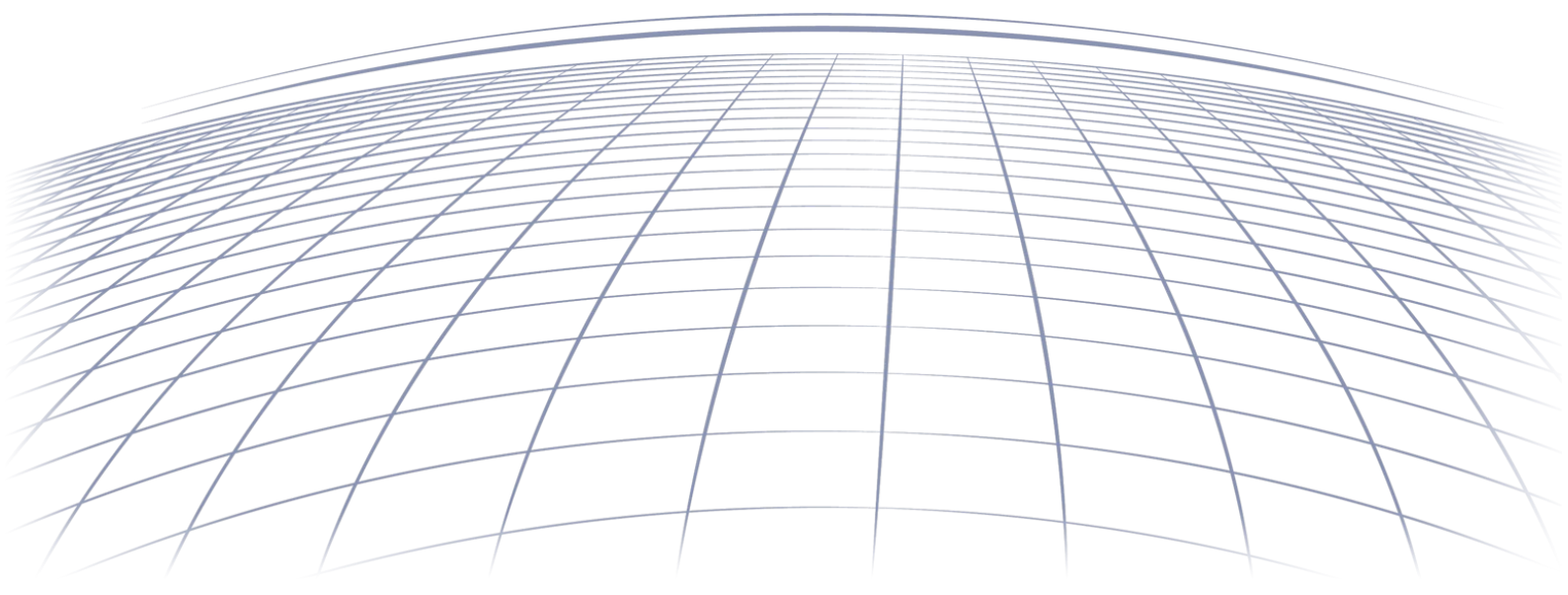


Wadswick Green Residents Meeting 21/01/2025 – Ark Responses

Spring Park, P6 Planning Application

May 2025



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Wadswick Green Meeting

1 INTRODUCTION

On 21st January 2025 the Director of Technical Operations and the Head of Sustainability from Ark Data Centre attended a voluntary meeting, convened by the, at the time, Liberal Democrat Local Ward Councillor, at the Wadswick Green Retirement Village to listen and respond to concerns raised both by residents of the Retirement Village and residents from the surrounding area to Planning Application for a new data centre (P6) on the neighbouring Ark Data Centre Campus.

Discussions with the residents during the meeting identified 6 key issues:

- a) The planning application has not considered the impact on the Wadswick Green Retirement Village because it (the village) is not shown on any of the plans and there is no cross section showing the proposed development, relative to it.
- b) There are no verified views for the Retirement Village.
- c) Residents suggest that they hear noise from the data centre campus and with the proposed new development this will only get worse.
- d) The submitted Drainage Strategy states there is no risk of surface water flooding, yet the site does flood and flooded badly in 2014.
- e) There is lightspill from the existing Spring Park Campus at night and if this is the case there will be significant light pollution arising from the new development.
- f) The state of Rowan Lane, the access road to the Retirement Village, is of poor quality and in need of improvement.

To mitigate the concerns summarised above the Ark team said they would:

- i. Create and report on three verified images of views from three points in the Retirement Village, to be identified by the village management.
- ii. Review the baseline noise survey data from previous noise surveys carried out at the identified sensitive receptors for prior planning applications.
- iii. Amplify on the flooding response given at the meeting, where Ark advised they were fully aware of the 2014 flood event and had taken active steps to mitigate against the causes, significantly reducing the risk of similar future events, both on the current campus and on the proposed new development.
- iv. Implement a lighting control strategy on the existing campus to turn off all external lights (apart from those required for emergency exits and site safety) at night, unless there is a maintenance issue.
- v. Confirmed that temporary pothole repairs on Rowan Lane have been instructed and that resurfacing of along the full length under Ark ownership along with a raised and segregated pavement is part of the proposed development.

This Technical Note and its supporting Appendices provide Ark's detailed response to the concerns raised and concludes:

- The extent of Wadswick Green Retirement Village – as completed at the time of the planning submission being made - was shown on the Site Location Plan and was considered. However, with Block C of the Retirement Village being more than 300m from the proposed data centre building it is not possible to include it on the detailed planning drawings. This is standard

Wadswick Green Meeting

practice with the drawings submitted in support of a planning application showing the development that is proposed.

- Three verified views have been made from the three locations agreed within the village complex and demonstrate that the proposed development will only be visible from one of them. Given the 15m elevation difference between the two sites (the village is 15m above the proposed development) and the extensive existing vegetation between the two sites, at ground level the facility will only be partially visible through the boundary hedgerow and trees during Winter and largely invisible in Summer.
- The comparison of the noise survey results from 2016-2024 shows no increase in noise level in the area surrounding the site that would be considered significant or likely to affect noise sensitive receptors in the area.
- The surface water drainage strategy successfully employed on the Ark data centre campus has already demonstrably reduced the volume of flood water discharging into the storm water drainage system on Westwells Road and the proposed drainage strategy will continue with this successful practice. The Council's Drainage Officer has provided a number of separate consultation responses confirming no objection to Ark's proposals.
- The lighting control strategy on the existing campus has been implemented. On the proposed development emergency lighting will be shrouded and the External Lighting Strategy shows there will be no light spill beyond the data centre site boundary.
- Temporary pothole repairs on Rowan Lane have been completed and the resurfacing and segregated pedestrian pavement works proposed above have been committed to with Wiltshire Council.

The note further demonstrates that Ark has met with the Wadswick Green residents and has taken active steps to address, mitigate and alleviate the concerns arising from this meeting.

2 RESPONSES TO CONCERNS RAISED

This section presents each concern in turn and provides Ark's detailed response to it.

2.1 Inclusion of Wadswick Retirement Village on Plans

The Site Location Plan (*HAL-SPP6-SW-XX-DR-A-000001*), submitted as part of the Planning Application Pack, and copied below (Figure 1), clearly shows the Wadswick Green Retirement as built in 2024.

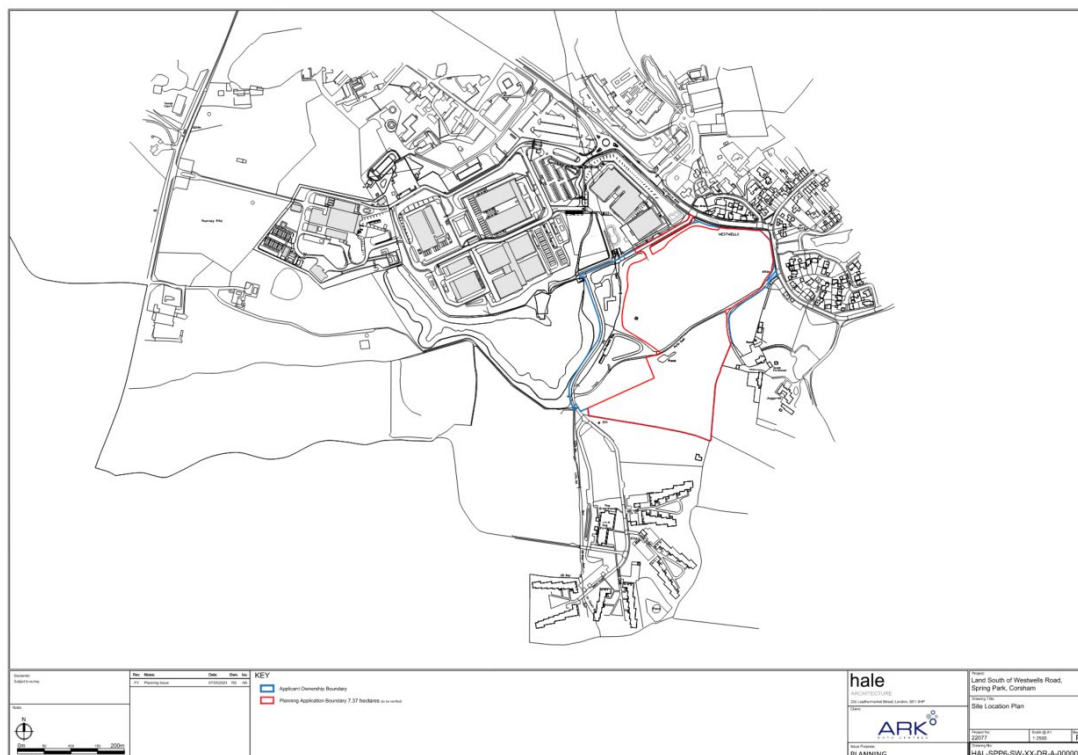


Figure 1 – Copy of Site Location Plan, as submitted.

