Our ref: MH20038

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Senior Executive Officer
Forward Planning Section
Land Use Planning & Transportation Department
County Hall
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Dear Sirs,

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

Introduction

RPS, West Pier Business Campus, Dún Laoghaire, Co. Dublin has been instructed by Interxion Ireland DAC (a Digital Realty company) to make this submission on their behalf to the Proposed Material Alterations to the South Dublin Draft County Development Plan 2022-2028.

The submission relates to **Amendment 13.3** which seeks to remove data centre from uses which are 'Open for Consideration' in EE (Enterprise and Employment) zoned land and instead have this use included as 'Not Permitted'. While our submission relates to EE zoned land, the points made equally apply to REGEN and MRC zoned lands.

The submission will first set out the emerging policy position. We then consider the benefits of data centres and their role in facilitating modern life and enabling a healthy economy. National and regional policies in support of such uses are then outlined. The Council's response to similar submissions at earlier stages of the Plan will then be set out. Finally, our submission recommends the inclusion of data centres as uses which are 'Permitted in Principle' in lands zoned for Enterprise and Employment (EE).

Draft Plan and Material Amendments

The draft County Development Plan 2022-2028 included data centres as an 'Open for Consideration' use in zonings EE: Enterprise and Employment, MRC: Major Retail Centres; and REGEN: Regeneration. With regard to uses which are 'Open for Consideration', the draft Plan stated:

> *"Land uses that are listed as 'open for consideration' in the land use zoning tables may be acceptable to the Planning Authority subject to a detailed assessment against the principles of proper planning and sustainable development, and the relevant policies, objectives and standards set out in this Plan.*
>
> *Proposed uses in this category will be subject to the full assessment on their own merits and particularly in relation to their impact on the development of the County at a strategic and a local level. Such uses may only be permitted where they do not materially conflict with other aspects of the County Development Plan".*

As noted above, under the draft Plan, data centres would only be permitted where a detailed assessment against the principles of proper planning and sustainable development, and the relevant policies, objectives and standards of the plan finds that the proposals are acceptable.

However, following Special Council meetings on 1st, 3rd, 7th and 9th March 2022, the Council of SDCC have resolved that the draft Plan be amended. The proposed amendments are set out in the Proposed Material Alterations documentation; consultation on which ends on Tuesday 26th April. This letter responds to this consultation.

Material Alteration 13.3 seeks to remove data centres from the list of uses which are 'Open for Consideration' in land use zoning EE. The proposed alteration would see data centres included in the list of uses which are 'Not Permitted'. Identical changes are proposed for lands zoned MRC and REGEN.

Role of Data Centres

Data centres are vital to the Irish economy and enable much of the digital economy which is worth billions and is responsible for tens of thousands of jobs. A thriving cloud infrastructure is vital to Ireland's economic success, as a growing number of businesses locate in regions with well-developed cloud infrastructure. Almost two thirds of global GDP is digitised - meaning it passes through at least one data centre around the world[1].

To ensure their competitiveness, many Irish businesses and organisations have found that they must digitally transform their services to meet the needs and expectations of customers and users. Online services now form part of the offering from almost every business or organisation. This includes enabling working from home, online shopping, banking, online education, accessing government services, content streaming, social media, gaming etc. On a more practical level they are used to back up our personal data storage including photos on our phones and are used for complex processes such as processing huge data sets required for weather forecasting. To do all those things, data needs to be produced, shared, processed, aggregated and stored – all of which is facilitated by data centres.

One practical example is changes in the planning system compared to 15 years ago. Planning applications are accessible online, policy documents are consulted on electronically and submissions to applications can be made on the Councils' websites and on the Board's website. Over the next few years, planning will progress towards online submission of planning applications – this too will require the infrastructure to facilitate the transfer and storage of data.

Data centres also play an important role in supporting the Irish economy through facilitating global business transactions, hosting government services and portals, powering academic research and supporting logistics. They underpin all digital activity and are the central nervous system of the digital economy

It is acknowledged that energy demand from data centres has increased. This growth has been predicted as we become more reliant on data. There has also been a general movement from individual data storage in each business to centrally located data storage – so while energy usage has increased in data centres, it will have reduced in individual businesses as they move their data storage requirements to more central facilities. These facilities can often provide data storage in more efficient ways than companies can themselves on site.

