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For a fossil free future for Ireland

Planning Application Reference Number: FW22A/0308
Applicant: Universal Developers LLC
Location: *Cruiserath Road, Dublin 15*

Description:
"Universal Developers LLC, intend to apply for a seven year planning permission for development on a site at Cruiserath Road, Dublin 15. The application site is located to the north of the data centre permitted / constructed under An Bord Pleanála Reg. Ref.: PL06F.248544 / Fingal County Council Reg. Ref.: FW17A/0025, to the west of the two data centres permitted under Fingal County Council Reg. Ref.: FW19A/0087, and to the north and west of the 220kV Gas Insulated Switchgear substation permitted under An Bord Pleanála Reg. Ref.: 306834-20. The site is within an overall landholding bound to the south by the R121 / Cruiserath Road, to the west by the R121 / Church Road and to the north by undeveloped land and Cruiserath Drive.
The proposed development consists of the following:

- *Construction of three data centre buildings (Data Centre E, Data Centre F, and Data Centre G), with a gross floor area (GFA) of c. 1,425 sq.m, c. 20,582 sq.m, and c. 20,582 sq.m respectively, each over two levels (with Data Centre F and G each including two mezzanine levels);*
- *Data Centre F and G will be located in the north-western portion of the overall landholding, with a primary parapet height of c. 19.8 metres and each will accommodate data halls, associated electrical and mechanical plant rooms, a loading bay, maintenance and storage space, office administration areas, with plant and solar panels at roof level;*
- *Data Centre E (which will be ancillary to Data Centre F and G) will be located within the south-western portion of the overall landholding, with a primary parapet height of c. 13.1 metres and will accommodate data halls, associated electrical and mechanical plant rooms, a loading bay, maintenance and storage space, office administration areas, with plant at roof level;*
- *Emergency generators and associated flues will be provided within compounds adjoining each of the three data centre buildings (1 no. for Data Centre E, 19 no. for Data Centre F, and 19 no. for Data Centre G);*

- *The development includes one diesel tank and two filling areas to serve the proposed emergency generators;*
- *Provision of ancillary structures including two MV buildings, water storage tanks and three bin stores;*
- *Construction of access arrangements and internal road network and circulation areas, footpaths, provision of car parking (105 no. spaces), motorcycle parking (12 no. spaces) and bicycle parking (56 no. spaces), hard and soft landscaping and planting (including alteration to a landscaped berm to the north of proposed Data Centre E), lighting, boundary treatments, and all associated and ancillary works including underground foul and storm water drainage network, and utility cables.*

An EPA-Industrial Emissions Directive (IE) licence will be applied for to facilitate the operation of the proposed development. An Environmental Impact Assessment Report (EIAR) will be submitted to the Planning Authority with the planning application and the EIAR will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy at the offices of the Planning Authority."

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. To avoid the most severe impacts of climate change, global temperatures must be kept below 1.5°C above pre-industrialised levels, and we will need rapid and deep action to decarbonise our energy systems. Burning fossil fuels is the single biggest cause of climate change, and taking climate action means all proposed and newly built infrastructure in Ireland must be fossil free. Planning is a key area of influence, and County Councils have a major role in facilitating the transition from fossil fuels to renewable energy. This encompasses processes for carbon-proofing major decisions, programmes, and projects.

Regarding the application to Fingal County Council for the construction of another development phase of the Mulhuddart Data Centre operated by Amazon Data Services Ireland Ltd, including three new data storage buildings spanning 42,589 sqm in floor area:

> We object to this development on the basis that, as noted by the applicant, the proposed development would emit an additional 202,139 tonnes of CO2 per annum and as the applicant notes, "all new greenhouse gas emissions contribute to a negative environmental impact" (EIAR Ch 9, p.16). It is unclear what benefits would be provided by the development, given the lack of transparency about the data being stored and its uses.

