BRACKNELL DATA CENTRE

Planning Statement

20305B-RPS-XX-XX-RP-T-9701

OXF11741 Bracknell Data Centre
Planning Statement
Final
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rpsgroup.com

Approval for issue	
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EXECUTIVE SUMMARY

This Planning Statement addresses the planning considerations relating to a planning application for the development of land at Cain Road, Bracknell, Berkshire, RG12 1HN. It has been prepared on behalf of the applicant Mount Elbert Edgecore Services LLC.

The site lies within the administrative area of Bracknell Forest Council.

This application seeks consent for the development of a new Data Centre (containing data halls, associated electrical and AHU Plant Rooms, loading bay, maintenance and storage space, office administration areas and plant at roof level), emergency back-up generators and emission stacks, diesel tanks and filling area, electrical switchroom, a water sprinkler pump room and storage tank, a gate house, site access, internal access roads, drainage infrastrcutire and hard/soft landscaping.

The Application Site was formerly occupied by HP Enterprises who have relocated their office headquarters. The offices are partially tenanted, and they will be vacated by the end of March 2021.

There is a current planning application (reference 20/00563/FUL) on the site that seeks full planning permission for the *"Erection of commercial units for B1c, B2, and B8 uses together with associated first floor offices, access, parking, and landscaping following the demolition of the existing buildings*". To our understanding, this was put forward on a speculative basis, with no specific known end user. The subject application represents intended investment to utilise the site for a Data Centre, for which, subject to planning permission, there is a defined plan to commence construction and implement the scheme in 2021.

The site is located on the western edge of the established Amen Corner Business Park. The site is bounded by Cain Road and Beehive Road. The site is located within the defined employment area and shown on the Bracknell Forest Policies Map and surrounded by exiting, complementary uses. It is acknowledged that it is set within a location which is changing character and transitional in nature with a mix of existing and proposed uses in the immediate locality.

This Planning Statement demonstrates that the proposal will make a significant contribution to the objectives of Bracknell Forest Council, as set out in their Development Plan. It will not generate any unacceptable impacts on the environment; it meets all relevant planning considerations and complies with the adopted Development Plan. As such, it represents sustainable development for which there is a presumption in favour of granting planning permission. Development of the site represents an opportunity to secure economic, social and environmental gains in accordance with the National Planning Policy Framework.

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1 INTRODUCTION

1.1 Context

1.1.1 This planning statement accompanies and supports a planning application for the development of land at Cain Road, Amen Corner, Bracknell, Berks. It has been prepared on behalf of the applicant, Mount Elbert Edgecore Services LLC.

1.1.2 It forms one of a suite of technical reports forming part of a planning application for a Data Centre on land at Cain Road, Amen Corner, Bracknell.

1.1.3 The Application Site extends to a total of 9.9 Ha and is made up of 2 distinct sections. The Main site (7.5 Ha) (hereafter called the Main Site) and an area of land (2.4 Ha) to the south on the opposite side of Beehive Road (the 'Former Recreation Site').

1.1.4 The site lies within the administrative area of Bracknell Forest Council.

1.2 Application Submission

1.2.1 The scope of the planning application has been discussed and agreed within pre-application consultation with Bracknell Forest Council.

1.2.2 This application seeks planning permission for a Data Centre, with associated office administration areas, emergency generators and emission stacks, diesel tanks and filling area, electrical switchrooms, a water sprinkler pump room and storage tank, a gate house / security building, site access, internal access roads, drainage infrastructure and hard and soft landscaping. Full detail of the proposal is set out in Section 6.

1.2.3 The purpose of this planning statement is to provide details of the proposed development and the content of the planning application, along with an assessment of the proposal development against the statutory Development Plan, national planning policy and other material considerations.

1.2.4 The application comprises the completed application forms and relevant certificates, along with the application drawings and a suite of technical reports, addressing various environmental considerations relevant to the planning case.

1.3 Environmental Impact Assessment

1.3.1 A request for an Environmental Impact Assessment (EIA) Screening Opinion was submitted to the Bracknell Forest Council on 11th December 2020.

1.3.2 A formal Screening Opinion was received on the 13th January 2021, which confirmed that the Local Planning Authority is of the opinion that the submission of an Environmental Statement in connection with this development at this time is not required (Reference 20/00044/SCR). Please refer to Appendix A for details.

1.3.3 Accordingly, the technical documents which accompany this application comprise of the following:

- **Planning Statement**, (this document), which provides and assessment of the proposals in the context of planning policy.
- **Design and Access Statement**, which sets design principles including building design, layout, access, scale;
- **Landscape, Townscape and Visual Impact Assessment** (LVIA), which considers the proposals in the context of the impact on views;
- **Landscape Management Plan**, which puts forward the necessary actions required for the ongoing maintenance and management of the soft landscape zones;

- **Air Quality Assessment,** which assesses the potential impacts on air quality that might arise as a result of the proposed development**;**
- **Noise Assessment**, which addresses potential for noise impacts;
- **Flood Risk Assessment and Drainage Design Philosophy**, which assesses the potential for flood risk, and provides a strategy for sustainable drainage;
- **Heritage Statement,** which considers the likelihood of impacts arising on heritage assets and buried archaeological remains;
- **Transport Assessment and Travel Plan,** which considers the transport implications of the development and sets out sustainable travel measures;
- **Construction Traffic Management Plan and Delivery and Servicing Management Plan**, setting out the management of construction and operational traffic respectively;
- **Ecological Appraisal**, which address the potential for ecological impacts across the site and sets out Biodiversity Net Gain;
- **Tree Survey and Arboricultural Impact Assessment,** which assess existing trees and foliage on the site, impacts from the proposals and protection measures for retained trees;
- **Ground Conditions,** which establishes ground contamination and ground gas assessments previously carried out and identifies any outstanding work requirements that will need to be completed prior to occupation of the completed development;
- **Site External Lighting Report,** which sets out the proposed lighting scheme for the development;
- **Energy Statement,** which sets out the proposed energy strategy following an assessment of the likely energy demands prior to consideration of low and zero carbon technology options;
- **Sustainability Statement and predictive BREEAM assessment,** which set out the sustainability credentials of the proposed development;
- **Code of Construction Practice,** providing a management framework that will be implemented throughout the construction of this development; and

1.3.4 The findings of the above technical reports have informed the planning assessment that is set out in this Planning Statement. A list of the application drawings is set out within the Covering Letter that accompanies this submission; cross references are used as applicable throughout this document.

1.3.5 The remainder of this statement is structured as follows:

- **Section 2** sets out the background to the application;
- **Section 3** summarises the pre-application consultation activities;
- **Section 4** details the application site and the context of the surrounding area;
- **Section 5** highlights the planning history of the site;
- **Section 6** sets out the key development proposals;
- **Section 7** establishes the development plan and other material considerations;
- **Section 8** assesses the proposals against the development plan and other material considerations;
- **Section 9** establishes the potential S106 Heads of Terms; and
- **Section 10** sets out the concluding comments in support of the application.

2 BACKGROUND TO THE APPLICATION

2.1.1 This section establishes the context for the Proposed Development. It provides detail on the purpose and operation of a Data Centre use. The planning history of the Application Site is addressed, along with a summary of the pre-application activity that has preceded the submission of this planning application. This application is made on behalf of Mount Elbert Edgecore Services LLC (hereafter referred to as 'the Applicant'). The development will be operated by a third party (hereafter referred to as 'the Operator').

2.2 Data Centres

Purpose of a data centre

2.2.1 Over recent years, a wide variety of service providers, including the Operator, have begun offering IT infrastructure services – now commonly known as 'cloud computing'. At the core of cloud computing are Data Centres which comprise networks of remote servers hosted to store, manage, and process data in place of local servers and personal computers.

2.2.2 The proposed Data Centre will support the provision of cloud computing services. Cloud computing is the on-demand delivery of IT resources over the Internet with pay-as-you-go pricing. Instead of buying, owning, and maintaining physical data centers and servers, organisations can access technology services, such as computing power, storage, and databases, on an as-needed basis from a cloud providers such as the Operator of the proposed facilities.

2.2.3 Organizations of every type, size, and industry are using the cloud for a wide variety of use cases, such as data backup, disaster recovery, email, virtual desktops, software development and testing, big data analytics, and customer-facing web applications. Cloud computing offers significant advantages to organisations over traditional in-house (on premises) data storage systems. The primary advantages are:

- Higher reliability and redundancy of systems;
- 24/7 monitoring and maintenance of storage by staff;
- Higher security and data protection;
- Flexibility & Lower Cost – ability to increase or decrease storage requirements at short notice in line with specific business needs; and
- Increased energy efficiency over on-premises data centres; attributable to the combination of a more energy efficient server population and much higher server utilisation.

2.2.4 The growth of the digital economy depends heavily on the capacity to store, process and access data. The proposed development is intended to help meet this demand.

Requirements of a data centre

2.2.5 Whilst physically resembling a conventional warehouse-type building, a Data Centre has a series of specific infrastructural and technological requirements.

2.2.6 These include the need for secure and resilient electrical power, which will ensure the operation of the servers on a continual basis (24 hours a day). A key consideration in the site selection process is therefore locating a Data Centre close to existing electricity infrastructure. This power supply must be guaranteed even in the event of a power failure. A Data Centre must also be equipped with 'back-up' power infrastructure, specifically comprising on-site emergency (back-up) generators with sufficient capacity to power the servers (at their critical IT load) and other infrastructure in an emergency (i.e. a power failure) scenario.

2.2.7 Data Centres rely on the ability to import data via the internet, and accordingly robust incoming fibre connectivity is also required.

2.2.8 A Data Centre must be carefully controlled for optimal internal temperatures. Computer servers produce heat while operating, meaning that to ensure their optimum performance the internal environment must be controlled. As such, Data Centres must be equipped with specialised cooling and humidity control infrastructure, in the form of air handling units. Accommodating this equipment, with air handling units either side of the data halls and exhaust fans at roof level, influences the size and layout of Data Centre design.

2.2.9 Lastly, effective safety and security measures must be incorporated given that a Data Centre houses sensitive customer data and computer processes for organisations and individuals. These can include 'physical security' incorporated into the building's structural design, as well as measures such as, secure perimeter fencing, access controls and CCTV.

2.3 Planning Use Class

2.3.1 The use of a Data Centre is not formally identified in 'The Town and Country Planning (Use Classes) Order 1987, however it is considered to be Class B8 – Use for storage, or as a distribution centre. This is supported by case law, namely The Planning Inspectorate Appeal Decision Ref APP/Y0435/X/09/2103771 issued in August 2009. The Inspector concluded that in the Use Class Order, the word 'storage' is not qualified by reference to goods in any other way, accordingly, data storage (and Data Centre uses) comprise B8 development.

2.3.2 Bracknell Forest Council also considers that a data centre comprises a use within Class B8 of the Town and Country Planning (Use Classes) Order 1987 (as amended), as confirmed within the Pre-Application response dated 11th January 2021.

2.3.3 Notwithstanding the above, it is acknowledged that Data Centre uses differ from conventional B8 development in a number of ways, both physically (in terms of infrastructure / plant requirements) and in terms of impacts (particularly with regard to lower transport generation). Accordingly, this planning application seeks permission explicitly for a 'Data Centre' development, rather than an 'open' B8 use. All technical documents have assessed the proposal in this way.

3 CONSULTATION

3.1 Pre-Application Consultation with the Local Planning Authority

3.1.1 Alongside the EIA Screening Request on the 11th December 2020, the Applicant carried out formal pre-application consultation with the Local Planning Authority, including the submission of proposed project details and an introductory virtual meeting on a 22nd January 2021 to discuss the overall principle of development and planning approach.

3.1.2 Following this meeting, a formal pre-application response was received on 11th February 2021. The full response can be seen at Appendix B.

