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Date: 22 November 2021

Kildare-Meath Grid Upgrade Consultation, Eirgrid plc 160 Shelbourne Road, Ballsbridge, Dublin 4 D04 FW28

Dear Sirs,

Kildare Meath Grid Upgrade Consultation

RPS is instructed by Venturis Investment Group (hereafter Venturis) to submit this observation with regard to the proposed Kildare Meath Grid Upgrade Consultation. Venturis own a site of c. 88ha at Jigginstown to the south west of Naas. This site has been recently zoned partly for Data Centre use and partly for Community and Education use in the Naas LAP. The Naas LAP will come into effect on 1st December 2021. Two route options impact on my client's landholding. For the reasons set out below, our Client prefers Options A and D and would not support Option B or C.

Subject Lands

Our client's lands comprise c. 88ha to the south west of Naas in the Jigginstown area (see **Figure 1**). The lands are approximately 1.5km west of the town centre, south of the R445 (Newbridge Road) and the Grand Canal (Corbally Line) and west of the Naas Inner Relief Road.



Figure 1: Venturis' landholding edged in yellow

Naas Local Area Plan 2021-2027

At a special meeting on 21st October 2021, the Members of Kildare County Council adopted the Naas Local Area Plan 2021-2027. The Naas LAP will come into effect on 1st December 2021.

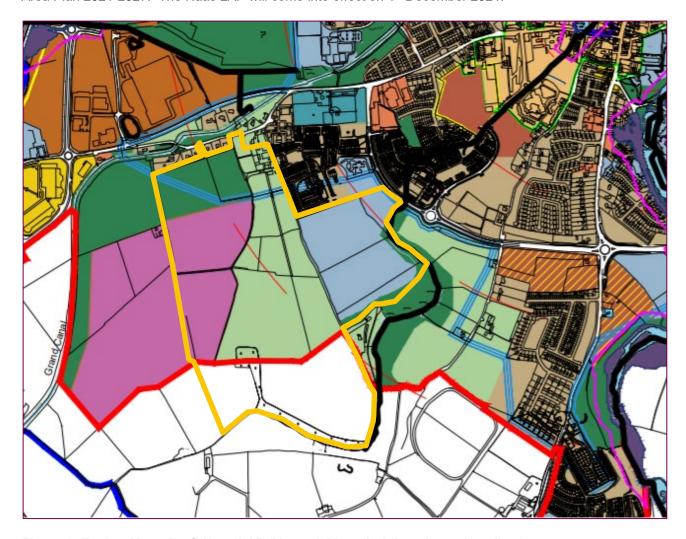


Figure 2: Zoning Map - Draft Naas LAP (Venturis' Landholding shown in yellow)

The Proposed Material Alterations to the Draft Naas Local Area Plan 2021-2027 consultation ended on 24th August 2021. This consultation proposed alterations to the proposed zoning of my Client's land as set out below:

Proposed Material Alteration No. 74 was as follows:

"Amend Land Use Zoning Map 11.1 (and any consequential amendments) to change land zoned 'I: Agriculture' to 'P' Data Centre (12 hectares) and 'F' Open Space (12 hectares)"

Proposed Material Alteration No. 75 was as follows

"Amend Land Use Zoning Map 11.1 (and any consequential amendments) to reduce land zoned for E: Community and Education to include for zoning for C: New residential Phase 2 and a N: Neighbourhood Centre"

Material Alteration No. 74 will be included in the LAP. Material Alteration No. 75 was not adopted and the change will not be made to the LAP.

