

Planning Department  
Kildare County Council  
Áras an Chontae  
Devoy Park  
Naas  
Co. Kildare



24<sup>th</sup> May 2022

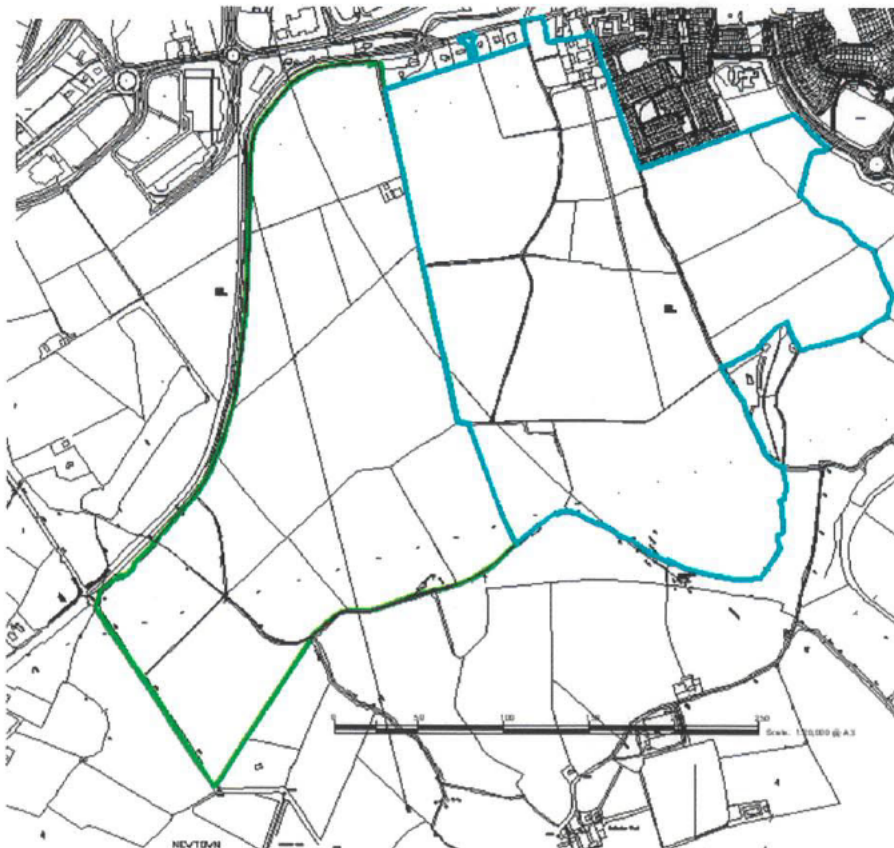
**Submission to the draft Kildare County Development Plan by Mr Tom McParland and Sassabunda Ltd in relation to the zoning of lands at Jigginstown, Naas, CO. Kildare.**

### 1.0 Introduction

This submission is being made by Kieran Rush Consult Ltd on behalf of my clients;

- Mr Tom McParland, [REDACTED]
- Sassabunda Ltd. [REDACTED]

Between them my two clients own 170 ha (420 acres) acres of lands at Jigginstown in Naas, Co. Kildare. Mr McParland owns 78 ha (approx. 192 acres, outlined in green on Map A) while Sassabunda Ltd. owns 92 ha (approx. 228 acres, outlined in cyan on Map A)



MAP A  
existing  
ownership

Approx. 162 acres of both land owners' lands were zoned in the Naas Local Area Plan 2021-2027 for *P: Data Centre*, with other lands zoned *F: Amenity and Open Space* and *E: Community and Education*. The remaining lands in my clients' ownership are unzoned.