3.1.3 The principal of the proposed development is considered to be acceptable. Some other pertinent aspects of the response, along with cross reference to where the information can be found, is summarised below:

- *"There is some concern that the submitted Masterplan appears to indicate the loss of existing planting. In the absence of an Arboricultural Impact Assessment, replacement landscaping plans or details of levels, it has not been possible to assess the acceptability of this tree loss or the visual impact of the proposed development, and these will be key considerations for any forthcoming application."*
  - Please refer to the Arboricultural Impact Assessment (ref 20305B-RPS-XX-XX-RP-P-9733) illustrating those trees to be lost and protected as part of the development. Alongside the Landscape Strategy 20305B-RPS-SI-XX-DR-A-9530 which identifies significant additional planting. Please also refer to the submitted LVIA (ref 20305B-RPS-00-XX-RP-L-9722)
- *"Of primary importance is the established boundary planting along Cain Road and Beehive Road and an area of emerging woodland in the site's south-western corner. This latter area appears to be identified as an area of passive open space…"*
  - Please refer to the Arboricultural Impact Assessment (ref 20305B-RPS-XX-XX-RP-P-9733) illustrating those trees to be lost and protected as part of the development. Alongside the Landscape Strategy 20305B-RPS-SI-XX-DR-A-9530. The emerging woodland is to be retained and enhanced by the proposals.
- *"There is a difference in levels between Cain Road and the site which varies across its width. No details of this change in levels have been provided, however this information will be material to an assessment of the visual impact of any development."*
  - Please refer to Site Sections & Elevations plan ref 20305-RPS-00-XX-DR-A-9507 and Visual Impact Assessment (ref 20305B-RPS-00-XX-RP-L-9722)
- *"Around the data centre itself a vehicular route is proposed with a one-way anticlockwise circulation. No details of vehicle types anticipated nor swept paths have been provided for this route."*
  - Please refer to the submitted Transport Assessment (ref 20305B-RPS-00-XX-RP-P-9724). Swept Paths are within Appendix B of this document.
- "*The Beehive Road frontage has always been considered sensitive…. The location of the emergency access prohibits planting in this location and facilitates views into the site along the formal access and towards both the main building and the MV compound. The Highways Authority has requested its removal… and the concerns are endorsed by design considerations set out above."*

- *"An egress is shown out onto Beehive Lane. The purpose of this egress is questioned, given that there are two access points to the north…. It is considered unnecessary by the Highway Authority and it is recommended that this is removed."*
  - Please refer to Section 8 of this statement which establishes the specific requirements for the accesses and the secure nature of the proposed development. The Beehive Road access is a replacement of the existing emergency access. Please also refer to the Transport Assessment (ref 20305B-RPS-00-XX-RP-P-9724), Visual Impact Assessment (ref 20305B-RPS-00-XX-RP-L-9722) and the Landscape Strategy Plan 20305B-RPS-SI-XX-DR-A-9530.
- *"The Councils Parking Standards SPD (March 2016) provides standards for data centres as:*
  - *Standard Car Parking 1:47 sq. m*
  - *Cycle Parking 1:200 sq. m*
  - *Disabled Parking 5% of total parking capacity*
  - *Motorcycle Parking 1 space per 35 car spaces*
  - *Electric Vehicle Charging 20% of spaces*

  The Application Form states that the proposed data centre is 6,892 sq. m, accordingly this would equate to a requirement for 147 car parking spaces based upon the Council's Parking Standards 1:47 ratio. However, it is noted that the Parking Standards SPD places Data Centres in use class B1, where a number of appeals have resulted in the standard use class for Data Centres being B8. Accordingly, the B8 parking standard is 1:70 sq. m, which would result in a requirement for 98 car parking spaces. 34 cycle parking spaces are required.

  The submitted plans show 32 standard car spaces, 5 of which are enabled for electric vehicles, and three disabled spaces, along with a small cycle store. Overall the proposed car and cycle parking does not appear to accord with the Councils Parking Standards SPD."

  - Please refer to Section 8 below and the Transport Assessment (ref 20305B-RPS-00-XX-RP-P-9724) which establishes the level of parking necessary for the proposed development.
- *'Whilst it is appreciated that efforts have been made to break up the bulk of the building through use of vertical cladding panels in 6 alternating colours, it is considered that a simpler, less visually intrusive result would be achieved if wider panels and a more limited colour palette were used. At present, no details of the utility compound are provided… Full details should be provided as part of the application.'*
  - Please refer to plan 20305B-RPS-01-XX-DR-A-9522 which illustrates the elevational treatment proposed, alongside plans 20305B-RPS-40-XX-DR-A-9545 and 20305B-RPS-50-XX-DR-A-9546 containing further information of the MV compound. Visual impact has been comprehensively considered within the submitted LVIA (ref 20305B-RPS-00-XX-RP-L-9722). Further details regarding design can be found within the Design and Access Statement (ref 20305B-RPS-XX-XX-RP-A-9570).
- *'It is appreciated that the nature of the proposed use has security requirements which will necessitate security lighting and fencing. Full details of the design of these will be required at application stage in order to judge the visual impact on adjoining uses and, in the case of the lighting, upon biodiversity.'*
  - Please refer to Masterplan Fence types plan 20305B-RPS-00-XX-DR-A-9504 and the submitted Site External Lighting Report (ref 20305B-CON-XX-XX-RP-E-9735). Both fencing and lighting details have been assessed as necessary within the associated reports, particularly with regard to visual impact and biodiversity. Please refer to the LVIA

(ref 20305B-RPS-00-XX-RP-L-9722) and Ecological Appraisal (ref 20305B-RPS-XX-XX-RP-P-9725).

- *"It is understood that data centres have very high energy requirements. The Council's Renewable Energy Officer has been consulted and recommends that the roof could be covered with solar PV and heating could be by means of an air source heat pump. A report should be submitted to demonstrate that the maximum on-site renewable energy has been installed."*
  - The submission is accompanied by an Energy Statement (ref 20305B-CUN-XX-XX-RP-E-9736) which sets out the energy demands of the proposal development alongside renewable energy considerations and proposals and low carbon technologies.

3.2 Ongoing Engagement

3.2.1 A community engagement specialist, Tristan Fitzgerald Associates, has been commissioned by the applicant to carry out engagement activities as the application is progressed to determination.

3.2.2 In early March 2021 an information note will be sent to leading members of Bracknell Forest Borough Council, Bracknell Forest Borough Council local ward members for Binfield and Warfield and to Binfield Parish Council to bring the development proposals to their attention and offer a way of finding out more detail regarding the proposals, outside of the formal application process.

3.2.3 Virtual meetings are also planned with borough councillors and members of Binfield Parish Council.

4 THE SITE AND SURROUNDING AREA

4.1 Site Location and Wider Context

4.1.1 The Application Site is located at Cain Road, Bracknell in Berkshire. The site is located within the established Amen Corner Business Park, part of the wider Western Industrial Area.

The Bracknell Forest Local Plan proposals map (2013) shows that the Main Site is situated within a defined employment area (light blue shading*)* and it is also within the development limits of Bracknell. A public right of way runs along the western edge of the Main Site (black dots*).*

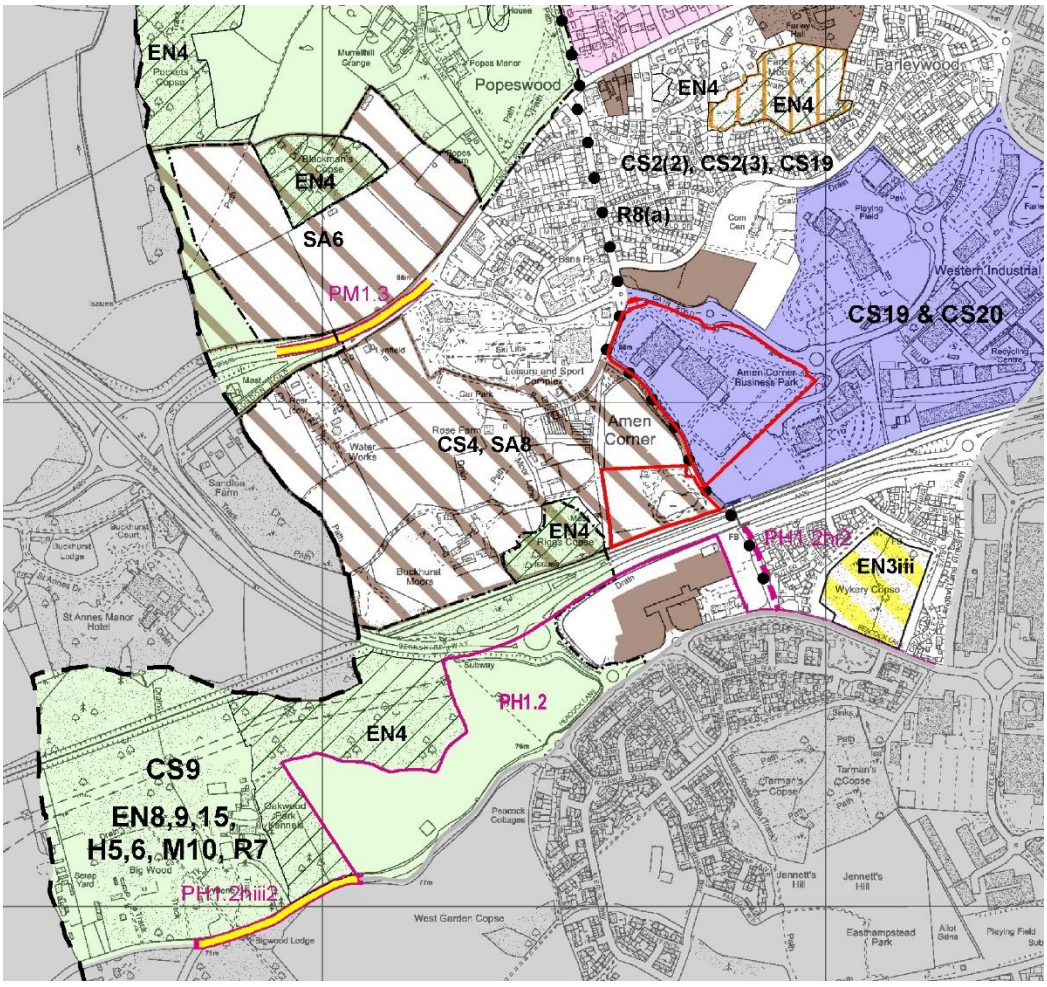


Figure 1: Proposals Map Extract

4.1.2 A disused golf driving range is south-west of Beehive Road and separates the site from a group of residential properties a North View and South View. This is part of a mixed-use allocation and the subject of a planning application for a new primary school. There is residential development to the north of the site beyond an area of open land, enclosed by solid wooden fencing, and Farley Wood Community Centre with associated playing fields and open land. The commercial / industrial development of Bracknell extends west from the site and includes the John Nike sports complex, office buildings, the Coppid Beech Hotel, car dealership, building merchant and other industrial units. New homes are currently being constructed at Amen Corner on the north side of B3408 London Road.

4.1.3 There is significant activity ongoing and proposed in the locality and the character of the surrounding area is changing. The site is considered to be a transition location, particularly in terms of use. Further details are provided in the Planning History section.

4.1.4 There are several statutorily designated nature conservation sites located within 2km of the Application Site, the closest of which is Wykery Copse SSSI located 240m from the site. Thames Basin Heaths Special Protection Area (SPA) lies approximately 2.8km south.

4.1.5 Three non-statutory nature conservation sites are located within the 2km search radius of the site, the closest being Riggs Copse located approximately 20m from the site boundary. Big Wood is a larger area of ancient woodland located over 800m west of the Former Recreation Ground. In addition, there are a further 10 small blocks of ancient woodland with 1km with similar number between 1km and 2km.

4.1.6 Further detail of the designated sites is provided in the Ecological Appraisal.

4.2 The Application Site

4.2.1 The Application Site extends to a total of 9.9 Ha and is made up of 2 distinct sections. The Main site (7.5 Ha) (hereafter called the Main Site) and an area of land (2.4 Ha) to the south on the opposite side of Beehive Road (the 'Former Recreation Site').

4.2.2 The Site currently comprises two three storey office buildings surrounded by extensive area of car parking with intermittent amenity tree, shrub and hedgerow planting. There is extensive boundary tree and shrub planting provided alongside Cain Road and Beehive Road. Intermittent tree planting within a further expanse of car parking provides separation from the adjacent office development to the south-east. There is a small area of woodland in the south west corner of the Site, which is identified as an area of passive open space.

4.2.3 Access to the site is from two locations on Cain Road via access points off two separate roundabouts. A third gated emergency access exists off Beehive Road to the south.

4.2.4 The Former Recreation Site comprises a dis-used/abandoned football pitch, pavilion building and drainage pond, alongside significant vegetative planting. A number of trees bordering this site's western boundary are covered by Tree Preservation Order No. 294. Further information on the TPO is contained within the Arboricultural Impact Assessment (ref 20305B-RPS-XX-XX-RP-P-9733). The site is accessed via lockable gates, off Beehive Road.

4.2.5 The location of the site can be seen on The Site Location Plan 20305B-RPS-00-XX-DR-A-9500 submitted as part of the application.

5 PLANNING HISTORY

5.1 Site History

5.1.1 The site was first granted outline Planning Permission in the late nineteen eighties. This established the principle of development on the site with outline planning consent (ref 610511) granted in 1987 for development comprising business Class B1 floorspace and warehousing (Class B8) development on 14.72 hectares with 0.49 hectares of open space. This permission related to a wider area but included the Application Site. The existing buildings were constructed pursuant to reserved matters application ref: 614324.

5.1.2 Since this time, further s73 applications have been submitted & approved to allow an extended time period for the submission of reserved matters pursuant to the original outline permission (and subsequent permissions granted which related thereafter). No other buildings have been constructed under these approvals; however the LPA considers that there remains extant permission to construct further office accommodation and a multi-storey car park on the Main Site as part of the outline permission relating to a wider site.

5.2 Wider Context

5.2.1 The Application Site is located within an area that is largely composed of commercial uses including Office, Industrial, Storage and some retail. The larger area has been developed over the past several decades and whilst the site on the western edge of an Employment Area it is seen as a transitional site due to the multiple uses existing and proposed in the immediate vicinity.