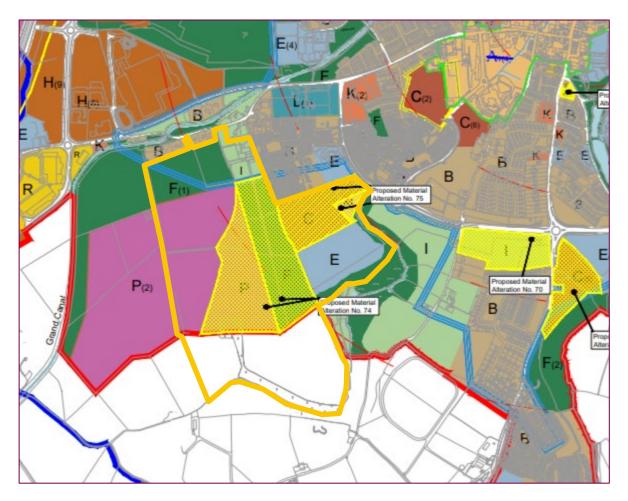


Figure 3: Proposed Material Alterations (Venturis' Landholding shown in yellow)

Following the Draft LAP and Material Alterations stage, the final LAP will include the following zonings for my Client's lands (edged in yellow in Figures 2 and 3):

- A portion of my Client's lands, to the east of their landholding, will be zoned Community & Education (shown in blue to the east in **Figure 2**).
- A large portion of my Client's lands, to the west of their landholding, will be zoned Data Centre (marked 'P' and coloured purple to the west in **Figure 3**)
- The remaining lands will be zoned F: Open Space & Amenity and I: Agriculture as shown in Figure 3.

Proposed zonings for residential development to the east of the site, as shown in **Figure 3** were not adopted by the Councillors. For this reason, this land remains Community & Education as shown in **Figure 2**.

To conclude, my Client's landholding will be zoned Data Centre, Open Space & Amenity and Community & Education when the LAP is adopted.

In addition to this, the Draft Naas LAP includes a "Possible Future Route:- Jigginstown (indicative only)" which runs through the site. The intention for this road is to serve the data centre site. This was added to at Material Alterations stage but this material alteration wasn't accepted. Therefore, the indicative route for the road is as per the Draft Plan (Figure 4).

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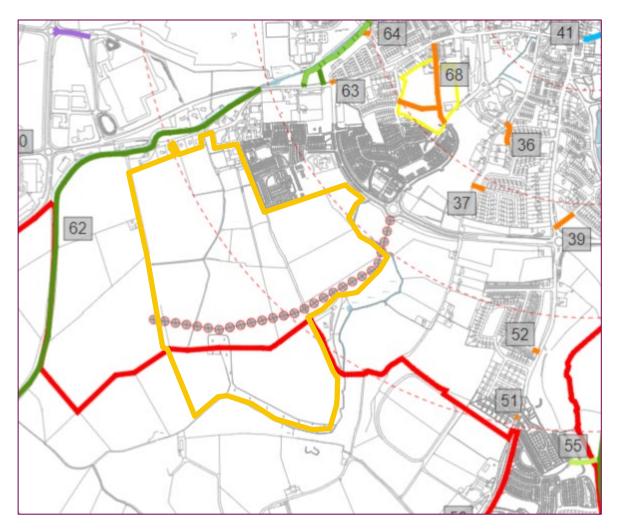


Figure 4: Draft Naas LAP Movement & Transport showing Indicative Road (Venturis' Landholding shown in yellow)

Observations

The consultation documents set out four route options. In summary:

- Option A: The Red Route proposes the cable route along the Naas South Ring Road (R447). This
 would not impact on my Client's landholding.
- Option B: The Green Route proposes a cable route through my Client's land which will be zoned for Data Centre use from 1st December 2021.
- Option C: The Orange Option proposes a cable route through my Client's land which will be zoned for Data Centre use from 1st December 2021.
- Option D: The Blue Option proposes the cable route along the Naas South Ring Road (R447). This
 would not impact on my Client's landholding.

My client would welcome Options A and D and would not support Options B and C.

Options B and C, as noted on the consultation website, have been drafted on the basis that my client's land is agricultural. Option B states with respect to this part of the route: "To the south of the Southern Link Business Park, a potential corridor over agricultural land is shown". With regard to Option C, the consultation website states: "To the south of the Southern Link Business Park, a potential off-road corridor over agricultural land is shown".