In the interest of accuracy and in response to the comments raised this drawing has now been updated to show the new blocks under development in the Retirement Village. The new Site Location Plan (*HAL-SPP6-SW-XX-DR-A-000020*) and long section showing relationship between Wadswick Green and the application site (*Site Section_250219*), are provided in Appendix A.

These two drawings demonstrate that, at its closest point, Wadswick Green (in the future) will be 244m away from the proposed data centre, with an elevation difference of some 15m between the ground levels of the two sites, with an established hedgerow and additional landscaping between.

2.2 Verified Views from Wadswick Retirement Village

As agreed at the meeting on 21st Jan 2025 verified views from three locations within Wadswick Green have been prepared and the full report is presented in Appendix B. This includes the methodology used for capturing the verified views.

The position of the three verified view locations in the Retirement Village are illustrated on Figure 2 below:

3.0 Viewpoint Location Plan



Figure 2 – Copy of Verified Viewpoint Location Plan.

Three images are shown for each viewpoint – the view, the view with the proposed development with tree planting at Year 1, and the view with the proposed development with tree planting at Year 15. However, the proposed data centre is only visible from Viewpoint 3. It is hidden from Viewpoints 1 and 2 by the new residential block under construction in the village. Photographs for the verified views were captured in the winter months when, inherently, vegetation was at its sparsest.

The annotated image from Viewpoint 3 with tree planting at Year 1 is presented in Figure 3 on the next page with the top line of the proposed facility shown in light blue.

The position of the line on the verified viewpoint demonstrates that due to the distance between the proposed data centre (>300m) and the elevation difference (the site is ~15m lower than the ViewPoint) the proposed building will only be partially visible through the boundary hedgerow and trees, partially visible in winter, largely invisible in summer.

7.1. Viewpoint 3 - Existing baseline view with year 1 tree planting.



Viewing Distance of 50cm - This is the distance from eye to paper to gain a true representation of the image (A3 pages to be printed at 29.7x42.0cm)

Figure 3 – Copy of Verified Viewpoint 3 at Year 1 – Annotated to show expected visibility.

2.3 Noise Impacts

2.3.1 Historical Noise Concerns

Since 2005 Ark has developed the Spring Park Data Centre campus in phases. As each new phase is deployed Ark incorporates technological improvement and lessons learned in prior phases into the new programme. These improvements include changes to permanent noise emitting plant including:

- Changing energy centre cooling designs to remove the need for dedicated air handling units.
- Increasing noise attenuation on roof mounted plant.
- Increasing noise attenuation on data room intake and exhaust louvres.

These, often innovative changes, mean that there has been no significant increase in noise levels surrounding the site since regular baseline noise surveys (by Sweco Ark's specialist acoustic and noise consultant), at the three nearest noise sensitive receptors, started in 2016.

The level of noise complaints received from local residents reflects the baseline survey data in that there have only been two complaints in 20 years of Ark's operation:

- The first operational noise complaint received directly from a local resident was in September 2023. Mitigatory measures were taken, and no further complaints were made.
- The second operational complaint was a formal notice via the Wiltshire Council Environmental Health Officer (EHO) in October 2024 and January 2025, alleging that a

Wadswick Green Meeting

low rhythmic hum emanates from the data centre campus and that it has been continuous since 2022/2023, except for 2 days when apparently the “equipment wasn’t running” at the beginning of December 2024.

A number of written objections to the planning application raised concerns around existing noise levels associated with the Spring Park Campus and anticipated future levels of noise if the proposed data centre was built, which were further reflected during the Wadswick Green Meeting to which this note refers.

2.3.2 Additional Noise Studies

In response to these concerns and in addition to the Noise Impact Assessment for the P6 Planning Application PL/2024/05527 Ark has:

- Reviewed the sources of continuous noise on the campus and when they first became operational.
- Commissioned a Comparison of Baseline Sound Surveys in 2016, 2019, 2023 and 2024 prepared by SWECO.

(a) Sources of Continuous Noise

The review of continuous noise emitters has identified six types of continuous noise sources. The types of noise source and the dates (month/year) on which they became operational are summarised below:

- The HV transformers in the Utility Substations - SQ18 05/2010, P7 12/2018.
- The chillers on SQ17 - 12/2009, 6/2016, 12/2019.
- The air handling units on the P1 and P2 energy centres - P1 04/2012, 06/2013, 03/2014; P2 10/2015, 02/2016.
- The air handling units on the P2, P3 and P4 ancillary blocks - P2 10/2015, P3 05/2019, 07/2019; P4 10/2020.
- Server breakout noise from P1 and P2 heat discharge louvres- P1 04/2012, 06/2013, 03/2014; P2 10/2015, 02/2016.
- First generation attenuation server breakout noise on P2, P3 and P4 heat discharge louvres - P2 10/2015, 02/2016; P3 05/2019, 07/2019; P4 10/2020 (the last 75% of P4 is became operational in Q2 2025)

These six types of continuous noise emitters have been in operation since the date they became operational and were definitely NOT switched off on 1st and 2nd December 2024. This reflects that data centres are, inherently, required to operate on a continuous basis.

This summary and the plan included in Appendix A demonstrate that all permanent noise sources in operation in January 2025 on the Spring Park Data Centre Campus were all in operation by October 2020 and therefore well before the start date identified by the complainant to the EHO (2022/2023).

Other noise sources (standby generators, standby direct expansion cooling systems) do exist on the campus, but they only operate for limited periods of time dictated by maintenance,

weather and/or electricity supply issues. They could not provide a continuous low rhythmic hum for more than 2 years.

In conclusion it is highly unlikely that the continuous low rhythmic hum that started in 2022/2023 (except on 1/12/2024 and 2/12/2024) is caused by operations on the Spring Park Campus.

(b) Comparison of Baseline Sound Surveys

Sweco (Ark's specialist Acoustic and Noise Consultants) has reviewed the historic and latest baseline environmental sound surveys undertaken at the three closest noise sensitive receptor locations around the Spring Park Data Centre Campus that have been used to measure consistent base line conditions for the surrounding area. The review was required to evaluate how the baseline acoustic environment have evolved through the years and how this has impacted the noise climate in the surrounding areas.

The following paragraphs present the key points and findings from the study. The full report is presented in Appendix C.

Sweco has undertaken 4 baseline noise surveys since 2016, as follows:

- In August 2016, before the construction of the P3 and P4 data centres. SQ17, P1 and P2 buildings were in operation and no construction was happening in the site.
- In May 2019, SQ17, P1 and P2 data centres were in operation, and construction works for P3 and P4 data centre buildings were ongoing.
- In May 2023 with SQ17, P1, P2, P3 data centres in operation. Data Centre P4 was complete, but only Module 1 was in operation.
- In November 2024 with SQ17, P1, P2, P3 data centres in operation. Data Centre P4 was complete, but only Module 1 was in operation.

Campus operations, in terms of operating facilities, were the same for the May 2023 and November 2024 noise surveys.

The location of the three closest noise sensitive receptor locations around the Spring Park Data Centre Campus (MP1, MP2 and MP3) are shown on Figure 4 on the next page. It should be noted that the location of MP1 is closer to the data centre campus than the Wadswick Green Retirement Village and that MP2 is a similar distance from the data centre campus as the location of the noise complaint (via the EHO) referred to in paragraph 2.3.1 above.



Figure 4 – Copy Long Term, Baseline Noise Monitoring Positions MP1, MP2 and MP3.

The conclusion arising from the comparisons of the four baseline surveys at the three historical monitoring points is that there has been no increase in noise levels in the surrounding area that would be considered significant, or likely to affect noise sensitive receptors in the area. This is consistent with on-site observations that support the consistency of the noise climate and noise levels in the area.