5.2.2 Land to the west of the site is allocated for mixed use development consisting of 725 homes, employment, a neighbourhood centre and a primary school (Amen Corner South allocation SA8 in the Site Allocations Local Plan 2013 (SALP)). An application is pending determination for a primary school on part of this allocated site to the west of the site (north of the Former Recreation Site) (application ref. no. 18/00217/OUT).

5.2.3 Land to the north is identified within the SALP (SA2) and is the subject of a current planning application (ref: 20/00947/FUL) for residential uses, including a care home.

5.2.4 Further development is also progressing on the Amen Corner North site which has an allocation for 400 homes (SALP SA6). An application is pending consideration ref 18/00242/OUT.

5.2.5 A prior approval application has also been granted for conversion of offices at Technology House, The Boulevard to 81 residential flats with planning permission subsequently granted for 12 flats in the roofspace (refs 18/00200/PAC & 17/01319/FUL). A recent application at the same site (ref no. 19/00703/FUL) was recently refused for change of use and additional dormer windows to provide 93 flats and erection of a four-storey office building.

5.3 Cumulative Assessment

5.3.1 The cumulative effects of the proposed development in conjunction with other proposed schemes have been considered. The cumulative effects assessment considers major developments that are formally in the planning system at the time of submission within a 2Km radius of the Application Site. Developments that are built and operational at the time of assessment will be considered as part of the baseline. A list and associated figure of proposed developments and planning policy allocations included within the cumulative assessment, within the associated environmental assessments submitted is provided in Appendix C.

6 THE PROPOSED DEVELOPMENT

6.1.1 This application seeks consent for a Data Centre building (containing data halls, associated electrical and AHU Plant Rooms, loading bay, maintenance and storage space, office administration areas and plant at roof level), emergency generators and emission stacks, diesel tanks and filling area, electrical switchrooms, a water sprinkler pump room and storage tank, a gate house / security building, site access, internal access roads, drainage infrastructure and hard and soft landscaping.

6.2 Key Elements of the Proposal

6.2.1 All the details of the proposal are within the drawing package submitted as part of the application. Cross references are included below for ease. The drawings package also includes visualisations which are an artist's impression of the site once the Data Centre is fully operational.

6.2.2 As set out on the Master Site Plan (20305B-RPS-00-XX-DR-A-9501), the proposed development focusses on the Main Site. No development is proposed on the Former Recreation Ground other than ecological enhancements and the area will not be used for an associated construction activity relating to the Main Site.

Site Access

6.2.3 There will be three vehicular accesses to the Main Site, but only one vehicular access will be for operational use. The operational vehicular access is located on the northern boundary of the Main Site at Cain Road and is the north-western vehicular access. Thus, the operational vehicular access utilises an existing roundabout which will accommodate all modes. The Main Site will include a controlled access enclosure involving a series of secure barriers, electronic bi-fold gates and an intercom system linked to the Security Gatehouse.

6.2.4 The other existing vehicular access onto Cain Road on the northern boundary of the Main Site, the north-eastern vehicular access, will be used for emergency phased fit-out purposes. It will be gated closed during the operational phase and only opened up for phased fit-out purposes.

6.2.5 The existing emergency access on Beehive Road will be relocated to the north-west of its current location. This relocated emergency access is proposed as a replacement emergency access, with the access arrangements in principle the same as the existing site. It is an improvement on the existing emergency accessdue to its relocation further north-west, nearer to the junction, thereby reducing the emergency travel requirements along Beehive Road.

6.2.6 The Beehive Road access will only be used for emergency purposes only and will have a separate barrier at the entrance to the access, which will remain closed at all times except for during an emergency.

6.2.7 Pedestrian and cycle access will be provided from the operational access onto Cain Road. There will be dropped kerbs and tactile paving to allow for pedestrian movement across the junction.

6.2.8 The route leading to the areas marked to the MV compound connects to the main internal route via an internal access. The access into the MV compound is for very irregular use and would be a reinforced grass with a dropped kerb.

Data Centre

6.2.9 The Data Centre building will be 139.2m(l) x 67.4m(w) x 12.2m(h) to the top of the roof parapet. This provides for 8,692m² which is made up of 7,267m² of technical space (Data Hall) and 1,425m² of office and personnel space.

6.2.10 The Data Hall and Office Accommodation within the Units have been designed to meet the operator's intended employment and operational space requirements.

6.2.11 Internally, the Data Hall layout is primarily driven by the process of cooling internal equipment during operation. Free Cooling is used as the primary means of cooling for the Data Hall. External air is drawn via the sides of the Data Centre building before being distributed in the Data Hall. A high-level return plenum transfers the warmed air either to roof mounted plant to discard or recirculates the air to the cooling equipment depending on the seasonal cooling requirements of the building. During peak summer temperatures, the outside air cooling is supplemented by an evaporative cooling system. Water from the storage tanks is sprayed across the media to lower the supply air temperature to maintain satisfactory internal conditions.

6.2.12 The electrical rooms within the data hall will have a concrete soffit which forms the fire protected enclosure to these rooms, as well as forming an air plenum from the external louvres to the internal data hall and providing maintenance access to the louvres and dampers at this level.

6.2.13 Material details for the Data Centre can be found on Site Elevations plan (20305B-RPS-00-XX-DR-A-9507) and within the Design and Access Statement (ref 20305B-RPS-XX-XX-RP-A-9570). This includes the use of steel frames along with pre-cast and steel faced cladding materials for the building envelope.

Associated plant

6.2.14 The Data Centre includes the following roof top plant

- 42 AHU Exhaust Units (Exhausts).
- 12 Direct Exchange Units (DX Units).
- 200m2 of Photovoltaic (PV) Solar Panels

Power Generation

6.2.15 The buildings will be served by a direct Medium Voltage (MV) National Grid (NG) connection routed from the north and distributed via the onsite MV Compound. The proposed MV Compound is located in the north east element of the Site. This location and orientation has been driven by the site's incoming power supply. Utility Supplier and Occupier Switchrooms are provided, together with dedicated maintenance access and secure fencing. The Utility Supplier building (18.1m(l) x 8.6m(w) x 5.6m(h)) is the primary intake switchroom owned and maintained by Utility Supplier, having secure access via Cain Raod. The Occupier building (17.1(l) x 13.4m(w) x 5.6m(h)) is the distribution switchroom for the site owned and maintained by the Applicant. Access to this building is obtained from within Main Site, via locked gate.

6.2.16 Please refer to the MV Compound Buildings GA plan (20305B-RPS-03-XX-DR-A-9545) for further details, including materials and circulation routes.

Resilience and Redundancy

6.2.17 Power for the data centre will be supplied from/by the National Grid which operates its transmission system in accordance with the Security and Quality of Supply Standard which is a requirement of its Transmission Licence. In accordance with this standard, a level of redundancy is also built into the transmission system[1].

6.2.18 The overall reliability of supply for the National Grid Electricity Transmission (NGET) System during 2018 - 2019 was 99.999984%[2]. During 2018-19, there were 347 NGET system events in

[1] https://www.nationalgridet.com/document/129991/download

[2] https://www.nationalgrideso.com/document/153121/download

the United Kingdom where transmission circuits were disconnected either automatically or by urgent manual switching. Most of these events had no impact on electricity users with only three of those disconnections resulting in a temporary loss of power supplies to customers.

6.2.19 The power distribution system, on-site, starting from the Medium Voltage intake substation down to the Low Voltage distribution, is designed to be safe, reliable, robust, and efficient and have in-built redundancy. The Operator designs and builds systems with in-built redundancy, based on Medium Voltage power supply connections from an electricity grid, being the primary power source to the site. The dual redundant circuit provides security of supply in the event of a fault or loss of supply from one source, the other circuit is capable of supplying full load to the site. To achieve this redundancy, the operator is proposing for the full supply to be split 50%/50% (dual-feeds) from alternative supply sources, each capable of supplying the 100%, if required. Essentially, the data centre will be supplied from the Grid by a substation with 2 separate cables from 2 separate feeders; therefore, in the event of a loss of supply from a single source, 50% of the development is still on the alternative source, while the remaining 50% is on back-up emergency generators temporarily until the site's own distribution system can be rearranged to resume supply from the available source. This arrangement stays in place until the failed source has restored supply, at which point power returns to the two supply sources. This arrangement is subject to connection agreement and compliance with transmission and distribution regulations (and providers).

6.2.20 The on-site infrastructure is designed on N+1[3] reliability and concurrently maintainable design. This means that there is redundancy built into the system, so that any one component, or any one distribution path can be out of service without affecting operations. Similarly, for the grid connection to the data centre to fail, it would require a number of failures to the upstream distribution network to occur simultaneously. The requirement to run back-up generators is therefore minimised.

6.2.21 The Operator also undertakes a regular and robust infrastructure inspection, preventive maintenance and testing programme and has an integrated Building Management System (BMS) and an Electrical Power Monitoring System (EPMS): these are additional control tools which are used to monitor physical assets and equipment status and performance.

6.2.22 The measures will minimise the potential for emergency operation of the diesel generators, reducing the overall environmental impact from the installation, in the rare event that they are triggered.

Emergency Generators

6.2.23 In the unlikely event of a loss of power supply, i.e. temporary grid blackout, the diesel-powered emergency (back-up) generators (3MVA) will be utilised to maintain power supply. These generators are designed to automatically activate and provide power to the plant pending restoration of mains power. The building will be served by 10 emergency generators: each with associated flues (at a height of 15m). There will also be one smaller (less than 1 MVA) generator to back-up supply to the administrative sections of the Data Centre.

6.2.24 To ensure the emergency generators are ready and maintained in the event of grid power failure the generators would be tested periodically at the following frequency:

[3] N+1 redundancy is a form of resilience that ensures system availability in the event of component failure. Components (N) have at least one independent backup component (+1). The level of resilience is referred to as active/passive or standby as backup components do not actively participate within the system during normal operation

- each generator tested separately at 25% load for a maximum of 0.5 hour (it will usually be a less than half of this) every two weeks per year (i.e. a total of 13 hours per generator per year - all during the daytime period);
- depending on maintenance-needs, there will also be approximately 1 hour of testing of generators (at approximately 25% load) per quarter after preventative maintenance and replacement of some critical components (all during the daytime period); and
- each generator tested separately at 100% load for 1.5 hours twice a year all during the daytime period (i.e. three hours per generator).

6.2.25 Testing would be carried out during normal daytime working hours (i.e. Monday to Friday between 07:00 and 19:00 hrs) and excluding Bank Holidays. The Applicant is willing to accept a planning condition to limit generator testing to these times.

6.2.26 The emergency generators will be individually containerised within enhanced acoustic enclosures (specifically engineered for greater sound attenuation) and located within a secure compound adjacent to the data centre.

6.2.27 Diesel will be stored on site and it is anticipated that each compound will be served by a main top-up tank holding approximately 40,000 litres. Each of the 3MVA emergency generators will also have an associated 16,000 litre belly tank. The smaller 1MVA emergency generator will have an associated belly tank with 6,000 litre capacity. The 16,000 litres and 6,000 litres represent the approximate volume of diesel required for 24 hours emergency operation of each engine running at full load. All tanks will be above ground and double skinned. The pipelines from the top-up tank to the belly tanks will also be above ground. The two main top-up tanks (1 for each Unit) will each be within a bund with a capacity of 110% of the storage capacity of the tank. Each belly tank is containerised and self bunded to contain 110% of the storage capacity of the tank. This fuel fill point is located in close proximity to the emergency generators and includes provision for fuel interceptors in the unlikely event of a fuel spill. Please refer to the Fuel Tank plan 20305B-RPS-03-XX-DR-A-9543 for details.

6.2.28 These back-up features are also to be covered by an Environmental Permit under the separate consenting regime within the context of the Industrial Emissions Directive (IED) and Environmental Permitting Regulations. A Part A Combustion permit will be applied for.

Intermediate power supply

6.2.29 Ahead of the construction of the Utility Supplier switchroom an MV power supply will be used for the initial phase of operation. This is referred to as the Intermediate power supply and is required until the NG power supply is available. The associated substation building, within the Temporary MV Compound, is located adjacent to the permanent MV compound, as shown on the Master Site Plan (20305B-RPS-00-XX-DR-A-9501) and is 15.6m(l) x 12.1m(w) x 5.6m(h).

6.2.30 Once the Utility Supplier switchroom is delivered and the power supply available, the Intermediate supply will be decommissioned, and above ground structures associated with it demolished.

6.2.31 Although this building is only required for a temporary basis it is shown on the Master Site Plan, as could potentially be in situ for 2 – 3 years. Following removal of this temporary building, the area will be laid to grass, equivalent to its immediate surroundings.

6.2.32 The Applicant is willing to accept a condition in relation to the removal of the temporary building, linked to the delivery of the NG power supply and permanent MV Compound.

Ancillary Facilities

6.2.33 The following ancillary functions will also be provided as part of the wider development:

Security Gatehouse

6.2.34 A single Security Gatehouse with a GEA of 65m² serves the entire site at the principle site entrance. This is a single storey building with a single slope pitch roof and will be approximately 10.4m(l) x 6.2m(w) and 5.4m in height.

6.2.35 This gatehouse will be manned 24 hours a day and controls the electronically operated gated entrance to the Application Site.