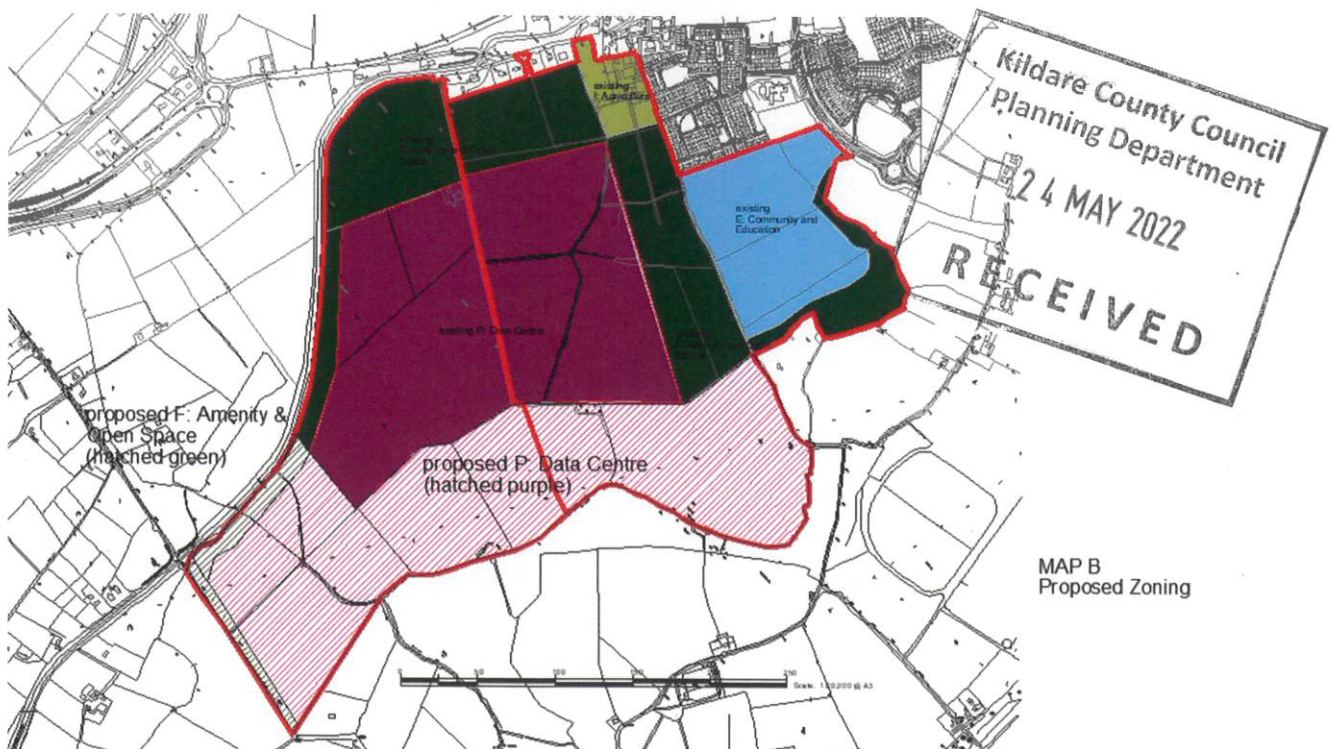
My clients welcomed these zonings and have been actively engaged in seeking to develop the lands zoned *P: Data Centre* for development as a data centre. However, it has become apparent that the lands currently zoned *P; Data Centre* may not be large enough to accommodate a development of the scale the major Data Centre operators require.

We believe that Data Centre operators would be keen to acquire more lands contiguous with the lands zoned *P: Data Centre*, if they were appropriately zoned. My clients, for their part, are happy to make these lands available for development.

While the lands already zoned for *P: Data Centre* may be adequate for the immediate needs of a first stage of development, Data Centre operators are generally anxious to ensure that they have sufficient lands to expand in future phases over the coming decades.

Operators are generally large corporations that are not in the business of land speculation and would not buy unzoned lands. However, they would also be anxious not to find themselves in a situation where future expansion plans are stymied due to the unavailability of land. Generally, they invest hundreds of millions of Euro in a facility and consequently are interested in a large scale and long-term commitments. Scale is everything for these operators.

We therefore hereby request that the lands identified as hatched purple (approx. 113 acres) on Map B are zoned for the development of a date centre, related and ancillary uses in the Kildare Development Plan 2023-2029. We are also cognisant of the Council's policy of developing the Corbally Branch of the Grand Canal as a Greenway and suggest the *F: Amenity and Open Space* zoning along the canal in the Naas LAP is extended to the Rathasker Road.



**2.0 Proposed Zoning in the Context of the Policies and Objectives of the Draft Plan**

We note the following policy context in the draft Kildare County Development Plan which supports the development of Data Centres generally, and this location in particular. The chapters of the draft Development Plan concerning the development of my clients’ lands are Chapter 4 and Chapter 7.

**Chapter 4**

Par 4.2 of the draft Development Plan states;

Lands zoned for uses related to employment and economic development account for a total of 1554.92 Hectares of zoned land in the County, not including the wide range of commercial and retail businesses which bring life to our towns and villages. Ensuring that we put the right employment in the right place, building on sustainable mobility and the potential for active travel will have a significant impact on the realisation of our local and national climate action targets.