We make the following recommendations:

1. **New data centres must be powered entirely by on-site or new off-site renewable energy in order to reduce, rather than increase, Ireland's carbon dioxide (CO_2) emissions, consistent with the national Climate Action Plan (2021) and international commitments under the Paris Agreement.**

We note that buildings F and G would be constructed "based on power becoming available in 2025 and 2026 which aligns with AWS's current forecasted business demands" under a provision in AWS's 2017 connection agreement with EIRGRID.

However, the government has acknowledged that "data centres pose considerable challenges to the future planning and operation of Ireland's power system" (Department of Business, Enterprise and Innovation, 2018). These challenges include higher electricity costs for consumers (Taylor, 2018). The Danish Council on Climate Change recommended in April 2019 that the Danish government impose legal obligations on data centre owners and developers to contribute to the infrastructure required to supply the centres with renewable energy, such as wind and solar farms (Irish Examiner, 2019).

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 (Chernicoff, 2016), which means that the energy is sourced from the grid, which in Ireland is 69% fossil fuel-powered (Sustainable Energy Authority of Ireland, 2019). 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' fossil fuel 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 on-site renewable energy generation such as rooftop solar farms or ***genuinely new*** off-site generation such as offshore wind or solar farms.

Indeed, this application refers (page 9 of the EIAR non-technical summary) to Amazon's commitment to offtake 100% of the power from ***existing*** renewable wind projects in Cork, Donegal, and Galway which are projected to add 229 MW of renewable energy to the Irish grid and touts that it is the largest corporate buyer of renewable energy in the country. However, though we observed some plans to provide for the generation of on-site renewable energy via 285 solar PV modules, it appears the total peak power of 85.5kWp generated by them would offset only "the lighting and IT electrical power requirements during the peak summer months for the administration and office of each building".

The 202,139 tonnes of CO_2 per annum to be emitted by the proposed development, as indicated by the submitted EIAR, would *increase* Ireland's greenhouse gas (GHG) emissions by 0.33% of 2018 emissions during a period where, by law, emissions ***must be reduced by 51%*** - based on data from the Environmental Protection Agency (2020) indicating that Ireland had total GHG emissions for 2018 of 60.93 million tonnes carbon dioxide equivalent (Mt CO2e). The proposed development would be regulated by the EU Emissions Trading System (ETS) and is not consistent with ETS targets, which are seeking to "reach an economy-wide 2030 reduction in emissions of at least 55%, compared to 1990 levels" (Climate Action Plan 2023, p. 279).

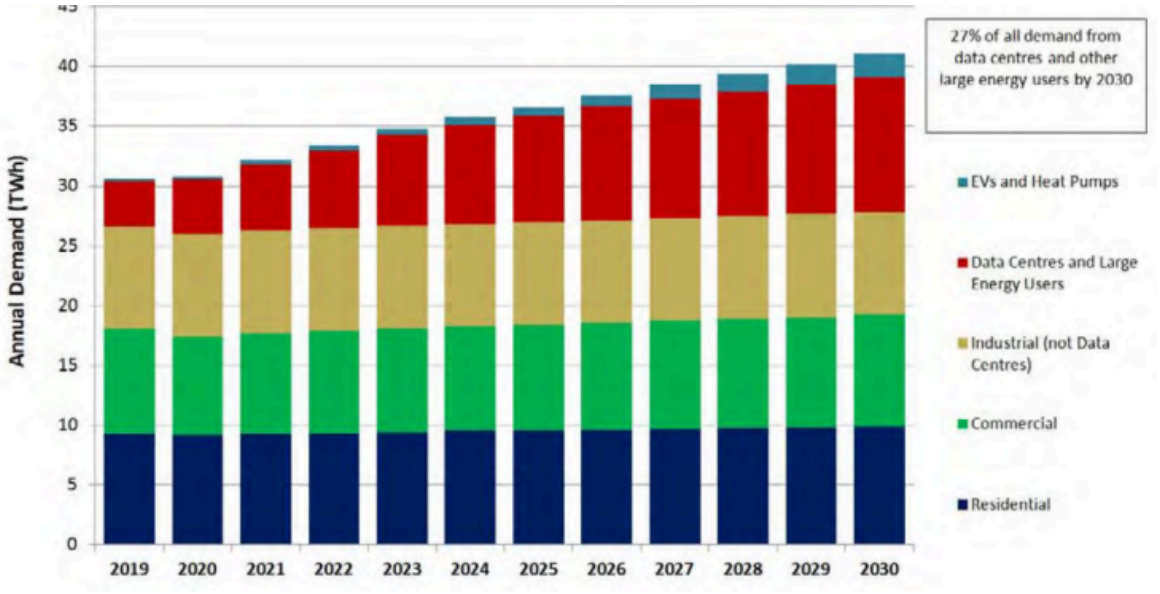
Since this plant cannot be powered entirely by renewable energy, it will lead to an increase in Ireland's GHG emissions between now and 2030, contravening the Climate Act, Climate Action Plan, and National Planning Framework. As powering the data centre entirely with onsite or new off-site renewable energy would not be feasible based on this application, permission for its development should be refused.