6.2.36 Please refer to Gatehouse GA plan 20305B-RPS-03-XX-DR-A-9540 for further details.

Sprinkler Tank & Pump House

6.2.37 A single sprinkler tank and pump house are located remotely from the buildings but adjacent to it. These are required for fire protection purposes.

6.2.38 The pump house will be 9.7m(l) x 8.7m(w) and 4.8m in height, with a flat roof. The tank room is accessed via a steel composite door on the western elevation.

6.2.39 The associated tank is located to the south of the pump room and is 11m in diameter at a height of 5.8m.

6.2.40 Please refer to Sprinkler Tank and Pump Room GA plan 20305B-RPS-03-XX-DR-A-9542 for further details, including materials.

Cycle Shelter

6.2.41 A cycle shelter, to house up to 10 bicycles is provided adjacent to the car park.

6.2.42 The shelter is 5m in length and 2.75m wide. The shelter is 2.86m in height to allow adequate space for a person to walk under.

6.2.43 For further details, including materials, please refer to details on the Master Site Plan 20305B-RPS-00-XX-DR-A-9501.

Waste Bin Store

6.2.44 A dedicate waste bin store is provided adjacent to the office element of the building. This is constructed from treated softwood timber fencing, 2.4m in height, to provide a compound area 8.4m^2

6.2.45 For further details please refer to the Master Site Plan 20305B-RPS-00-XX-DR-A-9501.

Process Water Tanks

6.2.46 Adjacent to the offices are 2 process water tanks. Each tank is 6.1m in diameter and 10.9m in height.

6.2.47 The process water tanks contain the water required to supplement the cooling system for cooling the data hall spaces. During peak summer temperature, the outside air cooling is supplemented by an evaporative cooling system. Water from the storage tanks is sprayed across a media to lower the supply air temperature to maintain satisfactory internal conditions.

MV Room

6.2.48 An MV Room, separate from the Data Centre building is provided to the north west of the building.

6.2.49 The MV Room will be single storey with a flat roof at a height of 6.9m; the building will be 13m long and 16.6m wide providing a GEA of 216m^2.

6.2.50 Please refer to MV Room GA plan 20305B-RPS-03-XX-DR-A-9544 for further details.

Internal Access & Parking

6.2 Once on the site the access road takes vehicles through a controlled access enclosure involving a series of secure barriers, electronic bi-fold gates and an intercom system linked to the Security Gatehouse. Although likely to be a rare occurrence, vehicles rejected from site will reverse and

turn (within the Main Site). Vehicles will then be able to turn and exit onto the highway. Any reversing and turning of rejected vehicle would occur off the highway.

6.2.1 Vehicles accepted on to the site will then pass via the gates and pass the Security Gatehouse. Please refer to Sally Port GA plan 20305B-RPS-03-XX-DR-A-9546 for layout details.

6.2.2 Surface car parking is laid out to the north of the data centre Building. The proposed parking quantum has been established based on the projected vehicle accumulations at the data centre, based on the estimated trip generation.

6.2.3 A total of 37 car parking spaces are proposed on the Main Site, two of which are allocated for the MV compound and 35 to the data centre. There would be zero HGV parking spaces on site, other than the service yard areas, which also reflects the very low level of HGV activity that would be generated during operation.

6.2.4 The proposed parking quantum would include three disabled (blue badge holder) spaces. This equates to 9% of the parking provision. Disabled parking is located next to the internal pedestrian network, to facilitate safe access to the nearby datacentre.

6.2.5 Of the total parking provision assigned to the data centre, five spaces (14%) would also be provided with active electric vehicle charging infrastructure. The remaining 86% of spaces would be provided with passive electric vehicle charging infrastructure (i.e. the cabling) for future implementation.

6.2.6 Of the total parking provision assigned to the data centre, two spaces (6% of total parking provision) would also be assigned for car share users with appropriate signage in place to encourage the use of car sharing.

6.2.7 A Swept Path Analysis demonstrating that the car parking area is practical and usable is shown at Appendix B of the submitted Transport Assessment (ref 20305B-RPS-XX-XX-RP-P-9724). Access to refuse areas is also demonstrated at the same Appendix.

6.2.8 In terms of materials, the external yard areas which experience heavy vehicular loads are to be constructed in concrete, the parking areas and access roads will be laid to macadam.

Security and Lighting

6.2.9 As set out in Section 2 above, a principal requirement of a data centre is a secure site. This is achieved by multiple levels of secure solutions, involving fencing, CCTV, lighting and landscaping.

6.2.10 Security fencing is provided to the perimeter of the buildings and around the Main Site. 4 different types of fencing are proposed, varying in height from 2.4m to a maximum of 3.5m. The details of the fencing types and locations are set out on the Masterplan Fence Types plan 20305D-RPS-00-XX-DR-A-9504 and can be summarised as follows:

- Wider Site Perimeter & inner MV Compound Fence (Type 1)**:**
  - 2.65m(h) weld mesh panel fence (green)
- Unit Perimeter Security Fence (Type 2):
  - 3.5m(h) weld mesh panel fence (green)
- Generator Compound Fence (Type 3):
  - 2.65m(h) weld mesh panel fence (black)
- Outer MV Compound and access area Fencing (Type 4):
  - 2.4m(h) weld mesh profiled fence (green)

6.2.11 Around the Main Site perimeter, along the line of the Type 1 and 2 fencing, 7m high CCTV equipment on mounting poles are proposed at circa 50m intervals or where there is a change in fence direction.

6.2.12 Combined with the CCTV, lighting is also proposed (6m & 8m in height) around the Main Site, providing lighting to access areas, pedestrian routes and for surveillance. The lighting design has been optimised for the site to ensure no obtrusive glare, light spillage or other light nuisance on neighbouring uses. The external perimeter lighting is required during hours of darkness (dusk til dawn). Lighting within the generator compound incorporates integral motion sensors and will only be activated as necessary.

6.2.13 To prevent vehicle access onto landscaped areas and vehicular control bollards are proposed at specific areas, such as adjacent to the Main Site entrance to aid the filtering of traffic (lane management). These are 1m in height.

6.2.14 Location and elevational details of the above measures can be found on the Fence Types plan (20305B-RPS-00-XX-DR-A-9504 and further details within the submitted Site External Lighting Report (ref 20305B-CON-XX-XX-RP-E-9735).

6.2.15 No additional fencing or lighting is not proposed within the Former Recreation area of the site.

Drainage

6.2.16 The proposed surface water drainage layout for the scheme is shown on Surface Water Drainage Layout drawing 20305B-RPS-00-XX-RP-D-9630.

6.2.17 An existing pond located in the Former Recreational Ground currently serves the western catchment of the site, given a significant reduction in hardstanding, the proposed site will fully utilise the existing pond outfall and any additional runoff to suit current design standards and climate change factors will be attenuated on site within the drainage network and discharged later.

6.2.18 The proposed building and the associated impermeable external surfaces will have a dedicated below ground network and all catchments will pass through a catch-pit chamber before discharge into the existing attenuation pond.

6.2.19 Roof drainage for the data centre and ancillary buildings will comprise of tradition gravity drainage system with roof gutters and external downpipes. The rainwater downpipes will be connected directly to a below ground drainage network, where flows will be conveyed under gravity into the existing attenuation pond.

6.2.20 The perimeter circulation roads for each unit will fall-away from the building to linear drains or gullies. The linear drains or gullies will convey the run-off to the receiving below ground drainage network, where flows will be conveyed under gravity into the existing attenuation pond.

6.2.21 Vehicle entrances and car parking areas will be constructed of bituminous construction. Levels will be designed to ensure surface water run-off is collected within linear drains or gullies located at the lowest point. These drains will convey the run-off to the receiving below ground drainage into an alarmed by-pass separator. Flows will be conveyed under gravity into the existing attenuation pond.

6.2.22 Low trafficked area's such as the MV compound access road will be constructed from a permeable construction of 'grasscrete' or similar. Perforated drains within the sub-base will convey the run-off to the receiving below ground drainage network and flows will be conveyed under gravity into the existing attenuation pond.

6.2.23 With regard to foul drainage it is intended that domestic foul and process water flows will discharge to the existing 300mm diameter Thames Water Sewer which runs through the western part of the site. It is proposed that the existing sewer will be diverted to entirely follow the North west boundary before leaving the site as outlined on the proposed 'Foul Water Drainage Layout'.

6.2.24 Current foul flow volumes are likely to be significantly higher than required by the data centre, however any connections will be subject to a formal section 106 agreement with Thames Water and a separate trade effluent application for process water.

6.2.25 In respect of the attenuation pond, it would require ongoing regular maintenance to ensure continuing operation to design performance standards. A maintenance plan is proposed within the Drainage Design Philosophy which follows the guidance set out within the CIRIA Guide C753 SUDS Manual.

6.2.26 Further detail on the site's drainage proposals can be found in the Drainage Design Philosophy (ref 20305D-RPS-XX-XX-RP-C-9605).

Landscaping

6.2.27 The landscaping proposals have been devised in consideration of the site context, local character as well as the operator's security requirements relating to visibility across the Main Site and between the elevation of the building and boundaries. The landscape proposals are set out on the Landscape Strategy plan 20305D-RPS-00-SI-DR-A-9530 and is focused on the following key objectives:

6.2.28 The landscape proposals include the following features:

- retained and proposed tree and shrub planting (to be underplanted / infilled where practicable);
- avenue and parkland trees to be planted in informal groups of three or more and within more formal avenues, particularly at the two Cain Road entrances. Avenues and tree groups to consist of mixed species;
- native shrub planting as underplanting to tree belts at perimeter of site;
- wildflower turf cut frequently to maintain height of 75 mm to allow security requirements;
- meadow grassland, maintained to 300 mm or mown annually in autumn to maintain floristic diversity; and
- woodland interplanting, proposed native hedgerows and restored grassland to land off Beehive Road.

6.2.29 To accord with on-site security requirements which require clear sightlines and offsets requiring grassland management in and around the security fencing, a grassland management regime was developed and is presented as the Grassland Management Plan 20305B-RPS-00-XX-DR-A-9531. This plan differentiates the various grassland maintenance regimes across the Main Site.

6.2.30 In summary there are three levels of grassland maintenance:

- Level 1 – close mown 'Eco Lawn' that includes low creeping herb species maintained up to 75mm and mown at least once a fortnight.
- Level 2 – wildflower grassland topped as required to maintain 300 mm growth.
- Level 3 – appropriate wildflower meadow for soil conditions would be cut annually in September

Staff & Operating Hours

6.2.31 The Data Centre campus is expected to create a number of direct and indirect employment opportunities in addition to contributing induced employment to the local economy. 40-50 staff will work in shifts across a 24-hour period to provide 24/7 hour working on site. Shift patterns and estimated vehicle trip generation is set out in the Travel Plan (ref 20305B-RPS-XX-XX-RP-D-9730).

Construction and Fit Out

6.2.32 The construction phase is estimated to take 10 – 12 months to complete and will comprise external construction and civils activities. This is forecast to commence at the start of Q3 2021 (subject to the progress of the planning process). At the end of that period all external construction activities and civils work will be completed, including:

- hard and soft landscaping;
- security and access areas;
- perimeter fencing;
- internal access roads and car parking areas;
- drainage and attenuation;
- the shell and core construction of the main data centre building and administration block.

6.2.33 The construction phase will be followed by the installation and testing of the IT equipment (data storage and data processing technology) and then the creation of the data networks and various cloud computing services that will operate from the facility. These are then tested prior to becoming available for Customer data. All the Electrical, Mechanical & IT across the entire facility will not be deployed all at one time. Instead, internal fitout will occur in phases, the initial phase commencing within the site construction works at the start of Q3 2021, with follow on phased fit out determined by Customer demand. The reason for this is that having unused data servers and associated mechanical and electrical support systems would unnecessarily consume energy and also require ongoing maintenance and servicing. Thus, they are deployed close to the anticipated Customer needs.

6.2.34 Fitout works associated with these subsequent phases will primarily be carried out inside the completed building and be of circa 6 months duration. There will be limited external works involving the installation of generator sets and roof mounted mechanical equipment, associated with that phase. The principal foundations for each generator set will be built during the main construction period, as described above.

6.2.35 All materials and plant associated with the construction phase will be stored within the footprint of the Application Site. A loading and unloading area for plant and materials will be provided within the site boundary. It is anticipated that the majority of deliveries will be made via articulated low loader vehicles and rigid HGVs.

6.2.36 All construction will be undertaken under the Code of Construction Practice submitted in support of this application (ref 20305B-RPS-XX-XX-RP-P-9738). Please refer to the Code of Construction for further information.

