
Planning Statement

Land South of Westwells Road, Neston, Corsham

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Prepared for:

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1. Introduction

Introduction

- 1.1. This Planning Statement has been prepared on behalf of Ark Estates 4 Limited (or 'Ark') to support a planning application for the development of a data centre at the site known as "Land South of Westwells Road, Neston, Corsham". The data centre will function as an important extension to Ark's existing Spring Park Campus to the north.
- 1.2. The submission follows substantial engagement about the proposals. This has involved pre-application discussions with Wiltshire Council, a presentation of the proposals to Corsham Town Council, and a public consultation event.
- 1.3. The description of development is as follows:

"Redevelopment of site to deliver extension to existing Spring Park data centre campus consisting of (a) free standing data centre building (b) energy, power, and water infrastructure (c) site access and internal roads (d) site security arrangements (e) diverted Public Rights of Ways (f) hard and soft, green and blue, landscaping and (g) other ancillary and auxiliary forms of development."

- 1.4. The application is submitted in full.

Role of Data Centres

- 1.5. Data is central to nearly everything we do as a society. Its' recent growth has been phenomenal: even reasonably historic figures suggest that on average Google processes more than 40,000 searches every second and that each minute 41,666,667 WhatsApp messages are sent, 52,083 users connect on Microsoft Teams, and 3.7m Mastercard and Visa transactions are made. The growth in data is also expected to double every two years. Statista has calculated that the amount of data created, captured, copied, and consumed has more than doubled in the last three years and will have doubled again by 2026.
- 1.6. Not all of this data will be useful, but a significant amount will be and – applied well - this can be the base that we learn from, that guides innovation and allows us to react, grow and behave responsibly and sustainably. A recent economic emphasis – which gave data equivalent significance to concrete and steel – has now been matched with a social and environmental dimension. This recognises that data will drive new forms of responsible, deep and impact technology which are aimed at finding solutions to some of the most pressing and most significant challenges.

- 1.7. Without secure, efficient and affordable data management it will be impossible to capture what is generated, assess its' value and then use it as the basis for innovation and economic and social progress. Data centres provide these essential services – they are not just stores but places where the latest technology is deployed to host and accelerate data processing and data management. In this way, data centres are critical national infrastructure that bring data transmission, storage and management – together with the supporting networks - into general or conventional definitions of infrastructure. Some commentators call them modern foundries which sit at the interface between data logistics and informatics.
- 1.8. Various commercial models exist from hyperscale (cloud) facilities for single organisations to wholesale facilities which allow multiple companies to locate their data functions in one secure environment. They therefore most comfortably sit within Use Class B8 in that their purpose is to store, process, and distribute data.

Overview of Applicant

- 1.9. Established in 2005, Ark develops and operates secure and efficient purpose-built data centres, operating UK campuses at Spring Park in Corsham, Cody Park in Farnborough, Meridian Park in Enfield, and Union Park in Hayes.
- 1.10. Ark has also secured planning permission for, and is currently delivering of, a 36,000sqm data centre in Longcross (which will be known as Longcross Park), the remaining 40,000sqm data centre floorspace at Union Park (which will be known as Union Park), and a 40,000sqm of data centre floorspace in Park Royal (which will be known as Alliance Park).
- 1.11. Ark is pioneering new approaches to environmentally sustainable data centres and has procured 100% Renewable Energy Guarantees Origin (REGO) backed renewable energy since 2013 and have long term supply agreements in place into the future.
- 1.12. Ark has been involved with the Spring Park project for 15 years and has taken it through each stage of the planning process. Data centres P1, P2, P3, P4 and SQ17 are completed and operational, and proposals for P5 have recently been updated and approved (reference PL/2023/10233). The campus development also includes a generator area, substations, landscaping (including a retained “bat flight corridor” and nature conservation area), roads, and drainage.

Rationale for the Application

- 1.13. Ark is committed to continuing the development of its Spring Park site as a secure, sustainable data centre campus. This will continue to act as the platform for digital growth and progress and respond to the significant and rapidly growing need for additional capacity for data storage described above.

- 1.14. The best place to do this is as close to existing campus as possible, and the land South of Westwells Road is the ideal opportunity. Given the nature of the land uses surrounding the Spring Campus (with the Ministry of Defence operations to the north and east, and open countryside to the west), the land provides the only realistic site to deliver an expansion of the Data Centre Campus. The site's recent planning history confirms it is previously developed land and is an appropriate location for new development. There are also clear, and obvious, advantages of delivering additional data centre capacity as an extension to Ark's existing Spring Park Campus rather than creating a new standalone facility. Likewise – and as summarised already - there is no alternative direction which the Spring Park Campus could extend other than to the south.
- 1.15. The Spring Park Campus already delivers a major economic dividend for the County and LEP – and this proposal will continue to support and grow this significant positive impact on the local and regional economy. On the one hand it is crucial that more data centre facilities are built in the UK if it is to compete internationally and meet clear and growing demands. Added to this is the growing significance and importance of modern data storage and processing capacity to economic performance. The Spring Park Campus provides an excellent (and proven) location to meet this need and the project will deliver an 50 further jobs through a scheme that is deliverable and in an area with a clear and recent history of innovation, research and technological development.

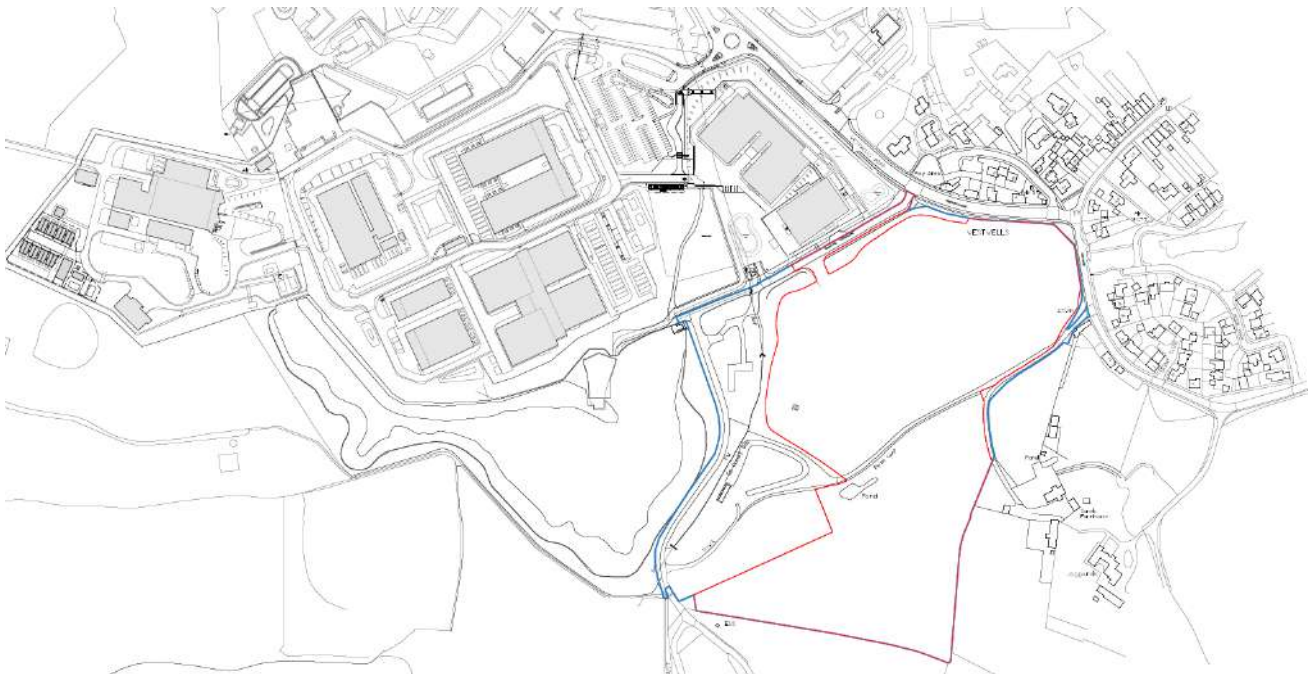
Statement Structure

- 1.16. This statement records the key headlines associated with the proposals and acts as a navigation guide to the full application that seeks planning permission for them. Following this short introduction:
- **Section 2** describes the site and the surrounding area, including the planning history for the site;
 - **Section 3** describes the application proposals;
 - **Section 4** summarises the key planning and economic development policy pertinent to the site and proposals; and
 - **Section 5** provides a short summary and conclusion.

