

HERBATA DATA CENTRE, NAAS - RESPONSE TO REQUEST FOR FURTHER INFORMATION ("RESPONSE TO RFI") FROM KILDARE COUNTY COUNCIL

ADDENDUM TO CHAPTER 1 INTRODUCTION AND NEED FOR EIAR



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ADDENDUM TO CHAPTER 1 INTRODUCTION AND NEED FOR EIAR

1.1 The Project - Overview

This Environmental Impact Assessment Report (EIAR) Addendum is provided in response of the Request for Further Information (RFI) from Kildare County Council (dated 4th October 2024) in respect of the proposed Herbata Data Centre Campus (the Project) which is subject of planning application reference 24/60787. The Kildare County Council RFI is provided in Volume II, Appendix 1.1.

The Addendum to the EIAR should be read in conjunction with the EIAR (dated June 2024), as submitted to Kildare County Council as part of the application for planning permission for the Project (submitted 13th August 2024) and in conjunction with the information and documentation contained in the response to the RFI including all documentation, supporting materials and drawing pack.

The response includes a Response to Further Information Report which sets out a response to each of the Items 1 – 30, set out within the Kildare County Council RFI and which cross refers to the other materials submitted as part of the Response to the RFI which are all required to robustly respond to that RFI.

1.2 The Project - Overview

We can confirm that, while some amendments are proposed in response to matters raised in the Kildare County Council RFI, the Project remains fundamentally unchanged, that is to say, the Project comprises of two main elements, namely:

“(a) The Data Centre, comprising 6 no. two storey Data Centre buildings, an administration/management building, car parking, landscaping, energy infrastructure and other associated works. These elements are the subject of the planning application submitted to KCC, and that application is referred to hereafter as “the Data Centre Application”.

(b) The substation, comprising a grid substation and 110kV transmission connection. These elements are subject of the SID application to An Bord Pleanála, and that application is referred to hereafter as “the Substation Application”.

The Data Centre Application and the Substation Application together constitute the “Project” for the purposes of Environmental Impact Assessment and Appropriate Assessment, and references to the “Project” in this EIAR Addendum should be read as references to those two applications taken together as one project.

The description of the Project (including both planning application boundaries) and the environmental assessment of the same, as set out in the submitted EIAR, remain unchanged unless stated otherwise within this EIAR Addendum.

1.3 Design Amendments

The aforementioned design amendments required to respond to the Kildare County Council RFI and a description of the same, are detailed in the Addendum to Chapter 4 Description of the Project and Need for the Project (and detailed in accompanying supporting information which all forms part of the Response to the RFI). The amendments are summarised as follows:

1.3.1 Data Centre 4

An amended design is proposed for Data Centre 4, primarily in respect of the arrangement of the proposed energy plant area (to the rear of the building) and subsequently, the overall plan of the building.

The amended design of Data Centre 4 is in response to the Kildare County Council RFI (Item 25) having considered the potential archaeological feature identified to the south east corner of the building; further detail and consideration of this is provided in the Addendum to Chapter 10 Cultural Heritage of the EIAR.

The external plant gantry and enclosed yard to the rear (encompassing the building energy infrastructure) of Data Centre 4 remains largely consistent with the description set out in the submitted EIAR however the arrangement of the energy infrastructure has been altered to reflect the amended building design.

Data Centre 4 will maintain the proposed solar photovoltaic (PV) arrays, located on the roof top albeit with a reduction in the number of panels, due to the amended design of the building.

In order to accommodate the amended design of Data Centre 4 building, minor amendments to the layout of ancillary elements (such as security fencing, access road, drainage etc) which are within immediate vicinity of the building, are proposed. The component elements of Data Centre 4 (as summarised in Section 1.2 (a) above), the location within the overall site, building height, materials and finishes, remain unchanged.