Energy Supply

We note recent concerns with regard to energy demand. While demand for electricity has been growing over the last decade, new deployments of dispatchable large scale generation have been limited and existing generation units have been closed to meet the important goals of climate change policy. Grid planning and new interconnections have been delayed and key generation units are now unexpectedly offline. These circumstances have led to a brief security of supply concern.

[1] https://www.idc.com/getdoc.jsp?containerId=prUS46967420

It is noted that the Government has recently engaged in pre-application discussions with An Bord Pleanála to discuss two temporary energy generation proposals at North Wall, Alexandra Road, Dublin 1[2] and Huntstown Power Station, Johnstown, Co. Dublin[3]. In addition to this, the national grid is progressing at pace towards more sustainable energy generation.

The EirGrid All Ireland Generation Capacity Statement 2021-2030 states: *"EirGrid recognises the important role that data centres play in shaping Ireland's economy, and has committed to meeting the challenge of maintaining Ireland's high standards in security of supply while maximising the opportunities presented by these customers".*

In June 2019, the Irish Government published the Climate Action Plan 2019. This sets out 2030 targets for how, at high level, 70% renewable energy will be achieved. Measures being undertaken by the Government to do this include (as set out in the All Ireland Generation Capacity Statement 2021-2030 (EirGrid):

- *"Delivering an early and complete phase-out of coal and peat fired electricity generation*
  - *Moneypoint closure by 2025*
  - *Reduced reliance on peat fired plants*
    - *Bord na Mona transition away from peat by 2028. Current planning permission for Edenderry ends in 2023, but an extension to planning is being pursued.*
    - *ESB Shannonbridge and Lanesbourgh are to close at the end of 2020.*
- *An increase of electricity from renewable sources to 70% via:*
  - *At least 3.5 GW of offshore renewable energy,*
  - *Up to 1.5 GW of grid-scale solar PV energy,*
  - *Up to 8.2 GW total of increased onshore wind capacity.*
- *Meeting 15% of electricity demand by renewable sources contracted under corporate PPAs.*
- *Enhanced interconnection is planned, including the Celtic Interconnector to France and the Greenlink Interconnector to the UK.*
- *Facilitation of small and micro-scale generation at a residential and community level to sell excess generation back to the grid.*
- *Smart meter installation for all homes by 2024.*
- *Revised market structures and grid connection processes to best facilitate the targets".*

Figure 19 of the All Ireland Generation Capacity Statement 2021-2030 (EirGrid) indicates how the grid will move towards more renewable energies over the next 10 years **(Figure 1)**.