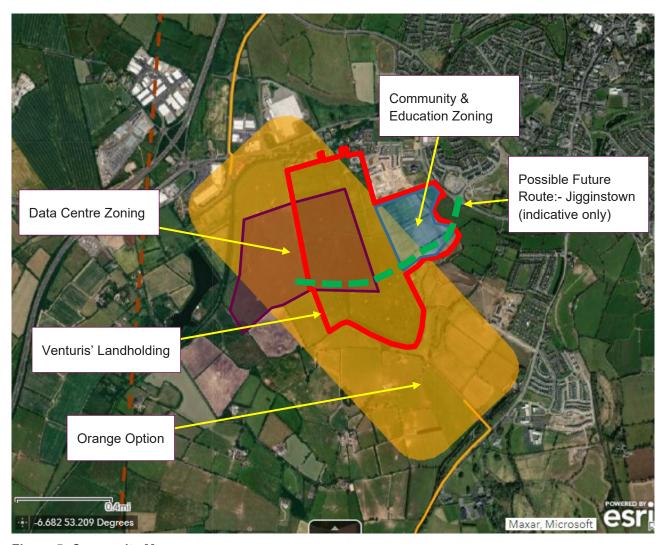


Figure 5: Composite Map

Figure 5 above shows the Off Road Options being proposed for Option C. This is the same as for Option B. Our Client's landholdings are shown edged in red. The Data Centre Zoning from the Naas Local Area Plan is shown in plum and the Community & Education Zoning is shown in blue. We also show the Possible Future Route: Jigginstown (indicative only) as set out in the Naas LAP. This demonstrates how heavily constrained this route is. It is thought that this has not been fully considered in the selection of routes.

The off road options being considered under Options B and C are heavily constrained due to the recently adopted Naas LAP.

The majority of the width of the route is zoned for Data Centre use. My Client's landholding and adjacent zoned land to the west has the potential to accommodate a sizable data centre. This would be of strategic importance to the Midland and Eastern Region and would generate employment in the area. Data centres are characterised by substantial underground cabling to bring both electricity, data and potentially waste heat to, from and around the site. It is considered that the site's use as a data centre would be complicated by the proposed Eirgrid cable route running through it.

Similarly, the proposed road, as shown in Figures 4 and 5, would further clash with the Eirgrid cable if it were to follow Options B or C.

It is considered that the preferred route for the cable is Option A or D, along the South Ring Road (R477).

Conclusion

RPS are instructed by Venturis to submit this observation on their behalf in relation to the Kildare Meath Grid Upgrade. Venturis own a site of c. 88ha at Jigginstown to the south west of Naas. The public consultation sets out four options, two of which (Option B and Option C) propose a cable route through my Client's land.

The consultation website notes that the route "south of Southern Link Business Park" is agricultural. It is considered that the route selection fails to take into consideration the Naas LAP and its zoning objectives for this land. Figure 5 shows the route for Option C (identical to Option B). This Figure also shows my Client's landholding. The Data Centre zoning is shown in plum and the Community & Education zoning is shown in blue. We also show the Possible Future Route:- Jigginstown.

It is considered that Routes A and D are preferrable to Routes B and C. Routes B and C would propose a cable through an area which is zoned for data centre and community & educational development. Both, but in particular the data centre development, would require a lot of cabling, gas connections and heat exchange from the site. These underground services may conflict with the Eirgrid cable should it run through this site. A road to serve the Data Centre zoning is also proposed. This would cross the proposed route which would add further complications.

Routes A and D propose the cable along an existing road. This would require minimal intervention and is in keeping with the overall spirit of the proposal which is to construct as much of the cable beneath existing roadway as possible. For these reasons, Options A and D are preferred so far as they relate to our Client's landholding at Jigginstown.

Yours faithfully, for RPS Group Limited

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