1.3.2 External Plant Compounds

Due to the amendment to the Project Energy Strategy and specifically in respect of the proposed Combined Cycle Gas Turbines (CCGTs) in response to the Kildare County Council RFI (Item no. 1 and 3), certain amendments have been made by way of additional compounds to the rear of each Data Centres 1- 3, 5 and 6. The amendments include the provision of air cool condensers and a steam turbine, adjacent to the fuel supply and sprinkler supply compounds (as proposed in the submitted planning application).

1.3.3 Energy Strategy

In terms of the energy strategy for the Project it remains the position that power generation on site is from gas turbines in combination with off-site renewable energy, however in response to the Kildare County Council RFI (Item 1) amendments are proposed which will reduce greenhouse gas (GHG) emissions by employing higher efficiency turbines supplemented by an increase in the level of renewable energy, obtained from *off site* via Compulsory Power Purchase Agreements (CPPAs).

Further detail in respect of the proposed amendments to the Project energy strategy are included in description are detailed in the Addendum to Chapter 4 Description of the Project and Need for the Project. The updated Energy Policy Compliance Report and updated Energy Strategy Report (provided in Volume II, Appendix 4.3 and 4.4 respectively) set out in detail, the proposed energy strategy for the Project.

1.3.4 External Boundary Treatments and Landscaping

The matters raised within the Kildare County Council RFI (Items 29 and 30) have been comprehensively addressed and clarifications provided in the Response to Further Information Report; as explained in this document, the response has not necessitated any significant amendments to the landscape design rationale and the approach as submitted with the planning application and the proposed landscape planting design, has not changed significantly. The clarification provided in response to the Kildare County Council RFI Items 29 and 30 within the Response to Further Information Report, notes that landscape planting and screening has already been maximised to the fullest extent within the constraints of the Project.

The amended design for Data Centre 4 has resulted in some minor amendments to landscape proposals within the immediate vicinity of the building; these however are minor in nature and do not alter the proposals as submitted in respect of retention of existing vegetation, proposed mounding and landscape planting along the site boundaries.

In response to the Kildare County Council RFI (Item 6) which notes the proliferation of palisade fencing throughout the site, an amendment has been made to the proposed Landscape Masterplan to include mammal passes in fences throughout the full extent of the site. These mammal passes are proposed within security fencing throughout the site, in order to facilitate movement of mammals across the site. There are no proposed amendments to the overall height, materials or layout of the proposed security fencing. Further detail and consideration of this is provided in the Addendum to Chapter 5 Biodiversity of the EIAR.

1.3.5 R409 Improvements

Amendments are proposed in respect of the Kildare County Council Roads Department for a footpath and cycle path as part of the proposals, along the R409 Caragh Road, which traverses the M7 motorway on an overbridge. The amendments to provide a footpath and associated line markings and replacement of the traffic barriers will be undertaken on the R409 (where it traverses the M7 motorway).

1.4 Design Drawings

A detailed description of the aforementioned design amendments is provided in the Addendum to Chapter 4 Description of the Project and Need for the Project.

The following drawings are provided Volume III Figures and Drawings and as part of the design drawing package submitted as part of the Response to the Kildare County Council RFI:

- DRAWING 22217-RKD-ZZ-ZZ-DR-A-1010-OVERALL PROPOSED SITE PLAN
- DRAWING 22217-RKD-ZZ-ZZ-DR-A-1012-PROPOSED SITE PLAN B
- DRAWING 22217-RKD-ZZ-00-DR-A-1115-DATA CENTRE - OVERALL GROUND FLOOR PLAN TYPE D
- DRAWING 10360452-HDR-ZZ-02-DR-E-602003 SITE PLAN PV LAYOUT
- DRAWING BSM-ZZ-ZZ-DR-L-0301 LANDSCAPE MASTERPLAN
- DRAWING BSM-ZZ-ZZ-DR-L-0311 LANDSCAPE BOUNDARY TREATMENTS PLAN
- DRAWING 22217-RKD-ZZ-ZZ-DR-A-1400-PROPOSED BOUNDARY AND FENCE DETAILS
- DRAWING 10360452-HDR-XX-XX-DR-C-082111 COMBINED CYCLE GAS SYSTEM COMPOUND
- DRAWING 2232-DOB-ZZ-ZZ-DR-C-1600 PROPOSED R409 ROAD VRU IMPROVEMENTS
- DRAWING 2232-DOB-ZZ-ZZ-DR-C-0600 PROPOSED SITE SECTIONS
- DRAWING NO. 22217-RKD-ZZ-ZZ-DR-A-1300-DATA CENTRE - OVERALL PROPOSED ELEVATIONS TYPE A
- DRAWING NO. 22217-RKD-ZZ-ZZ-DR-A-1305-DATA CENTRE - OVERALL PROPOSED ELEVATIONS TYPE B
- DRAWING NO. 22217-RKD-ZZ-ZZ-DR-A-1310-DATA CENTRE - OVERALL PROPOSED ELEVATIONS TYPE C
- DRAWING NO. 22217-RKD-ZZ-ZZ-DR-A-1315-DATA CENTRE - OVERALL PROPOSED ELEVATIONS TYPE D
- DRAWING NO. 22217-RKD-ZZ-ZZ-DR-A-1200-DATA CENTRE - PROPOSED GA SECTIONS TYPE A
- DRAWING NO. 22217-RKD-ZZ-ZZ-DR-A-1205-DATA CENTRE - PROPOSED GA SECTIONS TYPE B
- DRAWING NO. 22217-RKD-ZZ-ZZ-DR-A-1210-DATA CENTRE - PROPOSED GA SECTIONS TYPE C
- DRAWING NO. 22217-RKD-ZZ-ZZ-DR-A-1215-DATA CENTRE - PROPOSED GA SECTIONS TYPE D

The referred to above drawings should be read in conjunction with the Addendum to the EIAR and in conjunction with the other information and documentation submitted as part of the Response to the Kildare County Council RFI.

1.4.1 Data Centre 4 Amendments

For the purpose of comparison, Figures 1.1 and 1.2 below, illustrate the previously submitted site context plan and the amended, proposed site context plan respectively.