2.3.3 Conclusions Arising from Additional Noise Studies

The conclusions arising are from these additional works are:

- the apparent “low rhythmic hum” is highly unlikely to be caused by Ark’s campus operations. However, as a good neighbour, Ark is consulting with the EHO on an agreed course of noise monitoring adjacent to the complainant’s residence to assess if a low frequency hum can be identified at this location. The scope of this noise survey work has still to be agreed by the EHO.
- the conclusions presented in the P6 Noise Impact Assessment, based on the extensive noise mitigation measures included in the design, will be more significant than the measures deployed on the campus to date. This means that noise arising from the P6 plant operations will be below background noise levels in the area.

2.4 Surface Water Drainage and Flood Risk

To amplify the response on surface water drainage and flood risk that Ark provided during the course of the meeting, Ark has provided a summary of the surface water drainage strategy,

provided in Appendix 4, which provides an historical overview of flooding on the campus, the mitigation measures Ark has already taken and the approved drainage strategy for the P6 site.

2.4.1 Historical Surface Water Drainage Overview

The summary document presented in Appendix 4 identifies 5 key points relevant to historical flooding on the combined Spring Park Data Centre Campus and the P6 site:

- The combined sites are within Flood Zone 1 according to the Flood Map for Planning though certain areas of the land within sites identified in the Flood Map for Planning as being at risk of limited surface water flooding during 1:30 year and higher flood events.
- The combined sites are not unique in this part of Corsham in containing areas at risk of surface water flooding where the 1:30 year flood event maps show there is a mosaic of surface flooding risk throughout this part of Corsham. A Sequential Test has been submitted as part of the consideration of the application. This demonstrates that there are no reasonably available sites that are sequentially preferable in terms of risk of surface water flooding.
- Planning permission has previously been granted for the P6 site following a successful appeal for housing on this site (refs. 18/09884/OUT and APP/Y3940/W/19/3243873). Housing is inherently a more vulnerable land use than that of a data centre and matters relating to the acceptability of the proposals on flood risk were assessed and considered acceptable both at planning application and through a planning appeal.
- The 2014 flood event that affected the southeast end of Westwells Road was in part impacted by the construction works on the P2 Data Centre that were in progress at that time. The mitigation measures put in place by Ark as a result of this event has already reduced the flood risk to P6 site (and the residents of Westwells) by diverting surface water drainage from the original, constrained, surface water drainage system down Westwells Road into a new soakaway on their land.
- Finally, the surface water drainage strategy employed across the rest of the Spring Park campus, since 2008, which is to attenuate all surface water collected on site and dispose of it via soakaways has been proven to work. In fact, the soakaways have proven to be so effective that none of the surface attenuation ponds constructed on site have ever held water.

Based on the above experience and intimate knowledge of the site the same strategy is to be employed for the proposed development and there is no reason for it to be any less successful.

2.4.2 P6 Surface Water Drainage Strategy

As part of the overall strategy for sustainable development on the scheme, it is proposed that, as far as practicable, all rainwater should be collected for re-use as part of the development's cooling system.

Collected rainwater will be stored in below-ground attenuation tanks prior to passing through a filtration and treatment system, for use in the data centre's cooling system.

For rainfall events in excess of the draw rate of the data centre's cooling system, or if the rainwater harvesting tanks are full, the next preferred option for discharge will be infiltration to ground, as successfully carried out to date across the rest of the Spring Park Data Centre Campus.

As infiltration is proposed as the destination for surface water runoff, in line with all other surface water drainage systems at Spring Park, there will be no requirement for discharge to the local stormwater drainage system.

2.4.3 Surface Water Drainage Strategy Conclusions

The historical overview shows that Ark has already reduced the risk of flooding on the proposed P6 site associated with an event equivalent to the 2014 flood event by diverting flows that historically connected to the constrained Westwells Road stormwater drains to soakaways on site.

The P6 surface water drainage strategy for the proposed development will contain and dispose of all surface water run-off on site via a combination of rainwater harvesting tanks, attenuation ponds and soakaways on the proposed development.

Ark's continued approach to maximise the use of rainwater in its cooling systems and to retain and dispose of surface water on site through attenuation ponds and soakaways removes significant volumes of surface water discharge to the Westwells Road stormwater drainage system, thereby delivering betterment to the local flooding situation.

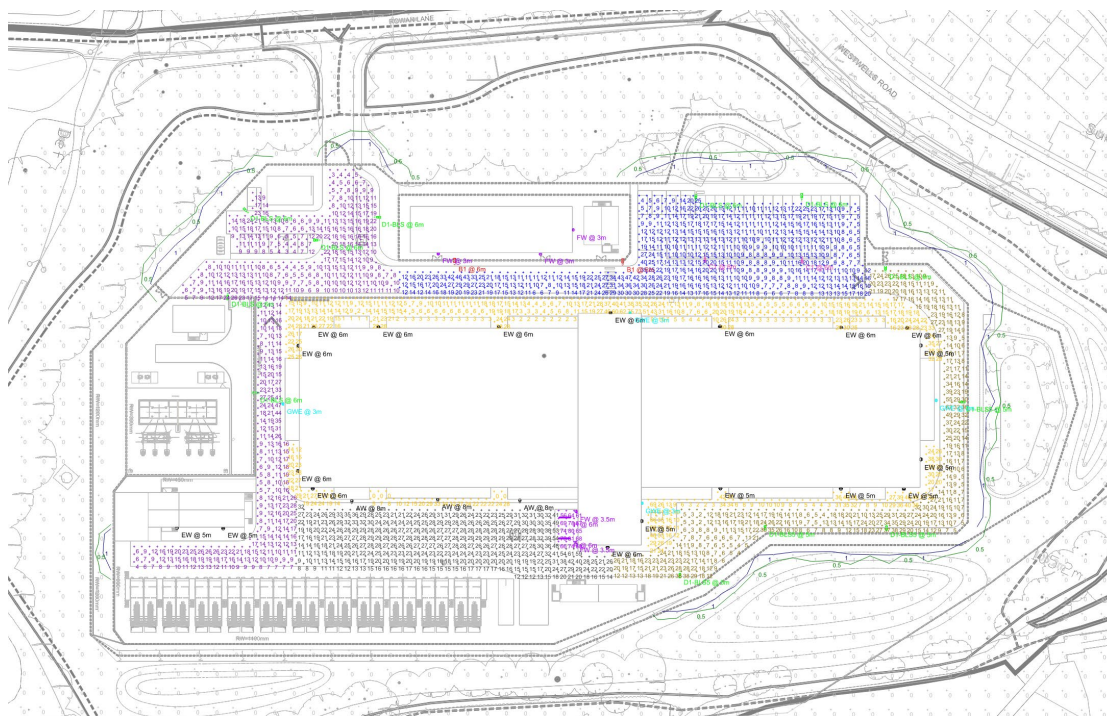
This has allowed the Council's Drainage Officer to confirm on a number of occasions that they have no objection to the planning application.

2.5 Lighting Control

The lighting control strategy on the existing campus to turn off all external lights (apart from those required for emergency exits and site safety) at night, unless there is a maintenance issue, was implemented on 22nd January 2025, the day after the Wadswick Green Meeting.

In addition, the design team for the proposed P6 Data Centre have specified that all external emergency lights are to be shrouded so that there is no light spill outside the data centre site. Investigations are underway to fit shrouds to external emergency lights on existing buildings.

Finally, the external lighting strategy presented as part of the P6 Planning Application (PL/2024/05527) shows that there will be no light spill to the local area outside the data centre security fence. Figure 5 on the next page, an extract from the strategy document, illustrates this point clearly.



Wadswick Green Meeting

unlikely that the continuous "low rhythmic hum" that started in 2022/2023 (except on 1/12/2024 and 2/12/2024, when there was no hum and continuous noise emitters were in operation) is caused by data centre operations on the Spring Park Campus.

- As reflected in the review of noise emitters the comparison of the noise survey results from 2016-2024 by Sweco (Ark's specialist acoustic and noise consultant) shows no increase in noise level in the area surrounding the site that would be considered significant or likely to affect noise sensitive receptors in the area.
- The surface water drainage strategy successfully employed on the Ark data centre campus has already demonstrably reduced the volume of flood water discharging into the storm water drainage system on Westwells Road and the proposed drainage strategy will continue with this successful practice, as agreed with Council's Drainage Officer.
- The lighting control strategy on the existing campus has been implemented. On the proposed development emergency lighting will be shrouded and the External Lighting Strategy shows there will be no light spill beyond the data centre site boundary.
- Temporary pothole repairs on Rowan Lane have been completed and the resurfacing and new segregated pedestrian pavement works proposed above have been committed to with Wiltshire Council.

Finally, this note demonstrates that Ark has met with the local community and has taken active steps to address, mitigate and alleviate the concerns arising both from this meeting and the objections/comments raised during the planning process.

