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# Sequential Test

Land South of Westwells Road, Westwells Road, Neston, SN13 9GB

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# 1. Introduction

- 1.1. This Sequential Test has been undertaken by Savills on behalf of Ark Estates 4 Ltd ('Ark'). Input has been provided by Hydrock who are advising Ark on drainage and flood risk matters.
- 1.2. Ark is the applicant for a live application for full planning permission at the site known as 'Land South of Westwells Road, Westwells Road, Neston, SN13 9GB'. The application reference is PL/2024/05527 and the description of development 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'*

- 1.3. Since the application was validated in June 2024, it has been subject to a period of consultation. This has included the provision of a response from the Council's Drainage Officer (included at Appendix A) supporting the proposals on drainage and flood risk grounds subject to the imposition of planning conditions (which are agreeable to Ark).
- 1.4. Since then, Wiltshire Council has requested that a Sequential Test is undertaken. This is contained within this document which is structured as follows:
- Section 2 provides an overview of the policy position with regards to flood risk and how this relates to the site;
  - Section 3 outlines the nature of the proposed data centre use and its specific locational requirements;
  - Section 4 undertakes the sequential test; and
  - Section 5 makes a series of concluding comments.

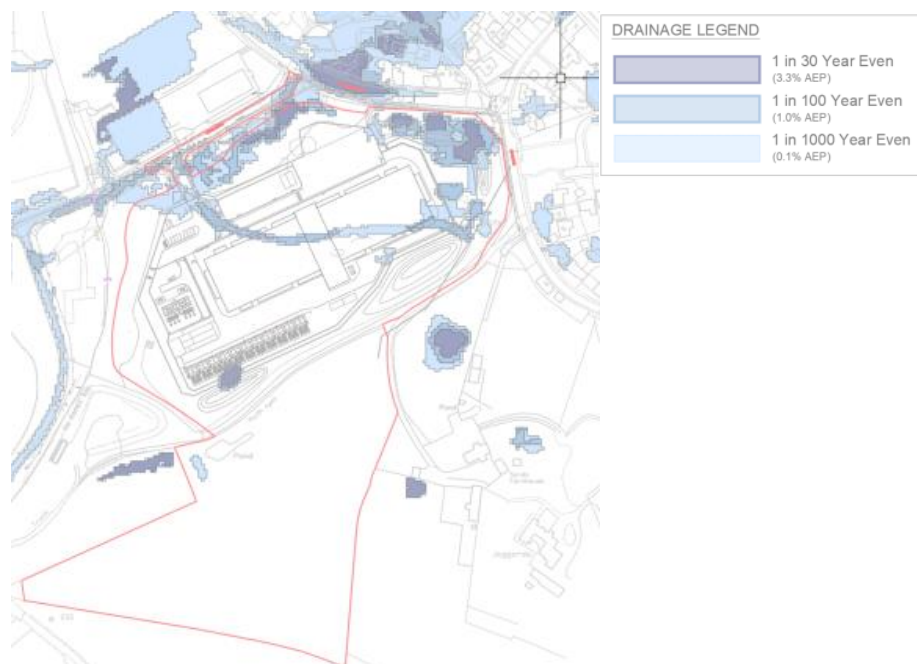
## 2. The Need for and Location Requirements of Data Centres

- 2.1. 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.
- 2.2. 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 technology which are aimed at finding solutions to some of the most pressing and most significant challenges faced by the planet.
- 2.3. 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, 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 (and were designated as such in September 2024) that bring data transmission, storage and management – together with the supporting networks - into general or conventional definitions of infrastructure.
- 2.4. The Spring Park Campus already delivers a major economic dividend for the County and this proposal will continue to support and grow this significant positive impact on the local and regional economy.
- 2.5. The need for additional data centre capacity is clear, substantial, national, and urgent. This document is not the right place to provide a detailed overview of this, but it is recognised (and well considered) throughout a recent appeal decision for a proposed data centre at Court Lane Industrial Estate in Buckinghamshire (Appendix B) and in the response to this application from the Council's Inward Investment Manager (Appendix C).
- 2.6. 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.
- 2.7. Data centres have specific locational requirements that drive where they can and cannot be located. The core locational requirement for a data centre is the ability to connect to a fibre network and the availability of a secure and reliable power supply.