The source of Greenhouse Gases (GHGs) from the industrial and commercial sectors is essentially from the activities and processes used in the manufacturing industries. These include combustion emissions from industrial and commercial activities, including processes used in food and drinks production. Fossil fuels are also used for the heating and cooling of industrial and commercial buildings. Energy efficient gains are achievable in this sector through innovative design, low-carbon technology, use of Combined Heat and Power (CHP) and roll out of district heating and other renewable energy projects. In addition, sustainable development requires that our economic strategy is resilient, adaptable and innovative.

The subject lands are located at the edge of Naas Town and will form the natural development boundary to the town. While data centres are a major consumer of electricity, they are also a major source of heat which can be harnessed for use in District Heating Systems. My clients are committed to a zero-carbon strategy. We believe there is huge potential for the harnessing of surplus heat generated from the facility for district heating for Naas town.

Par 4.3.2 of the Draft Plan aligns the Development Plan with *Kildare 2025*, the county’s economic and development strategy. The eight key focuses of *Kildare 2025* are;

1. Indigenous Industries	2. Foreign Direct Investment	3. Knowledge Economy
4. Equine Industry	5. Agri Food Sector	Kildare 2025
6. Sustainable Tourism, Hospitality and Leisure	7. Retail	8. Climate Action and Green Economy



The proposed development of the subject lands as a Data Centre focused on cutting-edge high technology is 100% aligned with Strand 2 of *Kildare 2025* which prioritises the development of the county’s ‘Key Towns’ to act as economic drivers and strategic employment locations.

Par 4.4 of the draft Plan identifies Naas (together with Maynooth) as the Key Towns in Co. Kildare. We welcome the following statement, and believe the zoning of the subject lands will be a key driver in facilitating its realisation;

#### 4.4.2 Key Towns

Naas and Maynooth are identified in the County's Economic Development Hierarchy as its two Key Towns. These towns are recognised as having the potential to accommodate commensurate levels of population and employment growth, facilitated by their location on public transport corridors and aligned with requisite investment in services, amenities and sustainable transport. The growth of these Key Towns will require sustainable, compact and sequential development and urban regeneration in the town core. The degree to which these 'Key Towns' can grow will have a notable bearing on the County's ability to attract additional multinational companies. The development of urban centres of scale is key to developing agglomeration benefits, which is considered an especially important factor in creating an appropriate economic environment for multinational companies.

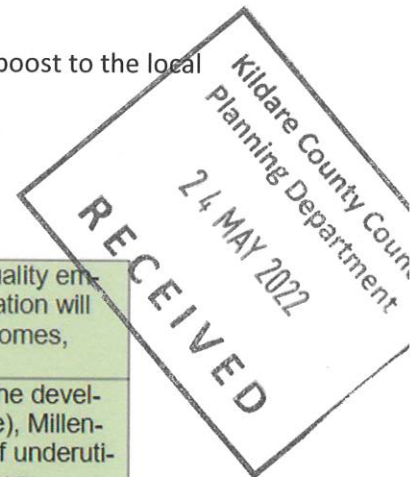
As evident from the RSES, one of the key economic benefits of developing urban centres of scale within the region, is to ensure that we can accrue agglomeration benefits. Agglomeration allows for a variety of external benefits such as labour and knowledge spill overs, supplier concentration, and specialisation, which in turn contributes to increased productivity and regional economic growth. For this reason – and other factors – the IDA notes that clear trends are evident in the demands of multinational companies in selecting locations; with one of the main reasons being "regions of scale with appropriate urban centres". Therefore, ensuring investment priorities align with the growth ambitions of Kildare's designated key towns – namely Naas and Maynooth is imperative.

A major corporation locating one of its key assets in Naas would be a significant boost to the local and regional economy.

