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

ADDENDUM TO CHAPTER 12 TRAFFIC AND TRANSPORTATION

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ADDENDUM TO CHAPTER 12 TRAFFIC AND TRANSPORTATION

12.1 Introduction

This Addendum to Chapter 12 Traffic and Transportation of the EIAR (dated June 2024), submitted to Kildare County Council as part of the planning application for the Project on 13th August 2024, updates the traffic and transport assessment of the Project, in response to the Kildare County Council Request for Further Information (RFI).

This Addendum to Chapter 12 should be read in conjunction with the previously submitted EIAR, Chapter 12 Traffic and Transportation and its associated figures and appendices, and in conjunction with the other information and documentation submitted as part of the Response to the RFI.

As explained in the Addendum to Chapter 1 of the EIAR, the Kildare County Council RFI sets out a number of matters in respect of *Roads*, namely Items 7, 8, 9, 10 and 11 of the RFI, which state the following:

7. The Applicant is requested to submit details to confirm that the proposed works occurring over, under or adjacent to the motorway within the MMaRC (Motorway Maintenance and Renewal Contract) area have been addressed appropriately and that the proposed works adjacent to the M7 such as landscaping and drainage and lines associated works such as earth moving and lighting have been designed and constructed in a manner that has regard to the extents and function of the motorway.

8. The Applicant is requested to confirm the extent of the works within the MMaRC Area.

9. The Applicant is requested to submit details of the Works Specific Deeds of Indemnities, arrangements for third party access or consent from Transport Infrastructure Ireland (TII) in accordance with Section 53 of the Roads Act, 1993 which a third party seeking to undertake works within a motorway/dual carriageway will generally be required to carry out as advised by TII.

10. The Applicant is requested to submit details to highlight compliance with the Technical Acceptance Requirements for the assessment, alteration, modification, strengthening and repair of all road structures which must be prepared in accordance with the Technical Approval of Road Structures on Motorways and Other National Roads for structures' (TII, 2009, DNSTR03001). This is to ensure that the current application demonstrates protection of the safety, maintenance and operation of the heavily trafficked M7 at this location and to confirm the technical feasibility of the proposal having regard to TII Publications requirements as appropriate.

11. The Applicant is requested to submit details to resolve the following operational issues related to the proposed development as part of a Construction Traffic Management Plan (CTMP) to address concerns relating to national road network maintenance and road safety.

(a) Consultation with all relevant PPP Companies, MMaRC Contractors and the MDO over which the haul route traverses to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained.

(b) Any proposed works to the national road network, including signage, to facilitate construction traffic to comply with TII Publications and to be subject to Road Safety Audit as appropriate. Works should ensure the ongoing safety for all road users and prior to any development necessary licenses, approvals or agreements with PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) Companies and the MDO, as necessary, to be in place.

(c) All proposals agreed between the MDO/ KCC, PPP Concessions and MMaRC Companies and the Applicant impacting on national roads with mitigation measures identified by the Applicant.

(d) Measures to rectify any damage caused to the pavement of the existing national road due to the turning movement of abnormal 'length' loads (e.g. tearing of the surface course) to be in accordance with TII Pavement Standards and details in this regard to be agreed with the MDO.

The above matters are responded to in detail in the Response to Further Information Report submitted as part of the response to the Kildare County Council RFI, at Sections 4.7 – 4.11 respectively, and are further addressed through the provision of updated technical reporting as follows:

- Updated Construction Environmental Management Plan – Volume II, Appendix 4.5, which replaces the Construction Environmental Management Plan originally included at Volume II, Appendix 4.5 of the EIAR submitted with the application for planning permission; and,
- Updated Construction Traffic Management Plan (CTMP) – Volume II, Appendix 4.6, which replaces the Construction Traffic Management Plan originally included at Volume II, Appendix 4.6 of the EIAR submitted with the application for planning permission.

This addendum to Chapter 12 Traffic and Transportation of the EIAR is provided in consideration of proposed amendments to the improvements to the R409 (as described in the Addendum to Chapter 4 of the EIAR), and to update the assessment of the construction traffic impacts of the Project in light of the updated Construction Environmental Management Plan and the Updated Construction Traffic Management Plan submitted in response to the Kildare County Council RFI.