[2] https://www.pleanala.ie/en-ie/case/313112

[3] https://www.pleanala.ie/en-ie/case/313117

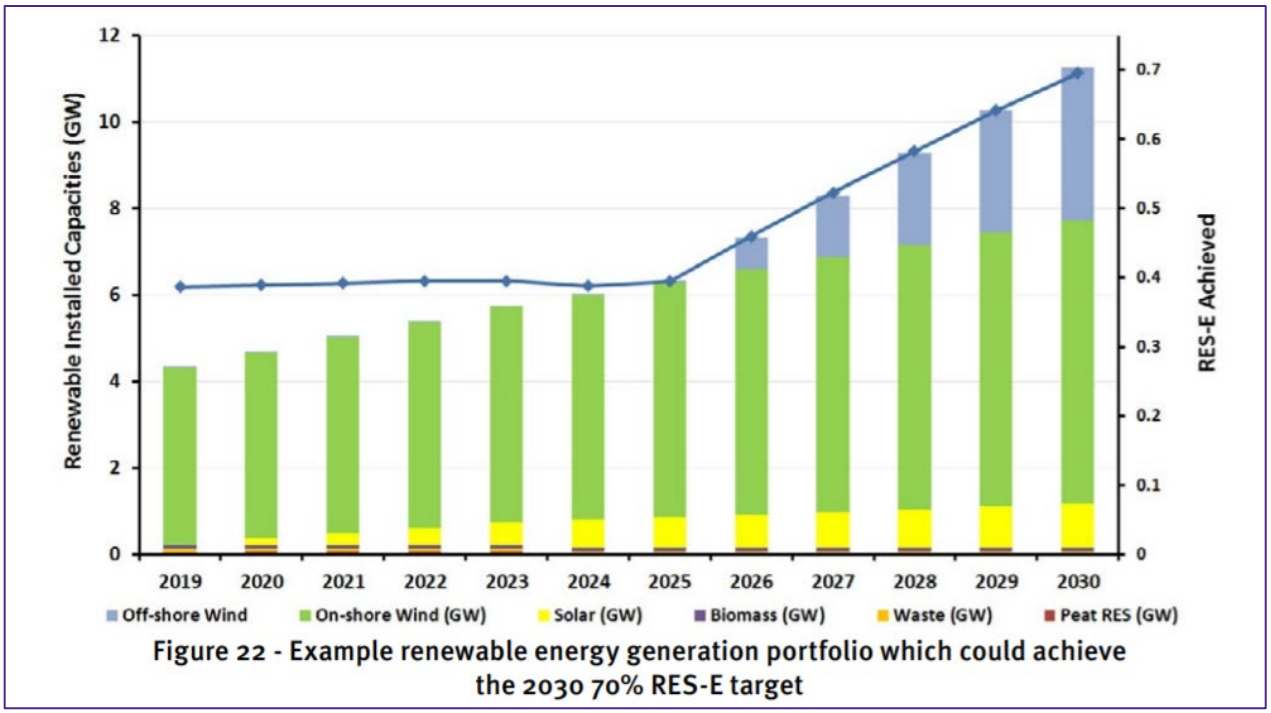

Figure 1: Future Grid Generation, Source: Figure 19 of the All Ireland Generation Capacity Statement 2021-2030, EirGrid

Sustainability Measures

As a global business, the data centre industry is committed to minimising their impact on the environment. A lot of work has gone into this but the industry is committed to going further, pushing the boundaries and accelerating their efforts to achieve net-zero.

Interxion Ireland DAC, in 2020, set aggressive science based carbon emission targets with the Science-Based Target initiative (SBTi), becoming the first global data centre organisation of their size and scale to do so.

Interxion Ireland DAC Commitment:

"We have committed to reducing our Scope 1 and 2 emissions (direct and indirect company emissions) by 68% and Scope 3 emissions (indirect emissions in our value chain) by 24% by 2030".

To achieve this aim, Interxion Ireland DAC has looked at the breadth of their business to see how and where they have the biggest impact – three clear areas of focus were identified; these are set out below:

Designing and constructing more sustainable data centres

"We are developing green buildings that minimise the impact on the communities where we operate. All of our data centres currently being built in Europe are aligned to the infrastructure criteria (specifically the use of refrigerant gases) set out in the EU Taxonomy, a classification system, specifically designed to guide environmentally sustainable economic activities. Our new data centres are also designed and built to receive certification in accordance with recognised global green building certification standards such as BREEAM and LEED™".

Finding new ways to power them

"We are supporting the development of new renewable energy supplies and exploring every avenue to help reduce our reliance on fossil fuels. Interxion Ireland DAC is a leading purchaser of renewable energy and we're working hard to make the switch to renewable power across our entire portfolio. We currently have 100% renewable energy powering our European (including our Irish sites) and US colocation businesses".

Driving continuous improvement in how we operate them

"We are investing in new technologies and best practice operating standards to continually improve our performance and reduce our overall environmental impact, whether that's through harnessing natural resources or participating in the circular economy. This includes pioneering dock and river water cooling schemes in Marseille, France and London, UK, which extract water from existing sources to naturally cool our sites. This approach returns all the water we extract back to the source and reduces our cooling system's energy consumption, dramatically reducing our electricity use and emissions.

"In Sweden we have been an active partner of the Stockholm Exergi Open District Heating™ initiative since 2015, a project that enables waste energy to be used to heat surrounding homes and businesses. We also have plans to contribute to similar district heating networks in Switzerland and France.

"By focusing our efforts and drive innovation in these critical areas, we can significantly reduce our global carbon emissions and meet our targets".

Data Centres as Catalysts for Energy Transformation

The alternative to data centres are on premise server rooms which are usually found inside private offices and institutions. They don't consolidate IT functions into purpose-built facilities. They are usually much less efficient than purpose-built and professionally managed data centres, which achieve significant economies of scale and efficiency.

Within the data centre industry, Interxion Ireland DAC provides 'colocation' data centres. In short, it's a type of data centre where equipment, space and bandwidth are available for rental to retail and enterprise customers.

Interxion Ireland DAC has many of customers who rent space in each of our colocation data centres around the world and they benefit from 100% clean energy usage, as well as market-specific initiatives, such as donating waste heat to open district heating networks to heat local homes and businesses.