Par 4.4.4 sets out the economic objectives for Naas as follows;

It is an objective of the Council to:

<b>RE O19</b>	Promote the Key Town of Naas as a primary centre of high-quality employment in the County so that its significant residential population will have employment opportunities within easy distance of their homes, thereby reducing outbound commuting
<b>RE O20</b>	Strengthen and promote the local employment base through the development of MERITS (Mid-East Regional Innovation Thinkspace), Millennium Park in the North-West Quadrant and the regeneration of underutilised lands including industrial lands in the north-east of the town.
<b>RE O21</b>	Regenerate and consolidate the historic centre of Naas to improve the retail and commercial functions of the town core, with enhanced permeability and sustainable mobility within the town centre and improve links between the core and surrounding residential and employment areas through the further development of walking and cycling routes and improved public transport.
<b>RE O22</b>	Co-ordinate the delivery of strategic infrastructure including pedestrian and cycle linkages within Naas, in a manner which supports future development and population growth



While we support all of these objectives, we suggest the following Objective is added;

*Promote Naas as a sustainable international for ICT infrastructure such as data centres, in line with Regional Policy 8.25.*

This would align the County Development Plan's economic development objectives for Naas with the Naas Local Area Plan objectives set out in Par 6.4.4 of the LAP.

With regards Data Centres, my clients note and welcome Par 4.16 of the draft Plan and in particular Policy RE P11 of the draft Plan which states;

<b>RE P11</b>	Support the accommodation of Data Centres at appropriate locations in line with the objectives of the National Planning Framework and the Government Statement on the Role of Data Centres in Ireland subject to appropriate Transport and Environmental Impact Assessments
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The recently adopted Naas LAP has already identified Jigginstown in the Naas LAP as an appropriate location for Data Centre development. We now seek additional lands zoned contiguous to the existing *P: Data Centre* lands to support the expansion and consolidation of this FDI investment.

With regards Foreign Direct Investment, my clients note and support Par 4.10 of the draft Plan and specifically Objectives REO 053 and REO 054 which state;

It is an objective of the Council to:

<b>RE O53</b>	Support existing FDI large industrial companies in sustaining and expanding their businesses at appropriate locations
<b>RE O54</b>	Promote and develop key land banks and business parks in conjunction with IDA and Enterprise Ireland throughout the County, to build more sustainable communities, which target key priority business sectors.

And Objectives RE 069 and RE 070 which state;

<b>RE O69</b>	Require that any application for a data centre shall take account of the cumulative visual impact of the proposed connections of the data centre with electricity transmission, renewable energy and broadband infrastructure in the area.
<b>RE O70</b>	Require data centres to consider the use of sustainable renewable sources of energy to fuel their operations in whole in the first instance or in part where this is not possible and where it has been satisfactorily demonstrated not to be possible.

Again, the zoning of my clients' lands will be wholly consistent with the above Objectives. The residual surplus heat can in turn feed into a District Heating System for the town of Naas.

The zoning of additional lands now will ensure the facility can be designed from the outset with each component in its appropriate location. A significant tree belt can be established around the perimeter of the campus to screen Phase 1 and subsequent phases.

Finally, with regards tourism and leisure development my clients support objective RE 0137 of the draft Plan which states;

<b>RE O137</b>	Work with Waterways Ireland to progress the delivery of the (i) Naas to Sallins Greenway and (ii) Naas to Corbally Harbour Greenway and to develop the harbour itself for amenity purposes.
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My clients own a small but significant stretch of land adjacent to the Corbally branch of the Grand Canal and would support its further development as a recreational asset for the town of Naas.



**Chapter 7**

Chapter 7: sets out the Council’s Policies and Objectives with regards energy and communications.

These policies and objectives are in line with ambitious national policy to transition to sustainable energy and the decarbonisation of the economy as fast as possible. My clients fully support such policies and are actively exploring the onsite generation of electricity to support the proposed development. With regards data centres we note and support the following policies and objectives;

**7.13 Communications**

**7.13.1 Data Centres & Energy Supply**

It is Government Policy as set out in the National Planning Framework and the Government Statement on “The Role of Data Centres in Ireland” to promote Ireland as a sustainable international destination for Information Communications Technology (ICT) infrastructure such as Data Centres. To date, some of the world’s best known companies including Microsoft, Google, IBM and Amazon AWS have chosen Ireland as the location for their European data centres.

Kildare County Council acknowledges that data centres contribute to job creation during construction, maintenance and from associated areas such as research and development, data analytics, customer service, technical support, marketing and sales. Data centres generally need to be located in areas where there exists a significant and sustainable electricity supply, high powered fibre optic cables, good accessibility and on large land banks that are easily developable with future expansion possibilities. In addition, the Council is mindful that Data Centres should avoid sensitive landscapes and environments.