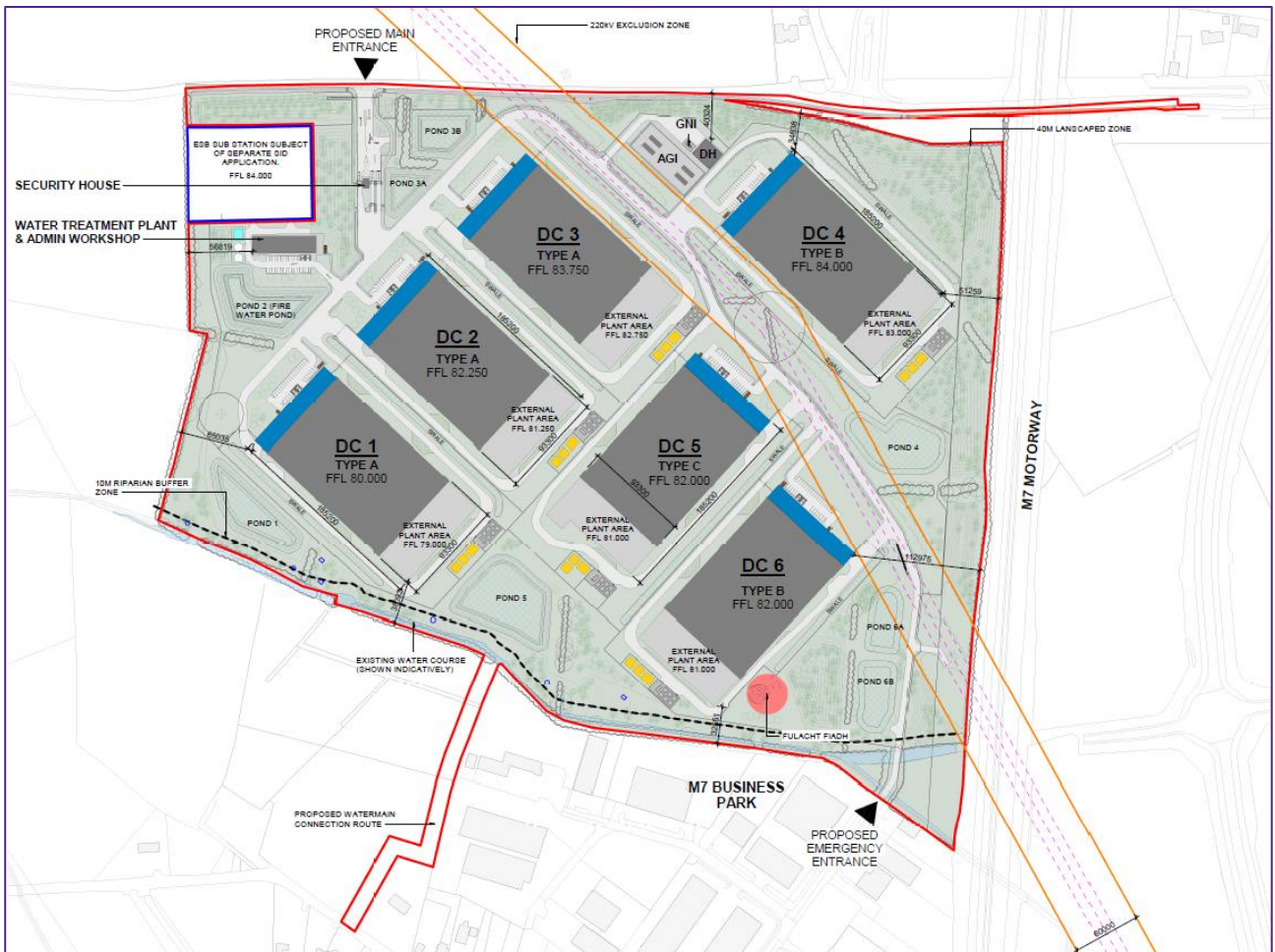


Figure 1.1: Previously Submitted Overall Proposed Site Plan (extract of submitted drawing 22217-RKD-ZZ-ZZ-DR-A-1010-OVERALL PROPOSED SITE PLAN)