Further, we note that this planning application features 39 emergency diesel generators and diesel fuel tanks, which will result in fossil fuels being used to power the data centre, at minimum for 18 hours but *potentially up to 500 hours per year*. We have observed nine separate applications to the EPA from the operators of this site - Amazon Data Services Ireland Ltd - for industrial emissions licences to extend the use of emergency generators from 18 hours to 500 hours annually. One of those applications (P1182-01) relates to generators for previously permitted applications at this data centre site. While the application implies that the diesel used will be renewable diesel, which the applicant states causes 90% less GHG lifecycle emissions than fossil diesel, that would still mean 330 tonnes CO2 eq per year GHG emissions. However, it seems likely the operator will apply for an EPA licence to run the generators up to 500 hours (27 times longer than ordinarily permitted). If granted the licence, this could result in GHG emissions of up to 8,910 tonnes of CO2 eq per year GHG emissions for this phase of the project alone, if renewable diesel is used.

Further, we note from section 6.1.3 of the Energy Statement in this application that the diesel used may not necessarily be renewable, as this is "subject to availability". In the event that renewable diesel is not available, and fossil diesel is used even for only 18 hours per year, this could emit the equivalent of 3,300 tonnes of CO2 per year, or 89,100 tonnes if used 500 hours per year.

2. **Due to the significant impact of data centres on energy consumption, we strongly urge that both EIAR and NIS assessments are comprehensively carried out before granting planning permission for any data centres, including the present application.**

Eirgrid estimates that data centres could account for up to 27% of Ireland's electricity demand by 2028, and up to 50% of new electricity demand growth (Eirgrid, 2021).



Source: EirGrid, All-Island Generation Capacity Statement 2021-2030

The Irish Academy of Engineering (2019) 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 in energy generation and storage of €9 billion by 2027.

In fact, if Amazon's eight data storage buildings Mulhuddart project, of which the three data storage buildings in this application are a part, 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 (Lillington, 2018).

To meet the GHG emissions targets set out in the Paris Agreement, and in the recently published Climate Bill, it is paramount that Fingal County Council examines the impact that energy supply of data centres will have on net emissions. Furthermore, it is crucial that Fingal County Council takes into consideration the **cumulative impact of data centres' energy demand on a nationwide basis**, as opposed to examining impact solely on a case-by-case basis. As this application would entail additional energy demand which is not met by on-site or new off-site renewable electricity generation, the planning application should be rejected.

3. Risk of blackouts

In the middle of an energy crisis, with Ireland's electricity grid at risk of failure in winter, large, wasteful energy users like data centres simply cannot be allowed to

use any more of the nation's gas and electricity. Blackouts from data centre pressure on energy demand is a real risk (The Irish Independent, 2022). With Eirgrid already banning electricity connections for data centres in Dublin, it is evident that this development is not future-proof and goes against the best interests of the country (Business Post, 2022).

Thank you in advance for your consideration.

Regards,
Angela Deegan
[redacted]

On behalf of ***Not Here Not Anywhere***

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