Table 1: Summary of the proposed development

Site Area:	**9.9Ha**
Main Site Area:	7.5Ha
Former Recreation Ground Area:	2.4Ha
DC Building (GEA):	8,692m² Of which: Technical Spaces: 7,267m² Office and personnel space: 1,425m²
Building Dimensions (including rooftop plant)	139.2m(l) x 67.4m(w) x 12.2m(h)
Emergency Generators	11
Flue Height	15m
Water Tank Height	10.9m

Site Area:	9.9Ha
Sprinkler Pump House	9.7m(l) x 8.7m(w) x 4.8m(h)
Sprinkler Tank	11m(dia.) x 5.8m(h))
Security Gatehouse	10.4m(l) x 6.2m(w) x 5.4m(h)
MV Substation (Utility) MV Substation (Occupier)	18.1m(l) x 8.6m(w) x 5.6m(h) 17.1m(l) x 13.4m(w) x 5.6m(h)
Temporary MV Building	15.6(l) 12.1m(w) x 5.6m(h)
MV Room	13m(l) x 16.6m(w) x 6.9m(h)
Car Parking	37 (2 for MV compound)
Cycle Parking	10
Fencing & Security	Type 1: 2.65m(h) weld mesh panel fence (green) Type 2: 3.5m(h) weld mesh panel fence (green) Type 3: 2.65m(h) weld mesh panel fence (black) Type 4: 2.4m(h) weld mesh profiled fence (green)
Lighting	Serving vehicular / pedestrian access and CCTV monitoring 6m(h) adjacent to site perimeter 8m(h) adjacent to access roads and inner fence perimeter around the building

7 POLICY CONSIDERATIONS

7.1 Introduction

7.1.1 This section sets out the Policy context for the Application Site and the development proposals. It establishes the policy documents which form the Development Plan and any other material considerations against which determination of the application will be based and draws out some of the main policy considerations.

7.2 The Development Plan

7.2.1 In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004 planning decisions should be made in accordance with the development plan, unless there are material considerations that indicate otherwise.

7.2.2 In Bracknell Forest a range of policy documents are used to guide the location and other aspects of future development. The development plan relevant to this application is considered to consist the following documents:

- Bracknell Forest Council Core Strategy (2008)
- Bracknell Forest Site Allocations Plan (2013)
- Bracknell Forest Borough Local Plan (saved policies) (2002)
- Binfield Neighbourhood Plan
- South East Plan Policy NRM6, which deals with the Thames Basin Heaths Special Protection Area, remains in place.

7.2.2 Bracknell Forest Council Core Strategy (2008)

7.2.1 The Core Strategy contains the Council's long-term aspirations for the borough and policies to guide and manage development in Bracknell Forest until 2026. It was adopted by the Council on 7 February 2008.

7.2.2 There are a number of policies are relevant to the consideration of the proposal and are set out below:

7.2.3 Policy CS1 'Sustainable Development Principles'

Development will be permitted which:

i makes efficient use of land, buildings and infrastructure; and

ii. is located so as to reduce the need to travel; and

iii. promotes a mix of uses; and

iv. conserves the use of resources including water and energy through a reduction in their use; and

v. supports the economic well being of the population; and

Protects and Enhances;

vi. the health, education and safety of the local population; and

vii. the quality of natural resources including water, air, land and biodiversity; and

viii. the character and quality of local landscapes and the wider countryside; and

ix. the historic and cultural features of acknowledged importance.

7.2.4 Policy CS2 provides the locational principles for new development, giving high priority to Previously development land and buildings in defined settlements and stating that "***Development will be permitted within defined settlements and on Allocated Sites. Development will be permitted which is consistent with the character, accessibility and provision of infrastructure and services within that settlement."***

7.2.5 Policy CS6 'Limiting the Impact of Development'

Development alone or in-combination with other proposals, will contribute to the delivery of infrastructure needed to support growth in the Borough and will mitigate adverse impacts on communities, transport and the environment.

Where those occupying development would lead to increased pressure on local infrastructure, community facilities or resources, that impact is to be met by:

(i) on-site provision prior to full occupation and maintained for the life of the development; or, in agreement with the Council:

(ii) contributing to additional or expanded provision on a different site; or

(iii) a mix of on-and off-site provision, of infrastructure & facilities, reasonably related and needed to serve the development and which will make it more sustainable. The additional provision to be sufficient and in proportion to the scale and nature of the proposed development.

of infrastructure & facilities, reasonably related and needed to serve the development and which will make it more sustainable. The additional provision to be sufficient and in proportion to the scale and nature of the proposed development.

Where the Council agrees off-site mitigation is more practical and of greater value in creating sustainable communities, contributions towards provision on a different site will be secured by planning obligations.

7.2.6 Policy CS7 'Design'

The Council will require high quality design for all development in Bracknell Forest.

Development proposals will be permitted, which;

i build on the urban, suburban and rural local character, respecting local patterns of development and the historic environment;

ii. provide safe communities;

iii. enhance the landscape and promote biodiversity;

iv. aid movement through accessibility, connectivity, permeability and legibility;

v. enable a mix of uses;

vi. provide high quality usable open spaces and public realm;

vii. provide innovative architecture; and

viii. provide well designed and integrated public art

Development proposals will be required to demonstrate how they have responded to the above criteria through the submission of Design and Access Statements, clear and informative plans, elevations and streetscenes and where required site Masterplans, Development Briefs, Concept Statements and Design Codes.

7.2.7 Policy CS10: Sustainable Resources:

Development proposals will be accompanied by a Sustainability Statement demonstrating how current best practice in the sustainable use of natural resources has been incorporated

7.2.8 Policy CS12: Renewable Energy

Development proposals for five or more net additional dwellings, or for 500 square metres (GEA) or more of floorspace for other development, will be accompanied by an energy demand assessment demonstrating how (potential) carbon dioxide emissions will be reduced by at least 10% and will provide at least 20% of their energy requirements from on-site renewable energy generation.

7.2.9 Policy CS 19 'Location of Employment Development' reads as follows:

Employment-generating development will be permitted in Bracknell town centre and the Borough's defined employment areas. The new major locations for growth will also be appropriate for employment-generating development as part of a mix of uses.

7.2.10 Policy CS 20: New Development in Employment Area's reads as follows:

Development proposals for business, industry, distribution and storage uses will be permitted within the defined and major employment areas. Development within defined and major employment areas for non-employment use will only be permitted after a supportive examination of the relevant circumstances, including:

• the supply (amount, type, quality and use) of employment land and premises; and

• provision of and need for the proposed use; and • the relative suitability of the site for employment and for the alternative use; and

• the location of the site and its relationship to other uses.

Planning applications for large employment developments (involving a net increase of at least 2,500m2 GEA) will also be required to be accompanied by an Employment Impact Statement demonstrating:

• the need for the development; and

• a sequential approach to location; and

• how it is appropriate to its location; and

• the number and type of jobs likely to be created, and how they are to be sourced and what the wider impacts of doing so would be; and

• the mitigation that will be required to address any unacceptable adverse impacts.

Ancillary services which:

i. are small in scale (100m2 or less GEA); and

ii. support the primary business function of the employment area; and,

iii. cumulatively do not compromise the integrity of the prime business functions of the employment area

will be permitted in appropriate locations within defined and major employment areas.

7.2.11 Policy CS23 'Transport'

The Council will use its planning and transport powers to:

i. reduce the need to travel;

ii. increase the safety of travel;

iii. maintain and where possible improve the local road network;

iv. provide improved access to key services and facilities;

v. promote alternative modes of travel;

vi. secure the reliable movement of goods through the Borough;

vii. enhance sub-regional connectivity to and from the Borough;

viii. promote travel planning;

ix. make representations and bids for funding major transport infrastructure to help deliver the Core Strategy and Local Transport Plan schemes

7.2.12 Policy CS24: 'Transport and New Development'

Development will be permitted where mitigation against the transport impacts which may arise from that development or cumulatively with other proposals is provided. This shall be achieved through the submission of a transport assessment or transport statement , and where appropriate:

i. contributions towards local public transport and strategic transport improvements;

ii. contributions to transport modelling work;

iii. the implementation of works to the highway;

iv. the provision of new and the improvement of existing pedestrian and cycle routes;

v. the provision of travel plans to promote sustainable travel patterns for work related trips; and

vi. the entering into of freight or bus quality partnerships with the local authority and/or third parties.

Site Allocations Plan (2013)

7.2.13 This document identifies sites for future housing and other development and makes sure that appropriate infrastructure is identified and delivered alongside new development. It was adopted on 17th July 2013.

7.2.14 Policy CP1 'Presumption in Favour of Sustainable Development'

A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Where appropriate, the Council will work proactively with applicants jointly to seek solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions within the area.

The development plan is the statutory starting point for decision making. Planning applications that accord with the policies in the development plan for Bracknell Forest (including, where relevant, policies in neighbourhood development plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then permission will be granted unless material considerations indicate otherwise – taking into account whether:

Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

Specific policies in that Framework indicate that development should be restricted.

7.2.15 In the immediate vicinity of the site, Policy SA8 Land at Amen Corner (South), Binfield & SA2 Land North of Cain Road, Binfield are of particular relevance to the proposal and are considered within assessments as appropriate.

Bracknell Forest Borough Local Plan (2002)

7.2.16 This document was adopted in January 2002. Whilst some of the policies have been replaced by the Core Strategy and the Site Allocations Plan, the following saved policies are relevant to this proposal.

Policy EN1 & EN2 relates to Protecting and Supplementing trees and hedgerows setting out that consent will not be granted where the "…d***estruction of trees and hedgerows which are important to the retention of*** …***ii) The Character and appearance of the landscape or townscape."*** *And requiring "…* ***developers to include in their schemes the planting of indigenous species appropriate to the setting and character of the area and a variety of other indigenous plants according to circumstances, these may include grasses, heathland or wetland species."***

7.2.17 Policy EN3 '*Nature Conservation'* outlines that

Planning Permission will not be granted for development likely to have a significant effect the following areas unless their special value and character can be protected or there are imperative reasons of overriding public interest:

Existing and potential special protection areas (SPAs)

Existing and candidate special areas of conservation (SACs)

Sites of Special Scientific Interest (SSSIs)

The Borough Council will seek to enter into agreements concerning enhancement schemes as part of development proposals, these will incorporate, where appropriate, the management of public access into the site.

7.2.18 Policies EN6, EN7, EN12 are of relevance in so far as they relate to archaeological impacts of development, confirming that planning permission will not be granted for development which would adversely affect important archaeological remains.

7.2.19 Policy EN20 '*Design Considerations in New Development'* sets out that:

In their determination of applications for planning permission the borough council will have regard to the following considerations:

Be in sympathy with the appearance and character of the local environment and appropriate in scale, mass, design, materials, layout and siting, both in itself and in relation to adjoining buildings, spaces and views;

Retain beneficial landscape, ecological or archaeological features and, where reasonable, enhance these features;

Ensure that the design of the development promotes, or where necessary creates, local character and a sense of local identity;

Provide adequate space for private use and visual amenity where appropriate

Provide appropriate layout and design features to improve personal and general security, including the natural surveillance of public spaces, including footpaths, roads and open space;

Avoid the loss of important open areas, gaps in frontages and natural or built features (such as trees, hedges, walls, fences and banks) which it is desirable to retain;

Not adversely affect the amenity of surrounding properties and adjoining area

7.2.20 Policy EN22 '*Designing for accessibility'* outlines that

'A material consideration in deciding planning applications will be the provision of convenient access, parking spaces and facilities for people with disabilities. In assessing the types and amount of provision, the borough council will have regard to their adopted "design standards on accessibility.'

7.2.21 Policy EN25 '*Noise and other pollution'*:

'*Development will not be permitted if it would generate unacceptable levels of noise, smoke, gases, fumes, effluent, vibration, dust or other environmental pollution which would adversely affect the amenities of the occupiers of buildings, or public persons using public open space…'*

7.2.22 Policy M4 'Highway *Measures in association with new development'* outlines that

'Development that would result in a material increase in the use of the existing highway will not be permitted unless appropriate pedestrian, cycling and public transport routes and facilities are provided and/or improved and any reasonably required highway works undertaken.'

Binfield Neighbourhood Plan

7.2.23 The Binfield Neighbourhood Plan was brought into legal force by Bracknell forest Council on 20th April 2016. It forms part of the development plan for Bracknell Forest and is used for determining planning applications in the Binfield Parish. The Application Site lies to the southern end of this designated neighbourhood area boundary.

7.2.24 The following policies are of relevance:

7.2.25 Policy TC2:' Improvements *to Key Local Junction and Pinchpoints'*:

Any development that generates significant amounts of movement will be required to consider through a transport assessment the cumulative transport impact on key local junctions and pinchpoints.

Where there is a potential severe impact on these local junctions and pinchpoints, including in relation to pedestrian safety, suitable mitigation measures will be required.

7.2.26 Policy ENV2: '*Air Quality'*

Any development proposal which is required to be accompanied by an Environmental Statement will be expected to demonstrate the following:

1. it is not likely to result in the breach of European Union limits for air pollution; and

2. if such limits are likely to be breached, then measures will be expected to be put in place to adequately mitigate this impact and ensure that air pollution levels are maintained below the limit.

7.2.27 Policy BF2: '*Protection of Heritage Assets'*

Development proposals should demonstrate that negative impacts to the setting of heritage assets have been either avoided or minimised. Where the harm of any residual impacts of a proposed scheme is not justified by the public benefits that would be provided, it will not be supported.

