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An Bord Pleanála,  
28 Marlborough Street,  
Dublin 1,  
24 July, 2023

Observation on an appeal for: Construction of a data centre  
Site within the townlands of Ballybane & Kilbride, Clondalkin, Dublin 22  
Bord Pleanála Case reference: PL06S.317446  
Planning Authority Case Reference: SD22A/0420

Dear Sir or Madam;

Friends of the Irish Environment CLG is an environmental NGO established in 1997 concerned with protecting Ireland's environment and promoting sustainable development, including working for the full implementation and enforcement of environmental law and public participation in environmental decision making.

We write to support the primary reason given by the Planning Authority for refusing this application:

*Having regard to the existing insufficient capacity in the electricity network (grid), the lack of a fixed connection agreement to connect to the grid, the lack of significant on site renewable energy to power the proposed development, the lack of evidence provided in relation to the applicant's engagement with Power Purchase Agreements (PPAs) in Ireland, and the reliance on a predominantly gas powered plant to provide energy to the development, it is considered that the applicant has failed to demonstrate that the proposed use is acceptable on EE zoned lands, in accordance with EDE7 objective 2 and section 12.9.4 of the South Dublin County Development Plan 2022-2028. In this regard the proposed development, would, therefore, be contrary to the proper planning and sustainable development of the area.*

In support of this refusal, we draw the attention to "Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy" of July 2022 "The capacity constraints experienced by our electricity system today, and the binding carbon budgets that require rapid decarbonisation of energy use across all sectors, necessarily mean that not all existing demand for data centre development can be accommodated."

Yours, etc.,  
Tony Lowes