

A REPORT HIGHLIGHTING THE LACK OF COMPLIANCE TO THE DESIGN QUALITY STANDARDS SET DOWN BY GOVERNMENT AND WILTSHIRE COUNCIL

Executive Summary:

ARC have extended their data centre complex considerably over the years and now have five operational units and have Planning Consent for a sixth. All these units are set within the Spring Park complex, just north of Rowan Lane.

The latest planning application for a seventh data centre is outside the Spring Park complex on a field known as The Donkey Field. The design of this proposed unit cannot comply to the design standards set down by Wiltshire Council and thus it contravenes the adopted Wiltshire Core Strategy, so Planning Consent should not be granted for it.

This new data centre is positioned right in the heart of Westwells, to the south of Rowan Lane, and thus conflicts with the Corsham Neighbour Plan.

There is very strong local opposition to this expansion, over 400 objections have been registered on the Wiltshire Council planning web site. There is a very real fear that this escalation in data centres will cause irrevocable damage to our village.

The operational units are already causing noise issues for the residents of Westwells and the closest one is 300m away, and that is before the consented unit is built and commissioned.

Building an industrial structure 19m high, 160m long and 40m wide within 30m of existing residential housing cannot be considered acceptable.

The surface water drainage in the area is very delicate with the Donkey Field being a major sump accepting much of the surface water in the area. If a large portion of this is covered with an impervious surface, the resultant flooding could be catastrophic for Westwells.

Background:

Several planning applications have been made for the development of The Donkey Field, as it is locally known, mostly for housing, but there has been one for an industrial park.

All the previous applications have been refused, with the appeal inspector noting that the site should be preserved as a buffer between the MOD site to the north and the residential area of Westwells to the south.

The last appeal on the site, for housing, was upheld, with the appeal inspector putting a Grampian condition on the consent regarding surface water disposal. The area is susceptible to flooding, being the low spot of the area and there is no obvious way to cater for the flood water. The name Westwells, gives the game away.

ARC obtained planning consent to build a data centre to the north of Rowan Lane in April 1st 2021 with the WC landscape officer saying that he would not object on the understanding that there would be no further development to the south of Rowan Lane.

ARC have now made a planning application for another data centre on The Donkey Field, just south of Rowan Lane which is now being considered by Wiltshire Council.

Local residents believe this will be a huge intrusion into our village with a simply enormous industrial structure that is completely out of keeping with our village. We believe that this structure does not accord with most of the design policies, both national and local, that apply to this field.

Initially ARC wanted a data centre hidden at the back of Westwells. This then increased to four more, again all set back from the road and largely out of sight.

ARC was then granted for another data centre just 30m from the nearest house. The building is almost right up to Westwells Road and will be in plain sight for everyone to see. Difficult to miss a structure 12m high set only 10m from the edge of the carriageway.

Initially the design was for the data centre to be set behind an office complex that hid it from view. After the consent was granted, they then went back to the council to amend the consent so that now most of the site is covered with the data centre.

That unit does not accord with Wiltshire Design codes but Simon Smith, in his delegated report at the time, suggested it was acceptable due to the close proximity to the already constructed data centres at Spring Park.

Even so it is hard to see how that data centre was designed with any consideration of Core Policy 57, perhaps that policy was put to one side for this application.

This latest planning application is for yet another data centre on our precious Donkey Field which places it at the heart of our village. Rowan Lane surely forms the natural limit of the Spring Park complex and so must be used as the boundary.

As the Wiltshire Council's own landscape officer said 'further development south of Rowan Lane will result in harm to the local character of the area'. This view has not changed, Rowan Lane must be considered as the boundary of the Spring Park complex and no further industrial development should be allowed to the south of it.

As implicitly agreed in the decision to grant planning consent for the data centre just to the north of Rowan Lane.

The Government has produced a design guidance document entitled 'National Design Guide'. The introduction reads:

The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. This National Design Guide, and the National Model Design Code and Guidance Notes for Design Codes illustrate how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools

We have worked through all the sections of this design guide and cannot find any areas that this new data centre accords to the requirements of this guidance note.

Part 2 of this document is split into 10 sections – the so called ‘ten characteristics’.