2. Site Description and Context

Site Context

- 2.1. The application site lies within the administrative boundary of Wiltshire Council.
- 2.2. The site is bounded to the east by Westwells Road and Moor Green. Westwells Road runs northwest from the site's boundary, serving Ark's Spring Park campus and a mixture of other uses before connecting to the B3109. The nearest residential properties to the site are located on the eastern side of these two roads.
- 2.3. Rowan Lane runs westwards from Westwells Road immediately north of the site, forming the site's northern boundary. Immediately north of, and running parallel to, Rowan Lane are two existing factory buildings. These buildings are under Ark's control and benefit from a planning permission under ref. PL/2023/10233 for their redevelopment to deliver a 6,000sqm data centre as part of an extension to the Spring Park campus which is located further to the north and northwest.
- 2.4. The location of the site in the context of the latest Campus Masterplan is replicated below:

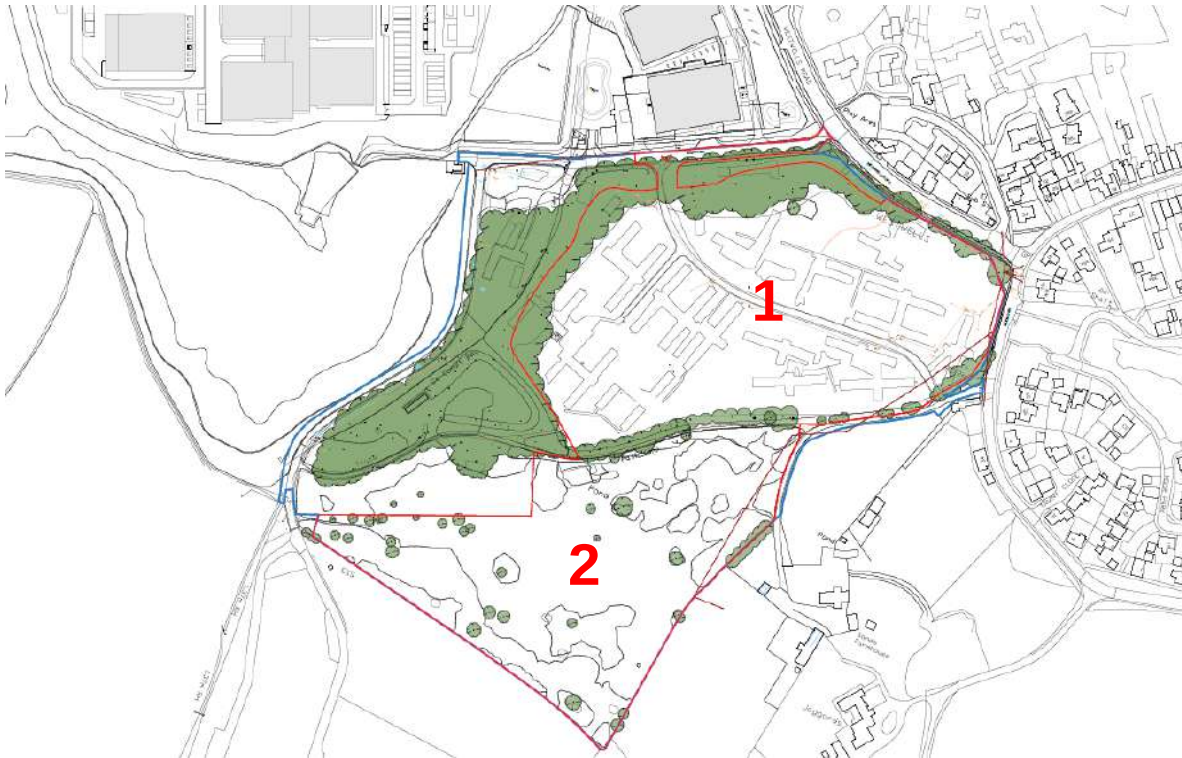


Campus Masterplan

- 2.5. Beyond the site's western boundary, Rowan Lane runs southwards towards the Wadswick Green over 60s development through an area of mature trees.
- 2.6. Jaggards House is located to the south of the application site, as is the Wadswick Green over-60s residential development with these set in undeveloped contexts comprising of agricultural land with areas of hedgerow and tree lines.

Site Description

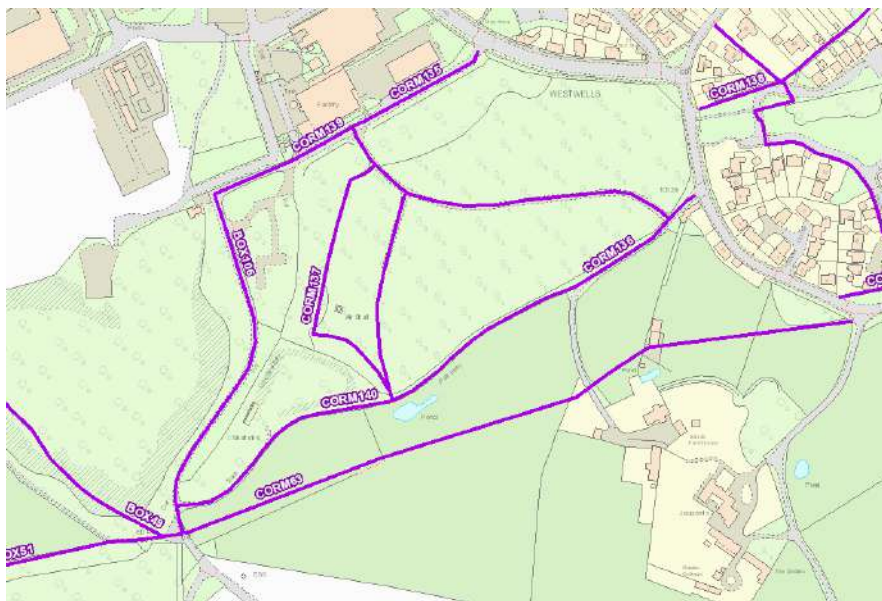
- 2.7. The application site has a total area of 7.37ha and consists of two main parts as shown below:



Existing Site Plan

- 2.8. The most significant, and relevant to this application (shown as '1' in the extract above), element of the site is known locally as the 'Donkey Field'. This is the portion of land that is bounded by Rowan Lane to the north, both Westwells Road and Moore green to the east, and an unnamed road to the south.
- 2.9. It is previously developed land, with the previous use linked to the Ministry of Defence. This position (or status) has been independently tested and confirmed recently (see below).