Leasing colocation space with a data centre provider like Interxion Ireland DAC and getting rid of private server rooms is a more sustainable, secure and scalable solution.

Interxion Ireland DAC's customers in turn benefit from improved energy efficiency and renewable energy to reduce their power consumption and carbon footprint, protect critical services and systems and address their sustainability targets by using Interxion Ireland DAC's colocation data centres to carry their workloads.

Interxion Ireland DAC are committed to playing their part in the journey to net-zero. While they have already set extensive targets, they know there is more to do and will continue to re-evaluate and challenge themselves to set increasingly ambitious targets going forward.

As a global industry leader, they have a duty to do right by their customers and the environment, which is why their approach to sustainability is truly global.

Interxion Ireland DAC are striving to lead the global data centre industry in sustainable environmental performance and providers such as them will stop at nothing to reach their global net-zero goals.

Planning Policy

Project Ireland 2040: National Planning Framework (NPF) is the Government's high-level plan for the future development of Ireland, with a focus on the strategic growth of Ireland.

National Strategic Outcome 6 of the NPF relates to the creation of *"A Strong Economy Supported Economy, Enterprise, Innovation and Skills".* This strategic outcome is underpinned by a range of objectives including: ***"Promotion of Ireland as a sustainable destination for ICT infrastructures such as data centres and economic activities".***

National Strategic Outcome 5 states: *"Ireland is very attractive in terms of international digital connectivity, climatic factors and current and future renewable energy sources for the development of international digital infrastructures,* ***such as data storage facilities.*** *This sector underpins Ireland's international position as a location for ICT and creates added benefits in relation to establishing a threshold of demand for sustained development of renewable energy sources."*

The Eastern and Midland Regional Assembly Regional Economic and Spatial Strategy 2019-2031 (RESS) is informed by the NPF. It is a strategic plan which identifies regional assists, opportunities, and pressures. It provides appropriate policy responses in the form of Regional Policy Objectives. These reiterate the objectives of the NPF and focus these on a regional level.

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA) includes Regional Policy Objective (RPO) 8.25 which states the following:

> *"Local Authorities shall:*
>
> *Support and facilitate delivery of the National Broadband Plan.*
>
> *Facilitate enhanced international fibre communications links, including full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland.*
>
> *Promote and facilitate the sustainable development of a high-quality ICT network throughout the Region in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.*
>
> ***Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data storage facilities and associated economic activities at appropriate locations.***
>
> *Promote Dublin as a demonstrator of 5G information and communication technology."*

Ireland's Climate Action Plan 2019 laid out a roadmap to reduce our greenhouse gas emissions and tackle the climate crisis. Implementing the Plan is helping to meet the overall 2030 climate commitments and putting Ireland on the pathway to achieving net zero emissions by 2050. The Plan outlined 183 Actions across all sectors, with responsibilities and clear timelines for delivery mapped out.

Action 20 of the Climate Action Plan, 2019 clearly states:

> *"Implement energy actions under the Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy to ensure that large demand connections are regionally balanced to minimise grid reinforcements".*

The Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy notes:

> *"Data centres directly contribute to job creation and they also generate significant added economic benefit by providing a range of services to other firms that undertake production, research and development, marketing, sales, service, and support activities in locations with no physical/geographic connection to the data centre".*

The Strategy concludes:

> *"Ireland continues to enhance the business environment to ensure its attractiveness as business needs evolve. The Government reaffirms support for the development of enabling technology and infrastructure to meet enterprise, economic and social policy goals.*
>
> *We acknowledge the need for social acceptance of large data centre developments. The planning process provides the necessary framework for ensuring that all necessary standards are met and that comprehensive statutory and non-statutory consultation is built into the process.*
>
> ***The Government endorses, supports and promotes the appropriate and timely delivery of data centres across the regions. It reaffirms that it is Government policy and in the national interest, that these developments are delivered in the most efficient and timely way possible, based on the best available knowledge and informed engagement on their impacts.***
>
> *The policy responses summarised above will help ensure that Ireland continues to achieve its national enterprise policy objectives, mindful of the strategic issues that come with developments in the area, while ensuring that our sustainability goals are also reached".*
>
> **[Our Emphasis]**

The energy secured from the grid will become more and more sustainable in line with the targets set out in the All-Ireland Generation Capacity Statement.