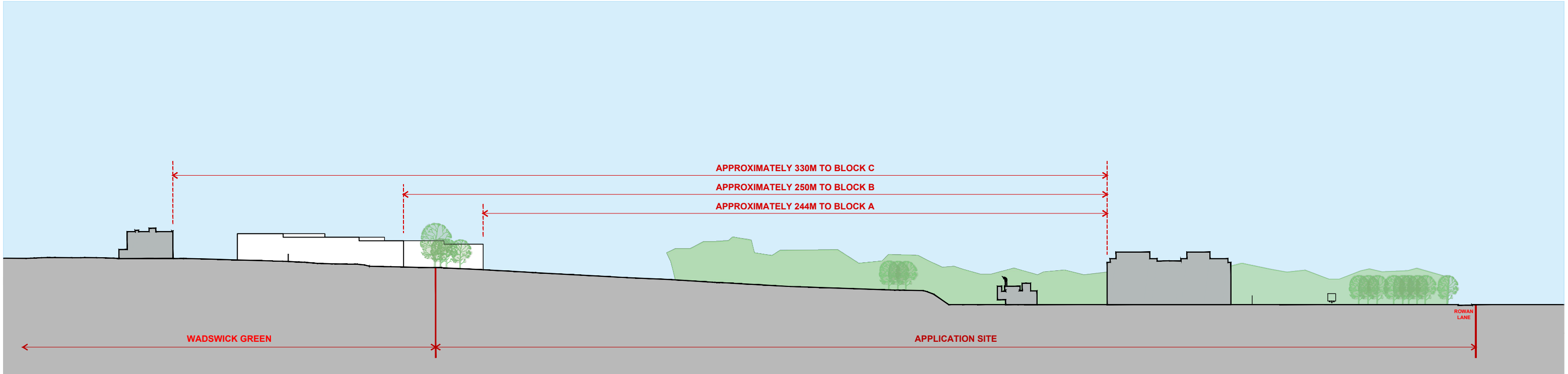
APPENDICES

Appendix 1	Long Section between Wadswick Green and P6. <i>Site Section_250219</i>
Appendix 2	Verified Views, Land South of Westwells Road, Neston. <i>V3D 250202</i>
Appendix 3	Comparison of Baseline Sound Surveys. <i>SWE-ZZ-XX-T-U-0003</i>
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Appendix 1







Appendix 2



Land South of Westwells Road Neston

Corsham

Verified Views - Document Reference No. V3D 250202

February 2025



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1.0 Introduction

1.1. Verified View / Accurate Visual Representation

- 1.1.1. A Verified View (VV) or Accurate Visual Representation (AVR) is “a still image, or animated sequence of images, intended to convey reliable visual information about a proposed development to assist the process of visual assessment”.¹
- 1.1.2. This document applies current good practice in preparing verified views of a proposed development. Views are from what is considered to be the most representative viewpoints in the area surrounding the site.
- 1.1.3. The current practice guides this process is informed by include:
 - The Landscape Institute's, 'Technical Guidance Note 06/19 : Visual Representation of Development Proposals'
 - 'Guidelines for Landscape and Visual Impact Assessment' Third edition April 2013, The landscape institute and Institute of Environmental Assessment and Management.
 - 'London View Management Framework', (March 2012) Published by Greater London Authority.
- 1.1.4. When displaying images taken with a 50mm lens at A3, It is advised (within the Landscape Institute's Technical Guidance Note 06/19) that the viewing distance for the montages from eye to paper should be 'at arms length' between 50 and 55cm (Landscape Institute TGN 06/19 para 3.8.3) with a Horizontal Field of View of around 39.6°.

In this document, for practical tabled discussions, the viewing distance has been set at 50cm so that the images display a HFOV of 44° when printed at A3. A3 pages to be printed at 29.7x42.0cm (at 100% scaling) so that the image size width is 38cm.

2.0 Methodology

2.1. Overview

- 2.1.1. In preparing the verified views/photomontages, accurate photography is required, with survey information recorded, and an accurate model of the application parameters prepared. In simple terms, this allows a 'virtual' viewpoint to be constructed that accurately reflects an actual photograph, which in turn allows a wireline (representing the outline of the proposed development form) or fully rendered image of the proposed development to be accurately superimposed on the existing photograph.

2.2. Photography

- 2.2.1. In accordance with current guidance, on-site photography records the position (as a grid reference), height of camera lens, camera used, lens type and focal length, field of view, date and time. Photographs were recorded at 1.6 metres above ground level to reflect the pedestrian eye height. Photographs are taken with a fixed 50mm focal length lens attached to a SLR camera (Canon EOS R5).
- 2.2.2. In assessing the impact of development on the landscape it is often necessary to record a panoramic view. A panorama made up from planar photographs is not strictly a 'true panorama' due to distortion encountered from the rectilinear projection of the lens. This is best described by looking through the viewfinder as you rotate the camera, the objects near the centre get larger as they approach the edge of the frame. Accurate 'stitching software' overcomes this effect by distorting each image into a cylindrical projection before aligning and blending, to reflect as accurately as possible the experience of the human eye.

2.3. Survey Information

- 2.3.1. On site surveying is carried out at the same time that the photographs are taken to record the position and height (Above Ordnance Datum) of the camera and its tripod alongside a range of 6 to 10 physical reference points per viewpoint (such as telegraph poles, road signs, or in the absence of sufficient existing reference points, ranging poles). To ensure the accuracy, the surveyed data was cross-referenced against OS information as well as the topographical site survey. This data is subsequently transferred into computer modelling software to produce an accurate 'virtual' view reflecting the actual panoramic photograph. Reference points are captured by a Total Station (the surveyors on-site equipment) with an electronic distance meter (EDM) which reads slope distances from the instrument to a particular point. These points are used to align the computer image against the photography.

2.4. Scheme Parameters Modelling

- 2.4.1. The Landscape Masterplan on page 5 (prepared by edp), provides a layout that is reflective of how the proposed application could be realised, and is therefore considered to be an acceptable basis for verified view production.
- 2.4.2. The 3D model has been formed with reference to the plan and elevation drawings (hale architecture). New tree planting is shown as 2m and then 7m at yr15.

2.5. Camera Matching

- 2.5.1. Having accurately modelled the scheme, a series of computer generated images are constructed from the exact viewpoint locations and have cylindrical projection applied before photo-stitching to match the panoramic photographs, thus creating a 'virtual' panorama of the proposed development. With the virtual and photographic images overlaid with each other, common (surveyed) reference points are used to aligned both the virtual and actual images and the wireline drawn.

¹ London View Management Framework March 2012



3.0 Viewpoint Location Plan





5.0 Viewpoint 1



National Grid Reference:
385095.075, 168218.124

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
129.67 AOD

Horizontal Field of View:
44 °

Date:
05.02.25

Time:
14.14



Existing extended panorama



5.1. Viewpoint 1 - Existing baseline view with year 1 tree planting.

- Proposal
- Tree Planting
- Foreground Terrain



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (A3 pages to be printed at 29.7x42.0cm)



5.2. Viewpoint 1 - Existing baseline view with year 15 tree planting.

- Proposal
- Tree Planting
- Foreground Terrain



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (A3 pages to be printed at 29.7x42.0cm)



6.0 Viewpoint 2



National Grid Reference:
385113.924, 168311.936

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
127.24 AOD

Horizontal Field of View:
44 °

Date:
05.02.25

Time:
13.57



Existing extended panorama



6.1. Viewpoint 2 - Existing baseline view with year 1 tree planting.

- Proposal
- Tree Planting
- Foreground Terrain



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (A3 pages to be printed at 29.7x42.0cm)



6.2. Viewpoint 2 - Existing baseline view with year 15 tree planting.

- Proposal
- Tree Planting
- Foreground Terrain



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (A3 pages to be printed at 29.7x42.0cm)



7.0 Viewpoint 3



National Grid Reference:
385237.593, 168368.555

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
123.66 AOD

Horizontal Field of View:
44 °

Date:
05.02.25

Time:
13.29



Existing extended panorama



7.1. Viewpoint 3 - Existing baseline view with year 1 tree planting.

- Proposal
- Tree Planting
- Foreground Terrain



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (A3 pages to be printed at 29.7x42.0cm)



7.2. Viewpoint 3 - Existing baseline view with year 15 tree planting.

- Proposal
- Tree Planting
- Foreground Terrain



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (A3 pages to be printed at 29.7x42.0cm)