- 2.10. Ark's land holding in this area also includes the tree belts along the site's southern and northern boundaries whilst the extent of the site runs eastwards up to Moor Green. It is along the site's northern boundary that the tree belt (which is under Ark's ownership) is at its densest, although the southern boundaries include a band of mature trees which screen the site from the surrounding area.
- 2.11. The second part of the site (shown as '2' in the extract above) is located to the south and southwest of the 'Donkey Field' and the unnamed road that forms its southern boundary. It consists of a mix of grassland and scrub with dispersed trees of varying maturity. No built development is proposed within this part of the site where ecological management will take place to deliver biodiversity enhancements.
- 2.12. A series of Public Rights of Way (PRoW) referenced as CORM135, CORM136, and CORM137 cross the main body of the site with CORM 135 and CORM136 laid as tarmac with a connection onto Rowan Lane. CORM63 runs to the south of the Donkey Field through the portion of the site that is to be used for ecological enhancements. The location of the PRoWs is shown in the below extract from Wiltshire Council's Definitive Map:

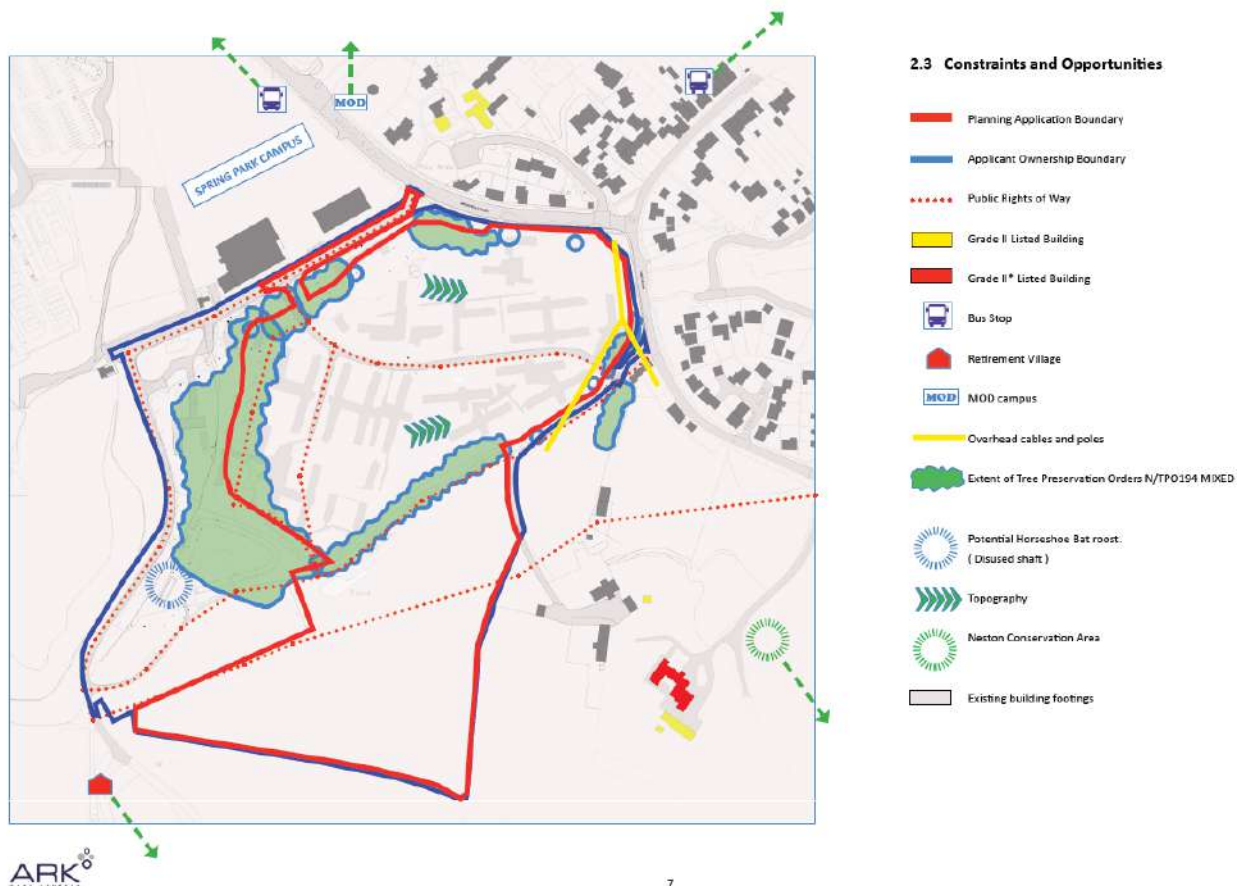


PRoW Definitive Map

- 2.13. The site's planning history is positive. Outline planning permission was granted at appeal for up to 81 homes with access coming from Rowan Lane (ref. 18/09884/OUT and ref. APP/Y3940/W/19/3243873). The permission confirmed the site's status as previously developed land and its' location as sustainable and accessible. It also tested the capacity of the environment it sits within to accommodate a redevelopment scheme, albeit a housing a scheme rather than a data centre scheme. Whilst that permission has now expired, the conclusions reached by the Inspector about site condition, position and potential remain relevant and material.

Designations, Constraints and Opportunities

- 2.14. The designations, constraints and opportunities map, for the site from the Design and Access Statement is repeated below:



Designations and Constraints Map

- 2.15. The map shows that the site does not lie within a Conservation Area and is not covered by any heritage designations. There are three Listed Buildings within 100m of the site boundary: 62 and 64 Westwells Road, 42-32 Westwells Road and Westwells Farmhouse (all Grade II Listed). To the south of the site is the Grade II* listed Jaggards House with surrounding and associated Grade II listed buildings. Neston Conservation Area is located further south beyond Jaggards house approximately 200m from the site's southern boundary. There are also a number of Scheduled Monuments within 250m of the site, all of which are associated with the multi-levelled underground chambers for Central Government War Headquarters at

MoD Corsham. A Heritage Assessment prepared by EDP considers all of these features and the effect of the proposals on them.

- 2.16. The site is not within or adjacent to any ecological designations though it is within 1km of the Bath & Bradford on Avon Bats Special Area of Conservation (SAC). An Ecological Appraisal (including impact assessment) is submitted in support of this planning application. The application is supported by an Ecological Impact Assessment prepared by Tyler Grange.
- 2.17. The site is not covered by any specific landscape designation, it being some distance to the east of the Cotswold Area of Outstanding Natural Beauty and the Bath and West Wiltshire Green Belt. A Landscape and Visual Assessment prepared by EDP considers all of these features and the effect of the proposals on them.
- 2.18. The site is not located within an Air Quality Management Area (AQMA). The submission is accompanied by an Air Quality Assessment prepared by Redmore Environmental.
- 2.19. The site is entirely within Flood Zone 1. A Flood Risk Assessment prepared by Hydrock supports this application.

