

Senior Executive Officer  
Forward Planning Section,  
Land Use, Planning & Transportation Department,  
County Hall,  
Tallaght,  
Dublin 24

25<sup>th</sup> April 2022

Dear Sir / Madam,

### **Submission on Proposed Material Alterations to the South Dublin Draft County Development Plan 2022-2028**

We welcome this opportunity to make a submission on the Proposed Material Alterations to the South Dublin Draft County Development Plan 2022-2028

It is with alarm that we learned a ban on future data centres within the life of the new county development plan has been included in the Proposed Material Alterations to the South Dublin Draft County Development Plan 2022-2028 under the following sections.

1. Chapter / Section 13.1 Land-Use Zoning Objectives, Table 13.4 Amendment ref 13.1 Page Number 506
2. Chapter / Section 13.1 Land-Use Zoning Objectives, Table 13.9 Amendment ref 13.2 Page Number 510
3. Chapter / Section 13.1 Land Use Zoning Objectives, Table 13.10 Amendment ref 13.3 Page Number 512

Following are the proposed material amendments to Chapter 13.

<b>Chapter/Section</b>	Section 13.1 Land-Use Zoning Objectives, Table 13.4
<b>Amendment ref.</b>	13.1
<b>Page No.</b>	506
<b>Policy/Objective no.</b>	Amend Table 13.4
<b>Text/Policy/Objective Amendment Wording</b>	
<p><b>Amend Zoning Objective 'REGEN' from:</b></p> <p><b>Open for Consideration:</b></p>	

Allotments, Bed & Breakfast, Betting Office, Boarding Kennels, Car Park, Crematorium, Cultural Use, Data Centre, Doctor/Dentist, Embassy, Funeral Home, Garden Centre, Guest House, Hospital, Industry-General, Nursing Home, Off-Licence, Place of Worship, Primary Health Care Centre, Public House, Recycling Facility, Retail Warehouse, Retirement Home, Service Garage, Shop-Neighbourhood, Social Club, Veterinary Surgery, Warehousing, Wholesale Outlet.

**To Read:**

**Open for consideration:**

Allotments, Bed & Breakfast, Betting Office, Boarding Kennels, Car Park, Crematorium, Cultural Use, ~~Data Centre~~, Doctor/Dentist, Embassy, Funeral Home, Garden Centre, Guest House, Hospital, Industry-General, Nursing Home, Off-Licence, Place of Worship, Primary Health Care Centre, Public House, Recycling Facility, Retail Warehouse, Retirement Home, Service Garage, Shop-Neighbourhood, Social Club, Veterinary Surgery, Warehousing, Wholesale Outlet.

**Not Permitted:**

Abattoir, Aerodrome/Airfield, Agriculture, Camp Site, Caravan Park-Residential, Cemetery, Concrete/Asphalt Plant in or adjacent to a Quarry, Conference Centre, ~~Data Centre~~, Fuel Depot, Heavy Vehicle Park, Industry-Extractive, Industry Special, Nightclub, Outdoor Entertainment Park, Refuse Landfill/Tip, Refuse Transfer Station, Rural Industry-Food, Scrap Yard, Shop-Major Sales Outlet, Transport Depot, Wind Farm

**Chapter/Section**

Section 13.1 Land-Use Zoning Objectives, Table 13.9

**Amendment ref.**

13.2

**Page no.**

510

**Policy/Objective no.**

Amend Table 13.9

**Text/Policy/Objective Amendment Wording**

**Amend Zoning Objective 'MRC' from:**

**Open for Consideration:**

Allotments, Crematorium, Cultural Use, Data Centre, Doctor/Dentist, Education, Health Centre, Hospital, Industry-Light, Nightclub, Offices 100 sq.m - 1,000 sq.m, Outdoor Entertainment Park, Place of Worship, Primary Health Care Centre, Social Club, Sports Club/Facility, Stadium, Transport Depot, Warehousing.

**To Read:**

**Open for Consideration:**

Allotments, Crematorium, Cultural Use, ~~Data Centre~~, Doctor/Dentist, Education, Health Centre, Hospital, Industry-Light, Nightclub, Offices 100 sqm - 1,000 sqm, Outdoor Entertainment Park, Place of Worship, Primary Health Care Centre, Social Club, Sports Club/Facility, Stadium, Transport Depot, Warehousing.

**Not Permitted:**

Abattoir, Aerodrome/Airfield, Agriculture, Bed & Breakfast, Boarding Kennels, Camp Site, Caravan Park-Residential, Cemetery, Community Centre, Concrete/Asphalt Plant in or adjacent to a Quarry, Conference Centre, ~~Data Centre~~, Embassy, Fuel Depot, Guest House, Heavy Vehicle Park, Home Based Economic Activities, Housing for Older People, Industry Extractive, Industry-General, Industry-Special, Live-Work Units, Nursing Home, Office-Based Industry, Offices over 1,000 sq.m, Refuse Landfill/Tip, Refuse Transfer Station, Residential, Residential Institution, Retirement Home, Rural Industry-Food, Science and Technology Based Enterprise, Scrap Yard, Traveller Accommodation, Wind Farm, Work Live Units.