- 2.8. Typically, data centres cluster in availability zones where there is sufficient power to operate and where there is fibre connectivity. Availability zones are geographic areas where specific data centre operators operate a network of independent but connected data centres within a fixed and close geography (typically no more than circa 15km in distance from one another) so that, in the case of a failure of one data centre within the availability zone, another can pick up its operations. This explains why the majority of the UK's data centres are clustered together in specific geographies such as Slough, Park Royal, Hayes, and the London Docklands and why, where new data centres are being developed, they are being delivered as new clusters in new availability zones such as those being developed in South Wales and Yorkshire.
- 2.9. Ark's existing Spring Park Campus meets the fundamental locational requirements for data centres – it is connected to the fibre network and has sufficient power for the data centres that are operational, the P5 data centre that benefits from planning permission, and the proposed data centre that this application relates to are not in an availability zone but connect to and between neighbouring zones. It is not Ark's intention to create a new availability zone.
- 2.10. Instead, the Spring Park Campus is considered in operational terms to be an isolated data centre campus, successfully operating because of its own critical mass as well as its in-built resiliencies. In that sense, any additional data centre capacity that Ark wish to develop in this locale has to be adjacent to the Spring Park Campus to increase this critical mass and to make use of these in-built resiliencies (vitally important to existing & new customers) which therefore cannot be delivered either elsewhere in Corsham or even elsewhere in Wiltshire. This is reflected in the description of development for the application which specifically frames the proposal as an '*...extension to existing Spring Park data centre campus*'.

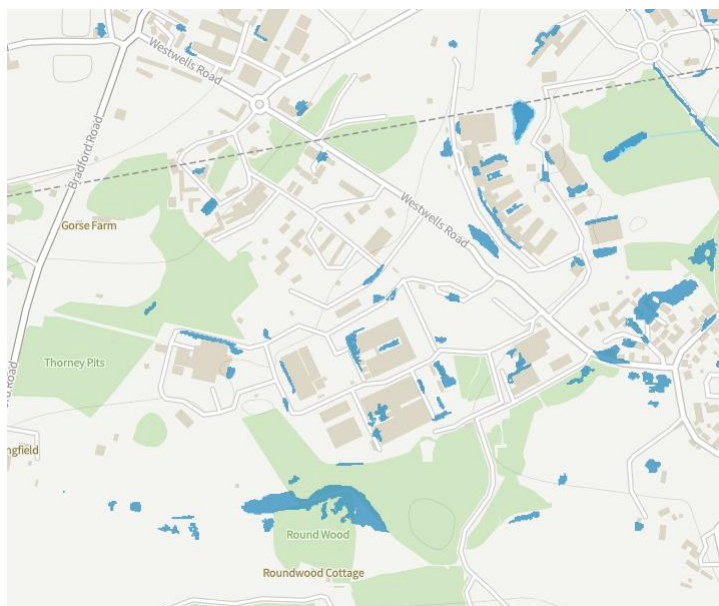
### 3. Flood Risk and Planning Policy Position

- 3.1. Paragraph 173 of the National Planning Policy Framework (NPPF) requires the undertaking of a Sequential Test when a planning application proposes built development on land that is, either now or in the future, at risk of flooding. Its aim, as set out in Paragraph 174 of the NPPF, is to direct development to those areas with the lowest risk of flooding, setting a framework where development in an area at risk of flooding is permissible only if there are no 'reasonably available sites' at a lower risk of flooding.
- 3.2. The proposal is for a 'Less Vulnerable' use as defined by the Flood Risk Vulnerability and Flood Zone Compatibility Matrix. The nature of the proposed data centre use is inherently one where the number of people onsite at any one time is fairly low (and typically lower than conventional Class B8 uses), no one sleeps onsite, and the risk of flooding (from any source) is inherently assessed, and has been accepted, by Ark as the developer and any of their occupiers in their decision to build a data centre building in this location.
- 3.3. 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 maps below overlay the proposed development on the 1:30, 1:100, and 1:1000 'Surface Water' flood layers from the Flood Map for Planning.



3.4. There are four further points to be noted.

3.5. 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.



3.6. 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 (without the need for a Sequential Test) both at planning application and through a planning appeal.