Planning Policy Context

- 2.20. The key messages from national and local planning policy with regards to the principle of development are that:
- National planning policy encourages sustainable development, offering support for proposals that align with local planning policy;
 - Clear support, both in the form of guidance within the NPPF and policies within the Wiltshire Core Strategy and the Corsham Neighbourhood Plan 2016-2026, is offered for economic development proposals, particularly where they are for innovative and emerging sectors;
 - Good planning practice (re-enforced by planning policy) guides us towards making the most effective use of previously developed land; and
 - There is specific local planning policy support, under the terms of Core Policy 37 (Military Establishments), for the redevelopment of redundant Ministry of Defence sites and buildings for employment-led development.
- 2.21. Alongside this, there are a range of development management policies within the Wiltshire Core Strategy and the Corsham Neighbourhood Plan that, whilst not relating to the principle of development, manage the technical and environmental acceptability and performance of any development. Such policies relevant to this site and these proposals relate to matters such as design, landscape, ecology, flood risk, drainage, sustainability, transport, noise, contamination, and air quality.

3. Development Proposals

Introduction

- 3.1. Planning permission is sought for a development with the following description:

“Redevelopment of site to deliver extension to existing Spring Park data centre campus consisting of (a) free standing data centre building (b) energy, power, and water infrastructure (c) site access and internal roads (d) site security arrangements (e) diverted Public Rights of Ways (f) hard and soft, green and blue, landscaping and (g) other ancillary and auxiliary forms of development.”

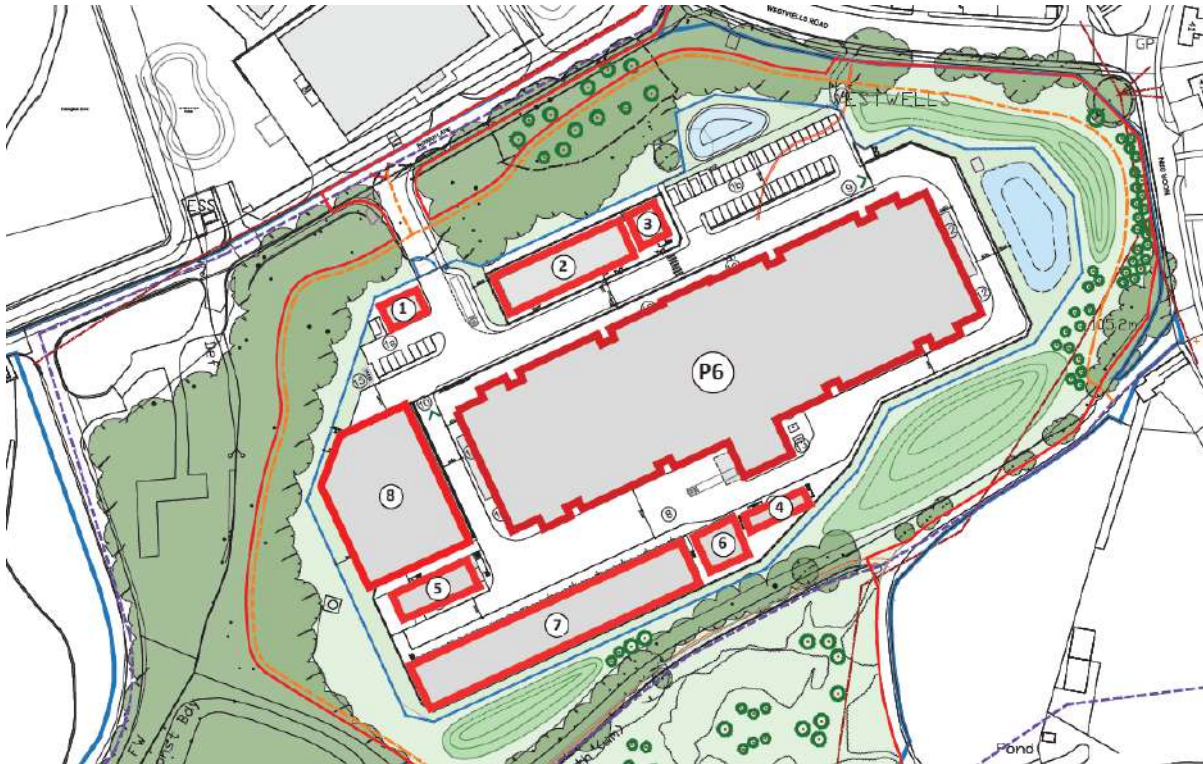
- 3.2. The application is submitted in full. The Proposed site Plan for the site is repeated below:



Proposed Site Plan

- 3.3. Central to the approach taken by Ark to site layout has been limiting built development to the previously developed parts of the site whilst locating the taller elements, access, yards and plant further away from Westwells Road and Moor Green. This is shown in the Site Plan replicated below which shows the location

of the data centre (P6) sitting centrally within the site and the substation (8) and generators (7) sitting in the western part of the site, behind the main data centre building.



Component Plan

- 3.4. The remainder of this section of the Planning Statement will provide an overview of each of the elements set out in the description of development.

a) free standing data centre building

- 3.5. A data centre is essentially an intensive climate controlled space for the continuous operation of computer servers and is supported by complex mechanical and electrical infrastructure (including generators). Although a unique type of storage and distribution, for planning purposes, data centres sit within Use Class B8. This is agreed with Wiltshire Council and is reflected in the wording of conditions attached to other earlier permissions at Spring Park.
- 3.6. The data centre building is to sit centrally within the site. At its closest point, it is 44m away from the nearest residential property at Westwells Road and 60m from the nearest residential property at Moor Green.

- 3.7. It will consist of a central ancillary block with a series of data halls on each side. The western data centre will be four storeys (i.e. ground plus three), with a height of 16.1m. Areas of rooftop plant across part of the roof will increase the height up to 18.7m (equivalent to circa five residential storeys). The eastern data centre has a lower maximum height of 11.3m (equivalent to circa three residential storeys) and is to be three storeys (i.e. ground plus two), with no rooftop plant. The height difference is both as a result of the additional storey proposed and the location of all rooftop plant on the western block. The intention is for PV panels to be located on the roof of the eastern data centre block where rooftop plant is not required.
- 3.8. In terms of design, the building is to be constructed using a combination a dark and light grey cladding systems with vertical coloured fins to help break up the building and add visual interest.

(b) mechanical, power, and water infrastructure

- 3.9. The successful operation of a data centre is reliant on mechanical, power, and water infrastructure and this is provided for onsite.
- 3.10. Located to the north of the building is a small water treatment facility which will ensure that water can be stored and provided to the data centre building. Much of this water will be captured from rain falling on the building and site.
- 3.11. A total of 22 generators, which will be used for back-up generation in the rare event of a grid failure (and for regular but infrequent testing), are to be located to the southwest of the data centre building, which will screen them from the homes along Westwells Road and Moor Green. These will be fuelled by hydrotreated vegetable oil, a non-fossil fuel waste product.
- 3.12. A substation compound, incorporating switchrooms, is located to the west of the data centre building whilst a splitter substation is located to the east of the water treatment plant and to the east of the back-up generators. This is required to ensure power at the right voltage is directed to the correct parts of the data centre.
- 3.13. These buildings and structures follow the form of the infrastructure they contain, they are modest in scale and will be read as a family alongside each other and the main data centre building.

(c) site access and internal roads

- 3.14. Vehicular access into the site will be from Rowan Lane in the same location as approved for the residential scheme. Whilst HGV movements will be very infrequent, the access point will need to be able to accommodate these once operational.
- 3.15. A package of internal roads is to be incorporated with a vehicular loop to be created around the data centre building. Separate sub-roads and turning points come off this vehicle loop providing vehicular access into certain discrete parts of the site as required.