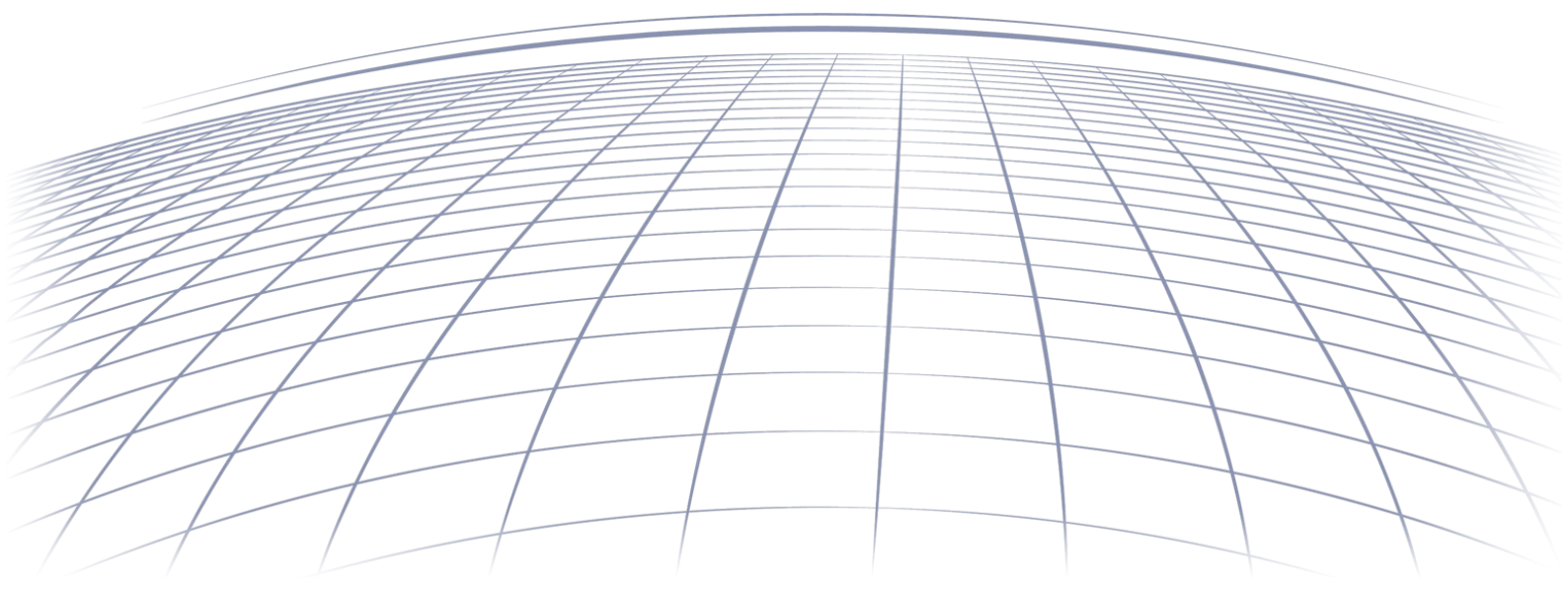
Appendix 3



Spring Park Noise Impact - Summary

Planning Application PL/2024/05527

May 2025



SP Noise Impact Summary

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Registered and Head office: Spring Park, Westwells Road, Hawthorn, Corsham, Wiltshire, SN13 9GB

SP Noise Impact Summary

1 INTRODUCTION

1.1 Since 2005 Ark has developed the Spring Park Data Centre campus in phases. As each new phase is deployed Ark incorporates technological improvement and lessons learned in prior phases into the new programme. These improvements include changes to permanent noise emitting plant including:

- Changing energy centre cooling designs to remove the need for dedicated air handling units.
- Increasing noise attenuation on roof mounted plant.
- Increasing noise attenuation on data room intake and exhaust louvres.

These, often innovative changes, mean that there has been no significant increase in noise levels surrounding the site since regular baseline noise surveys (by Sweco Ark's specialist acoustic and noise consultant), at the three nearest noise sensitive receptors, started in 2016.

1.2 The level of noise complaints received from local residents reflects the baseline survey data in that there have only been two complaints in 20 years of Ark's operation:

- The first operational noise complaint received directly from a local resident was in September 2023. Mitigatory measures were taken, and no further complaints were made.
- The second operational complaint was a formal notice via the Wiltshire Council Environmental Health Officer (EHO) in October 2024, alleging that a low rhythmic hum emanates from the data centre campus and that it has been continuous since 2022/2023, except for 2 days when "the equipment was turned off" at the beginning of December 2024.

1.3 Noise objections were subsequently raised in response to the P6 Planning Application, PL/2024/05527.

1.4 This Technical Note has been prepared in response to the second operational noise complaint and it:

- Identifies the sources of permanent noise and when they first became operational. By virtue of the fact that data centres operate 24 hours a day, 365 days a year from the moment they go into operation, these permanent noise sources are not switched off until the facility is decommissioned. None of these sources were off at the beginning of December 2024.
- Summarises the findings arising from the Comparison of Baseline Sound Surveys in 2016, 2019, 2023 and 2024 prepared by SWECO.
- Presents the conclusions arising from the Noise Impact Assessment for the P6 Planning Application PL/2024/05527

1.5 The conclusions arising are that:

- the apparent low rhythmic hum is highly unlikely to be caused by Ark's campus operations. However, as a good neighbour, Ark is consulting with the EHO on an agreed course of noise monitoring adjacent to the complainant's location in an attempt to identify the source of this noise. The scope of this noise survey work has still to be agreed by the EHO.

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- the conclusions presented in the P6 Noise Impact Assessment, based on the extensive noise mitigation measures included in the design, will be more significant than the measures deployed on the campus to date. This means that noise arising from the P6 plant operations will be below background noise levels in the area.

2 PERMANENT NOISE SOURCES

- 2.1 In response to concerns raised over operational noise Ark has both researched permanent noise sources on site and the dates on which they became operational and carried out maintenance on a number of air handling units serving ancillary space and energy centres on P2.
- 2.2 The details of the research into permanent noise sources have been prepared in response to the specific noise complaints made by the occupier of 64 Westwells, SN13 9RQ as detailed in Noise information email received from the EHO on 17/01/2025.
- 2.3 The plan *Spring Park Permanent Noise Emitters, 2009 - 2025*, provided as Appendix A, illustrates the location of all noise emitting sources that operate 24 hours a day, along with the date (month/year) on which they became operational. They have been operating continuously since that date. The location of 64 Westwells, SN13 9RQ is all shown.
- 2.4 The noise information from the complainant in 64 Westwells, states that: *"The noise is constant when the ARK machinery is operating. At the beginning of December it did go quiet and I walked the dog on the spoil tip overlooking the DC's and the machinery was indeed turned off. The first time I have been there and it was quiet. This confirms to me that the DC's are the source of the noise"*. The noise started approx 2 years ago (2022/2023). The supporting data at the bottom of the email clearly state there was no noise on 1st and 2nd December *"for the first time I can remember over the last few years"* on 2nd December *"Walked over the spoil tip which overlooks the DCs, machinery turned off which confirms to me that it is the source."*
- 2.5 Ark has six types of continuous noise emitters. The types of noise emitter and dates (month/year) on which they became operational are summarised below:
 - The HV transformers in the Utility Substations - SQ18 05/2010, P7 12/2018.
 - The chillers on SQ17 - 12/2009, 6/2016, 12/2019.
 - The air handling units on the P1 and P2 energy centres - P1 04/2012, 06/2013, 03/2014; P2 10/2015, 02/2016.
 - The air handling units on the P2, P3 and P4 ancillary blocks - P2 10/2015, P3 05/2019, 07/2019; P4 10/2020.
 - Server breakout noise from P1 and P2 heat discharge louvres- P1 04/2012, 06/2013, 03/2014; P2 10/2015, 02/2016.
 - First generation attenuation server breakout noise on P2, P3 and P4 heat discharge louvres - P2 10/2015, 02/2016; P3 05/2019, 07/2019; P4 10/2020 (the last 75% of P4 is became operational in Q2 2025)

These six types of continuous noise emitters have been in operation since the date they became operational and were definitely NOT switched off on 1st and 2nd December 2024.

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- 2.6 This summary and the plan included in Appendix A demonstrate that all permanent noise sources in operation in January 2025 on the Spring Park Data Centre Campus were all in operation by October 2020 and therefore well before the start date identified by the complainant (2022/2023). The last remaining parts of the P4 data centre went into operation in March/April 2025.
- 2.7 Other noise sources (standby generators, standby DX cooling systems) do exist on the campus, but they only operate for limited periods of time dictated by maintenance, weather and/or electricity supply issues. They could not provide a continuous "low rhythmic hum almost like a wartime bomber in the distance" for more than 2 years.
- 2.8 In conclusion it is highly unlikely that the continuous "low rhythmic hum" that started in 2022/2023 (except on 1/12/2024 and 2/12/2024) is caused by operations on the Spring Park Campus.