3.7. 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; and

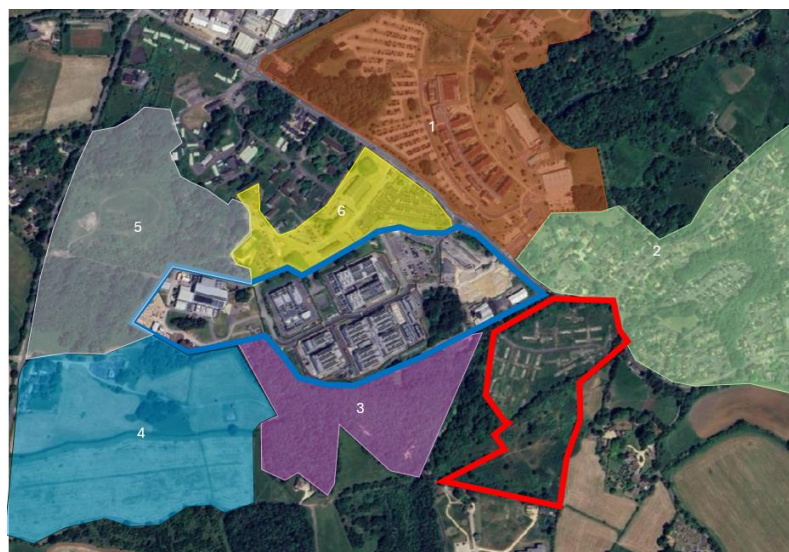
- As a result of this experience the applicant has connected the clearly active surface water drain from the adjacent MoD site to the new soakaway constructed for P2 which has successfully absorbed all subsequent rain events.
- 3.8. As a result of this work the applicant has already reduced the flood risk to the proposed development 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.
- 3.9. 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.
- 3.10. Based on the above experience and Ark's 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.

## 4. Sequential Test

### 4.1. The NPPG states that:

*“For individual planning applications subject to the Sequential Test, the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases, it may be identified from other Plan policies. In other cases, it may be identified from other Plan policies. For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives” (Paragraph 027 Reference ID: 7-027-20220825).*

- 4.2. Taking the commentary in Section 3 of this Statement, it is apparent that the proposed use is like the school example that the NPPG presents in the sense that it has a very specific locational requirement that drives where it must be located. This makes the nature of the use that is proposed as part of the application unique and completely different to other forms of land use (such as housing or conventional Class B8 uses) that are inherently more footloose.
- 4.3. Fundamentally, this means that any ‘reasonably available’ site must be one that could operate as an extension to the Spring Park Campus and, inherently, therefore must be directly adjacent to it. The Sequential Test is therefore structured to only consider those sites that are adjacent to the existing Spring Park Campus.
- 4.4. Included at Appendix D (and replicated below) is a map of those sites that are to be considered as part of the Sequential Test.



- 4.5. The application site is shown outlined in red and the Spring Park Campus (incorporating the land that benefits from a planning permission for a data centre under ref. PL/2023/10233) outlined in blue, with the six parcels that have been considered assessed in terms below.

Parcel 1

- 4.6. Parcel 1 consists of the primary element of Ministry of Defence's (MOD) Basil Hill facility. It is on the eastern side of Westwells Road from the Spring Park Campus.
- 4.7. Having been subject to a significant redevelopment program in 2011, the site supports the MOD's Global Operations Security Control Centre, Joint Security Co-ordination Centre, and Defence Equipment and Support's Information Systems and Services, as well as being the operational headquarters for a number of units.
- 4.8. Given the recency of the redevelopment and that the site is fully operational, it is not considered to be reasonably available.
- 4.9. It is also not considered to be sequentially preferable from a flood risk perspective in that it also contains areas that the Flood Map for Planning identifies to be at risk of surface water flooding.

Parcel 2

- 4.10. Parcel 2 consists of the residential area of Neston on the eastern side of Westwells and Moore Green which separate the parcel from the Spring Park Campus.
- 4.11. It consists of a series of residential properties that are under a series of individual ownerships, reflecting that this site consists of individual properties, all occupied by different households. By virtue of the fact that the site consists of a multitude of different ownerships with different owners having different aspirations for their property (and willingness to sell), this parcel is not considered to be reasonably available.
- 4.12. Further the parcel is not considered to be a suitable location for the type of development proposed given that it contains a number of listed buildings that would be required to be demolished to facilitate a data centre of the scale proposed.
- 4.13. It is also not considered to be sequentially preferable from a flood risk perspective in that it contains areas that the Flood Map for Planning identifies to be at risk of surface water flooding.

