

An Bord Pleanála
64 Marlborough Street
Dublin 1

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1st July 2021

P.A. Ref.:
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For:

21/663

Tunis Properties LLC

construction of a two storey (with mezzanine levels at both storeys) data storage facility building with a maximum overall height of c. 25 metres, containing data halls, associated electrical and mechanical Plant Rooms, a loading bay, maintenance and storage space, office administration areas, screened plant and solar panels at roof level, all within a building with a total gross floor area (FGA) of c. 28,566 sq.m. The proposed data storage facility building will be located to the north of the data storage facility building previously permitted under Reg. Ref: LB/191735 and to the south of the gas insulated switchgear substation compound proposed under An Bord Pleanála Ref: 308628-20. Emergency generators (26 no.), emission stacks and associated plant are provided in a fenced compound adjacent to the data storage facility, along with a single emergency house supply generator. MV Building (with a GFA of 249 sq.m), water storage tanks, diesel tanks and filling area, all located adjacent to the proposed data storage facility building. Construction of associated internal access roads and circulation areas, provision of temporary construction access arrangements, footpaths, provision of 50 no. car parking spaces and 26 no. cycle parking spaces within a bicycle shelter. Landscaping and planting, bin store, and all associated site works including underground foul and storm water drainage, and utility cables, on an application site area measuring 3.58 hectares.

Site:

Drogheda IDA Business & Technology Park, Donore Road, Drogheda, Co Meath

A Chara,

An Taisce wishes to appeal the decision of Meath County Council of 4th June 2021 to grant permission for the above application on the following grounds.

Local Authorities and An Bord Pleanála are granting permission for data centres on a case-by-case basis without adequately addressing the cumulative impacts of energy use and

concomitant greenhouse gas emissions. This is a systemic infringement 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.

1. Energy Use and Contribution to Ireland's Greenhouse Gas Emissions

Data centres are the built embodiment of the internet and data storage, housing rows of servers that rely on vast amounts of energy. Accounting for a considerable portion of the industry and its greenhouse gas emissions (GHG), they are identified as having the "fastest growing carbon footprint from across the whole ICT sector".¹ Given the intensity of data centres' energy usage, industry providers tend to select locations in Northern Europe where the cool and temperate climate is the preferred environment for development. However, this leads to these high energy consumers forming geographical 'clusters' and subsequently driving up local and national energy demand.

Ireland has been called the "data centre capital of Europe" due to its favorable climate and proclivity to Foreign Direct Investment (FDI). According to Host in Ireland's latest Biannual Report published in May 2021,² there are 70 data centres in operation using 900MW with a further eight under construction expected to use an additional 250MW. This proliferation of data infrastructure has largely gone unchecked, and data centres now consume 11% of Ireland's total grid-generated electricity. The Irish Academy of Engineers has projected that this will increase to 31% by 2027.³

By increasing overall energy demand in Ireland through the uninhibited development of data centres, we are actively diluting the end benefit of renewable energy penetration that has been created and added to the grid over the past 20-30 years. Any new data centre should not jeopardise Ireland's existing national climate/renewable energy targets - new data centre development should only be considered if it provides a new, directly linked supply of renewable energy or matches its energy consumption with a commensurate or greater contribution to Ireland's renewables supply.

Existing data centres and those that will likely be built over next seven years are projected to require 12.5 terawatts of additional power beyond current generation amounts – enough electricity to power 24 million homes.⁴

Progress in decarbonising Ireland's electricity supply notwithstanding, the projected exponential rate of data centre projects built in urban and semi-urban areas around the

¹ Whitehead, B., Andrews, D., Shah, A., Maidment, G. (2014) 'Assessing the environmental impact of data centres part 1: Background, energy use and metrics'. *Building and Environment* 82, pp. 151-159.

² <https://www.hostinireland.com/report#:~:text=Publication%20Date%2011th%20May%202021&text=Host%20in%20Ireland%20is%20an,location%20to%20host%20digital%20assets>.