- 3.16. Car parking is to be provided at two points on the site. Eight spaces are to be provided to the south of the visitor reception centre within the outer security fence line which will be used for visitors. A further 38 spaces, which are to be used for campus staff members, are provided to the east of the splitter substation building.

(d) site security arrangements

- 3.17. Site security is essential for all data centres and the proposals incorporate a comprehensive package of site security measures.
- 3.18. A single storey Visitor Reception Centre, with an area of 90sqm, is proposed to be located on the western side of the vehicular access into the site from Rowan Lane. This visitor reception centre will be single storey and modest in size, providing sufficient space for the screening of individuals before entering into the site.
- 3.19. Two security fence lines are proposed for the site – an outer fence line that contains the campus as a whole, including attenuation ponds, and an inner fence line which is tied far more closely to the extent of built development. Separate, and enhanced, security arrangements are also required for the HV substation.

(e) diverted Public Rights of Ways

- 3.20. Ark's proposals have considered how to successfully integrate the rights of way network into the scheme rather than simply design around the routes and alignments that exist. Arks approach was tested at the pre-application stage and has been refined in response to it. The proposals are illustrated on the Diversion Map below and allow Ark to deliver an efficient, single and secure scheme to make the most efficient use of land (which is what national and local planning policy and guidance encourages) whilst accommodating the PRow network within the green buffers that circle the scheme context.
- 3.21. An application for the above changes to the rights of way network under the terms of Section 257 of the Town and Country Planning Act (1990) has been made at the same time as this planning application.

(f) hard and soft, green and blue, landscaping

- 3.22. The approach to soft landscaping is to retain the existing trees along the site's northern boundary (which are subject to a Tree Preservation Order) and strengthen landscaping along the site's northeastern, eastern, and southeastern boundaries. This will help to screen the data centre from Moor Green and Westwells Road, but also to set the PRowS in a landscaped setting.
- 3.23. This is to be achieved by the planting of trees (and the proposal incorporates the planting of mature trees of 4m in height), the strategic planting of bunds (with a maximum height of 3m), and, in some places along its eastern boundary, a combination of the two. An attenuation pond is also located in the eastern portion of the site and to the north of the proposed car parking area.

- 3.24. This planting, together with the lower height of the eastern data centre wing and its position (or set back), helps to ensure that the scheme is largely screened from the surrounding area to the east. The image below is an Accurate Visual Representation from a point to the east of Moor Green which shows the role that strategic landscaping will play in embedding the building into the landscape.



Accurate Visual Representation View from Moor Green

- 3.25. Within the site, a comprehensive package of hard landscaping is proposed.
- 3.26. Extensive planting is proposed to the southwest of the Donkey Field where no built development is proposed in order to maximise the onsite biodiversity gain that development of the site can deliver. The proposals for this incorporate the creation of neutral grassland and scrub, re-instating a historic pond, and extensive tree planting.

(g) other ancillary and auxiliary forms of development

- 3.27. Inevitably for a development of this format and scale, there are elements of the proposal that do not neatly fit into the description of development but are required for the development to come forward – they are, as per the description of development, ancillary and auxiliary.

4. Planning Considerations

4.1. This section of the Planning Statement brings together the key messages from the supporting documents and the planning policy context for the proposals. It identifies the key planning material considerations that will inform the decision on the application. These considerations are:

- Principle of development;
- Economic benefits;
- Landscape and visual impact;
- Traffic and transport;
- Biodiversity;
- Drainage and flood risk;
- Noise;
- Air quality;
- Ground conditions and contamination;
- Archaeology and heritage; and
- Sustainability and Energy Use.

Principle of Development

4.2. The principle of development was one of the key items that Ark sought feedback from Wiltshire Council on at pre-application stage. The pre-application response from Wiltshire Council concluding that:

“Overall, there is considered to be compelling reasons to conclude at this stage that the principle of a new data centre on the Sands Quarry site would be supported by the Local Planning Authority.”

4.3. Whilst the pre-application response recognises that the site is not specifically allocated for employment purposes (in the same way that the Spring Campus is not either), the pre-application response recognises that the principle of the development can be supported based on alignment with various other policies in the Core Strategy, particularly because the portion of the site where built development is proposed constitutes previously developed land.

4.4. This was a key conclusion that was reached by the Planning Inspectorate in granting planning permission at appeal for the redevelopment of the site to deliver upto 81 homes (ref. 18/09884/OUT and ref. APP/Y3940/W/19/3243873).

4.5. Whilst clearly this application proposes a different land use to that which has previously been approved, the conclusion reached in that appeal decision that the site constitutes previously developed land as defined by the NPPF (Inspector’s Report - Paragraphs 9 and 10) and is a former military establishment (Inspector’s Report - Paragraph 13) is highly relevant.

- 4.6. The effect of this is that Core Policy 37 (Military Establishments) is relevant (Inspector's Report - Paragraph 14) and this is something that Wiltshire Council's pre-application response recognises in stating that:

"The context within which the site lies, as well as its recent planning history, are considered to be significant material considerations weighing in favour of the principle of new commercial development taking place of the land."

- 4.7. Core Policy 37 (Military Establishments) of the Core Strategy permits the redevelopment of redundant Ministry of Defence sites where they are well related to an existing settlement in terms of both location and scale (and where there is reference to floorspace limits, this is only where the site is remote from the settlement).

- 4.8. Clearly the site is well relocated to the existing settlement – it is adjacent to the north by Ark's established data centre campus whilst there is housing on the northeastern, eastern, and southeastern side of Moor Green and Westwells Road. There are no settlement limits for the village of Westwells but clearly the site abuts the village on two sides (Inspector's Report - Paragraph 15) and in no way can be considered to be either physically or visually remote. This is also recognised in the pre-application response which states that:

"...contextually, the site is well related to existing commercial and military development on the opposite side of Westwells Road and Rowan Lane"

- 4.9. The remainder of this paragraph relates to cases where the site is remote from existing settlements or not well located to existing settlements and is therefore not applicable.
- 4.10. The second paragraph of Core Policy 37 (Military Establishments) states that the "focus" will be on employment-led development and clearly the development of a data centre campus (which given the nature of the use and as accepted by Wiltshire Council in their determination of applications at Ark's Spring Park Campus) within Use Class B8 aligns with these aspirations.
- 4.11. Taking the above together, the conclusion can be reached that the proposals are supported by Core Policy 37 (Military Establishments) of the Core Strategy given that they will result in the employment-led redevelopment of a derelict former Ministry of Defence site and that there is a greater degree of policy support for the proposed use compared to the residential land use that has been previously approved on the site.
- 4.12. As well as being supported by Core Policy 37 (Military Establishments), the proposals also align with Core Policy 34 (Additional Employment Land). The purpose of Core Policy 34 (Additional Employment Land) is to provide a framework whereby proposals for economic development can be permissible on non-allocated employment sites.