3 BASELINE NOISE SURVEYS

- 3.1 Sweco (Ark's specialist Acoustic and Noise Consultants) has reviewed the historic and latest baseline environmental sound surveys undertaken at the three closest noise sensitive receptor locations around the Spring Park Data Centre Campus that have been used to measure consistent base line conditions for the surrounding area. The review was required to evaluate how the baseline acoustic environment have evolved through the years and how this has impacted the noise climate in the surrounding areas. The outcomes of the review are summarised in this section.
- 3.2 Sweco has undertaken 4 baseline noise surveys since 2016, as follows:
- In August 2016, before the construction of the P3 and P4 data centres. SQ17, P1 and P2 buildings were in operation and no construction was happening in the site.
 - In May 2019, SQ17, P1 and P2 data centres were in operation, and construction works for P3 and P4 data centre buildings were ongoing.
 - In May 2023 with SQ17, P1, P2, P3 data centres in operation. Data Centre P4 was complete, but only Module 1 was in operation.
 - In November 2024 with SQ17, P1, P2, P3 data centres in operation. Data Centre P4 was complete, but only Module 1 was in operation.
- 3.3 Campus operations, in terms of operating facilities, were the same for the May 2023 and November 2024 noise surveys.
- 3.4 The location of the three closest noise sensitive receptor locations around the Spring Park Data Centre Campus (MP1, MP2 and MP3) are shown on Figure 1 on the next page. It should be noted that the location of MP1 is closer to the data centre campus than the Wadswick Green Retirement Village and that MP2 is a similar distance from the data centre campus as the location of the noise complaint referred to in paragraph 2.2 above.



Figure 1 – Copy Long Term, Baseline Noise Monitoring Positions MP1, MP2 and MP3.

- 3.5 Three tables comparing noise levels for each of the monitoring positions during each baseline survey for measured Ambient $L_{Aeq,T}$, measured Background $L_{A90,T}$ and measured Maximum L_{AMax} noise levels are presented below:

Table 13: Summary of Measured $L_{Aeq,T}$ Noise Levels 2016 -2019 -2023 -2024					
Measurement position	Period (T)	Equivalent continuous SPL $L_{Aeq,T}$ (dB)			
		2016	2019	2023	2024
MP1	Daytime (07:00 – 23:00)	43	52	50	45
	Night time (23:00 – 07:00)	36	47	45	35
MP2	Daytime (07:00 – 23:00)	60	47	59	60
	Night time (23:00 – 07:00)	49	47	56	51
MP3	Daytime (07:00 – 23:00)	-	56	61	62
	Night time (23:00 – 07:00)	-	52	54	54

- 3.6 As would be expected the table above shows some changes in measured ambient noise levels between 2016 and 2019, particularly for the 2019 and 2023 surveys. Ambient noise levels are readily affected by local noise sources and changes in local conditions (more or less traffic, construction noise, weather conditions etc). Construction activities impacted the 2019 survey data and weather conditions the 2023 data. However ambient noise levels measured in 2016 and 2024 are very similar suggesting that the operation of additional data centres (P3 and P4) has not increased the ambient noise levels in the surrounding area.

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Table 14: Summary of Measured $L_{A90,T}$ Noise Levels 2016 -2019 -2023 -2024					
Measurement position	Period (T)	Background SPL $L_{A90,T}$ (dB)			
		2016	2019	2023	2024
MP1	Daytime (07:00 – 23:00)	32	33-35	36	35
	Night time (23:00 – 07:00)	28	28-29	28	29
MP2	Daytime (07:00 – 23:00)	40	34	41	41-44
	Night time (23:00 – 07:00)	28	24	26	26-28
MP3	Daytime (07:00 – 23:00)	-	43	43	41
	Night time (23:00 – 07:00)	-	28-29	31	30

- 3.7 The table above shows there are minor changes in the typical measured background sound levels over the years. However, the measured background levels at night do not change significantly over the years. In addition, the typical background noise levels measured in 2016 and 2024 are closely comparable supporting the conclusion that the operation of additional data centres (P3 and P4) has not increased the background noise levels in the surrounding area.

Table 15: Summary of Measured L_{Amax} Noise Levels 2016 -2019 -2023 -2024					
Measurement position	Period (T)	Maximum SPL $L_{Amax,T}$ (dB)			
		2016	2019	2023	2024
MP1	Daytime (07:00 – 23:00)	-	76	72	74
	Night time (23:00 – 07:00)	-	73	68	53
MP2	Daytime (07:00 – 23:00)	-	70	84	76
	Night time (23:00 – 07:00)	-	71	79	74
MP3	Daytime (07:00 – 23:00)	-	74	79	77
	Night time (23:00 – 07:00)	-	71	75	75

- 3.8 Recognising that measured Maximum L_{Amax} noise levels are affected by short-term maximum noise events (traffic noise, neighbouring noises, aircraft noise, etc.), these measurements are therefore unlikely to represent the operation of constant/steady state noise emissions. Notwithstanding this the data presented in the table above are consistent across the surveys.
- 3.9 The conclusion arising from the above comparisons is that there has been no increase in noise levels in the surrounding area that would be considered significant, or likely to affect noise sensitive receptors in the area. This is consistent with on site observations that support the consistency of the noise climate and noise levels in the area.

SP Noise Impact Summary

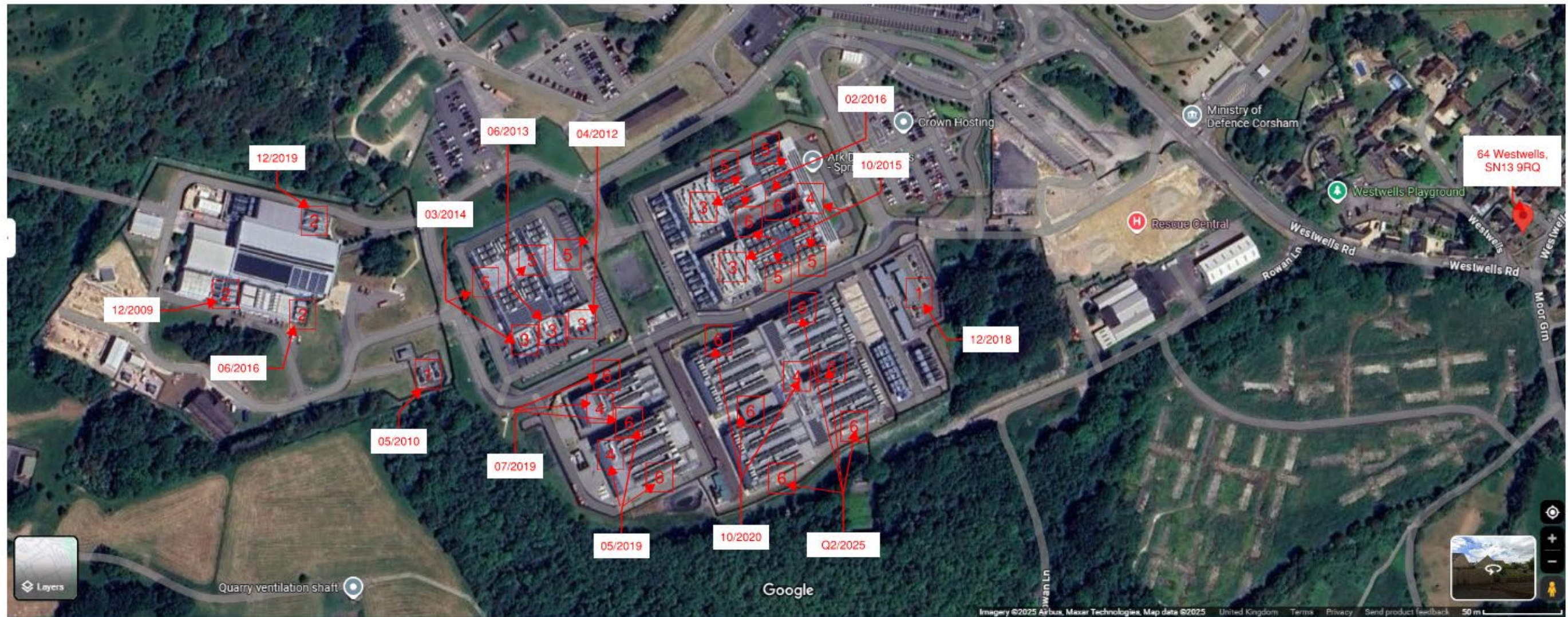
4 P6 NOISE IMPACT ASSESSMENT

- 4.1 As part of the P6 Planning Application a comprehensive Noise Impact Assessment has been carried out based on:
- The 2023 baseline noise survey data.
 - Noise data provided by the design team and equipment manufacturers.
 - The improved mitigation measures identified by technology changes and lessons learned from previous deployments.
 - The 2024 baseline noise survey was carried out after the submission of the P6 Planning Report and did not find any material differences to the 2023 survey.
- 4.2 The 'Normal Operation' scenario assesses the acoustic impact of plant that will normally operate 24 hours a day, 365 days a year, such as the breakout noise associated with ventilation inlet and outlet louvers at the building facades, the external roof and ground floor plant associated with the ancillary blocks and the energy centres, and the substation transformers.
- 4.3 The outcome of the assessment shows that under 'Normal Operations' noise levels are expected to be below typical background levels in the area.
- 4.4 An assessment on the noise impact on bats has also been and this suggests that the bats in the area will not be affected by the noise from the proposed site.