**Policy**

It is the policy of the Council to:

<b>EC P18</b>	Support the accommodation of Data Centres at appropriate locations in line with the objectives of the National Planning Framework and the Government Statement on the Role of Data Centres in Ireland subject to appropriate Transport and Environmental Impact Assessments.
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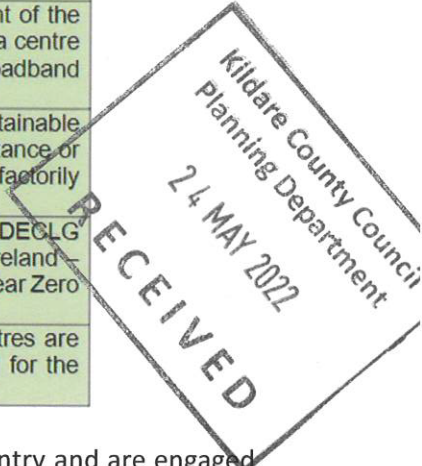
**Objectives**

It is an objective of the Council to:

<b>EC O57</b>	Consider applications for data centres having regard to the following criteria: <ul style="list-style-type: none"> <li>• Accessibility/ease of connection to power</li> <li>• Availability of renewable energy to power any proposed data centre</li> <li>• Availability of high-powered fibre optic infrastructure</li> <li>• Transport/road accessibility</li> </ul>
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	<ul style="list-style-type: none"> <li>• Compatibility of surrounding land uses/zoning</li> <li>• Avoidance of designated sites</li> <li>• Availability of significant landbanks</li> <li>• Noise</li> <li>• Visual impact</li> <li>• Flood risk</li> </ul>
<b>EC O58</b>	Require that any application for a data centre shall take account of the cumulative visual impact of the proposed connections of the data centre with electricity transmission, renewable energy and broadband infrastructure in the area.
<b>EC O59</b>	Require data centres to consider the use of renewable and sustainable sources of energy to fuel their operations in whole in the first instance or in part where this is not possible and where it has been satisfactorily demonstrated not to be possible.
<b>EC O60</b>	All data centre development applications shall have regard to the DECLG guidance document 'Towards nearly Zero Energy Buildings in Ireland - Planning for 2020 and Beyond', which promotes the increase of near Zero Energy Buildings (nZEB).
<b>EC O61</b>	Ensure that all significant development proposals for Data Centres are accompanied by an Energy Analysis that explores the potential for the development of low carbon district heating networks.



My clients are aware of the concerns surrounding power usage across the country and are engaged with the CRU with regards power supply and are satisfied that these issues can be resolved.

We also note the requirement of the Naas LAP that at least some of such energy has to be generated on site.

In practice, the only realistic way renewable energy can be generated on such a restricted site is through a biomass power plant. My clients are carrying out a feasibility study on the development of an onsite biomass power plant which we believe can generate a very significant proportion of the power needed by the Data Centre.

However this facility will require its own space. We have been advised by experienced data centre designers that one of the key reasons potential operators may struggle to accommodate proposed development on the limited area of lands zoned *P: Data Centre* in the Naas Local Area Plan is this requirement for on-site generation of energy. This necessitates more zoned land.

One of the main attractions of the Jigginstown lands to a Data Centre Operator is the fact that such a large tract of land is available so close to the town in the ownership of just two land owners who are committed to working closely together.

The availability for development of an additional 113 acres immediately adjacent to the lands zoned *P: Data Centre* is fortuitous, and a major opportunity for the town of Naas which should not be passed up. It will allow the development of a major technology centre in Naas with very significant additional benefits for the town.

### 3.0 Summary and Conclusion

My clients welcomed the zoning of a portion of their lands for the development of a Data Centre at Jigginstown, Naas in the Naas Local Area Plan 2021. Since this zoning, it has become apparent that more land is needed, especially due to the requirement for the on-site generation of renewable power, and we hereby request an additional 113 acres contiguous to the existing zoning is zoned in the County Development Plan 2023-2029.

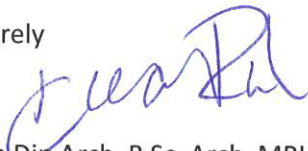
This is fully in line with national policy as set out in the National Planning Framework and local policy as set out in the Naas Local Area Plan 2021, and with the policies and objectives of the draft County Development Plan cited above.

The proposed development can have a transformative impact on Naas and we set out in the appended Development Vision for Jigginstown, prepared by John Fleming Architects, a vision for how the proposed development might be leveraged for the wider benefit of the community in Naas.

We invite the Council to engage with the landowners in devising a plan that will maximise the community, sustainability and biodiversity gains of the proposed development as outlined, with the goal of establishing Naas as a Low Carbon Town.

