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**BREEAM scope for a data centre building, Spring Park.
Land South of Westwells Road, Neston SN13 9GB.**

REF: 2024-10-04--Letter-FocusED-SPEExt

Dear Nick,

In response to the letter Ref: PL/2024/05527 from Wiltshire Council Climate Team, we appreciate that the Officer is considering a BREEAM Very Good target for the proposed building, following the findings in the submitted BREEAM Pre-Assessment and Sustainable Energy Strategy reports.

As noted in the letter *2024-04-17-Letter-FocusED-SPEExt*, the BREEAM assessment for the development is based on the BREEAM 2010 Data Centres version. Unfortunately, this version does not adequately account for the benefits of Zero Carbon technologies. Specifically, the weighting score for the Materials section in this version is minimal compared to the most recent BREEAM versions used for other building types. As a result, adopting low embodied carbon construction solutions for this building does not ensure a high score in the Materials section relative to other typologies evaluated under BREEAM. For instance, in the BREEAM 2010 version, the Materials section contributes only 7% to the total score, whereas the 2023 update (version 6.1) increases this to 17.5%.

The outdated methodology used to quantify carbon content under BREEAM does not accurately capture the impact of low-carbon construction elements. Therefore, as recommended by the Climate Officer, an Embodied Carbon Assessment has been developed, confirming the benefits of integrating steel structure instead of concrete. The assessment *2023-B01-P6-ECA-01* quantifies the benefits of low-carbon materials and reveals a resultant 414.06 kgCO₂e/m², meeting the recommended levels by the Wiltshire Local Plan Review, Policy 87.

Regarding the ENE 05 section, the installed PV technologies will allow us to achieve at least the first credit. In addition, the energy supply and benefits from the proposed LZC technologies (including potential waste heat technologies) will be reflected in BREEAM, confirming the energy reduction and securing two additional credits.

Since 2013, ARK Data Centres has been a Partner of the EU Code of Conduct on Data Centre Energy Efficiency. Considering this, there is a commitment to developing sustainable buildings, ensuring that ARK Data Centre buildings implement best practices and measures for energy efficiency and operation in line with the Best Practice Guidelines for the EU Code of Conduct on Data Centre Energy Efficiency (EU CoC). In view of this, building occupiers are requested to meet the EU CoC sections that are included in the lease, to ensure the operation of sustainable IT equipment. As BREEAM assessors, from Focus ED we have reviewed this section in other ARK buildings, awarding two credits for ENE 22.

In conclusion, as indicated in the BREEAM Pre-assessment, the building's BREEAM score can surpass the 55% required for a Very Good rating. However, it currently falls short of the 70% (+ 5% buffer) needed for an Excellent rating. Given this, we find the Officer's suggestion to target a score closer to Excellent to be reasonable, while still maintaining the ambition of achieving an Excellent rating. Therefore, we support the condition of aiming for a minimum score of 62.5%, also considering the Embodied Carbon Assessment confirms the carbon impact against the benchmarks outlined in the Local Plan Review.

Kind regards

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