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For a fossil free future for Ireland

5th December, 2022

Fingal County Council
County Hall, Main Street, Swords
County Dublin
K67 X8Y2

Planning Application Reference Number: FW22A/0257

Applicant: CGTD Limited

Location: In the Townland of Bay, Corduff Road, Ballycoolin, Dublin 15

Description:

Modification of approved plans Reg Refs FW21A/0077 and FW21A/0222 for the change of use of the revised warehouse/logistics building (total gross floor area 4.179 sq.m and max height 15.255 metres) including 2 storey ancillary office accommodation (529 sq.m) in reg ref FW21A/0222 to an energy centre within the approved building structure containing 12 no generator units with associated flues (6 no flues each 30m high) to power the approved 2 no data storage buildings on this site; external plant at approved loading bays with 2.75m high acoustic louvre screen surround comprising a radiator farm with 12 no radiators and 2 no black start (emergency) diesel generators, 1 no water sprinkler, pump house (11.65 sq.m) and 1 no tank, 1 no gas skid, reduced car parking from 45 to 13 no spaces and ancillary site development works
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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 and around the world.

The Fingal Development Plan 2017-2023 emphasises the necessity to reduce our greenhouse gas emissions and increase the proportion of energy consumed from non-polluting, low carbon and renewable energy sources across sectors. We note that the development plan is currently being updated and will need to incorporate the increased targets in the national Climate Action Plan and reflect the requirements of the Climate Action and Low Carbon Development (Amendment) Act 2021. The Act and the Climate Action Plan commit Ireland to a National Climate Objective of achieving a climate neutral economy by 2050.

In this context, data centre developments and any related applications must be considered carefully.

To align with our national climate targets, it is essential that Fingal County Council are aware of the projected emissions for all new infrastructure. It is our contention that data centres must be powered entirely by onsite or new off-site **renewable** energy to prevent an increase of Ireland's CO² emissions, consistent with the Climate Action Plan and commitments under the Paris Agreement.

In this case, we observe no plans to provide for the generation of renewable energy to compensate for the increased energy demand which the data centre is placing on the grid. In January 2022, EirGrid confirmed that they would not connect new data centres in Dublin for the foreseeable future due to concerns about energy security and the large electricity consumption of data centres (Hurley, 2022). Fingal County Council must take these concerns seriously when reviewing this application for data centre-related diesel generation infrastructure.

Diesel generators such as those proposed under this application will result in fossil fuels being used to both power the data centre and act as a back-up energy source. The applicant should be required to either provide for its own renewable energy generation (on or off site) and/or use fuel from renewable sources for storage or back-up generation.

If the data centre cannot be powered by renewable energy, it will lead to an increase in Fingal's greenhouse gas emissions between now and 2030, contravening the Climate Act, Climate Action Plan and National Planning Framework. Thus, in the event that powering the data centre with onsite or offsite renewable energy is not being proposed, permission for the development of diesel generation should be refused.

Diesel generators produce carbon dioxide (CO₂), Nitrogen Oxide (NO_x) and particulate matter. CO₂ emissions from diesel have been found to be far higher than emissions from the grid. For example, one US study found that a typical diesel generator emits 2.15 times more CO₂ than the U.S. grid¹.

In addition to increased emissions, release of these pollutants into the atmosphere contributes to reduced air quality in nearby areas. The European Environment Agency and Ireland's Environmental Protection Agency have flagged the health impacts of air pollution and in particular, emission of PM_{2.5} particles related to diesel.

¹ https://energyeducation.ca/encyclopedia/Diesel_generator

Granting permission for this development would also be in direct opposition to government policy: in July 2022, the government statement on the role of data centres stated clearly that "data centre developments, that are not connected to the electricity grid and are powered mainly by on-site fossil fuel generation, would not be in line with national policy." (Government of Ireland, 2022)

This application should be rejected on the basis that it is inconsistent with government policy, with Fingal's county development plan, with the national Climate Action Plan, and with the 2021 Act. It should also be rejected on the basis of the climate and health implications for nearby residents in Corduff, acknowledged by Fingal County Council as the most deprived area in Fingal.

Thank you in advance for your consideration.

Regards,

Dylan Murphy , 5 Rahillion way
Donabate
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On behalf of
Not Here Not Anywhere

References

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