12.1.1 R409 Improvements

As described in the Addendum to Chapter 4 of the EIAR, following engagement with Kildare County Council Roads Department, amendments are proposed in respect of the provision of a footpath and cycle path along the R409 Caragh Road, where it crosses over the M7 motorway on an overbridge (crossing above the Motorway Maintenance and Renewal Contract [MMaRC] area as described in detail in Section 4.7.1 of the RFI Response Report submitted as part of the response to the Kildare County Council RFI).

The amendments propose a footpath and associated line markings, and replacement of the traffic barriers, which will be undertaken on the R409 (where it crosses over the M7 motorway) and are detailed in Figures 12.1 and 12.2 (extracts from drawing 2232-DOB-ZZ-ZZ-DR-C-1600 PROPOSED R409 ROAD VRU IMPROVEMENTS).

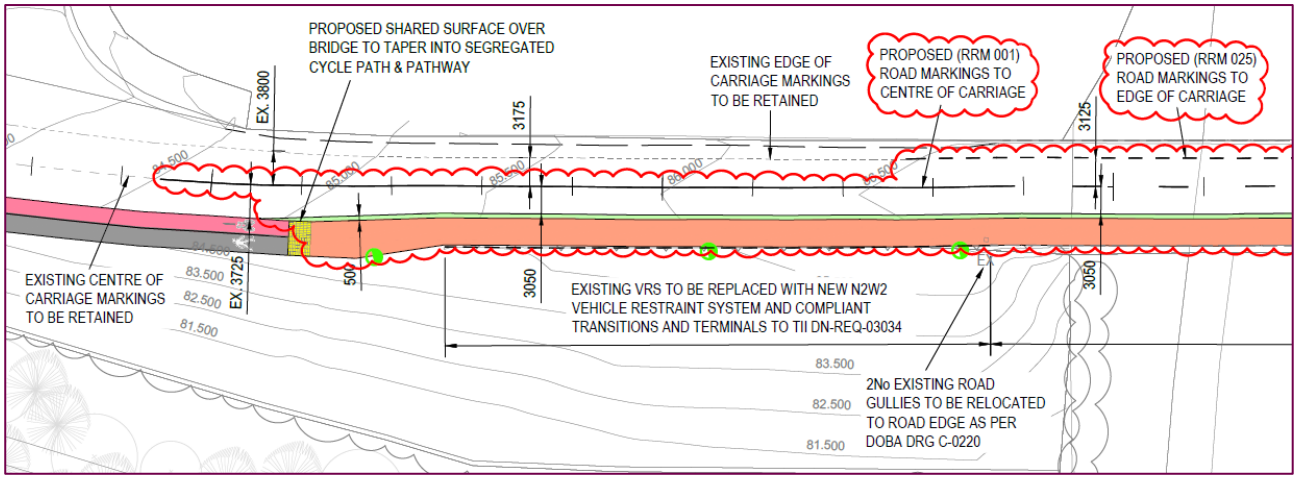

Figure 12.1: Detail of Proposed R409 Improvements (extract of now submitted drawing 2232-DOB-ZZ-ZZ-DR-C-1600)

