) This is in particular reference to the existing, permitted and applied for permissions as outlined in Point 3

The applicant has failed to quantify the contribution this development will make with reference to Ireland's carbon budgets and how this data centre will result in the state achieving its legally binding targets. The forecast growth of data centres clearly represents a challenge to Ireland's emissions targets. Energy demand, including data centres, will be expected to operate within sectoral emissions ceilings as per the Climate Action Plan (2021).

Significantly the applicant has underplayed the ecological importance of the lands to migratory birds, native birds and bats in the area, particularly due to the destruction of hedgerows with insufficient mitigating factors to replace these habitats. The application should be refused on these grounds

6. In July, 2022 the Department of Enterprise, Trade and Employment has issued its "Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy" (see <https://enterprise.gov.ie/en/publications/government-statement-on-role-of-data-centres-in-enterprise-strategy.html>). In this report, the Government states that *"The capacity constraints experienced by our electricity system today, and the binding carbon budgets that require rapid decarbonisation of energy use across all sectors, necessarily mean that not all existing demand for data centre development can be accommodated."* This report has failed to be acknowledged by the applicant. I ask that SDCC pay due heed to Government strategy on Data centres given the grid constraints in the GDA, along with the construction of 24 Diesel generators which contradict Government policy in this regard and should be refused permission by SDCC.
7. 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 on the entire of the buildings and battery storage, particularly given the scale of the buildings under consideration contrary to SDCCs Development Plan objectives. 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.
8. The application for a 10 year permission excessive and spans across 2 development Plan cycles in and is unnecessary. It is not clear why a 10 year grant of permission is required.
9. As has been the case in other applications, it will be at least 6-8 years before a connection to the national grid is permitted by Eirgrid (see application SD22A/0156). The applicant has failed to provide any correspondence from the Commission for Regulation of Utilities/Eirgrid that a grid connection is feasible and the timeline for the connection, as well as details of any consultation undertaken with these bodies. On this basis, the application should be considered premature given the grid constraints in the Greater Dublin Area.

I hope SDCC will give these points consideration when this application is reviewed and accordingly refuse permission.

Kind regards,


Proinsias Mac Eibhinnicháda

Proinsias Mac Fhlannchadha
6, Wilkins Court
Dublin
D12 AR00

Date: 05-Sep-2022

Dear Sir/Madam,

Register Ref: SD22A/0333

Development: Construction of 2 adjoined single storey data centres with associated office and service areas with an overall gross floor area of 15,274sq.m comprising of the construction of 2 adjoined single storey data centres with a gross floor area of 12,859sq.m that will include a single storey goods receiving area / store and single storey office area (2,415sq.m) with PV panels above, located to the east of the data centres as well as associated water tower, sprinkler tank, pump house and other services; The data centres will also include plant at roof level; with 24 standby diesel generators with associated flues (each 25m high) that will be located within a generator yard to the west of the data centres; New internal access road and security gates to serve the proposed development that will provide access to 36 new car parking spaces (including 4 electric and 2 disabled spaces) and sheltered bicycle parking to serve the new data centres; New attenuation ponds to the north of the proposed data centres; Green walls are proposed to the south and east that will enclose the water tower and pump house compound; 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 and Ref. SD21A/0042; 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 and SD21A/0042; An Environmental Impact Assessment Report (EIAR) has been submitted with this application.

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: 16-Aug-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**