Submission S3-125

Annette Ryan

From: Info Not Here Not Anywhere <info@notherenotanywhere.com>
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To: Development Plan
Subject: Submission to the proposed amendments to the Draft Clare County Development Plan 2023-2029
Attachments: Proposed Amendments to the Draft Clare County Development Plan 2023-2029 - Submission by Not Here Not Anywhere.pdf

Good afternoon,

Please find attached our submission to the proposed amendments to the Draft Clare County Development Plan 2023-2029.

Kind regards,
Róisín Greaney
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on behalf of
Not Here Not Anywhere - an all-volunteer organisation

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Proposed Amendments to the Draft Clare County Development Plan 2023-2029: Submission by Not Here Not Anywhere

This submission is made on behalf of Not Here Not Anywhere, a nationwide, grassroots, non-partisan group campaigning to end fossil fuel exploration and the development of new fossil fuel infrastructure in Ireland. We advocate for a just transition to publicly-owned renewable energy systems and a society-wide reduction in energy demand both here and around the world.

To avoid the most severe impacts of climate change, global temperatures must be kept below 1.5C above pre-industrialised levels, and we will need rapid and deep action to decarbonise our energy systems. Burning fossil fuels is the single biggest cause of climate change, and taking climate action means developing fossil free communities in every county in Ireland. County and city councils play a hugely important role in helping communities to transition from fossil fuels to renewable energy, and planning is a key area of influence. This encompasses processes for carbon-proofing major decisions, programmes and projects, including investments in transport and energy infrastructure.

This submission to the proposed amendment to the Clare Draft Development Plan specifically relates to data centre development in Clare.

Not Here Not Anywhere was concerned to learn about the recent decision made by Clare County Council to grant planning permission for a new data centre on the Tulla road. Set to be powered by onsite fossil gas and electricity, projects like this one are a huge risk to achieving the rapid, just energy transition to a fossil free future that we urgently need.

In relation to the proposed amendments to the Draft Plan, we welcome the inclusion of Climate Impact Assessments. This commitment, however, currently lacks the necessary detail to ensure that unfettered data centre development does not place unreasonable strain on both our national grid, and our climate commitments. We strongly urge Clare County Council to solidify and strengthen this amendment by incorporating the following recommendations:

Recommendations:

- Call for a national policy to be developed that sets a cap on the level of data centre energy demand that can be accommodated by the grid, while meeting our renewable energy and climate targets consistent with our commitments under the Paris Agreement.

- New data centres in Clare must be powered entirely by onsite or new off site renewable energy.
- Existing centres should be required to transition rapidly to onsite or new off site renewables.
- New data centres in Clare should have infrastructure in place to enable heat generated from them to be utilised for district heating systems.

Impact of data centres on energy demand and climate change

Electricity consumption by data centres increased by 32% between 2020 and 2021, according to the CSO {i}. As of 2021 national electricity consumed by data centres reached an all time high of 14%, which is more than all the residential homes in rural Ireland. This represents an increase of 265% from 2015; when the CSO first started reporting electricity consumption from data centres.

Eirgrid estimates that data centres could account for up to 27% of Ireland's electricity demand by 2028, and up to 50% of new electricity demand growth {iii}. The Irish Academy of Engineering predicts that data centre development will add at least 1.5 million tonnes to Ireland's carbon emissions by 2030, a 13% increase on current electricity sector emissions, and will require an investment in energy generation and storage of €9 billion by 2027 {iv}.

For example, if Amazon's eight centre project in Mulhuddart, Dublin 15, is realised, by 2026 it would use c. 4.4% per cent of the State's entire energy capacity, the equivalent of Galway city, but employ only 30 people post-construction, largely in facility maintenance {v}. The Apple data centre proposed for Athenry, Co. Galway, would have ultimately used "over 8% of the national capacity..., more than the daily entire usage of Dublin, and "would require 144 large diesel generators as back-up" {vi}.

The government has acknowledged that "data centres pose considerable challenges to the future planning and operation of Ireland's power system" {vii}. These challenges include higher electricity costs for consumers {viii}. The Danish Council on Climate Change recommended in April 2019 that the Danish government legally binds data centre owners and developers to contribute to the infrastructure required to supply the centres with renewable energy, such as wind and solar farms {ix}.

Currently, many companies claim to operate data centres powered by 100% renewable energy. However, the energy is largely sourced indirectly through Renewable Energy Certificates or Purchase Power Agreements {x}, which means that the energy is sourced from the grid, which in Ireland is 69% fossil fuel-powered {xi}. If we continue to allow companies to virtually purchase clean energy where it is cheapest to create, while actually using and increasing demand for dirty energy in Ireland, we allow them to profit while our real emissions continue to rise. It is crucial therefore that data centres are powered directly by onsite renewable energy generation such as

rooftop solar farms or genuinely new offsite generation such as offshore wind or solar farms. Data Centres also generate large quantities of waste heat which could be utilised in district heating systems {xii}.

To meet the greenhouse gas emissions targets set out in the Paris Agreement, and in the recently published Climate Action and Low Carbon Development Bill, it is paramount to examine the impact that energy supply of data centres will have on net emissions. Furthermore, it is crucial that every City and County Council takes into consideration the cumulative impact of data centres' energy demand on a nationwide basis, as opposed to examining impact solely on a case-by-case basis.

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