- 4.13. One element of Core Policy 34 (Additional Employment Land) allows for proposals for economic development outside of the Principal Settlements, Market Towns, and Local Service Centres where they are either:
- *'Are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements; or ...*
 - *are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council.'*
- 4.14. Clearly the proposals align with both of these policy tests in that the proposed data centre would function as an extension to Ark's existing Spring Park Campus and, as set out in the following section, would build upon what is a strategically significant economic operation within the County.
- 4.15. Core Policy 34 (Additional Employment Land) also sets various requirements around the proposal being a sustainable form of development, being of a consistent scale, delivering economic and social benefits, not undermining strategic employment allocations, and being supported by adequate infrastructure. These matters are covered in the following sections of this Planning Statement.
- 4.16. This is also a key point that is recognised in the pre-application response provided by Wiltshire Council which states that:

"The context within which the site lies, as well as its recent planning history, are considered to be significant material considerations weighing in favour of the principle of new commercial development taking place on the land"

Economic Benefits

- 4.17. The Spring Park Campus already delivers a major economic dividend for the County and wider region – and this proposal will continue to support and grow this significant positive impact on the local and regional economy. The application site, strategically adjacent to Ark's existing Spring Park Campus, is an ideal place for future data centre development. This is recognised in Wiltshire Council's pre-application response which states that:
- "...with the West Corsham locality being identified by the Swindon and Wiltshire Local Enterprise Partnership: Strategic Economic Plan (March 2014), as being an important centre for in the information and communications industries within Wiltshire."*
- 4.18. In accordance with the planning and economic policy context, the site has the immediate capacity to capture current data centre formats for cloud, processing and storage; as well as the ability to adapt to changing technology and requirements. Clustering data provision also provides better opportunities to attract and retain power and other essential infrastructure.

- 4.19. The wider West Corsham Area (including MoD facilities opposite the application site) already provides a cluster of high-quality laboratory and R&D space and offices. Further data centre facilities at the Spring Park Campus will not only boost the performance of existing operators at the Campus, but it will have the ability to attract new companies and investment to the wider area.
- 4.20. At a local level, this will result in the creation of jobs. It's probably inappropriate to use the HCA's guidance on the job dividend associated with data centres, both because of the range that it generates and the interdependent relationship that the proposed development would have with the wider Spring Park Campus. Ark's experience suggests that the development will generate approximately 50 jobs on top of the existing level of employment associated with Spring Park but it is not quite as straightforward as that, whilst there will be members of staff permanently onsite, the development will support jobs that are based elsewhere within Ark's Spring Park Campus or at Ark's other campuses.
- 4.21. It should be born in mind that, together with the jobs that are created during construction and operation, these data centres will trigger and support a number of indirect jobs and multiplier effects. The figure above does not include the staff that would visit the site to maintain and update the plant and equipment deployed on site, which is supplied by specialist contractors. Ark's data hosting model allows and encourages this sort of access which takes place regularly (for maintenance purposes) and occasionally when new data infrastructure needs to be installed. Ark's model also allows companies to reserve space, which helps to ensure that data capability provides no brake on expansion (and this can be critical to a firm's growth and competitiveness).
- 4.22. In addition any new development will give rise to a 'multiplier effect' relating to jobs and associated expenditure created by the development. These take the form of indirect jobs resulting from supply and servicing the business requirements of the data centres (e.g. building maintenance / vehicle servicing to the supply and management of electronic hard / software). Induced jobs will also be created as a result of the extra spending in the local and national economy triggered by the direct and indirect jobs created at the Campus.
- 4.23. At a high level (again), many commentators recognise that data and big data will be key to business change and innovation over the coming years. This generally comes from two sources:
- The first is the creation (or improvement) of digital infrastructure. This brings data transmission, storage and processing into general or conventional definitions of infrastructure and will continue to enhance Wiltshire's position on the map of locations with modern data facilities; and
 - The second is the use of data capability as the focus or platform for new clusters of talent and infrastructure (or what Cambridge University has called an innovation ecosystem) which can drive and guide growth regionally and locally.
- 4.24. In this way data capability can both generate and support growth. It can attract activity and occupiers and this is particularly the case for cloud computing and big data where secure storage and processing capacity

can draw in investment quickly and then sustain it. These systems are rare (globally) but will be critical to success and prosperity.

- 4.25. Secure, resilient and affordable data management is critical in assessing what this useful data is – and its application to innovation and sustainable models of growth. In this way, data centres are not stores, but places where the latest technology is deployed to accelerate data processing and data management. This is the interface between data logistics and informatics.
- 4.26. Data provision is also important at all stages of the business development cycle and whilst the focus is often on very large and established organisations it is equally important at the other end of the business spectrum. Here access to data facilities is vital for smaller or newer enterprises and those with a very high data requirement (and which have a strong technological dimension). This is especially important in Wiltshire given the new and emerging businesses that the Council and the LEP is trying to attract (which rely on data to operate and succeed).
- 4.27. The ability to act at all stages of the business lifecycle, at all scales and across all sectors and organisations explains why data capability is a critical piece of modern economic infrastructure. It plays an important role in marketing and capturing mobile business as well as helping to develop local skills and new business creation.
- 4.28. Data is also growing in amount and value. This is unlikely to be questioned, but on the first point, fixed internet traffic is likely to double every two years and mobile data traffic will increase at a rate of 25 – 42% each year. A significant proportion of this data will serve a practical, scientific and/or economic function. On value, data's current contribution to the economy is both growing and highly significant. In 2017, Tech Nation reported that the contribution of a digital technology worker to the economy is more than twice that of a non-digital worker (£103,000 compared to £50,000).
- 4.29. In this light, the need for more modern data centre space is clear (and recognised). This will become more urgent in the next few years as significant data growth coincides with new economic conditions and security challenges.

Landscape and Visual Impact

- 4.30. A Landscape and Visual Appraisal prepared by EDP accompanies this planning application. The purpose of the Landscape and visual appraisal is to establish a landscape and visual baseline, before considering the impact that the proposed development would have on this and recommended design and mitigation measures to be incorporated into the hard and soft elements of the scheme.
- 4.31. It is initially worth providing an overview of the strategy that Ark's proposals for the site seek to employ to soften and embed the building into its local and wider landscape context. Effectively, this is twofold. Firstly, the building has been designed to step the main data centre down from west to east. This is achieved by lowering the eastern wing of the data centre building and pushing all rooftop plant onto the roof of the western wing. Secondly, Ark's landscaping proposals incorporate extensive strategic landscaping along the

site's eastern and southern boundary with the proposals including the planting of mature trees as part of the 'day 1' landscaping scenario.

- 4.32. As with all development, the Landscape and Visual Appraisal notes that development of the site would have a permanent and long-term landscape impact, this being by virtue of the fact that the proposal is for additional built development on what is currently a degraded previously developed site.
- 4.33. From a landscape perspective, the Landscape and Visual Appraisal concludes that the site is considered to align with the aspirations of the landscape character areas that it sits within as it will result in the recycling of previously developed land and, through the planting and enhancements proposed, deliver longer term landscape benefits with the transition between settlement edge and rural landscape being retained through the substantial landscape buffers incorporated into the scheme.
- 4.34. Visually, the Landscape and Visual Appraisal concludes that, whilst the proposed development will be visible from certain residential receptors and from PRowS, it will be seen in the context of existing and proposed landscaping and is mitigated for somewhat through a sensitive approach to building design and façade treatment.
- 4.35. Overall, the Landscape and Visual Appraisal suggests that the site can be developed without triggering an in-principle objection on land and visual grounds. This aligns with the conclusions reached in the pre-application response provided by Wiltshire Council which states that:

"Notwithstanding the above, the Council's Landscape Officer does advise that, in their opinion, the proposed development could probably be accommodated successfully within the site (over the longer term) without resulting in far reaching adverse effects to landscape character or public visual amenity / receptors."