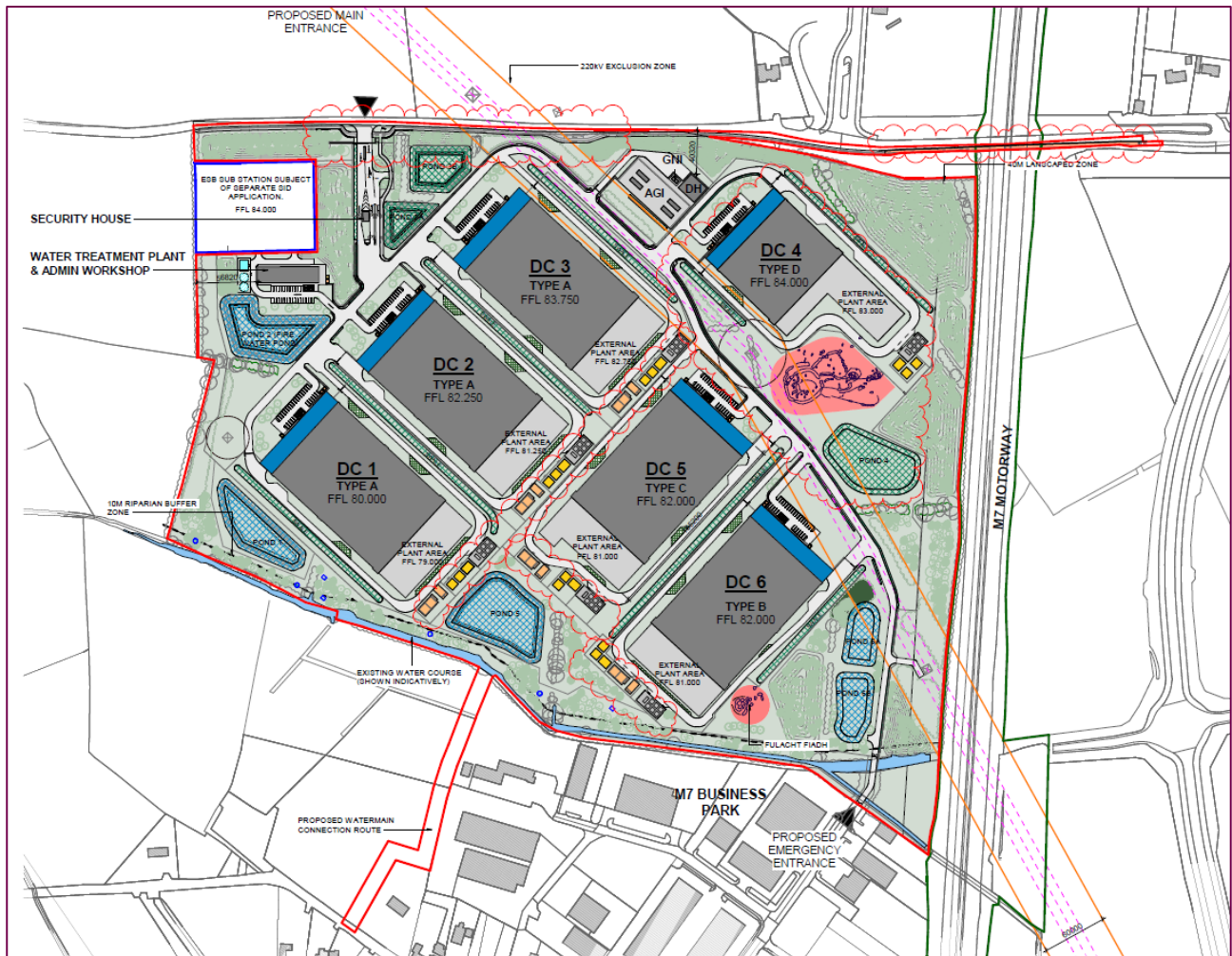


Figure 1.2: Amended Overall Proposed Site Plan (extract of now submitted drawing 22217-RKD-ZZ-ZZ-DR-A-1010-OVERALL PROPOSED SITE PLAN)

Drawing 22217-RKD-ZZ-ZZ-DR-A-1010-OVERALL PROPOSED SITE PLAN is provided in Volume III Figures and Drawings and as part of the design drawing package submitted in response to the Kildare County Council RFI.

For the purpose of comparison, Figures 1.3 and 1.4 below, illustrate the previously submitted layout detail for Data Centre 4 and (amended) proposed layout detail for Data Centre 4 respectively.