³ <http://iae.ie/wp-content/uploads/2019/08/Data-Centres-July-2019.pdf>

⁴ <https://www.rte.ie/news/business/2020/0109/1105273-what-impact-do-data-centres-have-on-climate/>

country is inconsistent with national climate and environmental policy objectives. According to the Irish Academy of Engineers, data centres will add between 1.5 and 3 million tonnes of CO₂ to Ireland's overall greenhouse gas emissions by 2028.⁵ This trajectory is not conducive to the achievement of Ireland's legally binding EU renewable energy targets or the realisation of its national climate policy goals.

Ireland already hosts an enormous and disproportionate amount of Western Europe's data infrastructure. Therefore, data storage development proposals in Ireland need to be based on appropriate and complete considerations of the direct, indirect and cumulative effects of the development on energy demand in Ireland and therefore on climate.

Section 9.7.2.2 of the EIAR states that: *"the indirect CO₂ emissions from electricity to operate the facility will not be significant in relation to Ireland's national annual CO₂ emissions."* The applicant goes on to calculate that the proposal will use 420 GWh of power annually, or 157,680 tonnes CO₂eq (approximately 0.26% of Ireland's annual emissions based on EPA figures for 2019). In conjunction with the permitted data storage building on the site and "indicative future development", the power use equates to 473,040 tonnes CO₂eq per annum (approximately 0.79% of Ireland's annual emissions based on EPA figures for 2019). The applicant deems this impact on climate to be "indirect, long-term, negative and slight". We firmly contest the appraisal that 473,040 tonnes CO₂ eq per annum results in an overall "slight" impact on climate.

The applicant states that due to the high power demand of the facility, it will require an emissions permit and will form part of the EU Emissions Trading Scheme (ETS), thereby not impacting obligatory reductions in the non-ETS sectors. However, we consider this assessment to be insufficient. The increased demand on the grid due to data centres, including the subject proposal, will likely lower the level of renewable power available to the non-ETS sectors, therefore potentially causing Ireland to miss binding targets, both in terms of renewables share and emissions reduction.

We submit that a sufficiently rigorous assessment of the direct, indirect and cumulative effects of the proposed development on energy demand and on the climate has not been completed in the EIAR. This is not compliant with the obligations under EIA Directive 2014/52/EU.

We note that the concerns raised in our submission on the original planning application in relation to energy demand, electric grid capacity, and cumulative climate impacts were not addressed in the Planner's Report. Instead, the following excerpt, taken from Section 8.7.8. 'Land, soil, water, air and climate', briefly reiterates the EIAR on indirect climate impacts:

"In terms of climate it is stated that the impact is deemed to be short-term and imperceptible in relation to Ireland's obligations under the EU 2020 target. Concerns in respect of these and other obligations have been raised in the submission. The EIAR states that no significant on-site CO₂ emissions will occur as a result of the

⁵ <http://iae.ie/wp-content/uploads/2019/08/Data-Centres-July-2019.pdf>

proposal and whilst the use of electricity in conjunction with the existing data centre would indirectly result in emissions of some 473,040 tonnes CO₂ eq per annum the overall impact to climate is deemed indirect, negative, long-term and slight."

While the existing data centre on the site is considered in conjunction with the data centre in question with regard to cumulative emissions, the third data centre proposed for the site is not. This omission renders the cumulative climate assessment incomplete.

2. Pressure on National Grid Capacity

While we acknowledge that the subject proposal is outside the Greater Dublin Area, An Taisce nevertheless highlights the precarious condition of the national electric grid, which is being placed under increasing pressure from data centre grid connections. These grid connections have accumulated at an exponential rate as a result of the uninhibited proliferation of data centres in recent years. Relevant authorities such as EirGrid have expressed the need for a review of data centre connections and their implications for Ireland's energy security. The Commission for the Regulation of Utilities (CRU) has recently launched a public consultation on this issue. We would draw the Board's attention to following excerpts from their consultation paper:

"The CRU is concerned that continuing to allow data centres to connect in accordance with current arrangements will significantly impact the ability of the electricity system to meet the reasonable demands of all consumers including data centres."