Development proposals will be required to sustain and enhance the setting of heritage assets in their vicinity, including views from historic parks and gardens, through the careful choice of building heights, layout and materials, use of landscape buffers and placement of green open space. These should avoid placing incongruous tall buildings in prominent locations in views that contribute to the significance of these heritage assets.

7.3 Emerging Policy

7.3.1 Bracknell Forest Council are currently preparing a new local plan which will set the long term spatial vision and development strategy for the borough up to 2036. Once adopted it will replace the Bracknell Forest Local Plan (2002) and the Core Strategy (2008). The Draft Submission Bracknell Forest Local Plan was due to be published in Spring 2020 but due to delays caused by the coronavirus pandemic. The publication of a further Regulation 19 version of the draft Local Plan is anticipated within the next couple of months.

Draft Bracknell Forest Local Plan (Part 1 & 2 2019)

7.3.2 A Draft Local Plan was consulted on between 5th October until 6th December 2019. The document has not been through examination in public so less weight can be given to any of the policies. However, it does give a clear direction to how Bracknell Forest Council wish to see the area developed in future. Consequently, it is considered that it would be useful to highlight the relevant policies contained within the document.

7.3.3 TheMain Site remains within the defined employment area (Policy LP25), as such. development for business, industry, distribution and storage uses is supported.

7.3.4 Policy LP1 'Sustainable Development Principles' sets out that proposal for development will be permitted that:

i) provide suitable land/buildings to help meet development needs;

ii) make efficient use of land/buildings;

iii) create a high quality built environment, enhance and maintain local character and landscapes, and reduce and prevent crime;

iv) protect and enhance the natural environment and heritage assets together with their settings;

v) minimise the use of natural resources, address the waste hierarchy and respond to climate change;

vi) include essential infrastructure, services and facilities required, and maintain the green infrastructure network;

vii) promote healthy lifestyles and maximise health and wellbeing;

viii) are located so as to reduce the need to travel; and,

ix) offer a choice of modes of travel with minimal reliance on the private car.

7.3.5 The following emerging policies are also of relevance:

- Policy LP12 'Infrastructure'
- Policy LP13 'Transport Principles'
- Policy LP17 'Flood Risk'
- Policy LP19 'Design'
- Policy LP 42 'Protection and enhancement of the historic environment'
- Policy LP 43 'Biodiversity'
- Policy LP 44 'Designated nature conservation and geological sites'
- Policy LP 46 'Sustainable construction'

- Policy LP 47 ‘Renewable and low carbon energy’
- Policy LP 48 ‘Sustainable Drainage Systems (SuDS)’
- Policy LP 49 ‘Pollution and hazards’
- Policy LP 50 ‘Development of land potentially affected by contamination’
- Policy LP 51 ‘Assessing transport impacts and requirements’
- Policy LP 52 ‘Transport infrastructure provision’
- Policy LP 53 ‘Travel Plans’
- Policy LP 54 ‘Parking’

7.4 Material Considerations

7.4.1 In addition to the Development Plans, the following are considered material considerations in the determination of this application.

Local Material Considerations

7.4.2 The following Supplementary Planning Documents (SPD) are considered to be of particular relevance to this proposal.

Design SPD

7.4.3 This SPD sets out general advice on design principles and seeks to assist with the implementation of current planning policies and provide prospective applicants with a clearer view of the council’s expectations for design and advice upon the content of design & access statements.

7.4.4 Whilst many of the principles relate to residential proposals, the following are considered relevant:

- Understanding the site and its context;
- Integrating the site into its surroundings;
- Consideration of SuDs from the outset;
- Contribute to environmental sustainability;
- Practical and attractive arrangement of built development and associated requirements;
- Appropriate boundary treatments;
- Coherent approach to design; and
- Siting and design should minimise potential impacts on neighbouring properties and surroundings;

7.4.5 The Design and Access Statement should explain how the application will achieve high quality design and so comply with Core Strategy Policy CS7 and any other relevant policies

Parking Standards SPD

7.4.6 The Parking Standards SPD was adopted in March 2016 and sets out parking standards for new developments and technical design details covering issues including disabled parking and electric vehicle charging.

Planning Obligation SPD

7.4.7 The Planning Obligations SPD was adopted in February 2015. The Community Infrastructure Levy came into effect in the borough in April 2015. The Council applies a nil rate to non-residential development (other than retail development); the current proposals is therefore not CIL liable. This

SPD sets out how site specific obligations will be sought in such circumstances. Further details on this matter can be found in Section 9 below.

Streetscene SPD

7.4.8 The 2011 SPD contains design guidance for streets and other public spaces and whilst is targeted towards residential developments, contains some relevant guidance. The SPD includes details on defining the character and context of a street to inform design and that this should form part of a Design and Access Statement.

7.4.9 The SPD also sets out supporting information which should be part of applications submissions and their assessments including lighting, landscaping, access and drainage design.

Other Policy and Guidance

7.4.10 Other topic specific policy and guidance, such as Sustainable Resource Management, Strategic Flood Risk Assessment and BFC transport guidance, are specifically dealt within in the associated environmental documents submitted in support of the application

National Material Considerations

National Planning Policy Framework

7.4.11 The updated National Planning Policy Framework ("NPPF") was issued and took force in 2019 (replacing the original March 2012 version). It identifies the purpose of the planning system as being to contribute to the achievement of sustainable development, particularly economic, social and environmental objectives.

7.4.12 The NPPF represents up to date government planning policy and is a material consideration that must be taken into account where it is relevant to a planning application. This includes, at the heart of the framework, the presumption in favour of development found at paragraph 11

7.4.13 The NPPF seeks to build a strong and competitive economy (Section 6), and advocates planning decisions which create conditions in which businesses can invest, expand and adapt. The importance of Britain becoming a global leader in driving innovation, including in the field of big-data, is emphasised. The NPPF also directs planning decisions which recognise the locational requirements of different sectors, including clusters or networks of knowledge and data-driven, creative or high-technology industries, as well as storage and distribution operations at a variety of scales.

7.4.14 The NPPF promotes sustainable transport and states that when assessing development, it should only be prevented on highways ground if there would be a severe unacceptable impact. It promotes the effective use of land, including the development of 'previously developed' or 'brownfield' land (Section 11). It encourages developments which are well designed, visually attractive as a result of good architecture and layout, with appropriate and effective landscaping (Section 12). The NPPF requires the consideration of climate change, including flooding, along with the natural environment, pollution, and energy usage (Section 14). Conserving and enhancing the natural environment (Section 15) establishes the principal that if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

Planning Practice Guidance

7.4.15 The Planning Practice Guidance ("PPG") was published in March 2014, and revised in July 2018, and provides guidance and reinforcement as to the application of planning policy and legislation as set out in the NPPF.

8 ASSESSMENT OF THE PROPOSAL

8.1.1 This section considered the key planning issues relating to the proposals, taking into account planning policies within the identified development plans and other material considerations.

8.2 Principle of the Development

8.2.1 As established within the Pre-Ap response, the principle of the development is deemed acceptable. The Main Site lies within a Defined Employment Area for the purposes of the development plan. This designation is proposed to be retained in the Bracknell Forest Borough Draft Policies Map (2019). This shows the Defined Employment Area being extended to incorporate existing commercial development to the west of the Site, on the north and south sides of John Nike Way. Policy CS19 'Location of Employment Development' of the Core Strategy confirms that 'employment-generating development will be permitted in Bracknell town centre and the Borough's defined employment areas'. This is also reflected in Policy CS20 'New Development in Employment Areas' which seeks to protect these areas from non-employment uses, although it is noted that it does not specifically protect the quantum of floorspace. Policy CS2 provides the locational principles for new development, giving high priority to previously development land and buildings in defined settlements.

8.2.2 For the purposes of these policies, 'employment generating development' is defined as uses falling within Use Classes B1, B2 and B8 together with any sui generis uses that share a significant number of characteristics with those uses. The data centre thus falls within such definition.

8.2.3 The proposed development will transform the site into a well-designed, landscaped and contemporary facility, providing visual interest, while offering employment opportunities for the local residents.

8.2.4 The development fully accords with the presumption in favour of sustainable development at the heart of the National Planning Policy Framework. This also reflects the ambitions of Bracknell Forest development Plan, which reflects the importance of the economic role of sustainable development to contribute to building a resilient, responsive and competitive economy, through delivery of land in the right locations to support growth.

8.2.5 It is considered that the principle of development fully confirms with both national and local policy requirements.

8.3 Economic Development and Employment

8.3.1 Two of the identified dimensions of sustainability within the Framework is 'Economic' – contribution to building a strong, responsive and competitive economy and 'Social' – supporting strong, vibrant and healthy communities (NPPF Section 6).

8.3.2 The planned investment in the construction, operation and maintenance of the proposed data centre will generate substantial economic benefits in the UK economy. The Operator is planning to invest over £500 million from 2020 to 2032, including capital and operating expenditures, to build and operate the new data centre. This investment includes in-country (local) spending on construction labour and materials, utilities and imports of highly specialized and proprietary equipment.

8.3.3 The construction of the Data Centre and fitout of the first phase will sustain approximately an average of 400 full-time equivalent (FTE) jobs. Subsequent fitout phases will be timed to meet business demand, each taking approximately 6 months to complete. The completion of each of the remaining fit out phases will sustain approximately an average of 120 full-time equivalent (FTE) jobs. In calculating FTE impacts, the Operator considers Direct and Indirect economic impact generated from projected capital expenditure utilising the input-output multiplier methodology. The estimated result includes those employed by the Operator directly and additional jobs generated in

the related industries through the supply chain. The data is extrapolated based on historical Operator data from similar projects and data from the UK's Office for National Statistics (ONS).

8.3.4 The idea behind the results of input-output methodology is that an initial change in economic activity results in other rounds of spending—for example, building a new road will lead to increased production of asphalt and concrete. The increased production of asphalt and concrete will lead to more mining. Therefore, the economic impact results should be larger than the traffic estimates because it is a cumulative of both on-site jobs directly hired by AWS or through general contractor, and the jobs generated in the supply chain related to the construction of the data centers.

8.3.5 The operation of the Data Centre will sustain approximately 40 FTE jobs during the first three years. After the first three years, the ongoing operation expenditure is estimated to sustain approximately 50 FTE jobs.

8.3.6 The direct jobs supported include construction-related jobs, such as construction general contractors, subcontractors, tradesmen, as well as operation and maintenance jobs, such as engineers, technicians, janitors, security guards and many others. Due to the sophisticated design and engineering of the data centers, the operation and maintenance jobs are high-skilled and high-tech contributing to the high-skilled labour pool within the wider Bracknell area. The Data Centre will contribute to attracting business and enterprise to the Amen Corner Business Park, part of the wider Western Industrial Area, including through spill-over effects arising from the clustering of high-tech operators, high value activity to the supply chain of products and services.

8.3.7 It is also anticipated to generate further indirect and induced employment during both the construction and operation phases of the Data Centre campus as well as contribution into the local economy by way of hotels, shops, restaurants and other services for construction workers.

8.3.8 The Operator runs a number of training and job placement programs, including full-time, classroom-based skills development and training program that prepares individuals for careers in the cloud and connects them to potential employers. Programs are focused on unemployed or underemployed individuals and designed to educate young adults, military veterans, members of the military reserve, those leaving the Armed Forces, and service spouses on the latest software development and cloud computing technologies.

8.3.9 The proposed development has a potential to contribute to the future economic viability of this area of Bracknell and the surrounding areas in the short-term during construction, and the long term through employment opportunities, training programmes and expenditure by staff in the local area, contributing significantly to the local economy.

8.3.10 For both the construction and operational phases, where possible, the Operator will recruit local contractors and operational employees. Additionally, there are opportunities further down the construction supply chain, with use of local suppliers for materials and equipment.

8.4 Transport, Access & Parking

8.4.1 The submitted Transport Assessment (TA) (ref 20305B-RPS-XX-XX-RP-P-9724) has demonstrated that the proposed development has access to a range of sustainable travel options, as well as links to public transport services to the wider area.

8.4.2 An analysis of the traffic volumes and impact has been undertaken and it is concluded that the vehicle movements generated by the proposed development would not result in an unacceptable impact on highway safety or the road network. The assessment undertaken including analysis of the permitted vehicle movements associated with the existing

8.4.3 It is considered that the transport and traffic impact matters have been appropriately assessed and presented to ensure a justified and robust highways case. The proposal is therefore considered to satisfy the requirements of Development Plan policy which seeks to ensure that the impacts of

new development on the strategic and local road network are minimised; and that developments are designed in a way to promote sustainable transport access both within new sites, and linking with surrounding facilities and employment.

8.4.4 The site can achieve a safe and suitable means of access for all modes of transport via the existing primary access. Appendix B of the TA demonstrates that a 16.5-metre long articulated vehicle is able to access and egress the site without issue. The proposed parking quantum has been established based on the projected vehicle accumulations at the data centre, based on the trip generation data presented within the TA. The provision of a total of 37 spaces (2 dedicated to the MV compound) is suitable to accommodate the parking demands of the proposed development whilst being able to accommodate excess parking during any short periods of higher demand, such as staff changeover periods. It would also allow for any periods of higher demands from visitors / maintenance staff. Therefore, there would be no displaced parking occurring off-site at any time.