Parcel 3

- 4.14. Parcel 3 abuts the southern boundary of the Spring Park Campus.
- 4.15. It is an irregularly shaped greenfield parcel of land consisting entirely of dense areas of woodland growing over the "spoil tip" arising from the old stone quarries below the site. By virtue of the number of trees that would be lost (rendering demonstrating a biodiversity net gain nigh on impossible), the nature of the "spoil

tip”, and its irregular shape prevents the siting of a data centre of the scale that this application proposes. Therefore, this site is not considered to be a suitable location for the type of development proposed.

- 4.16. It is also not considered to be sequentially preferable from a flood risk perspective in that it also contains areas that the Flood Map for Planning identifies to be at risk of surface water flooding.

Parcel 4

- 4.17. Parcel 4 consists of a series of fields located to the southwest of the Spring Park Campus’ southwestern and western boundary.
- 4.18. From a planning policy, the site’s western half is within the Green Belt, and land to the west of the site on the western side of Bradford Road is designated as a National Landscape.
- 4.19. Unlike the main Spring Park Campus this site is unscreened from the Green Belt and National Landscape west of Bradford Road. The proposed data centre development would be highly visible from these areas.
- 4.20. On that basis, this parcel is not considered to be to be a suitable location for the type of development proposed given that it is considered unlikely that Wiltshire Council would grant planning permission for a data centre development.
- 4.21. It is also not considered to be sequentially preferable from a flood risk perspective in that it also contains areas that the Flood Map for Planning identifies to be at risk of surface water flooding and has not benefitted from the surface water drainage measures already undertaken at Spring Park, as described in paragraph 3.8 above.

Parcel 5

- 4.22. Parcel 5 consists of dense areas of woodland with a clearing in the centre which is understood to be used for quad biking. It is located to the west, north, and northwest of Spring Park’s northwestern boundary.
- 4.23. The woodland is a known host for bat roosting with the northeast boundary forming a bat flight zone.
- 4.24. From a planning policy, the site is greenfield, its western half is within the Green Belt, and land to the west of the site on the western side of Bradford road is designated as a National Landscape.
- 4.25. It is physically divorced from the Spring Park Campus by virtue of the dense areas of woodland, would require a separate access, and could not therefore share any of the facilities associated with Ark’s existing operation.
- 4.26. Existing subterranean MOD facilities are located below the site, prohibiting the use of surface water infiltration drainage.

- 4.27. On that basis, this parcel is not considered to be to be a suitable location for the type of development proposed.

Parcel 6

- 4.28. Parcel 6 consists of a secondary element of the MOD's Basil Hill facility. It runs along much of the length of the Spring Park Campus' northern boundary.
- 4.29. Parcel 1 was subject to a significant redevelopment program in 2011 and this site provides car parking and other ancillary space to support the wider Basil Hill site at Parcel 1.
- 4.30. Given the recency of the redevelopment and that the site is fully operational in supporting Parcel 1, it is not considered to be reasonably available.
- 4.31. It is also not considered to be sequentially preferable from a flood risk perspective in that it contains areas that the Flood Map for Planning identifies to be at risk of surface water flooding.

## 5. Conclusion

- 5.1. This Sequential Test has been prepared by Savills and Hydrock on behalf of Ark in connection to their live application for full planning permission under planning reference PL/2024/05527.
- 5.2. The document is structured to provide an overview of the specific locational requirements of data centres and the implications that this has on the undertaking of a Sequential Test. The conclusion is reached that the proposed development is one that there is a national and global requirement for but, in a geography such as this outside of an availability zone, needs to be delivered on mass and adjacent to existing facilities. This means that the Sequential Test can only consider those sites that directly adjoin Ark's existing Spring Park Campus.
- 5.3. On this basis, the Sequential Test considers the suitability of all land adjacent to the existing Spring Park Campus to accommodate the proposed use. The conclusion is reached that there are no sequentially preferable sites from a surface water flood risk perspective that are considered to be reasonably available and therefore the Sequential Test is passed.