"According to the most recent draft GCS, it may not be possible to secure sufficient generation capacity with the necessary certainty to meet the projected rapid increase in electricity demand in the coming years and it is evident to the CRU that additional intervention is necessary now to ensure that security of supply is maintained. After this winter 2021/22, the CRU intends to carry out a wider review of the assumptions underpinning capacity requirements and forecasted demand to better understand demands of the electricity system for the medium to longer term."

"Due to the rapid, disproportionate impact the increase in data centre connections has compared to other sectors of large energy user industries, the supply security and financial risk to the energy consumer is increased."

We would also point out the lack of consideration in the Planner's Report for the proposed development's impact on national and regional electricity demand.

An article in the *Irish Times* on 1st July 2021 (attached as an appendix) highlighted that 'emergency plans' are being devised by the Government for Dublin's electricity supply following concerns raised by grid operators with regard to potential power outages, should the current growth trajectory of 'power hungry' data centre development continue. While Ireland's wind energy portfolio grows steadily, the closure of power plants such as

Huntstown, Co. Dublin and Whitegate, Co. Cork has exposed a concerning gap between electricity supply and the ever-growing demand. Calls to temporarily introduce fossil fuel-based electricity stations to make up this widening margin have grown louder following the eight system alerts since last November. The need for 'emergency plans' could easily extend to regions outside of Dublin as electricity demand grows, including from additional data centres. Considering Ireland's reliance on intermittent wind has yet to be robustly supplemented by other renewable energy sources, such as solar or wave energy, the increase in electricity demand will largely have to be met by fossil fuels.

An Taisce therefore calls into question any further grants of permission for data centre development as we advance towards meeting Paris Agreement targets.

It is our view that the proposal's potential role in exacerbating the current electricity supply crisis should be assessed, acknowledging the delicate relationship between electricity supply and demand. We would also assert the need to resolve grid capacity issues and give way to forthcoming policy formation prior to the granting of approval for the proposed data centre.

3. Conclusion

In light of the above points, we request that An Bord Pleanála overturn Meath County Council's grant of permission on the grounds that the proposed development contravenes Ireland's legal obligations under the EIA Directive.

Yours sincerely,



Niamh Delanty

An Taisce Advocacy Office

An Taisce – The National Trust for Ireland



Phoebe Duvall

Planning and Environmental Policy Officer

An Taisce – The National Trust for Ireland

Appendix 1 (attached): Irish Times article, 1st July 2020, "Electricity supply concerns spark emergency plans for Dublin"

Electricity supply concerns spark emergency plans for Dublin

Power to be generated in North Wall in response to grid alerts and winter fears

Out 9 hours ago

Arthur Beesley

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The Government is taking steps to provide emergency power generation in Dublin because of serious constraints on the electricity network that have raised concern about supplies next winter.

The push to bring in temporary generators in the autumn follows a series of system alerts since November in which grid operators warned about supply levels.

To facilitate the move, the Coalition is steering a legislation through the Dáil so emergency generators can bypass planning laws. "The Government has approved amendments to the Planning and Development Act . . . to ensure temporary generation could be permitted in a timely manner if required," said the Department of Environment, Climate and Communications.

According to a senior electricity market source, the ESB plans to install temporary generators at the North Wall in Dublin on a brownfield site. "Within the industry, we're all very exercised about it, and understandably so. It's going to be a very hard winter," the source said.

The ESB declined to comment.

The moves follow the shutdown of big power plants at Huntstown, Co Dublin, and Whitegate, Co Cork, which are closed for repairs that will take months to complete.

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Tight margins



“Simultaneous outages of two large generators increase the risk of tight margins this winter, if these do not return as planned by November,” said



EirGrid, operator of the national grid.