Traffic and Transport

- 4.36. Submitted as part of this planning application is a Transport Assessment prepared by IMA Transport Planning who have advised Ark on transport planning matters throughout the delivery of the Spring Park Campus.
- 4.37. As set out in Section 2 of this Statement, proposals for residential development of the site were recently tested and approved. Whilst the application was originally refused by Wiltshire Council, there was no reason for refusal that related to transportation and highways matters.
- 4.38. The central element of the Transport Assessment is a comparison of the number of trips associated with the proposed data centre with the approved residential scheme. Whilst that planning permission is now expired, it represents the most recent determination of an application site and the fact that no highways objection was raised is highly relevant as it confirmed that such a level of additional vehicular trips could be accommodated on the highways network without an unacceptable impact.

- 4.39. The number of trips associated with the proposed data centre is based on an aggregation of those associated with the current Spring Park Data Centre Campus based on the amount of floorspace proposed whilst the forecast number of trips associated with the housing is taken from the determination of that planning application. The calculation of trips associated with the proposed data centre assumes that there will be no crossover of staff between the proposed data centre and Spring Park Data Centre Campus and therefore is very much a worst-case scenario.
- 4.40. The Transport Assessment concludes that the number of trips associated with the data centre development would be 73% of those trips generated by the residential scheme in the AM peak and 63% of those trips generated by the approved residential scheme in the PM peak (which was considered both by Wiltshire Council and the Planning Inspector to be acceptable on highways, traffic, and transportation grounds). The Transport Assessment confirms that there is capacity on the local highways network for the proposed data centre development both now and in 2028 when operational. This aligns with the pre-application response provided by Wiltshire Council which notes that:

“Further, it is also accepted that data centre type development is not likely to generate the levels of vehicle movements as other form of employment (or indeed the consented housing development on the site).”

- 4.41. Reflecting the number of trips associated with the proposed development (which is considerably fewer than a conventional Class B8 use), the level of car parking proposed is less than the standards for a conventional Class B8 use. This is justified based on the reduced number of vehicle trips that the development will trigger and is explained further in the Transport Assessment.

Biodiversity

- 4.42. Included as part of this submission is an Ecological Impact Assessment prepared by Tyler Grange. The Assessment included an Extended Phase 1 Habitat survey and data search followed by species specific surveys that took place during the 2022 and 2023 seasons. Additional hazel dormouse surveys are being undertaken throughout the 2024 survey season and will be reported in an updated Ecological Impact Assessment during the consideration of the planning application.
- 4.43. The Assessment confirms that the site is previously developed land, consisting of visible hardstanding throughout which has and is being colonised by tall ruderal vegetation and scrub. A line of trees runs along the site’s northeastern boundary with broadleaved woodland along its northern, western, and southern boundaries. The PEA confirms that it is the trees across the site which are of “local” ecological importance with other features of negligible significance.
- 4.44. The site is not within or adjacent to any ecological designations however it is noted that the site is located in relatively close proximity to the Bradford on Avon and Bath Bat SAC and the Box Mine Site of Special Scientific Interest. The proposed development will not affect the ecological corridor (not the Nature Conservation Area), which is to be retained as an integral part of the wider Campus development. The Ecological Impact Assessment confirms that the development will avoid negative impacts on the Bradford

on Avon and Bath Bat SAC by virtue of the extent of tree loss being modest and compensated by the additional tree planting proposed, and the implementation of a lighting strategy with no light spill (i.e. 0 LUX) at all tree and woodland lines.

- 4.45. Included alongside the Ecological Impact Assessment is a Biodiversity Net Gain Assessment, also undertaken by Tyler Grange, using the DEFRA Statutory Biodiversity Metric.
- 4.46. The proposals have been designed to seek to maximise the ecological enhancements that the scheme can deliver. The project team has sought to do this by maximising planting across and around the portion of the site that is to accommodate the data centre, as well as committing to the retention, enhancement, and maintenance of land under Ark's control to the south and southwest of where development is proposed for ecological purposes. The proposals for this incorporate the creation of neutral grassland and scrub, re-instating a historic pond, and extensive tree planting.
- 4.47. Alongside this, offsite options, including delivering enhancements within Ark's Spring Park Campus, have been explored but dismissed as not possible given that the Campus is fully operational and any spare undeveloped land within this heavily constrained by below ground services rendering further landscaping not possible.
- 4.48. Despite these measures to maximise onsite biodiversity and the exploration of offsite options, the proposals would result in an onsite biodiversity loss. Primarily, this is as a result of the change in the DEFRA Metric from the 4.0 version to the Statutory version with the lowering of the weight given to tree planting meaning that, rather than the site being able to deliver a net gain in excess of 10%, a net loss is now shown.
- 4.49. As a result of this, Ark have been in discussion with a Wiltshire-based habitat bank to purchase biodiversity credits which, in tandem with the measures that Ark are proposing onsite, will deliver a 10% net gain in biodiversity.
- 4.50. The ability to use a habitat bank to deliver a biodiversity net gain, as well as being facilitated in national guidance and legislation, is explicitly recognised in the pre-application response provided by Wiltshire Council which states that:

"Alternatively, the developer may use a third party broker to deliver the required number of biodiversity units, on a receptor site agreed with the LPA, or may apply to use the council's own biodiversity offsetting scheme."

Drainage and Flood Risk

- 4.51. According to the Environment Agency's Indicative Flood Map for land-use planning (Rivers and Sea), the site lies within Flood Zone 1, which is classified as land where flooding from rivers is very unlikely (having a less than 0.1% (1 in 1,000) chance of flooding occurring in any one year). The risk of flooding to the Site from pluvial, groundwater and artificial sources has also been assessed and found to be low. Because of

the size of the site, though, a Flood Risk Assessment (FRA) is required and submitted with this application which reviews conditions and identifies appropriate mitigation and enhancement measures.

- 4.52. A Drainage Strategy prepared by Hydrock also sits as part of this submission. The Drainage Strategy confirms that the site can achieve a greenfield run-off rate which, given that the site constitutes previously developed land with areas of hardstanding, would represent a betterment compared to the existing arrangement. This would mean that development of the site should deliver a betterment to any surface water flooding that currently takes place locally.
- 4.53. Incorporated into the proposed development is a network of sewers, SuDS basins, and underground tanks which ensure that this can be achieved entirely within the site's boundary without a requirement for any offsite solutions or third party connections (beyond that of the statutory undertakers).

Noise

- 4.54. A Noise Impact Assessment prepared by SWECO supports this planning application. SWECO have provided support to Ark on noise matters throughout the delivery and operation of the Spring Park Campus.
- 4.55. Two types of plant are required for successful operation of the data centre campus – operational plant, which runs continuously and is required for the powering, cooling, and overall successful continued operation of the data centre and stand-by plant which, whilst subject to regular but infrequent testing, is only used in incredibly infrequent circumstances where there has been a National Grid power failure.
- 4.56. Due to the infrequency of use of the stand-by plant, this is scoped out with the purpose of the Noise Impact Assessment being to assess the impact of noise associated with the operational plant on the nearest noise sensitive receptors which are at Westwells Road, Bradford Road, and to the west of Rowan Lane and west of the Wadswick Green development.
- 4.57. In this case the rating levels predicted for the night-time periods are of 23dBA and 24dBA at Westwells Road and Moor Green which are the nearest noise sensitive receptor. Such noise levels are objectively very low and lower than typical suburban noise levels. When the background noise levels are so low, BS4142:2014, which provides a framework for rating and assessing the impact of industrial and commercial noise, states that:

“Where background sound levels and rating levels are low, absolute levels may be as, or more, relevant than the margin by which the rating level exceeds the background, especially at night”.