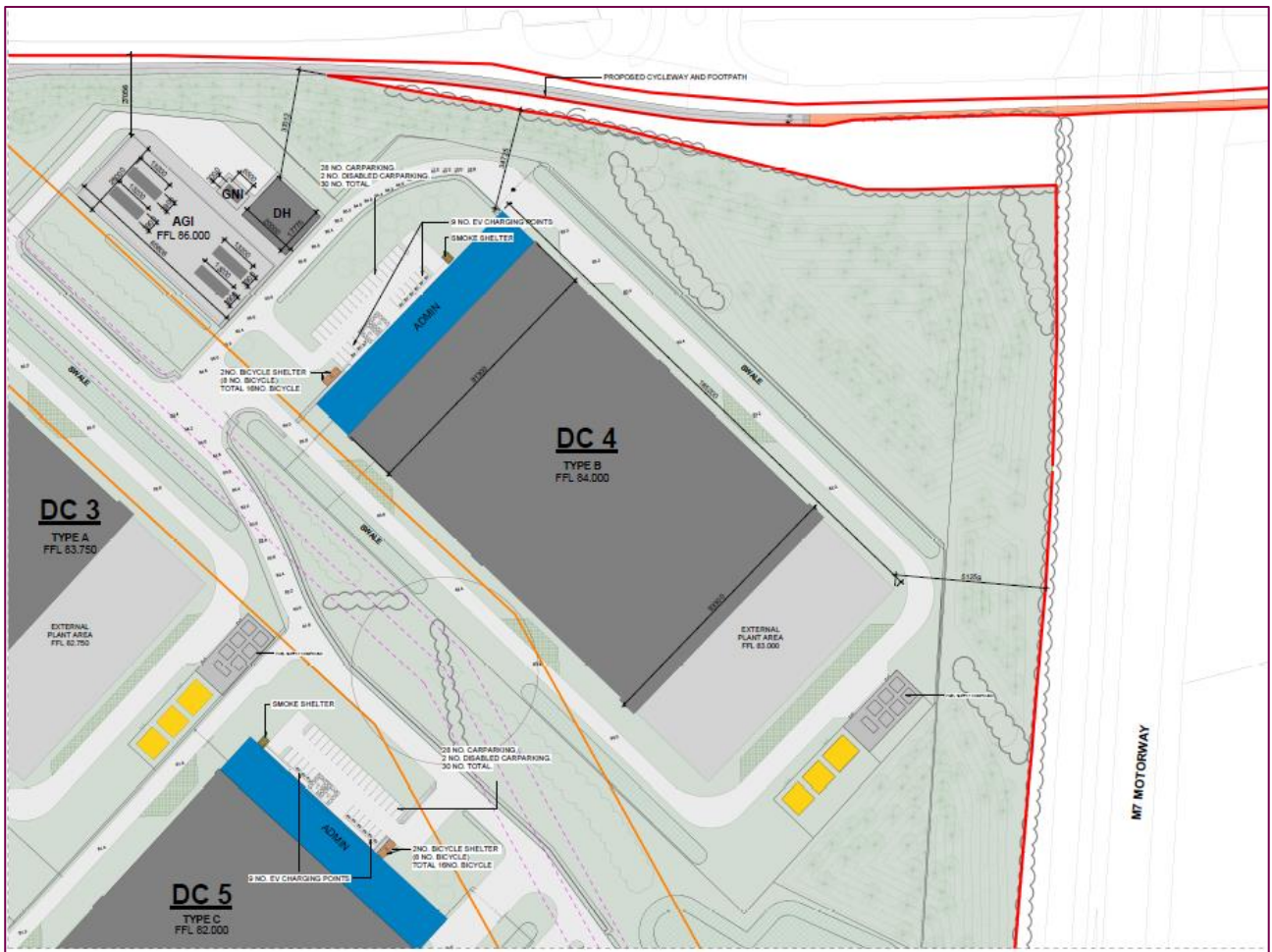


Figure 1.3: Previously Submitted Proposed Site Plan B (extract of submitted drawing 22217-RKD-ZZ-ZZ-DR-A-1012-PROPOSED SITE PLAN B)