Taking these in turn:

1. Context – enhances the surroundings.

Well-designed places are:

- based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;
- integrated into their surroundings so they relate well to them;
- influenced by and influence their context positively; and
- responsive to local history, culture and heritage

Reading through the requirements of this section of the NDG (National Design Guide), it is hard to see how the design of the proposed data centre on the Donkey Field accords with any of these requirements. It is almost as if this NDG has not been considered at all.

The title of this portion is – ‘enhances the surrounding’! How exactly does this data centre ‘enhance the surrounding’?

There is no attempt to copy the architecture of the surrounding area, admittedly this is difficult as the surrounding buildings are all residential houses.

Perhaps a fundamental reason why this data centre is in completely the wrong position. It should not be forced into a small local village.

Wiltshire Councils ‘Inward Investment Manager’ states that there will be benefits to the local economy? No one in the village can think of any benefits this additional data centre will bring us. The minimal jobs are specialist and so will be out sourced, as will the jobs during the build.

Maybe he could be slightly less dismissive and actually suggest some benefits that we will enjoy?

We will be left with a monstrous building forced into the centre of our village spewing noise and light and disturbing the delicate surface water drainage system that ARC do not seem to understand.

2 Identity – attractive and distinctive.

Well-designed places, buildings and spaces:

- have a positive and coherent identity that everyone can identify with, including residents and local communities, so contributing towards health and well-being, inclusion and cohesion;
- have a character that suits the context, its history, how we live today and how we are likely to live in the future; and
- are visually attractive, to delight their occupants and other users.

Again it is hard to see how the design of the data centre proposed for the donkey field considered any of these NDG requirements.

3. Built form – a coherent pattern of development.

Well-designed places have:

- compact forms of development that are walkable, contributing positively to well-being and placemaking;
- accessible local public transport, services and facilities, to ensure sustainable development;
- recognisable streets and other spaces with their edges defined by buildings, making it easy for anyone to find their way around, and promoting safety and accessibility; and
- memorable features or groupings of buildings, spaces, uses or activities that create a sense of place, promoting inclusion and cohesion.

We realise the design is for a data centre but nevertheless it shows no respect for these design guidance.

That's why this is the wrong place for a data centre.

4 Movement – accessible and easy to move around.

A well-designed movement network defines a clear pattern of streets that:

- is safe and accessible for all;
- functions efficiently to get everyone around, takes account of the diverse needs of all its potential users and provides a genuine choice of sustainable transport modes;
- limits the impacts of car use by prioritising and encouraging walking, cycling and public transport, mitigating impacts and identifying opportunities to improve air quality;
- promotes activity and social interaction, contributing to health, well-being, accessibility and inclusion; and

- incorporates green infrastructure, including street trees to soften the impact of car parking, help improve air quality and contribute to biodiversity

Again, we understand that this is a data centre but its design and placement seem to be complete at odds with this portion of the Design Guides.

Another reason that a data centre is the wrong building for this site.

5 Nature – enhanced and optimised.

Well-designed places:

- integrate existing, and incorporate new natural features into a multifunctional network that supports quality of place, biodiversity and water management, and addresses climate change mitigation and resilience;
- prioritise nature so that diverse ecosystems can flourish to ensure a healthy natural environment that supports and enhances biodiversity;
- provide attractive open spaces in locations that are easy to access, with activities for all to enjoy, such as play, food production, recreation and sport, so as to encourage physical activity and promote health, well-being and social inclusion.

The existing Donkey Field supports a wide variety of wildlife that seems to be pushed up to one end of the site to make way from the data centre.

This certainly does not 'prioritise nature', it seems to prioritise ARC at the expense of nature.

6 Public spaces – safe, social and inclusive.

Well-designed places:

- include well-located public spaces that support a wide variety of activities and encourage social interaction, to promote health, well-being, social and civic inclusion;
- have a hierarchy of spaces that range from large and strategic to small and local spaces, including parks, squares, greens and pocket parks;
- have public spaces that feel safe, secure and attractive for all to use; and
- have trees and other planting within public spaces for people to enjoy, whilst also providing shading, and air quality and climate change mitigation.