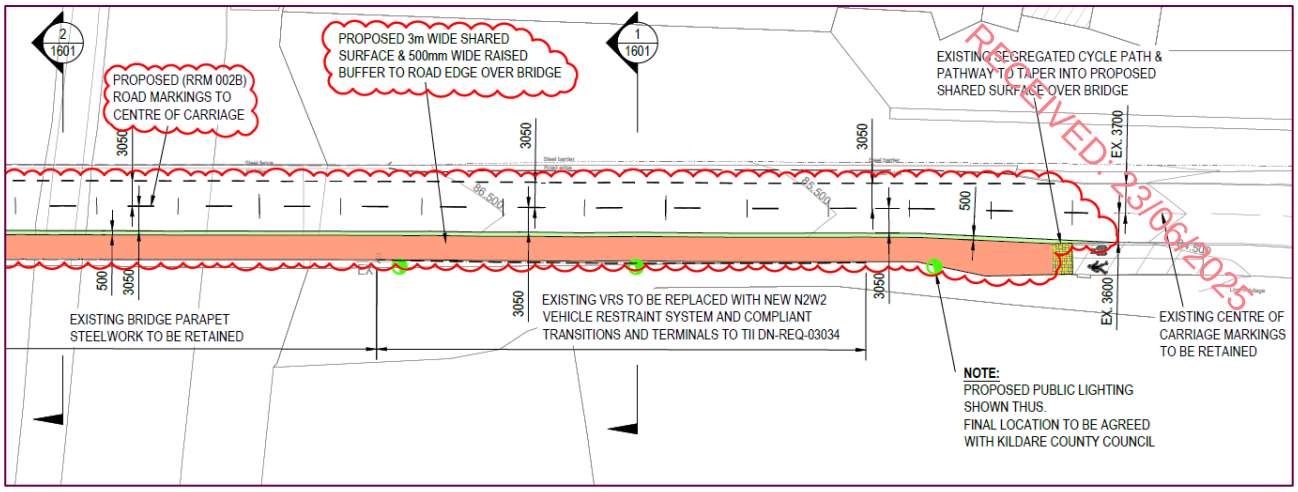

Figure 12.2: Detail of Proposed R409 Improvements (extract of now submitted drawing 2232-DOB-ZZ-ZZ-DR-C-1600)

Drawing 2232-DOB-ZZ-ZZ-DR-C-1600 PROPOSED R409 ROAD VRU IMPROVEMENTS, the source of the two detail extracts set out at Figures 12.1 and 12.2 above, is provided in Volume III Figures and Drawings and as part of the design drawing package submitted in response to the RFI from Kildare County Council.

In summary, the proposed amendments comprise of the provision of a 3m shared surface (with a 500mm buffer) across the bridge and a reduction in the carriageway width from 7.8m to 6.1m, across the bridge; by comparison, the submitted application proposed a 2m shared surface (with no buffer).

The amended proposals are comparable to pedestrian improvement works previously undertaken on the L2030 bridge (adjacent to the M7 Business Park) and on the L3014 Sallins Road bridge (KE M07-036.00), both of which bridges also cross over the existing M7 motorway, above the MMaRC area. In both cases, the bridge structures are identical to that on the R409, and there is no technical impediment to providing improved pedestrian facilities on the R409 in a similar manner.

Engagement with Kildare County Council National Roads Office and Transport Infrastructure Ireland has informed the proposed amendments and both parties are considered in agreement with the same.

All of the proposed works on the R409 have been designed and will be constructed in a manner that has regard to the extents and function of the M7 motorway, and being located on a bridge over the M7, will not have any impact on the operation of the M7.

12.2 Impact Assessment

12.2.1 Construction Phase

The Construction Traffic Management Plan (CTMP) has been updated and included as part of the response to the RFI and attached as Appendix 4.6, Volume II, replacing the Construction Environmental Management Plan originally included at Volume II Appendix 4.6 to the EIAR submitted with the application for planning permission. The Updated CTMP will be developed and finalised by the appointed contractor prior to construction, taking account of any relevant planning conditions and the construction programme.

Details of any large delivery and specialised loads are scheduled in the Updated CTMP. The nature and frequency of anticipated construction traffic and specialised loads are such that the strategic function of the national road network can and will be maintained throughout the construction period.

12.2.1.1 Project Phasing

Site phasing is proposed for the construction of the Project and remains unchanged from that set out within the submitted EIAR. As set out in the addendum to Chapter 4 of the EIAR, submitted as part of the response to the Kildare County Council RFI, the proposed construction programme remains an estimated 8 years and 9 months however an amended commencement date of January 2026 has been presented, serving as an indicative start date in order to illustrate the construction milestones. A final commencement date will be subject to the timescales for the Project in obtaining all necessary consents.

Table 12.1 below provides an amended, indicative construction phase programme for key milestones; this proposed construction programme is derived from the updated CTMP, 10360452-HDR-XX-XX-RP-T-000002 provided in Volume II, Appendix 4.6.