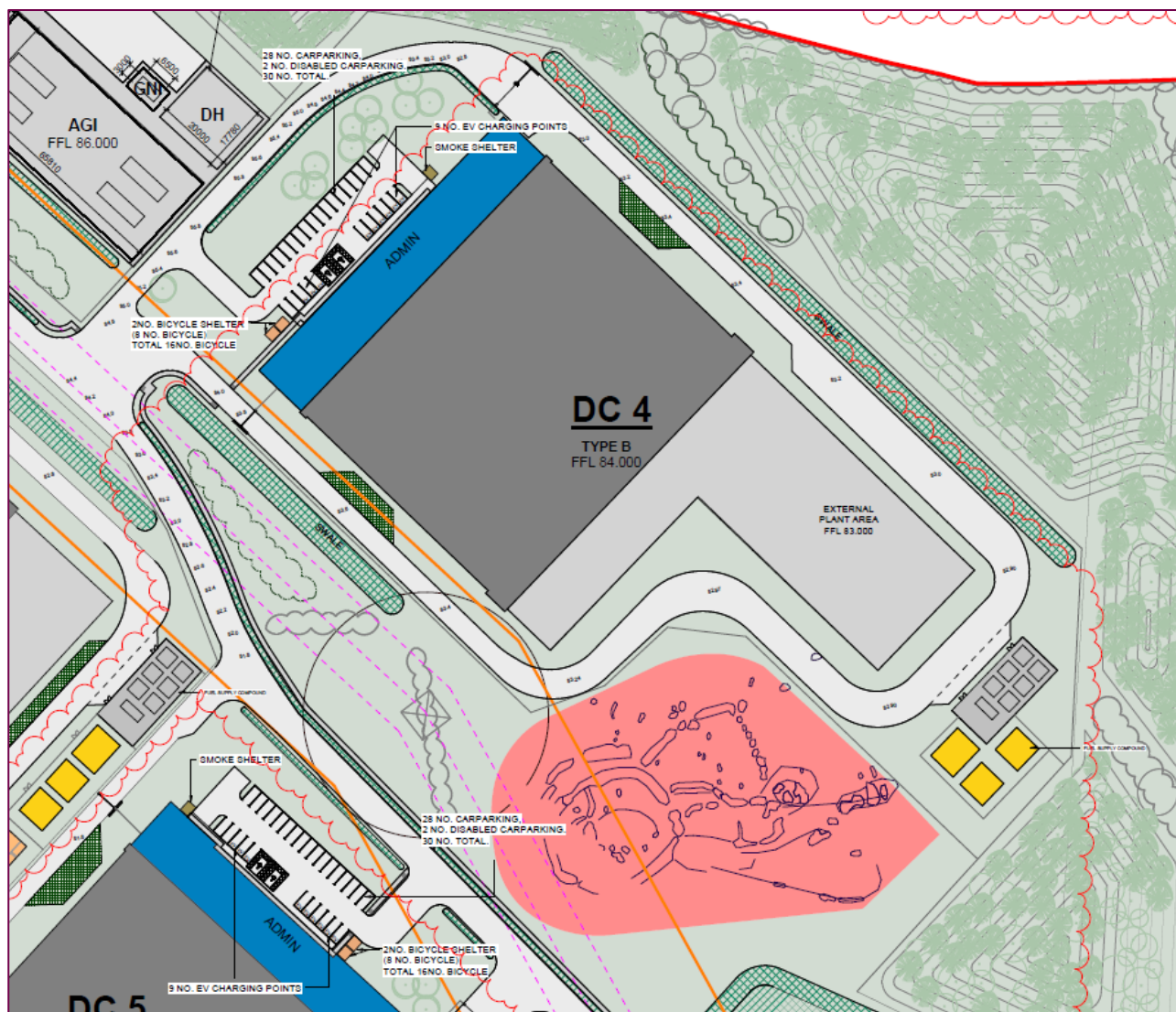


Figure 1.4: Amended Proposed Site Plan (extract of now submitted drawing 22217-RKD-ZZ-ZZ-DR-A-1012-PROPOSED SITE PLAN B)

Drawing 22217-RKD-ZZ-ZZ-DR-A-1012-PROPOSED SITE PLAN B is provided in Volume III Figures and Drawings and as part of the design drawing package submitted in response to the Kildare County Council RFI.

1.5 Need for the Addendum to the EIAR

This Addendum to the EIAR is provided in response to the Kildare County Council RFI. The Addendum to the EIAR is provided along with the other materials, submitted as part of the Response to the Kildare County Council RFI (all of which are required to respond to that RFI).

Where additional or updated information, submitted as part of the Response to the Kildare County Council RFI is considered relevant to the environmental assessment contained in the previously submitted EIAR, an addendum to the corresponding chapter, is provided.

