



Amazon Web Services Response to Proposed Material Amendments to the Draft South Dublin County Development Plan

26 April 2022

Submitted by:

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Submitted to:

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Introduction

Amazon Web Services (AWS) welcomes the opportunity to make a submission in respect of proposed material alterations to the South Dublin County Council (SDCC) draft Development Plan (“the Plan”). Our submission pertains specifically to amendments 13.1 (p. 506), 13.2 (p.510), and 13.3 (p.512).

AWS supports SDCC’s objective of formulating a far-sighted Plan that will shape the future development of the area’s community and environment. We also share the emphasis SDCC has placed on achieving the most sustainable development pattern possible up to 2040 and beyond. As a long-time proud investor and employer in South Dublin, we want to see the area continue to thrive and we hope the Plan will be instrumental in allowing that to happen.

AWS appreciates the comprehensive and consultative process undertaken by the Council in developing the Plan. We also fully support its aim of ensuring the area’s needs – whether it’s employment opportunities, community amenities or long-term economic development – are provided for. We hope the information set out in this submission will now be helpful to Councillors, as well as the executive, in the context of their deliberations on proposed material amendments to the Plan.

Response to Amendments 13.1, 13.2, 13.3

AWS respectfully submits that these particular proposed amendments – while undoubtedly well-intentioned – may be inimical to South Dublin’s interests. Their effect would be to preclude a high-value category of technological investment, namely the construction of data centres (DC), that has delivered – and continues to deliver – real benefits to the community. We ask that, in considering whether these amendments should be incorporated into the Plan, that Councillors and the executive give due consideration to the advantages that AWS investment in South Dublin DCs have generated for the people of the area over many years. Those advantages span the following broad categories: economic contribution; community impact; and sustainability.

1.1 Economic contribution

As noted above, AWS is a significant investor in South Dublin and has constructed and operated DCs there for over a decade. In 2020, we commissioned a study from Indecon International Economic Consultants to enhance our understanding of the economic impact that that investment has had within its boundaries (as well as other areas). Some of its key findings include:

- In 2020, AWS DCs in South Dublin directly and indirectly supported a total of 2,500 jobs. This represents a seven-fold increase on the equivalent statistics for 2011, demonstrating the upward positive trend in terms of employment generated by DC infrastructure.
- For that same year, AWS investment in the South Dublin area – all of which stems from our DCs – led to an increase in economic output of over €280 million, including direct, indirect and induced effects.
- AWS investment over the last decade in South Dublin totalled over €1 billion in the form of capital and operational expenditure. In 2020 alone, AWS invested nearly €70 million in capital expenditure.

These figures are evidence of the telling economic contribution that AWS DCs have made to South Dublin. They are not just intangible statistics either – this investment supports the livelihoods of thousands of people, whether they live in Tallaght and Templeogue or Rathcoole and Rathfarnham. By allowing for the future growth of the sector – in the shape of further high-value technological investment – the Plan can therefore create even more jobs and economic benefits for the South Dublin community.

1.2 Community impact

AWS has a deep respect for the South Dublin community. Its members welcomed us from day one and have enabled the growth of our business ever since. AWS is grateful for their support and we have always tried to contribute to the community as best we can, whether it’s been sponsoring local programmes or delivering educational and social impact initiatives.

Education has been a particular focus for us in South Dublin. For the past five years we have partnered with the Tallaght Campus of Technological University Dublin on their Data Centre Technician Programme. This offers participants the opportunity to up-skill for a career in cloud



computing with annual bursaries and the possibility of a paid work placement with AWS. Each year 20 scholarships are offered to members of the local community so that they can develop the skills required to build a successful career in the cloud industry. The proximity of the campus to our DC infrastructure allows participants to gain hands-on experience with the most advanced technology.

Another education-related initiative is the recent launch of the AWS “Think Big Space” in Tallaght. This is a learning laboratory which aims to inspire students interested in science, technology, engineering, arts and maths. It provides a dedicated space for students, educators and communities to explore innovative and imaginative ideas through interactive hands-on technical education. We are excited about its capacity to help South Dublin students deliver on their potential.

Our involvement in the community extends beyond the pure educational realm. Every year AWS contributes 650+ volunteer hours, delivers 10+ community events and engages 3,000+ community members. Recent initiatives in South Dublin include planting mini forests – which will serve as outdoor classrooms for students and teachers – in Killinarden Community College, St Kevin’s Kilnamanagh and Colaiste Chillian Clondalkin. AWS volunteers have also contributed to other community initiatives within the area, such as the re-painting of schools and the development of sensory rooms. They have helped too with the installation of the Innovation Centre in Tallaght University Hospital, creating both a welcoming space for patients and a creative working area for university staff. AWS was proud as well to sponsor an Irish Homeless Street chapter in Tallaght and to bring the All-Ireland finals of the Home Street League to Old Bawn in 2019 and again later this year.

When AWS commits investment to infrastructure, we also commit to the community in which it’s located. That approach has guided us ever since we first established a presence in South Dublin. We hope that the Plan will allow us to deepen that commitment further over its duration.

1.3 Sustainability

AWS is committed to building a sustainable business for our employees, customers and the communities in which we operate. In 2019, Amazon co-founded The Climate Pledge, a commitment to achieve net-zero carbon emissions across our business by 2040. As part of this goal, Amazon is on a path to powering its operations with 100% renewable energy by 2025, five years ahead of its original target of 2030. AWS is also continuously working on ways to increase the energy efficiency of our facilities and equipment. This includes innovating the design and manufacture of our servers, storage, and networking equipment to reduce energy and water use, as well as limit waste.

We consider South Dublin to be a great example of what is achievable when it comes to working with the local community in pursuit of shared sustainability goals. For example, AWS is proud to support SDCC’s delivery of the Tallaght District Heating Scheme (TDHS), the first such initiative in Ireland. AWS provides excess heat from one of our DCs to TDHS, which heats public sector, residential, academic and commercial premises in Tallaght. This is projected to save almost 1,500 tonnes of CO2 per annum in its first phase alone. It has prompted other County Councils to consider the possibility of similar schemes in their respective development plans. And we regularly receive international queries about the TDHS, as other countries look to South Dublin to see what can be done when it comes to improving sustainability.



AWS also knows that the lowest carbon energy is the energy we don't use. That's why AWS has been, and remains, resolutely focused on improving efficiency in every aspect of our DC infrastructure. For example, to reduce both energy and water usage, we employ direct evaporative cooling systems. This means that for more than 95% of the year, no water whatsoever is needed for cooling. For the few hot days that Ireland experiences annually, we use a minimum amount of water to cool the air that removes heat from our servers. Utilising this approach, our newest DC designs use as a little as 1,000 m³ of water for cooling annually – that is equivalent to the yearly water usage of just eight average Irish households.

South Dublin can continue to be an exemplar of DC sustainability for years to come. We hope to continue developing pioneering sustainability initiatives there that will demonstrate how high-value technological investment can be delivered in the most environmentally-friendly way possible.

Conclusion

We want to emphasise again the esteem in which we hold South Dublin and its community. It has been a wonderful home to AWS for so many years and we hope the Plan will allow our partnership to continue for many more. We respectfully ask that our submission be considered as the Council determines its approach to material amendments 13.1, 13.2, and 13.3.