

6 Wilkins Court,  
Limekiln Lane,  
Dublin D12 AR00.  
12<sup>th</sup> of January 2023.

**Ref; Planning Application – SD22A/0460**

Dear sir/madam,

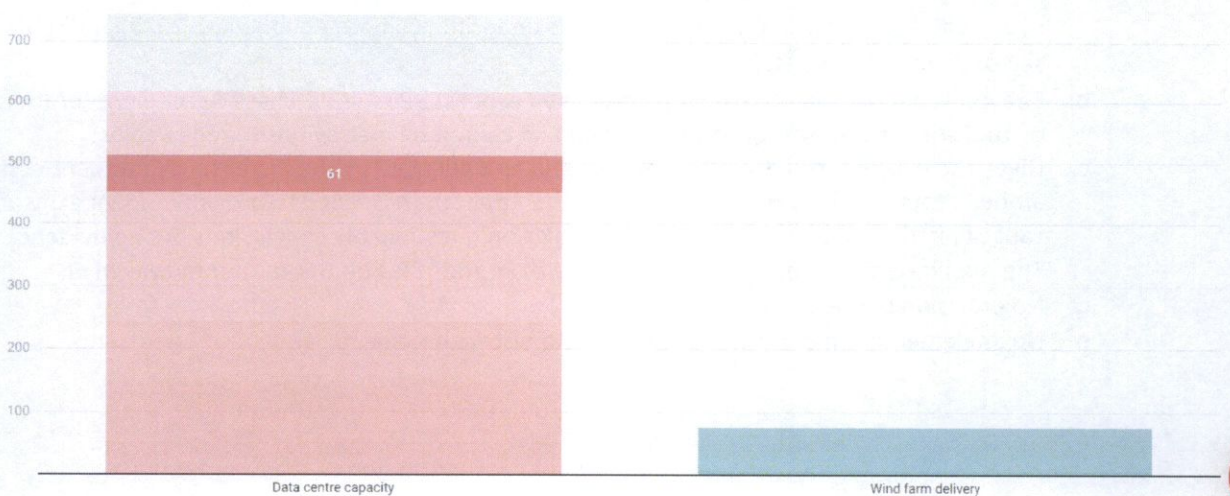
I wish to lodge an objection to the proposed planning application as referenced above and with due consideration that SDCC may refuse permission for some of the reasons as outlined below.

1. This planning application is premature pending the publication of the City Edge Local Area Plan and is contrary to EDE4 Objective 10 of the SDCC development Plan (2022-2028) and contributes to a gross underutilisation of EE zoned lands at a time when industrial and commercial vacancy in SDCC is at record lows.
2. The Planning application states that *“There is no provision of associated new electricity connection infrastructure as it will utilise existing ESB networks infrastructure. Electrical supply will not fall within the scope of Eirgrid’s “Data centre connection offer process and policy.”* I would contend that this is quite an assumption to be made by the Applicant and that this confirmation needs to be obtained from Eirgrid given the current energy crisis in GDA and the fact that his application fails to demonstrate compliance with Eirgrid’s Data centre connection offer process and Policy at present. The Applicant has also failed to demonstrate how there is sufficient capacity in the Grid to accommodate this development contrary to their assertions on page 16 of the Planning Report.
3. The Applicant should be asked to demonstrate compliance and adherence to national [the Climate Action Plan \(2023\)](#) which was published on the 21<sup>st</sup> of December, 2022.
4. In multiple applications made by applicants on behalf of AWS as operator, we constantly see this nonsense issued that Amazon would power 100% of its operations by renewable power by 2025. For context, this is how far off Amazon are achieving this goal back in 2021. This graph does not take into account the planning applications that have been lodged since. SDCC should challenge the applicant on AWS’s current status in Ireland with regard to powering their data centres using renewables.

**AWS data centre capacity and wind PPAs in Ireland**

MW, existing and under development

DUB2 (Tallaght)\* DUB3 (Blanchardstown)\* DUB4, DUB7 (Clonsilla)\* DUB10, DUB50, DUB51 (Clonsilla) DUB54 (Clonsilla) DUB9 (Blanchardstown)  
DUB 58 (Mulhuddart) DUB9, DUB53 (Tallaght) DUB55 (Tallaght) Droichead Grange Castle Cork Donegal Galway





Source – The Currency “Amazon’s data centres will need more power than a million Irish homes – but where from <https://thecurrency.news/articles/31454/amazons-data-centres-will-need-more-power-than-a-million-irish-homes-but-where-from/> - Published 14<sup>th</sup> of December, 2020.

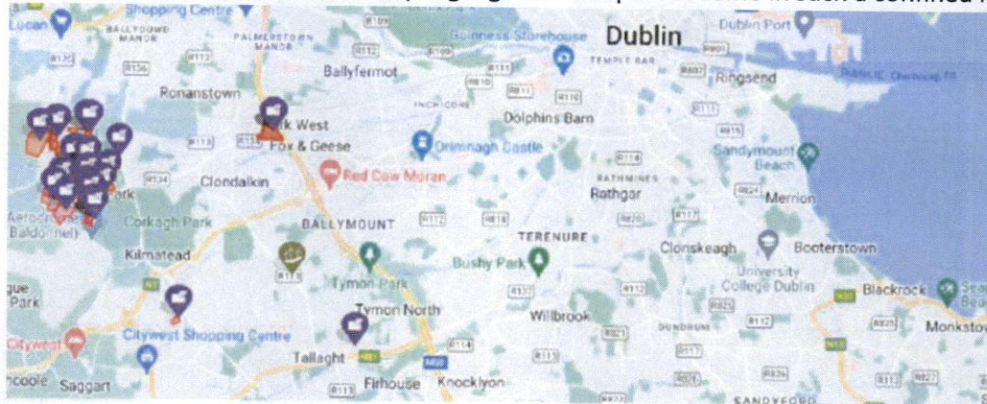
5. The EIAR provided as part of this application does not take into account the cumulative effects/ impacts of this proposed development in combination with other similar data centre developments in the greater Dublin area. This is a systemic deficiency of the Environmental Impact Assessment (EIA) process 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 (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 28<sup>th</sup> 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 MtCO<sub>2</sub>eq emissions by 75% to 3 MtCO<sub>2</sub>eq 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 CO<sub>2</sub> and NO<sub>x</sub> reduction and how this development will adhere to the national and local environmental policies under the South Dublin County Development Plan 2022 - 2028 for a net zero environment.

6. As per Objective EDE7 Space Extensive Land Use of the South Dublin County Development Plan (2022 – 2028), the Applicant has failed to demonstrate Adherence to EDE7 Objective 1 *“To ensure that, insofar as possible, space extensive enterprise is located on lands which are outside the M50 and which do not compromise labour intensive opportunities on zoned lands adjacent to public transport.”*
7. As per Objective EDE7 Space Extensive Land Use of the South Dublin County Development Plan (2022 – 2028), the Applicant has failed to demonstrate adherence to EDE7 Objective 2 in so far.
  - 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 (2023) 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.
  - d. No provision of on-site renewables
  - e. No implementation of measures to facilitate district heating



8. 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



9. 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, which contradict Government policy in this regard and should be refused permission by SDCC.
10. 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.
11. 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 in its lack of architectural and design quality contrary to EDE7 Objective 3.

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

Kind regards,

  
Profhais Mac Eibhlinnchadh