5 CONCLUSIONS

- 5.1 The conclusion arising from Sections 2 and 3 above is that it is highly unlikely that the continuous "low rhythmic hum" that started in 2022/2023 (except on 1/12/2024 and 2/12/2024) is caused by operations on the Spring Park Campus.
- 5.2 The consistent background noise levels with no significant change to them over the last 8 years, despite more than doubling the operational data centre capacity in that period, demonstrates the effectiveness of the mitigation measures the Ark design team have employed over the period. There is no reason to believe that the continued development of noise mitigation measures on future facilities will be any less effective than in the past. Therefore, the conclusion in the P6 Noise Impact Assessment, that for permanent plant operations noise levels are expected to be below typical background levels in the area, is very clear and reasonable.
- 5.3 Notwithstanding the above, as a good neighbour, Ark is consulting with the EHO on an agreed course of noise monitoring adjacent to the complainant's residence to assess if any of the Spring Park operations produce noise frequencies that correspond to the low frequency hum identified at this location. The detailed scope of this proposed noise survey work has been submitted to the EHO for their agreement, prior to implementation.

SPRING PARK CAMPUS - PERMANENT NOISE EMITTER LOCATIONS AND OPERATIONAL START DATES



Ark has six types of continuous noise emitters. The types and dates on which they became operational are summarised below:

1. The HV transformers in the Utility Substations - **SQ18** 05/2010, **P7** 12/2018.
2. The chillers on **SQ17** - 12/2009, 6/2016, 12/2019.
3. The air handling units on the P1 and P2 energy centres - **P1** 04/2012, 06/2013, 03/2014; **P2** 10/2015, 02/2016.
4. The air handling units on the P2, P3 and P4 ancillary blocks - **P2** 10/2015, **P3** 05/2019, 07/2019; **P4** 10/2020.
5. Unattenuated server breakout noise from P1 and P2 - **P1** 04/2012, 06/2013, 03/2014; **P2** 10/2015, 02/2016.
6. First generation attenuation server breakout noise on P2, P3 and P4 - **P2** 10/2015, 02/2016; **P3** 05/2019, 07/2019; **P4** 10/2020 (the last 75% of P4 is due to become operational in Q2 2025)

These six types of continuous noise emitters have been in operation since the date they became operational and were definitely NOT switched off on 1st and 2nd December 2023.



