Cloud Infrastructure Ireland submission on material amendments 13.1 (p. 506), 13.2 (p. 510) and 13.3 (p. 513) to the SDCC Development Plan 2022-2028

About Cloud Infrastructure Ireland
Cloud Infrastructure Ireland (CII) is a trade association within Ibec focused on the infrastructure policy issues that affect cloud providers. Ireland's cloud infrastructure enables much of the Irish and global digital economy and is responsible for tens of thousands of jobs. CII seeks partnership with local and national governments to protect and nurture cloud infrastructure to enhance Ireland's global economic standing.

South Dublin County Council Development Plan
We welcome the significant work South Dublin County Council (SDCC) and its members have invested in its new draft Development Plan ("the Plan"). CII supports the ambition of SDCC to make South Dublin an even more vibrant location in which to live and work. We share the vast majority of the Plan's goals and the detail set out by which they will be achieved.

CII, however, respectfully submits that the above-mentioned proposed amendments to the Plan – which would ban any new data centre development in the SDCC area – would be detrimental to the Council itself, the people it serves, and the wider community.

In economic terms, it's important to emphasise that data centres are, and will remain, critical infrastructure upon which businesses – including those in South Dublin – rely. At a national level, their contribution is undeniable. In 2018, an IDA study found that between 2010-2018 data centres contributed €7 billion in economic activity across a range of areas, including construction and engineering. The IDA also estimate that more than 20,000 jobs in the Irish economy are directly supported by data centre operators. Enterprise Ireland, meanwhile, estimates that Irish exporters – involved in the data centre industry through engineering and/or construction – have annual exports worth more than €2 billion.

Across Ireland, CII are major employers. Their presence generates business for a multiple suppliers or sub-suppliers across the economy including major construction contractors, mechanical and electrical suppliers, professional services, and a wide range of services provided by businesses in the local community. A number of these businesses have grown steadily alongside CII companies, these include but are not limited to Collen Construction, Hanley Energy and Mercury Engineering.

This national impact should not overshadow the significant local contribution made by CII members to the South Dublin area. They are, for example, substantial rate payers to SDCC and have invested significant capital expenditure in the area. Over the last five years members have directly and indirectly contributed:

- In excess of €65 million in rates paid to SDCC.
- An investment of over €1.6 billion in capital and operational expenditure.
- The total investment by CII members in the South Dublin County area has led to an increase in economic output valued at over €280 million.

If the construction of further data centres were to be prohibited under the new plan, South Dublin would unavoidably stand to benefit less from what has been an important job creating industry for the area to date.

CII understands the motivation to ban data centre expansion in South Dublin is driven by environmental concerns. However, this overlooks the sustainability commitments and contribution made by CII members. According to the IDA "all large multi nationals with data centres in Ireland have committed to being fully renewable powered".

All three members of CII are global companies with strong commitments to be net carbon zero well in advance of 2050. Our members are committed to sourcing their electricity from renewable sources and are actively seeking innovative new means to deliver renewable energy.

Due to the presence of data centres the South Dublin area itself has seen a number of innovative new sustainability initiatives developed in recent years. A strong example of this being the Tallaght District Heating Scheme which will provide heat recycled from a data centre to public sector, residential, and commercial customers. The system will initially heat 47,000 m^2 of public sector buildings as well as 3,000m^2 of commercial space and 135 affordable rental apartments. This heat is provided free of charge and will heat several SDCC buildings including South Dublin County Hall, Tallaght County Library, arts hub RUA RED and the Civic Theatre.

Data centres have also brought real benefits to the local community in South Dublin across community projects and non-profit organisations. CII members, for example, have led a variety of initiatives aimed at improving local amenities or supporting education and covering various themes such as digital transformation, community broadband, workforce development, digital skills, community environmental sustainability and community empowerment funds. A number of notable projects are included below:

- Working with both SDCC and South Dublin Libraries to develop hands on education initiatives to help educate children about science, technology, engineering, the arts and mathematics.
- Supporting organisations such as CEEDS (Clondalkin Centre for the Unemployed) in their efforts to bridge the digital divide by creating an accessible technological hub in the heart of the community.
- Running "Inspiring the Future", a programme developed by our members that brings professionals of various backgrounds to local schools, to engage and provide role models for young people in the community.
- STEMPATHY project in the South Dublin area, supporting several local schools & young students to develop ethnical and empathic approaches to their design thinking.
- Digital Wealth and Pre-Service Teacher Fellowship projects, supporting school leadership & educators to utilise edtech in their classroom environment through developing digital strategies, continuous professional development and access to funding that can move their school from digital poverty to a digital wealthy position. The pre-service teacher fellowship is a further compliment of training pre-service teachers to deliver STEM education through their teaching, learning and practice. These teachers will be placed in the numerous Digital Wealth schools to drive further change & adoption of digital skills & 21CLD lessons.
- Numerous non-profit organisations supported with access to reliable, robust and secure broadband infrastructure that can enable operating non-profits to drive greater impact in their communities

Cloud providers also directly support other education initiatives in SDCC communities. The Tallaght Campus of TU Dublin currently partner with one of our members on a Data Centre Technician Programme. The programme has seen a number of individuals from the local community retrain for cloud computing roles. Our members, through these various programmes, have provided real benefits to the community in the SDCC area and they are committed to continue to develop these further in the future.

CII welcomes the opportunity to make this submission in respect of the Plan. The purpose of this submission is to inform the planning policy as laid out by SDCC around the development of DCs in the region.

Conclusion

It is clear from the information supplied above that data centre development has brought significant economic and social benefits nationally, and specifically to the people of South County Dublin. CII believes that if the amendments in question stand, the opportunity to deliver further benefits to the area will be severely constrained and we would, respectfully, submit that the Executive and Councillors reconsider.

Yours sincerely,

Michael McCarthy
Director, Cloud Infrastructure Ireland,
Ibec,
86 Baggot Street Lower,
Dublin 2