8.4.5 The relevant local parking standards include parking standards for data centre uses. However, these parking standards do not reflect reasonable assumptions for parking use for the proposed development. The parking standards place data centres in Section 3 of Table 8 for Non-Residential Use, under B1 (offices, light industrial). In the Table, data centres are also referred to as 'IT / Data Centres'. It is considered that the parking standards are not for modern data centre and the use of the proposed data centre is different to that of an IT centre. Should the parking standards be applied for the proposed development it would lead to parking provision significantly higher than the number of individuals accessing the proposed data centre.

8.4.6 For standard B8 use the parking standards allow for a maximum of 1 car parking space per 70 sqm. For comparison purposes only, if the proposed data centre were to operate under a B8 land use, the maximum number of car spaces would equate to 98 parking spaces. The proposed space provision is suitable to accommodate the proposals' demands and reflects the lower traffic generation of the proposed development.

8.4.7 The 9% of the total provision for disabled users (blue badge holders) is above the 5% recommended to be provided in accordance with BFC parking standards. Of the total provision, 5 spaces (14%) would also be provided with active electric vehicle charging infrastructure. The remainder of the spaces are to be provided with passive electric vehicle charging infrastructure for swift future implementation, if necessary. This exceeds the BFC requirements for employment sites greater than 500 sqm, to provide for 20% (1 in 5) of new spaces to be designed and constructed to be readily adaptable to provide charging points.

8.4.8 There are cycle parking standards for the project development land use. However, this notes for cycle parking as 1:200sqm. This would result in 34 parking spaces being required, or cycle parking for 72% of the 47 staff at the proposed development at any one time. The cycle parking has thus been tailored to this particular scheme and will provide a total of 10 cycle parking spaces. Cycle parking will be secure and sheltered, lockers and a dedicated changing area will also be provided within the data centre building.

8.4.9 A Construction Traffic Management Plan (CTMP) has been prepared (ref 20305B-RPS-XX-XX-RP-D-9731). The principal aim of this CTMP is to ensure that the construction works are organised and delivered in a manner that minimises impacts on the highway and maintains highway safety and the amenity of the area surrounding the site.

8.4.10 An outline Travel Plan (TP) has been prepared (ref 20305B-RPS-XX-XX-RP-D-9730) which relates to the operational use of both data centre buildings, establishing the overriding principles and objectives that a future full TP will incorporate. The Travel Plan has been prepared to be BREEAM compliant. Provision and implementation of the TP accords with both national policy requirements of the NPPF and PPG and local policy in the form of the Core Strategy policy 23 & 24 and emerging policy LP53.

8.4.11 A Delivery & Servicing Plan has been prepared (ref 20305B-RPS-XX-XX-RP-D-9732), which is a travel plan that aims to improve the sustainability of freight and servicing. This sets out how deliveries and servicing will be undertaken and managed during operation with the aim of minimising the number of trips made by freight, avoidance of peak periods and promote the use of viable access routes.

Relocated Emergency Access

8.4.12 Within the pre-ap response it was suggested that the emergency access point would be resisted from both highways and design considerations.

8.4.13 This relocated emergency access is proposed as a replacement emergency access, with the access arrangements in principle the same as the existing site & thus its function. However, it is considered to be an enhancement as it is relocated further north-west thereby reducing the emergency travel requirements along Beehive Road.

8.4.14 Part of the security for the data centre includes an inner and outer fence, with different security clearances for each. The inner fence encompasses the data centre building, whilst the outer fence encloses the gatehouse, MV compounds, and parking area. Access into the outer fence compound and access to the inner fence compound is strictly controlled with both security systems and physical security monitoring provided via the Security Gatehouse. .

8.4.15 The relocated emergency access onto Beehive Road is required due to the specific security requirements of the data centre in terms of the inner and outer fence. The emergency access on Beehive Road provides emergency access to the buildings within the outer fence without accessing the inner fence area. Thus, restricting access into the inner fence area.

8.4.16 Should there be an emergency and the operational access from Cain Road was blocked, then the emergency access onto Beehive Road would be used for vehicles to enter and exit the data centre.

8.4.17 As is established within the Arboricultural Impact Assessment (ref 20305B-RPS-XX-XX-RP-P-9733) and the Landscape Strategy Plan ref 20305B-RPS-SI-XX-DR-A-9530, the proposed replacement emergency access only necessitates the partial removal of hedgerow, no trees are proposed to be removed to facilitate this relocation. Additional tree planting is proposed in the location of the existing emergency access, enhancing the boundary of the Main Site at this point.

8.5 Design, Landscape and Visual Impact

8.5.1 Core Strategy Policy CS1 expects new development to make efficient use of land, buildings and infrastructure. Policy CS7 deals with the design of new development, including the principle of provision of a high quality development and innovative architecture, whilst adhering to policy EN20 requiring development to be in sympathy with the character and appearance of the local environment and appropriate in scale, mass, design, materials, layout and siting, both in itself and in relation to adjoining buildings, spaces and views.

8.5.2 The supporting Design and Access Statement (ref 20305B-RPS-XX-XX-RP-A-9580), a requirement of policy, sets out the design principles of the proposal, including design evolution. It is considered that the proposal represents a significant improvement to the site and whilst the buildings are of significant scale, their presence is limited by design measures which integrate then within their landscaped surroundings.

8.5.3 The data centre has been oriented so as to optimise the use of the site whilst adhering to specific operator requirements. Materials, colour palate and landscaping measures are all provided to soften visual impacts.

8.5.4 For all buildings on site, a muted colour scheme is used to harmonise with the surrounding landscaping and natural environment, providing pleasant and familiar aesthetics to onlookers and

resident workers. The chosen envelope cladding will provide a clean and functional look across the entire development. Office ribbon glazing will receive a feature frame and mullion extensions to form solar shading.

8.5.5 The landscape proposals have been designed as an integral part of the proposed development to provide treatment and landscape integration for the perimeter and internal part of the site, and mitigation and visual amenity from the properties, roads and public spaces adjacent to the site boundary. The proposed landscape design comprises predominantly native tree and shrub planting, and wildflower grassland focussed on the enhancement of the local landscape.

8.5.6 The development of the landscape proposals focused on the following key objectives:

- to provide a high-quality landscape setting for the buildings, at the enhance to the site and compliment the site's wider context;
- to strengthen the site's containment particularly at its north-eastern, and south-western and southern edge adjacent to Cain Road and Beehive Road, by extending areas of woodland blocks, interspersed with areas of individual trees and meadow grass areas in order to increase the potential biodiversity value;
- to extend native species trees and other landscape features into the site along access routes; and
- maintain biodiversity and conservation interest to land south of Beehive Road.

8.5.7 The Main Site layout will enable the retention of areas of existing tree and shrub planting adjacent to Beehive Road and part of the northern section of Cain Road, which would be protected as necessary during construction and augmented using native species to extend and reinforce the native vegetation boundary treatment.

8.5.8 The landscape proposals seek to improve the character of the site and the surrounding landscape by establishing vegetation using native species appropriate to the local area, which will provide screening and connectivity to the surrounding area and as an enhancement to the existing site conditions. The building would be enclosed by woodland belts and contained within a parkland setting.

8.5.9 The landscape proposals include the Former Recreation Ground off Beehive Road by retaining, establishing and maintaining native tree and shrub planting, grassland and fauna habitat creation in conjunction with ecologist for biodiversity enhancement.

8.5.10 This is considered to fully comply with policy, in particular Core Strategy policy CS7 and Local Plan policy EN20, which sets out design considerations for new development.

8.5.11 Lighting is proposed to ensure a safe and secure site, including the safety of movement around the Main Site. This has been designed to ensure it is not obtrusive and adequately serves its purpose. with no adverse effect on character, amenity, biodiversity, does not create hazards for people using the site.

8.5.12 Visual impact has been fully assessed in the submitted Landscape, Townscape and Visual Impact Assessment (ref 20305B-RPS-00-XX-RP-L-9722). This concludes that permanent changes that would occur in the Bracknell Urban area landscape character type as a result of the proposed development would be accommodated with in the commercial / industrial area, which has the capacity to absorb the development of a data centre. As the landscape proposals mature, they would become an important aspect of the development, capable of further softening and enhancing the quality of the townscape.

8.5.13 In terms of visual impact, the assessment considers that the location of the Application Site within a commercial / industrial area is such that there would be a relatively small number of visual receptors within Bracknell and the surrounding area that would experience a change in view. Where a view is possible of the building and flues the tops of these features would generally be

seen above intervening vegetation, or as glimpse and in context of other large-scale buildings or against a backdrop of vegetation and urban form.. All the visual effects are considered to be Negligible to Minor adverse with one Moderate adverse effect identified, from the footbridge over the A329.

8.5.14 Overall, the quality and character of the landscape and townscape together with visual resources would be maintained in the long term.

8.5.15 There remains extant permission to construct further office accommodation and a multi-storey car park on Main Site as part of a historic permission, the most recent reference for which is 10/00310/REM. This position has been confirmed by the LPA. This illustrates the consideration, and acceptability of, built form on the site at a similar height to the proposed data centre, with a greater proximity to the boundaries.

8.5.16 As acknowledged in the Pre-Ap response, the existing and proposed landscaping is considered key to successful integration of the proposed data centre into this mixed use area which is undergoing change. As has been established within the application and in particular the LVIA, the proposals achieve this integration with minimal impact and significant enhancement over the existing and extant development on the site.

8.6 Ecology and Arboriculture

8.6.1 An Ecological Appraisal (EA) (ref 20305B-RPS-XX-XX-RP-P-9725) has been prepared to support the planning application to identify and assess the ecological effects which would result from the proposed development. The ecological appraisal consisted of two components: a Phase 1 Habitat survey and a scoping survey for protected species and other species of conservation concern which could present a constraint to development.

8.6.2 The Phase 1 Habitat surveys were undertaken in August 2020 (Main Site) and November 2020 (Former Recreation Ground). A protected species scoping survey was carried out in conjunction with the Phase 1 Habitat survey. The site was assessed for its suitability to support protected species, in particular bats, birds, reptiles, great crested newt Triturus cristatus, badger Meles meles, bats, and other species of conservation importance.

8.6.3 The Ecological Appraisal sets out that the development proposals and landscaping will have a beneficial effect on bats, providing additional opportunity for foraging and roosts over time, alongside opportunities for hedgehog and other animals, including the introduction of new hedgehog homes.

8.6.4 Despite the temporary loss of available nesting habitats as a result of the development, the long-term benefits of the new native planting in the Main Site including fruit bearing species will offer new nesting and foraging opportunities. The maturation of the shrubs and woodland in the Former Recreation Ground continue to develop value for nesting and foraging birds alongside the nesting opportunities around the pond.

8.6.5 There are no statutory designated sites within or in the immediate vicinity of the application site or recreation parcel. The closest site (Wykery Copse SSSI) is located approximately 300m to the south of the Application Site. Although the site falls within the potential impact risk zone of this SSSI there is no connectivity to the development and negligible potential for adverse impacts.

8.6.6 Thames Basin Heaths Special Protection Area (SPA) lies approximately 3.1km south. The construction and operation of the proposed data centre development will not result in any increase in recreational activities at the intentionally designated site, thus accordingly with the saved policy Policy NRM6, within the revoked South East Plan

8.6.7 In terms of the existing and proposed habitats on the site, the Ecological Appraisal concludes that the highest value feature within the Main Site is the tree belt on the western boundary , which will

be retained and is the subject of permanent enhancement with the replacement of non-native ornamental planting with native species which over time will establish a linear urban woodland.

8.6.8 Loss of small strips of unmanaged former amenity grassland which sub-divide the car park is considered of negligible significance. Large area of the existing hardstanding will become wildlflower turf subject to frequent mowing around the building with new wildflower grassland between the perimeter fence and boundary tree belts.

8.6.9 The habitats in the Former Recreation Ground lie outside of the areas that could be directly affected by development activities. All the habitats are subject to protection and retention. Targeted enhancement of woodland and grassland to increase their species diversity and provide additional features to increase resident populations of fauna.

Biodiversity Net Gain

8.2 Using the Biodiversity Metric 2.0, the existing habitats in the Main Site and Former Recreation Ground have a baseline value of 20.81 habitat units. The majority of the value is outside the areas subject to development with the Main Site contributing under 5 habitat units.

8.3 The post development value for the Main Site and Former Recreation Ground is 37 habitat units, an increase of 16 above the existing value and equating to a 78% biodiversity net gain. A summary of the BNG is provided in Appendix C of the Ecological Appraisal.

Arboriculture

8.6.1 A tree survey of the Main Site was carried out by RPS on the 18th August 2020 and the 8th February 2021 in accordance with the requirements of BS5837:2012. The results of which are set out on the Tree Constraints Plan 20305B-RPS-00-XX-DR-A-9561 – 68, appended to the Arboricultural Impact Assessment (AIA) (ref 20305B-RPS-XX-XX-RP-P-9733). A walkover was also undertaken on the Former Recreation Site; a full tree survey was not undertaken as the development proposals will have no impact relating to existing trees on this element of the Application Site.