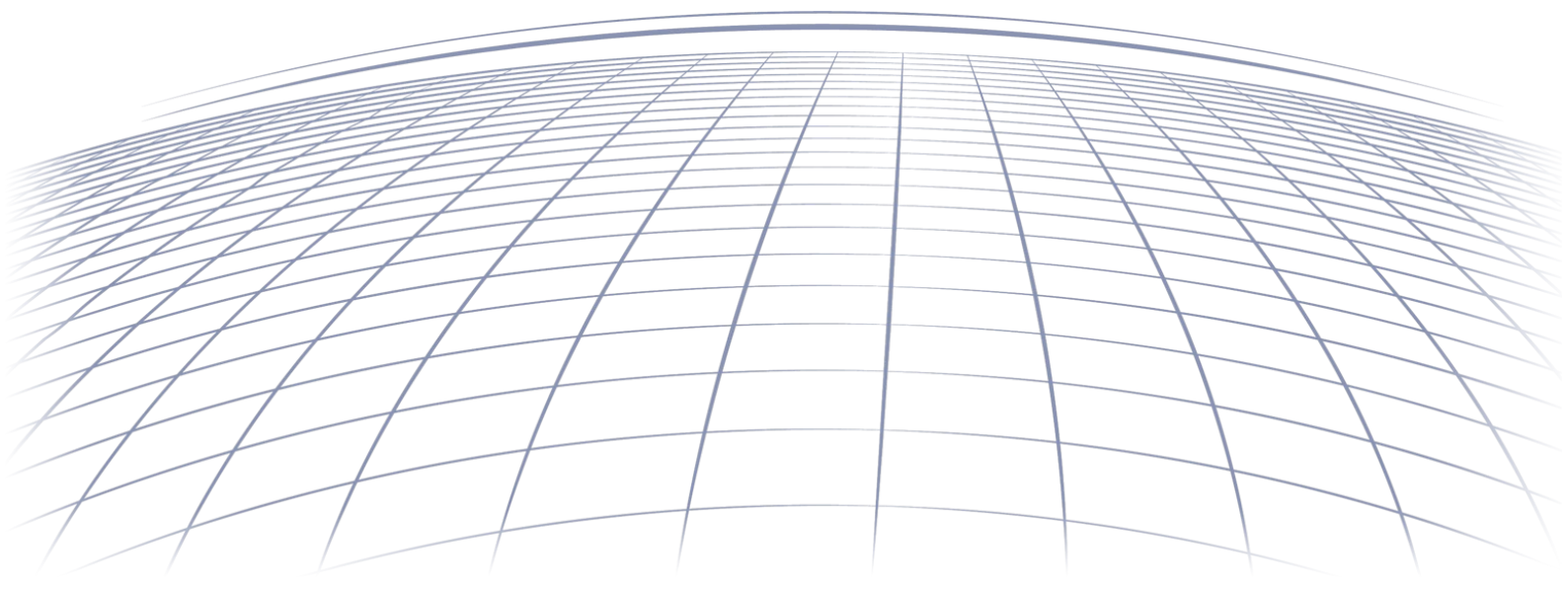
Appendix 4



P6 Surface Water Drainage Strategy - Summary

Planning Application PL/2024/05527

May 2025



P6 Summary Drainage Strategy

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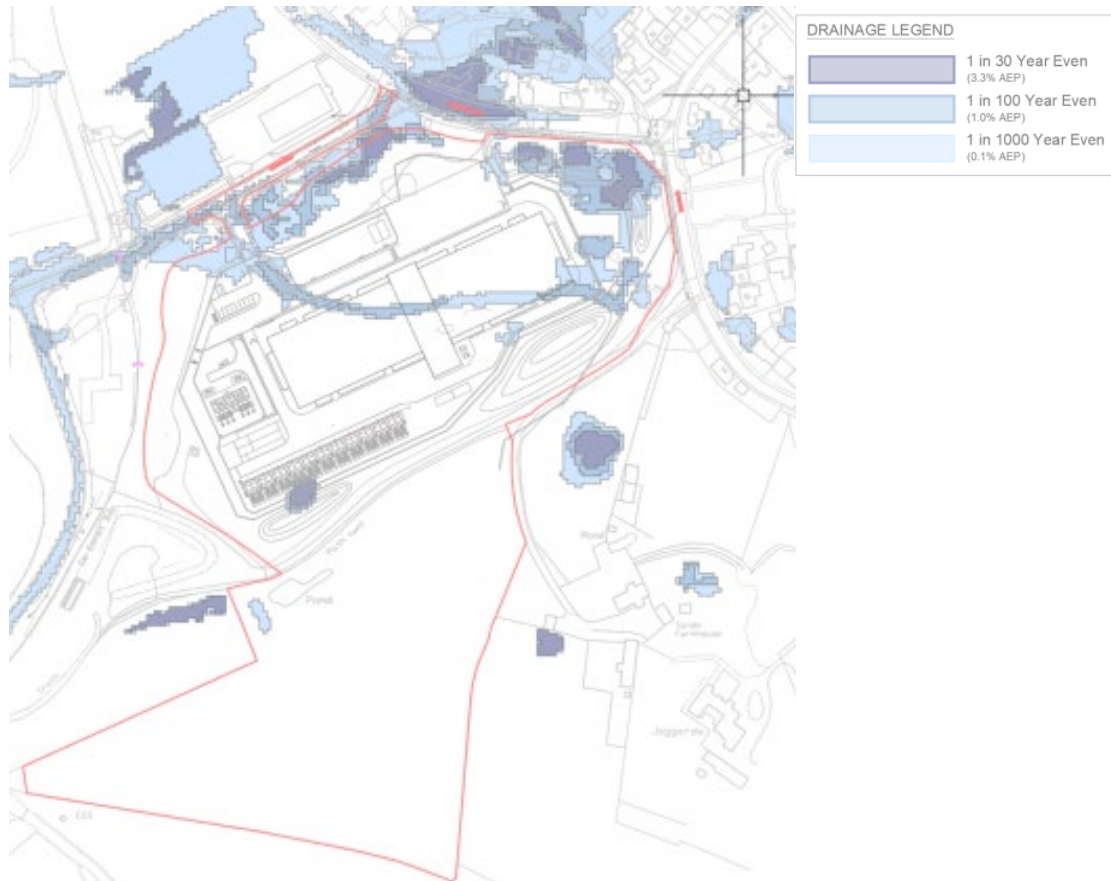
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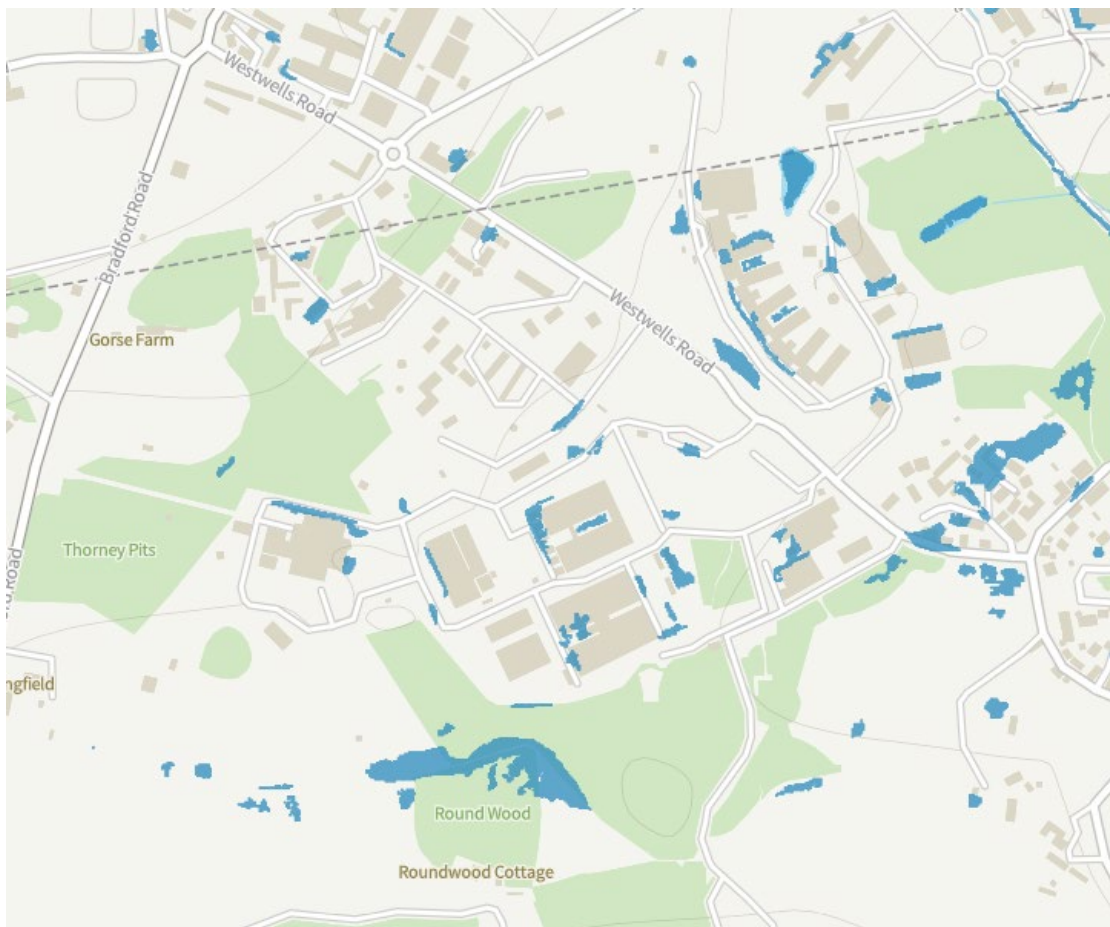
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1 HISTORICAL SURFACE WATER DRAINAGE OVERVIEW

- 1.1 The entirety of the site is within Flood Zone 1 according to the Flood Map for Planning though certain areas of the land within the red line are identified in the Flood Map for Planning as being at risk of surface water flooding. The map below overlays the proposed development on the 1:30, 1:100, and 1:1000 'Surface Water' flood layers from the Flood Map for Planning.



- 1.2 There are four further points to be noted.
- 1.3 Firstly, it is prudent to flag that the application site is in absolutely no way unique in this part of Corsham in containing areas at risk of surface water flooding. The below extract from the Flood Map for Planning shows that, even when showing only the 1:30 year flood event maps, there is a mosaic of surface flooding risk throughout this part of Corsham.



- 1.4 Secondly, planning permission has previously been granted following a successful appeal for housing on this site (refs. 18/09884/OUT and APP/Y3940/W/19/3243873). Housing is inherently a more vulnerable land use than that proposed as part of this application and matters relating to the acceptability of the proposals on flood risk were assessed and considered acceptable both at planning application and through a planning appeal.
- 1.5 Thirdly, the 2014 flood event that affected the southeast end of Westwells Road was in part impacted by the construction works on the P2 Data Centre that were in progress at that time:
- A surface water drain running across the site, identified as unused when the land was purchased from MoD, had been removed.
 - The 2014 flood event showed that far from being unused, this was the main surface water connection between the MoD land north of Spring Park and the surface water drainage down Westwells Road to the east of site. The flood water flowed uncontrolled across the site and down to Westwells, where flooding occurred.
 - As a result of this experience the applicant has connected the clearly active surface water drain from the adjacent MoD site to the new soakaway constructed for P2 which has successfully absorbed all subsequent rain events.
- 1.6 As a result of the work arising from the 2014 flood event the Applicant has already reduced the flood risk to the proposed development site (and the residents of Westwells) by diverting

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surface water drainage from the original, constrained, surface water drainage system down Westwells Road into a new soakaway on their land.

- 1.7 Fourthly and finally, the surface water drainage strategy employed across the rest of the Spring Park campus, since 2008, which is to attenuate all surface water collected on site and dispose of it via soakaways has been proven to work. In fact, the soakaways have proven to be so effective that none of the surface attenuation ponds constructed on site have ever held water.
- 1.8 Based on the above experience and intimate knowledge of the site the same strategy is to be employed for the proposed development and there is no reason for it to be any less successful.

2 P6 SURFACE WATER DRAINAGE STRATEGY

- 2.1 As part of the overall strategy for sustainable development on the scheme, it is proposed that, as far as practicable, all rainwater should be collected for re-use as part of the development's cooling system.
- 2.2 Collected rainwater will be stored in below-ground attenuation tanks prior to passing through a filtration and treatment system, for use in the data centre's cooling system. A draw rate for the system will be established as part of detailed design for the scheme, however it is anticipated that the cooling system will utilise all available runoff generated from a majority of rainfall events, aside from periods of sustained rainfall.
- 2.3 For rainfall events in excess of the draw rate of the data centre's cooling system, or if the rainwater harvesting tanks are full, the next preferred option for discharge will be infiltration to ground, as successfully carried out to date across the rest of the Spring Park Data Centre Campus.
- 2.4 Infiltration testing was carried out as part of a wider site investigation and returned results in line with those achieved elsewhere on the campus and in general accordance with BRE Digest 365.
- 2.5 The proposed infiltration strategy will utilise connected concrete ring soakaways surrounded by suitable porous material, as utilised successfully elsewhere on the Spring Park campus. When the water level in the SuDS Pond exceeds the design permanent water level, flows will discharge to this soakaway system and allow runoff to percolate into the sub-soils below. Due to the presence of limestone in the sub-soils, the soakaway chambers will be positioned with minimum 10m of separation to each other and any buildings / roads, in order to reduce the risk of dissolution features.
- 2.6 A geophysical survey was conducted as part of the wider site investigations in order to identify the preferred soakaway locations.
- 2.7 As infiltration is proposed as the destination for surface water runoff, in line with all other surface water drainage systems at Spring Park, there will be no requirement for discharge to the local stormwater drainage system.

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3 CONCLUSION

- 3.1 Section 1 of this Technical Note has demonstrated that the Applicant has already reduced the risk of flooding on the proposed site associated with an event equivalent to the 2014 flood event by diverting flows that historically connected to the constrained Westwells Road stormwater drains to soakaways on site.
- 3.2 Section 2 demonstrates that the surface water drainage strategy for the proposed development will contain and dispose of all surface water run-off on site.
- 3.3 Diverting the current brownfield surface water run-off from the Westwells Road stormwater drainage system (its current path) to the combination of rainwater harvesting tanks, attenuation pond and soakaways on the proposed development will further reduce the volume of flood water draining to the current system.
- 3.4 The Applicant's continued approach to maximise the use of rainwater in its cooling systems and to retain and dispose of surface water on site through attenuation ponds and soakaways removes significant volumes of surface water discharge to the Westwells Road stormwater drainage system, thereby delivering betterment to the local flooding situation.