EirGrid added that it was working with the Commission for Regulation of Utilities and the department to “proactively explore a variety of options (including potential temporary generation and other measures) to mitigate any issues and manage the demand and supply balance in order to maintain system security”.

Power demand has grown sharply in recent years in line with economic growth and a big rise in energy demand from power-hungry data centres.

Although successive governments have seen data centres as a good source of foreign direct investment, the regulator wants curbs on new developments. It warned recently that “consumers were facing rolling blackouts” if the current system for connecting new data centres to the grid was not changed.

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Rising electricity demand has coincided with the closure of older power stations as the State increases its reliance on windmills to meet climate targets.

Below optimum

There have been eight system alerts since November, three on the all-island network that the State shares with Northern Ireland and five that were confined to the North. Such alerts are issued when the level of surplus power above market demand is lower than optimum to cover any contingencies.

“As generators close and others age, margins are forecast to become tighter until new, efficient generation projects are built and connected to the system,” EirGrid said.

The department said the need for “more conventional generation” was recognised. “This will be needed to ensure continued secure electricity supply while supporting the growth in renewable generation from wind and solar energy,” it said.

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“It is expected that the majority of new conventional generation capacity will be gas-fired – primarily to replace peat-, coal- and oil-fired generation capacity that is being phased out over the coming years. While this new generation capacity will be reliant on fossil fuels, it will only run when needed – for instance during times of low wind. Its primary function will be to support the operation of the electricity system and ensure security of supply.”

The regulator acknowledged “challenges” responding to significant demand growth and the retirement of existing generating stations. It also cited challenges “resulting from our global leadership position in accommodating intermittent wind energy” on the grid.

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**Meath County Council
Planning Department
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Co. Meath C15 Y291
REG: 00172770**

Phone: 046 909 7000 Fax: 046 909 7001

Planning Application Ref: 21/663

An Taisce
Tailors Hall
Back Lane
Dublin 8

18/05/2021

Applicant: Tunis Properties LLC,
Agent: John Spain Associates

I wish to acknowledge receipt of your Submission/Observation made in writing to this office on the 17/05/2021 to the proposed development described as the proposed development consists of the following: construction of a two storey (with mezzanine levels at both storeys) data storage facility building with a maximum overall height of c. 25 metres, containing data halls, associated electrical and mechanical Plant Rooms, a loading bay, maintenance and storage space, office administration areas, screened plant and solar panels at roof level, all within a building with a total gross floor area (FGA) of c. 28,566 sq.m. The proposed data storage facility building will be located to the north of the data storage facility building previously permitted under Reg. Ref: LB/191735 and to the south of the gas insulated switchgear substation compound proposed under An Bord Pleanála Ref: 308628-20. Emergency generators (26 no.), emission stacks and associated plant are provided in a fenced compound adjacent to the data storage facility, along with a single emergency house supply generator. MV Building (with a GFA of 249 sq.m), water storage tanks, diesel tanks and filling area, all located adjacent to the proposed data storage facility building. Construction of associated internal access roads and circulation areas, provision of temporary construction access arrangements, footpaths, provision of 50 no. car parking spaces and 26 no. cycle parking spaces within a bicycle shelter. Landscaping and planting, bin store, and all associated site works including underground foul and storm water drainage, and utility cables, on an application site area measuring 3.58 hectares. An Environmental Impact Assessment Report (EIAR) has been prepared and 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.

The Submission/Observation is in accordance with the appropriate provisions of the Planning & Development Regulations 2001 to 2020 and will be taken into account by the Planning Authority in its determination of the planning application.

You will be notified of the Planning Authority's decision in due course.

John McCormack
On behalf of Meath County Council.

THIS IS AN IMPORTANT DOCUMENT

Keep this document safely. You will be required to produce this acknowledgement to An Bord Pleanála if you wish to appeal the decision of the Planning Authority. It is the only form of



evidence which will be accepted by An Bord Pleanála that a submission or observation has been made to the Planning Authority on the Planning Application.