Again, hard to see how this planning application has been developed to include these features.

7 Uses – mixed and integrated.

Well-designed places have:

- a mix of uses including local services and facilities to support daily life;
- an integrated mix of housing tenures and types to suit people at all stages of life; and

- well-integrated housing and other facilities that are designed to be tenure neutral and socially inclusive.

This section is primarily aimed at housing so perhaps non compliance is understandable.

8 Homes and buildings – functional, healthy and sustainable.

Well-designed homes and buildings:

- provide good quality internal and external environments for their users, promoting health and well-being;
- relate positively to the private, shared and public spaces around them, contributing to social interaction and inclusion; and
- resolve the details of operation and servicing so that they are unobtrusive and well-integrated into their neighbourhoods.

This data centre has been placed right in the middle of our wonderful village of Westwells. It does not relate positively at all to the local public spaces – how can it when it is completely out of keeping with the surrounding houses?

This building is almost 20m high, 40m wide and 120m long. How can a bulk of building this size ever be ‘well integrated into their neighbour’? It is completely the wrong use of this land.

Just because the proposed use cannot accord with these requirements does not give it ‘right’ not to comply to national and local design codes. It is the wrong building on the wrong site.

9 Resources – efficient and resilient.

Well-designed places:

- have a layout, form and mix of uses that reduces their resource requirement, including for land, energy and water;
- are fit for purpose and adaptable over time, reducing the need for redevelopment and unnecessary waste;
- use materials and adopt technologies to minimise their environmental impact.

The data centre is a highly specific building, it can only be used as a data centre, it cannot be used for anything else. It has a massive energy requirement – the BBC recently fact checked the power requirements for data centres and concluded that all the data centres in the whole world currently use as much electricity as Japan!

10 Lifespan – made to last.

Well-designed places, buildings and spaces are:

- designed and planned for long-term stewardship by landowners, communities and local authorities from the earliest stages;

- robust, easy to use and look after, and enable their users to establish a sense of ownership and belonging, ensuring places and buildings age gracefully;
- adaptable to their users' changing needs and evolving technologies; and
- well-managed and maintained by their users, owners, landlords and public agencies.

I am told that data centres have a short life span, perhaps only 10 to 15 years, they cannot be adapted for other uses.

It is the wrong use of this site.

Wiltshire Council have incorporated the Government design guides into their adopted local plan in their core policy 57 – which states:

Ensuring high quality design and place shaping.

A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

- i. enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced
- ii. the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development
- iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting
- iv. being sympathetic to and conserving historic buildings and historic landscapes
- v. the maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings

and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy)

- vi. making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area
- vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)
- viii. incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by occupants of the site
- ix. ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network)
- x. the sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials
- xi. taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long term future
- xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm
- xiii. the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place

- xiv. meeting the requirements of Core Policy 61 (Transport and New Development)

Comment:

We could run through and point out all the areas that the proposed data centre does not even come close to meeting the requirements of Wiltshire Council, however it is much quicker to point out the areas that it does

Perhaps 'ii' but that is about all. In all other areas the structure and design do not pay any attention to the requirement of the adopted Wiltshire Council plan as set down in their Core Policy 57.

An area of particular concern is para vii:

having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)

There are some major concerns about the noise these data centres emit. They emit a low frequency hum or drone that can be heard from some distance. We already hear the noise from the existing data centres and they are 300 meters away.

The cooling fans emit noise that is significantly higher than is being suggested by the applicant.

A short walk to the western most data centre is all it takes to hear the noise that these things give off.

Noise emissions from data centres is a well known issue but the applicant has been very mute on this point. The Noise Impact Assessment is selective and does not include all the required information. Some crucial sound penalties have not been included in some cases which will have the effect of raising the noise levels to 'present and intrusive'.

The applicant has not given any information on the noise the diesel generators will produce even though they have been operational for some time now so must know the frequency of testing.

There is considerable concern relating to the air quality when these generators are being run and we note they have been positioned to blow their exhaust towards Wadswick. Wadswick Green is a residential home for the elderly, who are perhaps the most vulnerable members of society, and they are being expected to tolerate this loss of air quality.

Why is this considered acceptable?