Table 12.1: Construction Programme (Indicative) (extract from the Updated CTMP 10360452-HDR-XX-XX-RP-T-000002), Volume II, Appendix 4.6

Phases	Construction Program	Start Date	End Date
Herbata Data Campus Overall Construction Program		08/01/2026	27/03/2034
Phase 1	Enabling Works Overall Construction Program	08/01/2026	27/07/2026
	ESB Substation Overall Construction Program	01/06/2026	28/03/2027
	AGI Building Overall Construction Program	01/06/2026	28/07/2027
	DC 1 Overall Construction Program	01/06/2026	17/07/2028
	R409 Road Improvement works that include the cycle lane, pedestrian walkway to both sides of the road.	08/12/2027	17/07/2028
	DC 2 Overall Construction Program	16/07/2027	01/09/2029
Phase 2	DC 3 Overall Construction Program	31/08/2028	16/10/2030
	DC 5 Overall Construction Program	15/10/2029	30/11/2031
Phase 3	Construct Secondary Construction Compound around the site and remove the existing construction carpark	05/10/2031	30/01/2032
	DC 6 Overall Construction Program	27/11/2030	13/07/2033
	DC 4 Overall Construction Program	11/01/2032	27/08/2034
	Site Wide Works Overall Construction Program	01/03/2033	27/09/2034

12.2.1.2 Construction Traffic

The submitted EIAR stated the following in respect of construction phase traffic impacts:

Based on the predicted daily vehicle trips associated with the construction phase of the development there are unlikely to be any significant environmental effects. The volume of HGVs on the surrounding road network is small (47no. per day / 6no. vehicles per hour), and the HGV traffic will, as far as reasonably practicable, avoid the peak hours. The larger traffic volumes associated with staff are likely to be via cars / vans (~175no. in the peak hours).

Therefore, assuming the staff vehicles are split 50% from the north of the site and 50% from the south of the site then this would equate to 88no. vehicles coming from the north and south respectively.

Whilst there will be an increase in traffic on the surrounding road network during the construction period, the percentage impacts during the AM and PM peak hour periods is less than 10% and given the volumes of traffic this section of the network is not currently congested. Therefore, the impact on the surrounding road network falls within the thresholds as set out in the relevant guidance. Given the percentage impact it is unlikely that the construction phase will result in a significant impact upon the surrounding road network.

Section 5.9 of the updated CTMP (Volume III, Appendix 4.6) sets out further information in respect of HGV Construction Traffic, including consideration of *Abnormal Construction Traffic, Specialised Vehicles* and

routing as mentioned in Item 11 of the Kildare County Council RFI. This information is summarised in Sections 12.2.1.2.1 - 12.2.1.2.3 immediately below.

12.2.1.2.1 Normal Construction Traffic

It is anticipated that over 99% of construction traffic serving the proposed construction works will be normal HGV (and smaller) vehicles. These vehicles can be two or three axle tractor units with various trailer combinations. Such vehicles can accommodate maximum weights of up to 46 tonnes. For all construction deliveries, appropriate vehicle combinations of tractor and trailer will be selected to ensure that the loading does not exceed 5.5 Tonnes per meter and that axel loads do not exceed 15 Tonnes.

12.2.1.2.2 Abnormal Construction Traffic

Occasional abnormal loads (ALs) will require to be brought to the construction site over the duration of the construction programme. This represents less than 1% of the total vehicular trips and will be distributed over the anticipated program from 2026 to 2034. In any given year of construction, the maximum number of potential abnormal loads will be no greater than 9 deliveries.

A vehicle/load is considered abnormal when:

- the total length of the vehicle exceeds 12m or 16.5m in the case of an articulated vehicle, or
- the overall width exceeds 2.55m, or
- the overall height exceeds 4.65m (subject to Regulation 2(2) of S.I. No 366 of 2008), or
- the weight of any axle exceeds the limits stated in S.I. No 5 of 2003.