Any environmental impacts relevant to the Response to the Kildare County Council RFI are addressed within the relevant addendum chapters (as set out in Section 1.6.1 below) are as follows: Biodiversity, Noise and Vibration, Cultural Heritage, Landscape and Visual, Climate Change and Traffic and Transport.

1.6 Structure of the Addendum to the EIAR

1.6.1 Proposed Structure

This section sets out the proposed structure of the Addendum to the EIAR and the various environmental topics to be considered arising from the Kildare County Council RFI are set out in this section. Table 1.1 sets out the chapters contained within Volume I of the Addendum EIAR.

Table 0.1: EIAR Addendum Structure

Document	Heading/Description
Volume I – Main Report	
Addendum to Chapter 1	Introduction and Need for EIAR Addendum
Addendum to Chapter 4	Description of the Project and Project Need
Addendum to Chapter 5	Biodiversity
Addendum to Chapter 9	Noise and Vibration
Addendum to Chapter 10	Cultural Heritage
Addendum to Chapter 11	Landscape and Visual
Addendum to Chapter 12	Traffic and Transport
Addendum to Chapter 16	Climate Change
Volume II – Technical Appendices	
Technical Appendices	Relevant technical appendices supporting the planning applications and EIAR Addendum are contained in Volume II.
Volume III –Design Drawings & Figures	
Drawings, graphics and figures	Contains selected design drawings and figures (which are not included in the body of the relevant Addendum chapters of the EIAR).

1.7 Planning History

The submitted EIAR (Volume I, Chapter 1 Introduction and Project) identified a number of projects (identified from a planning history search) which were within and immediately adjacent to the Project site boundary, for the purposes of cumulative assessment. This exercise has been repeated in order to identify any new projects which may have arisen since the submission of the Project planning application.

Whilst no pertinent permissions were identified on the subject site, a number of relevant applications were identified in the wider locale of the subject site.

Table 1.2 identifies all those projects which have been assessment with regards to cumulative impacts.

Table 0.2: Projects Identified in Respect of Cumulative Impacts

Planning Ref.	Address	Description	Status	Application Type	Determination Date
2560637	Unit 4 Osberstown Industrial Park , Caragh Road , Naas	For extension to existing glass recycling building (12m height) within existing glass recycling plant. The application relates to a proposed development which is for the purposes of an activity covered by waste licence WO279-02 issued by the Environmental Protection Agency	PRE VALIDATION	PERMISSION	N/A
2560378	Motor Park, Newhall , Naas	For the construction of a Surface Vehicle Storage Compound and Vehicle Inspection Building, together with all associated site and landscaping works	FURTHER INFORMATION	PERMISSION	N/A

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2461367	Site no. 15 Osberstown Business Park , Ploopluck , Naas	For, a) the development of a self storage facility comprising 20 no. steel storage containers, b) a staff welfare facility unit, c) a covered bicycle parking unit, d) car parking, e) boundary treatment/fencing, f) landscaping, g) signage and h) all associated site development works. Revised by Significant Further Information which consists of; The Site Layout Plan has been altered to include the following; the introduction of buffer zones, the relocation of storage units, additional landscaping/fencing, a revised parking layout and changes to the surface water drainage system	NEW APPLICATION	PERMISSION	N/A
2460968	18B Osberstown Business Park , Osberstown , Naas	For construction of a 93.0 sq/m Car Showroom and 35.6 sq/m Valeting building, both reduced in size from original granted permission ref: 221515	APPLICATION FINALISED	RETENTION	Nov 2024

The above named projects have been assessed in respect of potential cumulative effects with the Project; due to the nature, location, and scale of the projects, no significant cumulative impacts are predicted.

1.8 Methodology

The methodology employed in the Addendum to the EIAR is consistent with and remains unchanged to that set out in Chapter 1 Introduction and Need for EIAR of the submitted EIAR.