I trust that this is in order and will be taken into consideration in the preparation of the Kildare County Plan 2023-2029 and remain,

Yours sincerely



Kieran Rush Dip Arch, B Sc. Arch, MRUP, MIPI, MRTPI

Kieran Rush Consult Ltd.

24 Templeville Rd,

Templeogue,

Dublin D6W W529

Encl.



**A Shared Vision for Jigginstown, Naas, Co. Kildare**

> May 2022

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Kildare County Council  
Planning Department  
24 MAY 2022  
**RECEIVED**

# 3.0 A SHARED VISION FOR JIGGINSTOWN SITE LOCATION IN THE CONTEXT OF NAAS

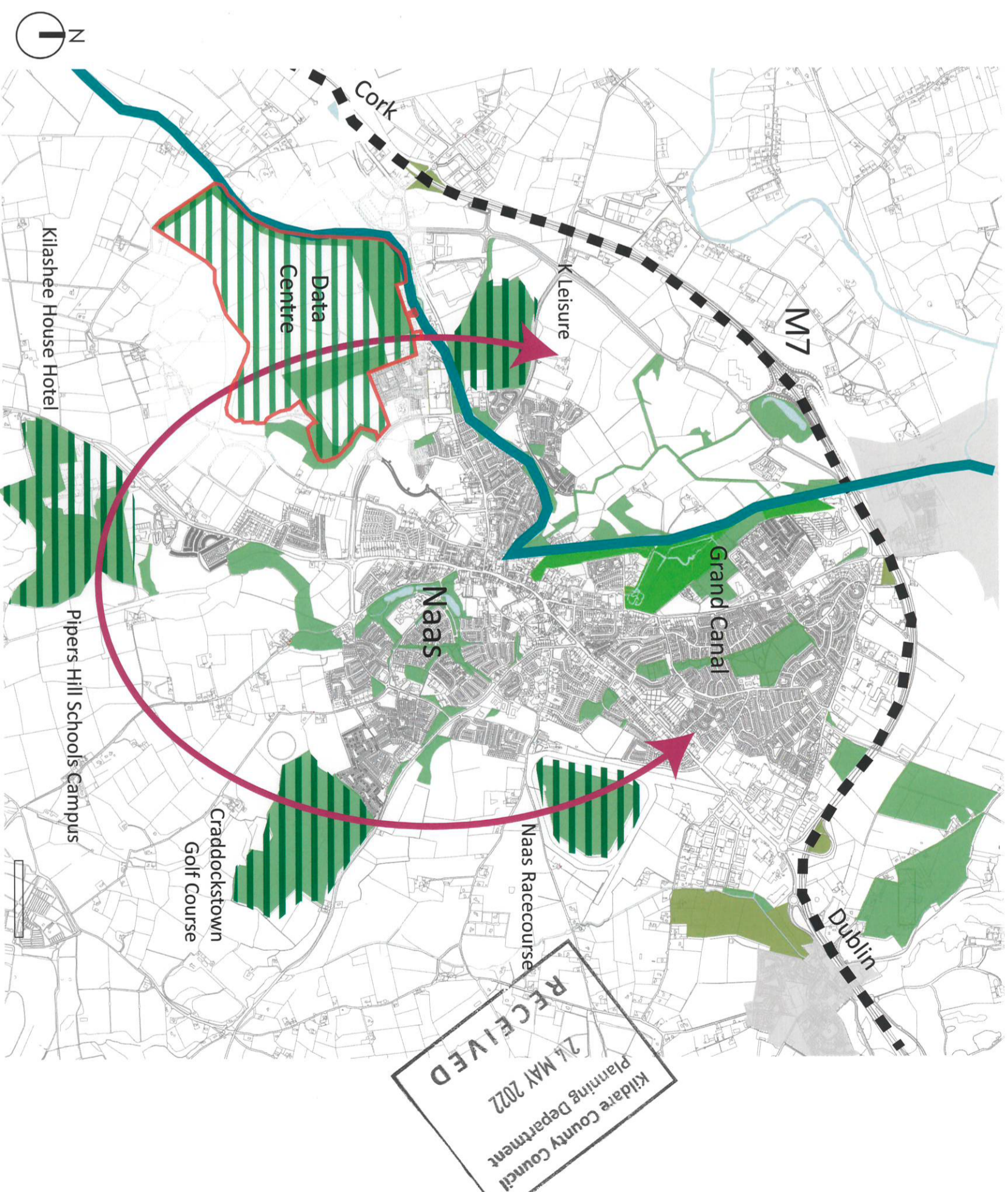
## 3.0 A Shared Vision for Jigginstown

One of the main purposes of land use planning is to provide a shared Development Vision all stake holders can commit to, and base their investment decisions on, and to enable synergies to be leveraged through the development of complimentary land uses.