- 4.58. The Noise Impact Assessment concludes that noise associated with operational plant will operate below the background noise levels at all of the nearest noise sensitive receptors. Associated noise levels will be 2dB below background noise levels at Moor Green and 3dB below background noise levels at Westwells Road during the nighttime.

- 4.59. Achieving a noise impact below the background noise levels as designed into the performance of the scheme, and as driven the selection and location of the plant to be used.
- 4.60. Such noise levels will be well below the recommended Indoor Ambient Noise Level (IANL) guideline values presented in BS8233:2014 and WHO guidance documents, which give some context on the low impact at the closest and most exposed receptors on Westwells Road and Moor Green.

Air Quality

- 4.61. Submitted as part of this application is an Air Quality Assessment prepared by Redmore Environmental.
- 4.62. The Air Quality Assessment only relates to operational impacts of the proposed data centre given that impacts at construction stage can be considered and controlled through a Construction Management Plan (incorporating Dust Management Plan) to be submitted and approved prior to the commencement of development. The purpose of this will be to ensure that during construction potential emissions of dust arising from the site do not result in nuisance to adjacent prosperities.
- 4.63. In considering air quality Impacts, the Air Quality Assessment considers a range of ecological and residential receptors. The residential receptors have been selected to include the nearest properties to the subject site with a range of receptors identified at Moor Green, Westwells Road, Bradford Road, and Wadswick Green whilst the ecological receptors are a mix of nearby statutory and non-statutory designated ecological sites. The Air Quality Assessment provides a worst-case scenario because, as well as considering the infrequent but regular testing of the back-up generators, it also allows for an annual 72 hour continuous power outage, something that is extremely unlikely and has never happened before during Ark's operation of data centres at the Spring Park Campus.
- 4.64. For both ecological and residential receptors, the Air Quality Assessment concludes that any impacts associated with the development would not be significant.

Ground Conditions and Contamination

- 4.65. The proposed development is not considered to be a sensitive land use. The scheme will require very little ground reduction works and therefore the potential for contamination is considered to be low given the nature of site uses and the watching brief procedure that will be employed by the developer. A Preliminary Environmental Risk Assessment for ground contamination has been undertaken and is submitted as part of this planning application.
- 4.66. The development and implementation of a Construction Management Plan, including standard, good practice mitigation measures will ensure, in the unlikely event of accidental spillages during construction works, that they will be controlled to ensure that any impacts would be minor (if at all). The proposed development will not introduce any new contaminant sources during its operation and mitigation measures would be put in place to ensure that no new significant effects on ground conditions would arise.

Accordingly, it is considered that the proposed development is unlikely to generate any significant effects on ground conditions and unlikely to pose a contamination risk.

Archaeology and Heritage

- 4.67. A Heritage and Archaeology Assessment prepared by EDP accompanies this planning application.
- 4.68. The Assessment concludes that the site itself is not subject to any heritage designations and therefore that its redevelopment would have no direct effects on either above or below ground heritage features.
- 4.69. The Assessment considers the potential indirect effect that the development could have on nearby designated heritage sites. A total of 9 Scheduled Ancient Monuments and 23 listed buildings are considered, as is the Neston Conservation Area. These designated heritage sites have been selected based on their proximity to the application site and their significance as assets. At present, the site forms no part of their setting.
- 4.70. The Assessment concludes that, by virtue of the scale of the development proposed, the intervening topography, and the additional landscaping proposed, the proposed development will have no indirect impact on surrounding heritage assets. This aligns with the conclusion reached in the pre-application response from Wiltshire Council for the site which noted that:

“The Council’s Conservation Officer has advised that whilst it seems unlikely to result in a high level of harm to the setting of heritage assets, care should be taken to soften the elevations where possible along with a comprehensive landscaping scheme.”

Sustainability and Energy Use

- 4.71. The Council requires developers to provide Sustainable Energy Strategies for all major developments. Sustainability and energy efficiency is at the core of Ark’s approach to data centre development and included as part of this submission is an Energy and Sustainability Statement prepared by JCA. This document outlines how the proposed development incorporates measures to reduce energy demand and embrace sustainable construction and operational practices.
- 4.72. The key measures are:
- A commitment to be Carbon Neutral and Carbon Negative by 2030 while retrospectively removing all carbon dioxide emitted by 2030;
 - The purchasing of 100% renewable energy as backed up by the Renewable Energy Guarantees of Origin (REGO);
 - The use of HVO within back-up generators, a fuel source that is not a fossil fuel and has less associated particulates;

- The construction of much of the data centre offsite using modular build technologies with up to 90% of building fabric to be recycled;
- The use of rainwater harvesting as a measure to cool the data centre; and
- The incorporation of solar panels on the rooftop of the eastern data centre building.

- 4.73. Ark is committed to ensuring that the proposed new building achieve BREEAM 'Very Good' standard and this would align with the BREEAM levels achieved elsewhere across its Spring Park campus. Included as part of this submission is a BREEAM Pre-Assessment Report prepared by FocusED which sets out what credits can be gained so that this can be achieved.
- 4.74. A separate covering letter prepared by FocusED confirms that achieving an "Excellent" rating has not been feasible at any data centre previously permitted at Ark's Spring Park Campus and will not be achievable for the development proposed. The letter suggests that the central reason for this is that the relevant guidance is outdated and fails to give credit for certain more up-to-date technologies which weren't envisaged when the Guidance was published in 2010. Ultimately, not achieving BREEAM "Excellent" is dictated by the site's location and history (with regards to access to public transport, and formerly contaminated nature) and the modular nature of the development within an existing campus (with regards to level of office provision and the need for a new modular built form).
- 4.75. It is considered that the proposed sustainable energy strategy complies with the aims of Core Policy 41 in so far as is possible.

5. Conclusions

- 5.1. This Planning Statement supports an application for full planning permission for the development of a data centre campus as an extension to Ark's existing Spring Park Campus. The application has been scoped with Wiltshire Council and Ark has engaged with the Town Council and members of the public in advance of making this submission.
- 5.2. The need for additional data centre capacity within the UK is fully understood in response to the ever-growing amount of data that is created and shared which needs storing. The Spring Park Campus does this task effectively and redevelopment of the application site provides the only realistic opportunity to deliver an expansion to the Campus. Likewise, the economic benefits associated with Ark's operation at the Spring Park Campus are well understood and the redevelopment of the application site provides the opportunity to expand these.
- 5.3. The principle of development of the site for a data centre is considered to be wholly appropriate and will recycle of a vacant and derelict parcel of previously developed land that was formerly used as a military establishment. A residential scheme was approved on the site at appeal which confirms the site's previously developed status and its potential to deliver well located and sustainable growth. The same conclusions – on principle and sustainability - apply to a data centre scheme which, for the reasons described in this statement, add significant economic benefit and align very well with the tests and guidance of current planning policy.
- 5.4. Submitted in support of the application is a package of documentation which considers and assesses the site's environmental and technical acceptability and performance. This package considers matters relating to landscaping, transport, biodiversity, drainage, flood risk, noise, air quality, ground conditions, archaeology, and sustainability. On each aspect, the reports confirm the acceptability of the scheme and the measures and proposals it includes. As a full application, the Council can be confident that where design features are important to performance and effects, these measures will be applied and will be successful as they have been already at the Spring Park campus that this scheme will extend.