This submission is made on behalf of Not Here Not Anywhere (NHNA), a nationwide, grassroots, non-partisan group campaigning to end fossil fuel exploration and the development of new fossil fuel infrastructure in Ireland.

NHNA welcomes the emphasis placed on climate action in the Draft Plan and your commitment to curbing GHG emissions. We particularly invite the development of renewable energies, the provision of support to tackle energy poverty, and Dún Laoghaire/Rathdown's recent passing of the motion to oppose fracked gas imports. NHNA recognises the integral role that county and city councils play in helping communities to transition from fossil fuels to renewable energy, and planning is a key area of influence. We make the following recommendations regarding your new development plan:

1. Fossil fuels and new fossil fuel infrastructure

Recommendations:

- The County Development Plan should ensure a rapid phasing out of all fossil fuels including gas.

- The County Development Plan should not allow the expansion of the gas grid.

- The County Development Plan should ban fracked gas in its energy mix.

- Any new large scale fossil fuel infrastructure projects must be mandated to undertake climate impact assessment to ensure they are consistent with Ireland's fair share net cumulative carbon dioxide (CO2) quota in line with the Paris agreement.

Impacts of Fossil Gas Projects

Research states that if we are to keep global temperature rise below 1.5°C and avoid catastrophic climate change, fossil gas must be phased out of the energy mix in Europe by 2035 {i}, discrediting claims that gas is a "transition fuel" in the transition to a decarbonised economy {ii}{iii}. Research also states that we can't develop any new fossil fuel infrastructure from 2019 onwards if we are to have a 64% chance of limiting temperature rise to less than 1.5°C {iv}. Currently, 69% of all gas produced in the US and imported to Europe as Liquefied Natural Gas (LNG) is sourced through hydraulic fracturing, or fracking {v}. New LNG exports will super-charge additional fracking, as 80% of the increased exports will come from new, i.e, fracked, wells {vi}. Recent investigation shows that this is 40% more damaging to the climate than coal {vii}. The lifespan of a project like LNG is at least 30 years which would increase our dependence on dirty fossil fuels and discourage the development of renewable energy projects {viii}.

Energy Security and LNG

New gas infrastructure is not required for energy security. A 2020 study by leading independent consultancy, Artelys concluded that "existing EU gas infrastructure is sufficiently capable of meeting a variety of future gas demand scenarios in the EU28, even in the event of extreme supply disruption cases" {ix}. The European body of gas network operators, ENTSO-G, in its 2017 Security of Supply Review, found that Ireland and the UK would suffer no curtailment in gas supply if faced with a variety of supply disruption scenarios {x}.

Historically, the UK has provided most of Ireland's gas supply, and Ervia states that in the UK "there is ample import capacity over and above demand" {xi}. Demand for gas in the UK has decreased by a fifth since 2004 and gas-fired electricity generation is expected to drop by 40% by 2025 {xii}. This is due to the existing over-capacity of the EU gas grid; gas import infrastructures have import capacity 200% higher than what Europe actually imports {xiii}.

2. Data Centres

Recommendations:

- New data centres must be powered by onsite or new off site renewable energy, with existing centres required to transition rapidly to onsite or new off site renewables.

- Where technically possible, heat recovered from Data Centres should be utilised for district heating systems.

Eirgrid estimates that demand from data centres could account for up to 36% of Ireland's electricity demand by 2030, along with 75% of new electricity demand growth (Eirgrid, 2017:30) {xiv}. The Irish Academy of Engineering predicts that data centre development will add at least 1.5 million tonnes to Ireland's carbon emissions by 2030, a 13% increase on current electricity sector emissions, and will require an investment of €9 billion by 2027 {xv}.

For example, if Amazon's eight centre project in Mulhuddart, Dublin 15, is realised, by 2026 it would use c. 4.4% per cent of the State's entire energy capacity, the equivalent of Galway city, but employ only 30 people post-construction, largely in facility maintenance {xvi}. The Apple data centre proposed for Athenry, Co. Galway, would ultimately use over 8% of the national capacity, more than the daily entire usage of Dublin, and would require 144 diesel generators as back-up {xvii}.