The maximum height of any vehicle on Irish roads – including HGVs – is 4.65 metres. From a thorough review of the anticipated construction traffic (taking account of the proposed design amendments including turbine specification), the following elements of the Project are the only elements that may give rise to potential abnormal loads:

- Gas Turbines – Gas turbines (Combined Cycle Gas Turbines (CCGTs) and Open Cycle Gas Turbines (OCGTs)) will be delivered to site with a package weight of 38t and will be delivered in packages within 3m wide x 12m long x 3.5m high. A total of 39 turbines shall be delivered to site (over a phased construction programme), 7 turbines for each of Data Halls 1 -3, 5 and 6 and 4 turbines for Data Centre 4.
- Substation Transformers – The Project requires 4 No. 100MVA substation transformers. Transformers will be dis-assembled and transported for assembly and commissioning on site such that each transformer load would be no more than 60t when shipped and have a maximum size of 5m x 3m x 4m. The overall height of the load will not exceed 4.65m.

12.2.1.2.3 Specialised Vehicles and Routing

Road Traffic (Specialised Vehicle Permits) Regulations 2009, S.I. No. 147 of 2009 (as amended), provide for a streamline permit system and list of Designated Routes to be administered by An Garda Síochána for the movement of loads not exceeding 27.4 metres in length and 4.3 metres in width on the major inter-urban routes. All specialised vehicle movements will be compliant with the above legislative and Garda Siochana requirements.

Dublin Port has been identified as the closest port to the Project and is the port through which imported specialised equipment (turbines and substation components) will be delivered. Figure 12.3 illustrates the proposed route of HGV vehicles transporting imported equipment to the site during the construction phase via the National Motorway Network.