The development of over 110 ha (275 acres) of lands in Jigginstown will have a profound impact on Naas which will be overwhelmingly positive. It will transform the national and international profile of Naas and be a significant source of employment, rates and development levies during its construction and in its operation.

The opportunity also exists to leverage this proposed development for additional wider benefits for the town of Naas.

Potential ecology and biodiversity benefits



Map showing site's relationship to Naas Strategic Open Space Strategy

# 3.0 A SHARED VISION FOR JIGGINSTOWN ECOLOGY AND BIODIVERSITY POTENTIAL

The requirement for extensive planting around the perimeter of the development to mitigate its visual impact affords opportunities for the development of wildlife corridors. It is envisaged that a dense tree belt will surround the proposed development averaging 30m in depth. This in turn can be further expanded with the development of parklands to the north and west, including a 50m wide greenway to the west of the data centre, bounded by the Grand Canal to the west and the data centre boundary fence to the east. The tree belt can be planted so as to incorporate existing hedgerows and mature stands of trees. In particular the existing mature band of trees to the south of the lands will be retained and reinforced.

The full benefit of this will only be realised if the outer boundary of the development is established at the outset, through the zoning and subsequent sale of the subject lands. The 30m perimeter buffer planting of native species around the proposed extended campus would lead to a permanent wildlife corridor 5km long and 16 ha in area, connecting to the existing Grand Canal Waterway.

A wide range of connected habitats can thus be generated and managed. For example potential exists for bat corridors stretching from the existing Grand Canal around the perimeter of the site to connect to the existing stand of mature trees to the south.

A detailed landscaping scheme is currently being worked on by Brady Shipman Martin, Landscape Architects which envisages the planting of over a half a million trees. This landscape plan will in turn be informed by ecologists advising on the how to maximise the potential of the lands for species diversity.

## Potential recreational and community benefits



Masterplan



# 3.0 A SHARED VISION FOR JIGGINSTOWN RECREATION AND COMMUNITY POTENTIAL

The lands zoned for parkland in turn can accommodate playing pitches, a playground and other recreational facilities. The potential also exists to bring the Grand Canal into more active use through the development of water-based sports such as kayaking.

This parkland will act as a buffer between the data centre campus and the wider town. It can be designed to merge seamlessly with the buffer zone around the campus to form a single landscape and habitat.

The potential also exists to develop green routes around the perimeter of the facility linking into the wider network planned for Naas;

- The Naas Historic trail along the canal tow path
- To the K Leisure facility to the north
- To Pipers Hill Schools complex and Killashoe House Hotel and Leisure centre to the south.

**Potential for harnessing surplus heat for a District Heating System**



Area zoned for parkland



# 3.0 A SHARED VISION FOR JIGGINSTOWN DISTRICT HEATING STRATEGY

While the energy performance of data centres has improved hugely since the first such centres were developed at the beginning of the century, data centres still generate significant surplus heat. This heat can be harnessed to power a district heating system for the town of Naas. The location of the subject lands close to the town centre makes the development of such a scheme more economically viable.

In response to the requirement for an element of sustainable power to be generated on site, the land owners are actively engaged with Shamrock Renewable Products (SRP) on the development of a Biomass Power Plant on the subject lands. SRP is a sister company to one of Sassabunda's stakeholders and is one of Ireland's leading biomass feedstock producers.

Biomass power is the generation of electricity from the burning biomass. The feedstock for a biomass plant is a mix of offcuts from commercial forestry and purpose grown willow in short rotation forestry purpose grown for incineration.

SRP has 2,000 acres of lands under plantation in Leinster and is currently building a fuel processing facility for the production of 100,000 tonnes of carbon neutral biomass products per annum.

