

File With _____

SECTION 131 FORM

Appeal NO: ABP 318780

Defer Re O/H

TO: SEO

Having considered the contents of the submission dated/ received 14/6/26
from

Martin Knox I recommend that section 131 of the Planning and Development Act, 2000

not be invoked at this stage for the following reason(s): No in 2/3/26

E.O.: [Signature] Date: 14/6/26

To EO: _____

Section 131 not to be invoked at this stage.

Section 131 to be invoked – allow 2/4 weeks for reply.

S.E.O.: _____ Date: _____

S.A.O.: _____ Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached submission

to: _____

Allow 2/3/4 weeks – BP _____

EO: _____ Date: _____

AA: _____ Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ABP 318180-23

M _____

Please treat correspondence received on 14/6/24 as follows:

- | | |
|--|--|
| 1. Update database with new agent for Applicant/Appellant _____
2. Acknowledge with BP <u>23</u>
3. Keep copy of Board's Letter <input type="checkbox"/> | 1. RETURN TO SENDER with BP _____
2. Keep Envelope: <input type="checkbox"/>
3. Keep Copy of Board's letter <input type="checkbox"/> |
|--|--|

Amendments/Comments

S131 resp from Martin Knox

LTD 24/6

4. Attach to file

- | | |
|---|--|
| (a) R/S <input type="checkbox"/> | (d) Screening <input type="checkbox"/> |
| (b) GIS Processing <input type="checkbox"/> | (e) Inspectorate <input checked="" type="checkbox"/> |
| (c) Processing <input type="checkbox"/> | |

RETURN TO EO

Plans Date Stamped
 Date Stamped Filled in

EO: [Signature]

AA: Faahimie Khadijova

Date: 14/6/24

Date: 14/6/24

ABP 318180 Universal Developers LLC Data Centre Development Cruiserath: DOYLE
Submission dated 28/5/2024

n Bord Pleanála.

64 Marlborough Street,
Dublin 1.
D01 V902

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
14 JUN 2024	
Fee: €	Type: _____
Time: 9.33	By: Reg POA

Martin Knox
10 Cottage Gardens,
Station Road,
ENNIS,
Co Clare V95 YFN5.
13th June 2024

Mr Doyle argues that the projected GHG emissions as per the EPA Report of the 24th May, 2024 (Ireland's GHG Emissions Projections, 2023-2050) must be taken into account when considering the above development for approval. He argues that the development is not consistent with government environmental policies, EPA projections, environmental targets and carbon budgets.

A decision to grant permission was made by Order dated 18-Sep-2023 (Fingal Co Co) for the above proposal. I presented a comment on Condition 13 where I rejected Fingal Co Co Condition 13 as not a valid condition unless (1) the CPPA is transparent and genuinely contributing to our energy security and (2) gas engines at the site are outlawed.

I agree with Mr Doyle's assessment: The projections as per the above EPA Report as well as current trends in GHG emissions from the energy sector and the associated energy sector budget indicate that we will exceed the 2030 GHG limit by a significant amount, thereby breaking the law in the matter and exposing the taxpayer. This matter must be taken extremely seriously by the Board. Thus far, ABP have granted high energy intensive projects without challenge, without proper EIA screenings or ethical analysis of the relevant data. Furthermore, government climate policy and trajectories seem to have been ignored when granting approvals for high energy projects. You must also now consider sectoral ceilings, and associated carbon budgets before granting permission for this development.

EPA analysis shows (2nd June 2023 Report) that planned climate policies and measures, if **fully implemented**, could deliver up to 29 per cent emissions reduction by 2030 compared to 2018, a reduction of 4 per cent each year from 2022 to 2030. This is **insufficient** to achieve the ambition of 51 per cent emissions reduction for all sectors in Ireland's Climate Act (Emphasis mine) together with an electricity sectoral reduction of 60% based on 2018 GHG emissions.

In July 2022 the *Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy*, states that 'in the last 4 years have seen annual increases in electricity demand usage of around 600GWh from data centres alone – equivalent to the addition of 140,000 households to the power system each year. EirGrid predicts that if all contracted capacity were connected, data centres would make up between 25% and 33% of Ireland's electricity demand by 2030. These forecasts are based on data centre projects already contracted to connect to the electricity system, which are all located in the Greater Dublin region. New data centre projects, not yet contracted to the electricity system, would only further increase electricity demand. EirGrid is aware of up to 1GW of these prospective data centre projects. This would present additional challenges for grid capacity and the emissions targets set for the electricity sector in the Climate Action Plan'. It has not been demonstrated that this project is 'already contracted'.

The CSO has published figures for metered consumption 2015-2022 showing that between 2019 and 2022 the percentage metered consumption by data centres increased from 9% to 18%, doubling in 4

ears. If this trend continues then the data centre sector could consume up to one third of metered power by 2030. We would therefore miss our carbon emissions targets for 2030 for the sector with serious implications for the country and ETS at €100 per tonne won't save the day (See the 4 scenarios in EPA GHG Emissions Projections,2023-2050, two of which are presented here):

3.16 MtCO₂eq (ETS and NON ETS with additional measures) projected for 2030 (electricity sector).

3.63 MtCO₂eq (ETS and NON ETS with existing measures) projected for 2030 (electricity sector).

The proposed development will add an extra 0.5 million tonnes of CO₂ eq., further exacerbating the budget exceedance, even in the best scenario and excluding data centres already in the pipeline.

Consistent with the EPA Projections' Report May 2024, the Climate Action Plan 2023 states:

'The plan implements the carbon budgets and sectoral emissions ceilings and sets out a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050, as committed to in the Programme for Government. Climate Action Plan 2023 sets out how Ireland can accelerate the actions that are required to respond to the climate crisis, putting climate solutions at the centre of Ireland's social and economic development'.

The electricity sector baseline Emissions (2018) were 10 MtCO₂eq and the 2030 target is 3 MtCO₂eq, a reduction of 60%. The applicant's references to zero carbon electricity in 2040 as pointed out by Doyle is exaggerated and clearly an attempt to greenwash and to enhance the chances of a favourable decision from ABP. The EPA projections do not support this scenario but rather support the view, expressed by Mr Doyle, that the 2030 budget limits for the sector will be exceeded by a significant amount.

The EPA Report cited by Doyle clearly predicts that the 2030 carbon budget and the energy sectoral ceiling will both be exceeded, thereby breaching national policies and targets. These predicted exceedances can justly be ascribed to data centre energy demands which are not powered using additional renewables, i.e. those not already planned and approved, as per government policy preference and are not consistent with government environmental policies and carbon budgets.

ABP have no choice now but to deny planning permission for the project not only on emissions grounds and projected emissions but also on grounds of deficiencies in the EIA where a rather loose approach was taken to the risk management strategy deployed by the developer, thereby exposing the citizens of Ireland to additional costs when the legal limits are exceeded and with no cognizance taken at all of burden sharing or of the interests of key stakeholders.

Best,



Martin Knox

10 Cottage Gardens,

Ennis,

V95 YFN5