**Chapter/Section**

Section 13.1 Land Use Zoning Objectives, Table 13.10

**Amendment ref.**

13.3

**Page no.**

512

**Policy Objective no.**

Amend Table 13.10

**Text/Policy/Objective Amendment Wording**

**Amend Table 13.10 Zoning Objective 'EE' from:**

**Open for Consideration:**

Agriculture, Allotments, Car Park, Childcare Facilities, Concrete/Asphalt Plant in or adjacent to a Quarry, Data Centre, Garden Centre, Hotel/Hostel, Industry-Extractive, Motor Sales Outlet, Nightclub, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Public House, Refuse Landfill/Tip, Restaurant/Café, Retail Warehouse, Social Club, Sports Club/Facility, Stadium, Veterinary Surgery.

**To Read:**

**Open for consideration:**

Agriculture, Allotments, Car Park, Childcare Facilities, Concrete/Asphalt Plant in or adjacent to a Quarry, ~~Data Centre~~, Garden Centre, Hotel/Hostel, Industry-Extractive, Motor Sales Outlet, Nightclub, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Public House, Refuse Landfill/Tip, Restaurant/Café, Retail Warehouse, Social Club, Sports Club/Facility, Stadium, Veterinary Surgery.

**Not Permitted:**

Aerodrome/Airfield, Bed & Breakfast, Betting Office, Camp Site, Caravan Park-Residential, Cemetery, Community Centre, Conference Centre, Crematorium, Cultural Use, ~~Data Centre~~, Doctor/Dentist, Education, Embassy, Funeral Home, Guest House, Health Centre, Hospital, Housing for Older People, Live-Work Units, Nursing Home, Off-Licence, Outdoor Entertainment Park, Place of Worship, Primary Health Care Centre, Recreational Facility, Residential, Residential Institution, Retirement Home, Rural Industry-Food, Shop Major Sales Outlet, Shop-Neighbourhood, Wind Farm, Work-Live Units.

**Chapter**

Whilst we fully understand the concerns expressed relating to power supply and to water supply, we see these as fundamentally national matters with specialised agencies Eirgrid and Irish Water have been tasked to manage and advise on these matters. A piecemeal approach based on each local self-interest will undermine the provision of the national approach needed on these crucial matters.

No one would suggest a car could work without a battery and we do not see any way we can have a technology industry in Ireland without data centres. Data Centres are an essential part of the framework for technology and undermining one part of the system undermines the system fundamentally.

The data centres in our county provide many jobs both directly and indirectly via suppliers and contracted services. Data Centres are a key component of our local economy paying millions of euros in local government funding through development contributions and commercial rates. This allows for the provision of many essential services annually to our community. In a volatile world certainty of income is a major asset for any county.

Our data centres have also made and continue to make a real and meaningful impact locally through supporting many local initiatives in voluntary and community organisations through their staff volunteering and through substantial funding supports. Support has also been provided by the data centres for our hospital and university.

South Dublin County are a leader in the field connectivity from our data centres to the wider community. Two additional initiatives worthy of mention include the establishment of the Data Centre Technician course with TU Dublin (Tallaght Campus) offering local people the opportunity to train to work in local data centres and the Tallaght District Heating System which is using excess heat from a data centre to heat public buildings including the County Council Offices. In doing this Tallaght is a leader in climate change solutions. This way of heating saves 1,500 tons of CO2 each year.

As the Chamber of Commerce for South Dublin County we actively promote our county as the best place to do business in Ireland. We do this because we believe it is true. We see serious reputational damage being done to South Dublin County if a ban is adopted on new data centre technology. Other counties in our region are welcoming the growth of new technology centres and the consequential provision of new jobs, local taxes and support for the voluntary community. The proposed South Dublin County ban on data centres may be seen as hostile to technology and inward investment into the county. This ban will not reduce the provision of data centres nationally and only encourages inward investment to other counties which will reduce the opportunities for employment within our county. Given the existing infrastructure assets already available to South Dublin County encouraging inward investment away from the county via this ban may result in less sustainable development where new infrastructural assets are not in place.

Our Chamber is totally committed to the UN's Sustainability Goals and share the concerns expressed relating to climate change. The solution is working together to make the changes needed, taking a national approach to renewable energy supply, green data and working locally with all stakeholders to ensure South Dublin County remains a good place to live and work.

We respectfully submit that the above noted Material Alterations are not included in the final adopted South Dublin County Development Plan 2022-2028.

Yours sincerely

Peter

Peter Byrne

CEO



Peter Byrne M.Sc (Mgmt.), B.Sc., MII.  
CEO, South Dublin Chamber.