Previous Submissions and CE Response

It is noted that submissions were made at draft Plan stage to restrict or remove data centres in the Plan[4]. These submissions were considered, and the Chief Executive's response was as follows:

> *"**CE Response:***
>
> *The contents of the submission are noted.*
>
> *The Council has monitored recent discussions in the Dail and Seanad on Data Centres energy consumption. As stated within Section 9.3, Space Extensive Land Uses generally have a higher carbon footprint, whether because of transport related uses or the large amounts of energy demanded by them.*
>
> *The Development Plan has included strong policies on high energy users through EDE7 Objective 2, requiring them to maximise onsite renewable energy generation with 100% renewable on site as far as possible. If demand cannot be met in this way there is a requirement to provide evidence of engagement with power purchase agreements (PPAs). These PPAs relate to renewable energy and emissions with a current grid emissions factor of 0.295 kgCO2/kWh, which will continually decrease as more renewables are connected to get to the national 70% target for renewable electricity.*
>
> *Having regard to the above, and to the Government's continued support for data centres, it is considered that the policy in the Draft Plan is robust and will require demonstration of capacity in the relevant networks and of the energy efficiency of the development.*
>
> ***CE Recommendation:***
>
> *No change to the Draft Plan"*

It is considered that the Chief Executive's consideration at this point was sound and in line with National and Regional Policy.

[4] Submission of People Before Profit (SD-C195-119) & ors

Submission

Data centres have become increasingly important in recent years. They facilitate home working, home schooling, data sharing, online shopping, weather forecasting, online streaming and a range of other activities which we have become accustomed to and rely upon on a daily basis.

In addition to their day to day usage, they are vital to the Country's economy and facilitate thousands of jobs as well as contributing financially.

Driven by client and customer demands, the industry is environmentally conscious and companies such as Interxion Ireland DAC are at the forefront of the delivery of sustainable data storage solutions.

As well as these direct effects, there are several indirect environmental benefits caused by data centres. Home working and home schooling has changed how we live our lives. Significant numbers of people in Ireland now work from home at least on a part time basis – greatly reducing traffic movements on our roads. From a planning point of view, initial research can be carried out online. Planning history searches are carried out online rather than having to visit the Council offices, sites can be viewed on Google Earth rather than visiting them in person and Development Plans can be consulted online. Even this current process of online consultation on Development Plans is done online. Data centres facilitate all these activities.

The energy use of data centres is acknowledged. However much of this energy usage is replacing energy which would be used (perhaps less efficiently) by companies if they had their own on site data storage.

Energy usage in general is also acknowledged but it is noted that the data centre industry is taking measures to become more sustainable. This includes onsite sustainable energy generation and distribution of excess heat to neighbouring properties. It is also noted that any energy obtained from the grid is becoming increasingly more sustainable with EirGrid targets of 70% renewable energy by 2030.

The importance of data centres is recognised in national and regional policies. NSO6 of the NPF includes an objective to promote Ireland as a sustainable destination for ICT infrastructure such as data centres. NSP5 states that Ireland is very attractive for digital infrastructure *"…such as data storage facilities. This sector underpins Ireland's international position as a location for ICT and creates added benefits in relation to establishing a threshold of demand for sustained development of renewable energy sources".* Further support is set out at a regional level in RPO 8.25.

It is noted that submissions were made at draft Plan stage supporting the banning of data centres. The Chief Executive's Report notes national and regional policy, the importance of data centres, and the other controls and protections included in the draft Plan to ensure that data centres can be delivered in a sustainable fashion and without any impact on amenity.

In light of the above, it is requested that Amendment 13.3 is rejected, and data centres are 'Permitted in Principle' or at least 'Open for Consideration' in EE: Enterprise and Employment zoned land in the adopted Development Plan. This would ensure that the Development Plan accords with National and Regional policy as required by the Planning and Development Act 2000 (as amended).

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Proceeding with the proposed banning of data centre development by SDCC will harm a key economic sector and drive the industry and its benefits from Ireland; Interxion Ireland DAC want and need to work together with key stakeholders – like the SDCC and the local community – to find a mutually beneficial solution.

Interxion Ireland DAC has been and will continue to be a “good neighbour” by building sustainable data centres, operating them efficiently, and powering them with renewables.

Yours faithfully,
for RPS Group Limited

[redacted]

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