The government has acknowledged that "data centres pose considerable challenges to the future planning and operation of Ireland's power system" {xviii}. These challenges include higher electricity costs for consumers {xix}. The Danish Council on Climate Change recommended in April 2019 that the Danish government legally binds data centre owners and developers to contributing to the infrastructure required to supply the centres with renewable energy, such as wind and solar farms {xx}.

Currently, many companies claim to operate data centres powered by 100% renewable energy. However, the energy is largely sourced indirectly through Renewable Energy Certificates or Purchase Power Agreements {xxi}, which means that the energy is sourced from the grid, which in Ireland is 69% fossil fuel-powered {xxii}. If we continue to allow companies to virtually purchase clean energy where it is cheapest to create, while actually using and increasing demand for dirty energy in Ireland, we allow them to profit while our real emissions continue to rise. It is crucial therefore that data centres are powered directly by onsite renewable energy generation such as rooftop solar farms or new offsite generation such as offshore wind or solar farms. Data Centres also generate large quantities of waste heat which could be utilised in district heating systems {xxiii}.

Due to the significant demand that data centres will place on Ireland's energy grid, we urge Dún Laoghaire/Rathdown County Council to examine the impact that energy supply of data

centres will have on net emissions. Furthermore, it is crucial to take into consideration the cumulative impact of data centres' energy demand, as opposed to examining impact solely on a case-by-case basis.

3. Public Participation and People-led Policy

Recommendations:

- Outside the development of this plan, the council should lead annual local climate dialogues which serve to inform communities about the ongoing transition to a low carbon society and seek their opinions, ideas and consent.

- The Climate Action and Environment office, or equivalent, within the council must be adequately resourced, publicised and staffed. These offices should work closely with local communities to improve education and access to information around environmental issues, proactively engage in consultations and participatory processes which allow local people to have a say in the energy transition in their area.

- Wherever practically possible, participatory processes should be designed in a participatory way, with input from representatives of all groups who are expected to take part.

- Special outreach efforts must be made to include disadvantaged or marginalised groups in participatory processes. Those running participatory processes should keep a detailed record of the participation of marginalised groups and of best practices that serve to increase this participation.

- Support and establish community energy projects throughout the lifetime of the county development plan.

Throughout the lifetime of this county development plan, Ireland's transition to a low carbon society is entering its most crucial decade. It's vital that it should be centred around providing people and communities with clean, affordable and reliable energy. The best way to do so is to ensure citizen participation at all levels and stages of the energy transition.

There are many different ways in which people can participate in governance, ranging from informing to consultation to partnership to citizen control, whereby community members control the process (Armstein, 1969) {xxiv}. While all of these methods of participation are useful and valid at different stages of policymaking, different forms of participation should be incorporated into major decisions (such as energy infrastructure projects) to create a thoroughly participative process; for example, informing and consulting at the stage of technical impact assessments. Ideally, there should be citizen participation in the design of the participatory process itself, for example through focus groups or workshops which feed directly into sub-national and national policymaking.

Community participation and ownership has proved important for public acceptance of the energy transition in countries where the transition is more advanced than in Ireland. For example, in Germany, 70% of the tax paid by wind turbine operators goes directly to the municipality where the turbines are based. In Denmark, taxes on energy go into funds to subsidise local initiatives for environmental improvement and community generation.

Denmark also requires that local communities have a 20% share in onshore or near-shore wind turbines. Ownership measures like this are shown to increase community acceptance of energy transition infrastructure, and can take the form of individual shares in an energy project, community ownership of part of the infrastructure, or joint ventures between communities and developers {xxv}. There are many renewable energy projects that, with the support of the Council, can be developed. Numerous renewable energy exemplar projects exist around Europe, such as the Edinburgh Community Solar Co-operative, which empowers the public to be part of the transition to a low carbon society {xxvi}.

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