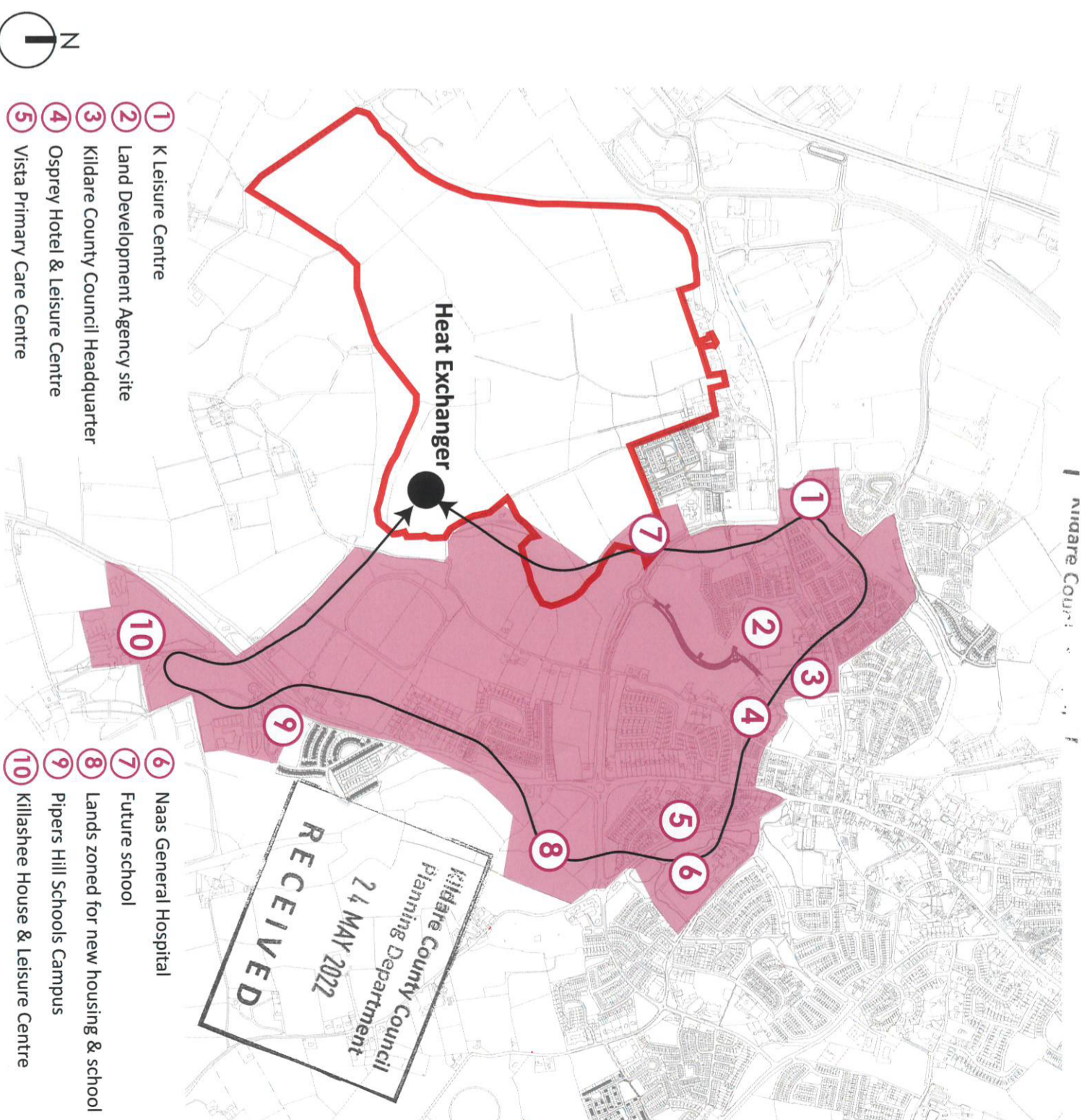
Thus, our vision for the proposed development of the subject lands as part of the Circular Economy is as follows:

- Locally sourced, sustainable, carbon neutral fuel to feed into a biomass power plant which will in turn generate;
- electricity to power the Data Centre and
- heat which will feed into a Heat Exchanger.
- This Heat Exchanger will in turn power a District Heating System network to heat large parts of the town of Naas.
- The waste heat generated by the Data Centre will also feed into the Heat Exchanger

As a first step it is suggested that a first 'loop' could extend to Naas General Hospital, the Council's Áras Chill Dara at Devoy Park and the neighbouring high density residential development being planned by the LDA. The future development of my clients' lands at Jigginstown currently zoned E: Community and Education in the Naas LAP could also benefit from such a District Heating System.

In time the District Heating System network can extend into Millennium Park and the North West Quarter.

**We suggest that the proposed development could lead to Naas becoming one of Ireland's leading Decarbonization Zones**



Map showing possible district heating

