

6 Wilkins Court,

Limekiln Lane,

Dublin D12 AR00.

24th of November, 2022.

Ref; Planning Application – SD22A/0420

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. The stated GHG Impact of the proposed Development in the EIAR with an output of 90,319tCo2e (Table 13;18) implies only from the use of the emergency diesel generators on site and **does not** take into account powering the facility using power from the national grid and the GHG emission profile of same using the National Fuel Mix for 2021 as published by the CRU which is **a gross under representation of the emission profile of this development.** The Applicant should be challenged on this aspect of their submission and asked to resubmit this information in the context of the emission profile to power the facility in its entirety.

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 (SD22A/ 0156, SD22A/0333, SD20A/0295, SD21A/ 0241, SD20A/0283 and a subsequent number of planning applications lodged since then.) This is reference to the existing, permitted and applied for permissions as outlined above

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). 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 13 diesel generators assist in the national and local environmental polices under the South Dublin County Development Plan 2022 - 2028 for a net zero environment.

I enjoyed reading that in 13.8.29 of the EIAR that the Applicant is satisfied that they can make a "*net zero carbon offset payment,*" (whatever that is) and that that regardless of the Sectoral Emission budgets whilst this development does not assist in achieving our aims, severe climate events are going to happen anyway so lets just keep calm and keep permitting data centres.

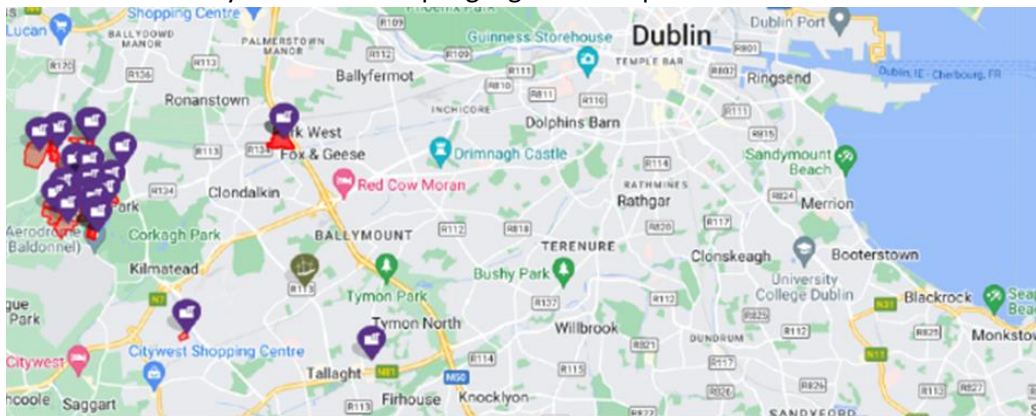
One would have to question how much research was undertaken into this EIAR given the constant references to the "**UK's trajectory to net zero.**"

2. As this is an application for a new data centre, I fail to see how Eirgrid could have provided a connection agreement for this development as these agreements are only entered into post receipt of planning permission from the relevant local authority. The Applicant should be challenged as to whether;
 - a. The connection agreement permits to only the granted development under SD21A/0241
 - b. Whether the application for connection to Eirgrid included the proposed development (SD22A/0420) despite the fact that it has not received planning permission at the time of application.

3. As per Objective EDE7 South Dublin County Development Plan (2022 – 2028), the Applicant has failed to demonstrate.
 - a. How this development actually supports national targets towards a net zero carbon economy, including renewable energy generation. Any claims by the applicant in their application of “committed to achieving net zero,” as referenced in the Planning Report by their consultant must be considered fanciful and irrelevant. As the applicant itself is not legally mandated to achieve “net zero,” the Applicant should be challenged as to how the provision of this development will aid the state in achieving its legally mandated goals under the Climate Action Plan (2021) and relevant sectoral emission targets.
 - b. The Applicant has failed to demonstrate any Corporate Power Purchase Agreement for the provision of 100% renewable energy as the site demand cannot be met by onsite renewables.
 - c. Given the existing strains on the national grid as evidenced by the increasingly frequent number of amber alerts issued by the Grid operator, the Applicant has failed to provide evidence of sufficient capacity in the national grid and instead relies on questionable conclusions but no evidence of same. The Applicant should be asked to engage with Eirgrid/ CRU on this matter by way of FI.

4. It is not clear what the source of energy is for the multi fuel plant is to be and it is not clear why there would be an additional need for 13 emergency generators to supplement this.

5. 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



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 aspect of the report has conveniently failed to be acknowledge 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 13 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. Disappointing to note that the Development makes no use of green walls/ living walls or green roofs as per G15 Objective 7. The development as it stands is stunningly monolithic as is the majority of Grange Castle/ Profile Park due to the proliferation of these data centres.
9. Contrary to Objective GI2 Objective 5 of the SDCC Development Plan (2022-2028), the Applicant intends to remove 260m of already established hedgerow. As per the objective existing GI infrastructure including hedgerows should be protected.

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

Kind regards,



Proinsias Mac Ehlannacháin