

Climate Team consultation response

Reference: PL/2024/05527
Address: Land South of Westwells Road, Westwells Road, Neston SN13 9GB.
Proposal: Redevelopment of site to deliver extension to existing Spring Park data centre campus consisting of (a) free standing data centre, (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.

Overall: No objection subject to conditions.

I am pleased to see that the developer has engaged with my previous comments. The developer has provided an Embodied Carbon Assessment that demonstrates this proposal will perform significantly better than emerging policy requirements and gives good information and evidence for future policy development. Furthermore, it illustrates that the developer is taking an iterative approach to designing a low carbon development and shows they can still achieve more potentially.

The developer has also provided a further betterment with the approach to solar PV. The plans show a larger array than referenced in the original Sustainable Energy Strategy (which now appears out of date and should be updated by condition). The array maximises the available roof space considering the need of the current design to utilise the roof for plant as well. They also satisfactorily explain why they cannot use the south elevation for solar PV.

In conclusion, so far as BREEAM relates to the climate team's interests I am of the view that the additionality provided outweighs any shortfall against BREEAM 'Excellent' policy requirements in this specific case. However, I recommend conditions to ensure a satisfactory compromise is realised, and so that the good work continues into the latter RIBA stages.

Suggested conditions:

- Within 6 months of the development being first brought into use a final Certificate shall have been submitted to and approved in writing by the Local Planning Authority certifying that the relevant BREEAM "Very Good" or "Excellent" standard has been achieved by the development (with a minimum score of 62.5%).

REASON: To ensure that the objectives of sustainable development set out in policy CP41 and CP57 of the Wiltshire Core Strategy are achieved.

- The development hereby permitted shall not be first occupied / brought into use until a final Sustainable Energy Strategy, explaining the low-carbon approach of the scheme, including that taken in the technical design stages and construction has been submitted to and approved in writing by the Local Planning Authority. This shall follow the principles established by the submitted:

- * Energy & Sustainability Statement (ref: 9192-JCA-ZZ-RP-ME-00001-P03);
- * Embodied Carbon Assessment (ref: 2023-B01-P6-ECA-01)
- * FocusED letter dated 04/10/24 (ref: 2024-10-04--Letter-FocusED-SPExt)
- * PV Proposal (ref: HAL-SPP6-ZZ-04-DR-A-100060 Rev P1)
- * Proposed Elevations (ref: HAL-SPP6-ZZ-ZZ-DR-A-1000050 Rev P03)

REASON: To ensure that the objectives of sustainable development set out in policies CP41, CP55, CP57 and CP60 of the Wiltshire Core Strategy are achieved.

- The development hereby permitted shall not be first occupied / brought into use until final details of the low-carbon and renewable energy technologies (such as air source heat

pumps and roof-mounted solar PV) has been submitted to and approved in writing by the local planning authority. Details shall include, but not necessarily be limited to location, number, dimensions and manufacturer's details. The development shall be carried out in accordance with the approved details.

REASON: In order to define the terms of the permission and in order to support and encourage sustainable construction in accordance with policies CP41, CP55 and CP57 of the Wiltshire Core Strategy.

- The development hereby permitted shall not be first occupied / brought into use until a final design stage Embodied Carbon Assessment covering A1-A5 elements for the substructure, superstructure and finishes in accordance RICS Professional Statement on Whole Life Carbon, 2017 and BS EN 15978:2011 has been carried out and submitted to and approved in writing by the Local Planning Authority. This final design stage report shall set out a final target for the substructure, superstructure and finishes to achieve as well as highlighting avenues where low carbon approaches can be taken on the major elements of the project.

This Embodied Carbon Assessment shall follow the principles set out in the hereby approved Embodied Carbon Assessment (Ref: 2023-B01-P6-ECA-01).

The development shall be carried out in accordance with the final design stage Embodied Carbon Assessment findings.

REASON: To ensure that the objectives of sustainable development set out in policy CP41 and CP57 of the Wiltshire Core Strategy are achieved.

Date: 4 November 2024

James Taylor BA(Hons) MA MRTPI
Climate Officer, Environment, Wiltshire Council

James.taylor@wiltshire.gov.uk - 01225 716727

Overall: Holding objection.

I have commented on similar proposals in the vicinity and wish to remain consistent with the views I expressed there so far as possible. However, whilst I note that history (where I accepted BREEAM Very Good) this is slightly different because this application is for a standalone data centre on adjacent land, not the same site.

I have read the BREEAM Pre-Assessment, the associated note and the Sustainable Energy Strategy. I note the expressed view that BREEAM Excellent is not feasible. I also note that the potential score of 67.91% is not far off the Excellent threshold of 70 and well in excess of the Very Good threshold of 55. So, there is a shortfall against the policy requirement under CP41, but it is not vast.

As such, I would be happy to recommend that a condition be imposed to secure Very Good certification **and** a score in excess of an ambitious figure to be agreed with the developer (perhaps beyond 62.5 might allow practical flexibility and still ensure a project that in BREEAM terms is approaching Excellent), **if** some additionality can be demonstrated and secured.

It is clear from the comments that this is a sector that is ambitiously moving towards net zero so far as practically possible given the energy and water intensity involved. Some of this is being secured through BREEAM but not all of it and so if areas of additionality can be secured then I think it will more than match any shortfall in the BREEAM rating. I have the following suggestions but would be happy to discuss these and/or alternatives with the developer (directly if that is most convenient):

- Ene. 05 Installation of LZC systems
There is lots to be positive about already here with use of air source heat pumps and back-up systems that avoid the use of diesel. There is also some mention of using solar panels and a generous sized array of some 100kW. However, the energy use of this site is very high. As such, any on-site renewables generation will be used on the site. This means that solar PV is very feasible and should be maximised at the site. This would follow invest to save principles.

Please request revised plans to show all the roofs being designed to maximise solar generation potential through orientation and building design and then the solar panels added to the roofs themselves. I'd welcome utilising the walls on the south elevation (as a brise soleil perhaps) too.

- Ene. 22 Procurement of Sustainable IT Equipment
I note that the user of the building is unknown at this stage and so this cannot be committed to. However, I would suggest that the developer could seek to address this requirement by agreeing to place a requirement within any future lease negotiations with potential end-users.
- Request an outline Embodied Carbon Assessment giving consideration of the substructure, superstructure and external finishes and reporting the impact in kg of carbon/m² benchmarked against the emerging Local Plan Review of 900 kg /m² of carbon. This will provide a valuable insight and quantify the benefits set out in the submission of steel versus concrete.
- Whilst I note that the developer is trying to make use of waste heat I would welcome comments on the potential there may be to future proof the scheme so that this might be utilised in the future – for example additionality might be provided through infrastructure to the site boundary for a future connection if an end-user of waste heat can be found. ([Thousands of homes to be kept warm by waste heat from computer data centres in UK first - GOV.UK \(www.gov.uk\)](#))

Date: 8 July 2024

James Taylor BA(Hons) MA MRTPI
Climate Officer, Environment, Wiltshire Council

James.taylor@wiltshire.gov.uk - 01225 716727