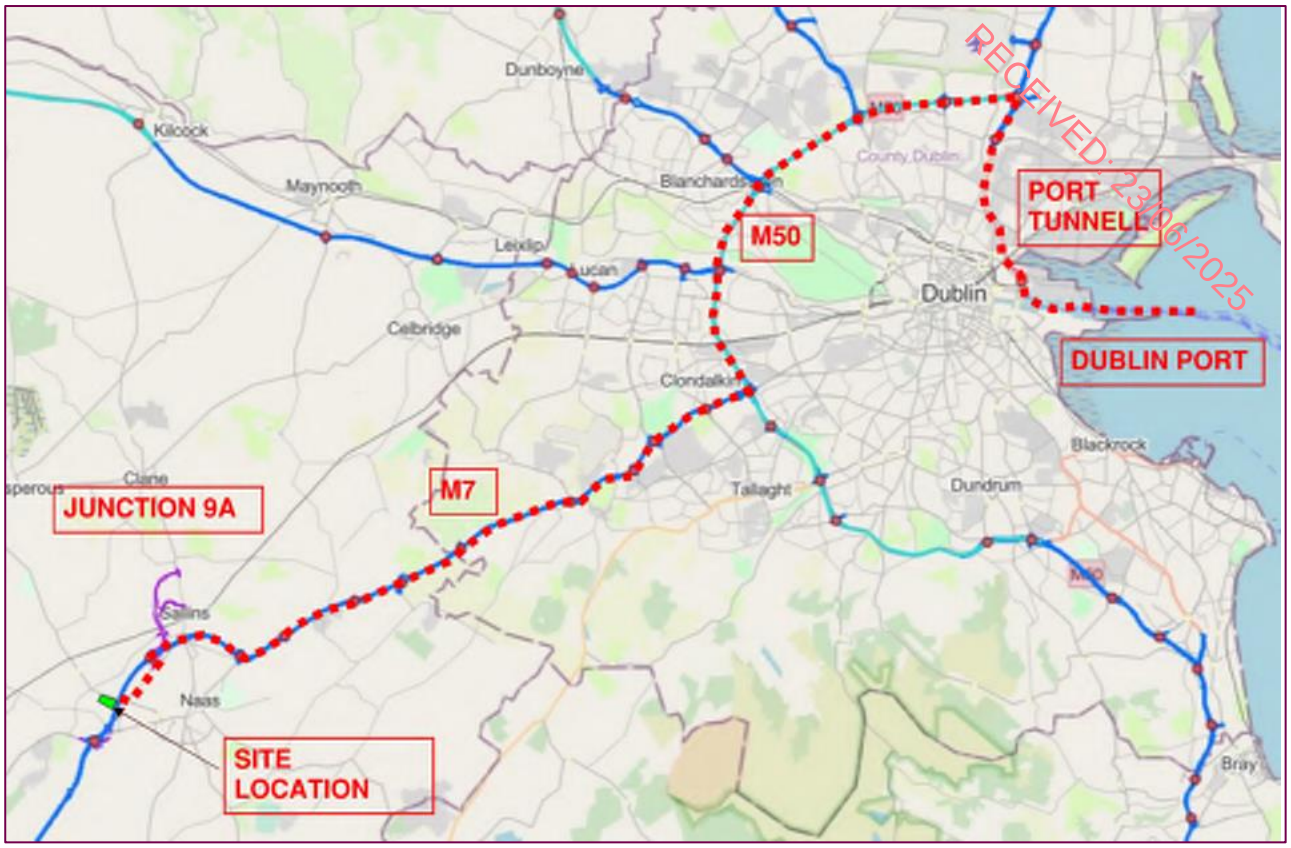

Figure 12.3: Proposed HGV Route from Dublin Port to Site on National Motorway Road Network (extract from updated CTMP, Volume II, Appendix 4.6)

Dublin Port Tunnel's height is designed for safe passage of HGV's height of 4.65m with a width of 2.9m and a length of 25m. Construction vehicles accessing the site from the north or south directions on the M7 can use either Junction 9a or Junction 10 to access the site.

Transport Infrastructure Ireland, in consultation with the Department of Transport, have developed a flow chart to assist Road Authorities in making decisions in relation to Exceptional Abnormal Load applications involving super loads greater than 180 tonnes. This process may be used by Local Authorities in respect of all abnormal load applications, where applicable.

While it is not anticipated that any deliveries to the site will exceed 180 tonnes, (maximum anticipated load expected to be 60 tonnes) the applicant confirms that, if required by the Local Authorities, the procedures set out therein will be followed and adhered to in respect of any abnormal loads.

A special permit will be required for the abnormal load movements, to be issued by An Garda Siochána and/ or relevant local authorities. This permit will be applied for within 5 working days before the movement. The Gardai will be informed of the movement in advance. The public will also be made aware of when abnormal load deliveries are taking place via social media, local radio, and the local press.

Best practice will be followed, and all legal obligations will be met to ensure that those escorting occasional abnormal loads and abnormal vehicles on the national road network do so in a manner which maximises safety for all road users. Self-escorting vehicles will be used when required which offers greater flexibility for scheduling movements and therefore should enable loads to travel at off peak times when there is less traffic. This will both reduce traffic disruption to other road users and improve journey times for the haulier.

12.2.2 Impact Assessment

The matters raised within the Kildare County Council RFI in respect of traffic have been responded to within the Response to Further Information Report submitted as part of the response to the Kildare County Council RFI at Sections 4.7 – 4.11, and through the provision of updated technical reporting including an Updated Construction Environmental Management Plan and Updated Construction Traffic Management Plan.

The matters raised within the Kildare County Council RFI and the subsequent design amendments have not resulted in changes to the anticipated traffic levels associated with the construction and operational phases of the Project, as set out within the submitted EIAR.

Further, the additional detail set out in the Updated CTMP and summarised in Section 12.2.1.2 above in relation to construction traffic movements, abnormal loads, and specialised vehicles have been further considered and assessed and the overall impact of the Project upon the surrounding highway network is considered to be negligible.

The proposed amendments to the improvements to the R409, as described above and in the addendum to Chapter 4 of the EIAR, have been considered and assessed and will not adversely impact its structural integrity, maintenance, durability, safety or operation of the M7 motorway. Engagement with Kildare County Council National Roads Office and Transport Infrastructure Ireland has informed the proposed amendments and both parties are considered in agreement with the same.

The overall impact of the Project upon the surrounding highway network, at both construction and operational phases is considered to be negligible, and there is no change in the respect from the assessment set out in Chapter 12 of the EIAR submitted with the application for planning permission.