8.6.2 Whilst the proposed development will necessitate the removal of 166 existing trees, the landscape proposal includes 338 standard trees to be planted at a range of 4 m to 6 m high. Part of this provision is in the location of the existing emergency access which will be removed as part of the proposals. Linking the boundary treeline to the existing area of passive open space in this locality. The proposed replacement emergency access necessitates the partial removal of hedgerow, no trees are proposed to be removed to facilitate this relocation.

8.6.3 To ensure that the construction works on site do not damage retained trees, protection measures will be put in place as set out in the Arboricultural Impact Assessment and the Code of Construction Practice (CoCP) (ref 20305B-RPS-XX-XX-RP-P-9738).

8.6.4 Overall, the proposed development fully accords with Core Strategy Policy CS1 ‘Sustainable Development Principles’ and Policy CS7 ‘Design’ which require protect of landscape and promotion of biodiversity, alongside emerging policy LP43. Protection and enhancement of trees and hedgerows in turn fully complies with Local Plan policy EN1 & EN20 and emerging policy LP19.

8.7 Heritage

8.7.1 A Heritage Statement has been prepared to support the planning application (ref. 20305B-RPS-XX-XX-RP-T-9728), this assesses the effects of the proposed development on all aspects of the historic environment, including buried archaeological remains, historic buildings, and historic areas. The assessment addresses short-term construction effects as well as any longer-term effects resulting from the operation of the proposed development. The assessment examines heritage assets within the Main Site and its immediate vicinity, together with any heritage assets of

the highest level of significance located within a wider area over which it is considered possible that the proposed development could affect the significance of such assets as a result of change within their settings.

8.7.2 With regard to construction, there may be some limited visibility of taller construction equipment (such as cranes) on the proposal site in views towards or across the designated heritage assets at Peacock Farm, but this would only occur over short periods of time. There may also be some noise from construction, but this is very unlikely to impact on the ability to understand and appreciate the significance of these designated heritage assets.

8.7.3 It is considered that the construction of the proposed development would not result in any harm to the significance of the designated heritage assets at Peacock Farm as a result of the change within their settings

8.7.4 Within the pre-application response the county archaeologist has confirmed that that 'since the site has already undergone a satisfactory level of archaeological evaluation and no archaeological features have been identified as surviving below ground, they are satisfied that nothing further is needed by way of investigation or mitigation'. This view is confirmed within the reported desk-based assessment submitted as part of this application.

8.7.5 There would be no change to the character of the historic landscape within or adjacent to the proposal site.

8.7.6 The operation of the proposed development would not result in any harm to the significance of the designated heritage assets at Peacock Farm. This is due to the limited visibility of the proposed data centre building in views from and across these assets and also the existing (recent) built development adjacent to the designated heritage assets.

8.7.7 No other proposed or consented developments have been identified which could result in cumulative effects on any designated or non-designated heritage assets.

8.7.8 Assessment and consideration of Heritage Assets is required by policy, particularly Development Policy EN6, EN7 and EN12, BF2 of the Binfield NP and LP42 of the emerging Local Plan; thus compliance is shown. Due to the absence of any such assets policy requirements mitigation are not relevant and there is therefore no policy conflict with the proposed development in this regard.

8.8 Flood Risk and Drainage

8.8.1 The existing site is a brownfield site where a large part of the site is already served by the existing pond located within the Former Recreation Ground. The proposed development will significantly decrease the impermeable area compared to the extensive buildings and hardstanding currently on site. The current impermeable area is around 6.4 ha and by comparison the proposed site is 3.3 ha, providing a 50% reduction.

8.8.2 A Flood Risk Assessment (FRA) has been prepared to support the planning application (doc ref. 20305B-RPS-XX-XX-RP-C-9602) which assesses the flood risk to the proposed development, the potential impact of the proposed development on flood risk elsewhere and to illustrate compliance with the requirements of national and local policy, including the NPPF and PPG ID7.

8.8.3 Environment Agency mapping shows that the proposed development is located within an area designated as Flood Zone 1, classified as low risk of flooding from fluvial and tidal sources and predominantly has a 'very low' surface water flood risk. The proposed development type is defined as 'highly vulnerable' in the NPPF and PPG ID7; such development is generally acceptable in Flood Zone 1.

8.8.4 Overall, the FRA illustrates that the application area is at low risk of flooding and meets the requirements of the NPPF, PPG ID7 and policies EN6 of the Local Plan and LP17 of the emerging Local Plan, requiring a FRA to support proposals in Flood Zone 1 and assess them against the BF Strategic Flood Risk Assessment.

8.8.5 A Drainage Design Philosophy has been prepared in support this planning application submission (ref. 20305B-RPS-XX-XX-RP-C-9605). This supplements the Flood Risk Assessment and sets out the proposed surface and foul water drainage strategy for the development.

8.8.6 The Drainage Design Philosophy proposes a drainage system discharging surface water runoff into the existing attenuation pond which is located within the Former Recreation Site and serves part of the surface water drainage network and provides attenuation before discharging into a Thames Water surface water sewer. Underground attenuation is proposed at the site to attenuate runoff generated by rainfall events up to a 1 in 100 year plus 40% climate change allowance with no above ground flooding or surcharging of the network to within 1m of the Finished Floor Level (FFL). A 10% increase in impermeable area for urban creep has been included within the design, in accordance with the Bracknell Local Flood Risk Management Strategy.

8.8.7 The impacts of the increase in surface water runoff will be reduced by the incorporation of appropriate and practicable SuDS mitigations measures in the built design, including the implementation of appropriate on-site management pollution control strategy.

8.8.8 The proposed buildings and the associated impermeable external surfaces will have a dedicated below ground network and all catchments will pass through a catch-pit chamber before discharge into the existing attenuation pond.

8.8.9 Surface water run-off should be managed at source, with flows controlled to mimic the natural pre-development rates to reduce downstream impact wherever possible through SuDS. Large areas of landscaping are included as part of the overall development proposals reducing the impermeable area by around half compared to the existing site. The existing pond and surrounding mature landscaping is retained and supplemented by new planting.

8.8.10 The established and new planting provides ecological benefit whilst offering an attractive amenity area. The existing pond is sized to accommodate the quantity of water required for attenuation as well as improve the quality of the water discharged from the Application Site

8.8.11 Mitigation measures as set out in detail within the Drainage Design Philosophy (ref 20305B-RPS-XX-XX-RP-C-9605) to ensure that surface water interests are protected during construction and are included in the CoCP (ref 20305B-RPS-XX-XX-RP-P-9738).

8.8.12 Local Policy seeks to ensure mitigation of Flood Risk is incorporated into all new development. Policy EN6 of the Local Plan and LP17 of the emerging Local Plan requires that the risk and impact of flooding will be avoided. The proposal and supporting documents provide compliance with this requirement. Compliance is also demonstrated with Policy LP48 of the emerging Local Plan which requires provision of a drainage strategy incorporating the use of sustainable drainage systems, allowing for both urban creep and climate change.

8.9 Noise

8.9.1 The potential noise sources from the development include the rooftop plant and the emergency generators. The main source of noise at the data centre would be the diesel powered emergency generators, the generators will be located within enhanced acoustic enclosures designed to reduce the noise to the lowest practicable levels. Measures include an enhanced cladding specification and a silencer fitted to the stack of each generator.

8.9.2 A Noise Assessment (ref 20305B-RPS-XX-XX-RP-P-9720), in accordance to BS 4142:2014+A1:2019 (BS, 2019) has been carried out in order to identify and mitigate potential effects of the development at local sensitive receptors. This includes assessment of existing receptors as well as future, particularly in relation to the site allocations SA2 and SA8.

8.9.3 This concludes that during normal operation and generator testing, in accordance with the scenarios as presented above, which take place during the daytime, predicted operational noise levels at NSRs would be below or just exceed the prevailing background sound levels; would be

well below the thresholds at which critical health effects would occur according to guidance published by the World Health Organisation; and would only result in a small increase to existing baseline ambient sound levels. Furthermore, noise from the proposed development would be similar in character to other uses within the vicinity. On this basis, the noise impacts for general operation of the proposed development are anticipated to be negligible and at the 'No Observed Effect Level'.

8.9.4 Noise from the generators has been mitigated and reduced to a minimum by locating the generators in enhanced acoustic enclosures. These enclosures are a higher-performance specification than the Applicant typically uses (reducing the sound emissions by over 33%). Notwithstanding this, in the event of a major grid failure, if all emergency generators are required, the noise impact would be considered as significant during the night-time.

8.9.5 As established in Section 6 above, the resilience and redundancy measures incorporated within the development will minimise the potential for emergency operation of the diesel generators. Every effort has been made in the design to prevent this from occurring in practice. The noise impact of these has been assessed in the rare event that they are triggered in the event of a loss of power supply, i.e. temporary grid blackout.

8.9.6 Although not explicitly stated in the standard, BS 4142:2014+A1:2019 is generally used to assess regular noise from industrial and commercial plant. Therefore, an important consideration in this context, is the infrequency of the noise impact occurring. Consideration is also given within the assessment of the windows at the receptors being closed (the application of the BS 4142:2014+A1:2019 assumes windows are open) and conservative assumptions made on the mitigation of the facades of the properties.

8.9.7 The noise assessment establishes that the potential for sleep disturbance is very low in a scenario where bedroom windows are kept closed.

8.9.8 It is acknowledged that there is the potential for a noise impact at night-time if all generators are in operation. Due to the rare likely occurrence of the emergency scenario, National Grid reliability and the in-built redundancy and infrastructure maintenance systems, the use of the emergency generators is unlikely to occur in practice and/or for any length of time and the conservatively assessed noise impacts this is considered acceptable.

8.9.9 In addition to the assessment of noise at existing and proposed NSRs, an appraisal of the compatibility of the use with the adjacent land allocation for a school has also been considered with respect to noise. It has been concluded that the site does not place constraints on the allocated land use and is therefore compatible with this use.

8.9.10 Outside of emergency use of the generators, the applicant is willing to condition the testing and maintenance to be carried out during normal daytime working hours (i.e. Monday to Friday between 07:00 and 19:00 hrs) and excluding Bank Holidays.

8.9.11 On the basis of the above, it is considered that the development complies with national planning policy in the National Planning Policy Framework (NPPF), Noise Policy Statement for England (NPSE) and Planning Practice Guidance for Noise (PPG-N); Local Plan policy EN25 and emerging policy LP49.

8.10 Air Quality

8.1 An Air Quality Assessment has been undertaken and reported as part of this application submission (ref 20305B-RPS-XX-XX-RP-P-9721). This assesses both construction and operational related activities in order to adequately consider air quality impacts of the proposed development, which accords with the 'environmental' objective of sustainable development as set out within the NPPF and in Core Strategy policy CS1, Local Plan policy EN25, emerging Local Plan policy LP49 and policy ENV2 of the Binfield Neighbourhood Plan.

8.10.1 During construction, the type of activities that could cause fugitive dust emissions are demolition; earthworks; handling and disposal of spoil; wind-blown particulate material from stockpiles; handling of loose construction materials; and movement of vehicles, both on and off site.

8.10.2 The main effect of any dust emissions, if not mitigated, could be annoyance due to soiling of surfaces, particularly windows, cars and laundry.

8.10.3 Impacts during construction, such as dust generation and plant vehicle emissions, are predicted to be of short duration and only relevant during the construction phase. The results of the risk assessment of construction dust impacts undertaken using the IAQM dust guidance, indicates that before the implementation of mitigation and controls, the risk of dust impacts will be medium. Implementation of the highly-recommended mitigation measures described in the IAQM construction dust guidance should reduce the residual dust effects to a level categorised as “not significant”. Mitigation measures are included in the CoCP (ref 20305B-RPS-XX-XX-RP-P-9738).

8.10.4 The key source of potential pollutants whilst the development is operational is considered to be the 11 diesel-powered back-up generators, for emergency use. Three modelling scenarios have been assessed, in line with the testing scenarios set out in 6.2.22 above.

8.10.5 Concentrations of NO2, PM10, SO2, CO and benzene have been predicted at selected sensitive receptors using a detailed atmospheric dispersion model and compared with the relevant long and short-term AQS objectives.

8.10.6 The long-term operational impacts for all pollutants are predicted to be ‘negligible’, considering the changes in pollutant concentrations and absolute levels. The short-term operational impacts for all pollutants have been screened-out as being insignificant at all receptors. Using professional judgement, the resulting air quality effect is considered ‘not significant’.

8.10.7 The resulting air quality effect is considered to be ‘not significant’ overall. Further details can be found within the submitted report. This is considered to fully comply with local policy including Core Strategy policy CS1, Local Plan policy EN25, emerging Local Plan policy LP49 and policy ENV2 of the Binfield Neighbourhood Plan as the development will not result in significant adverse impact on human health, the environment or local amenity.

8.11 Ground Conditions and Contamination

8.11.1 Significant site investigation works have been previously carried out on the site. The submitted Ground Conditions report (ref 20305B-RPS-XX-XX-RP-P-9734) summarises the findings of these previous reports and gives the opinion that the CBRE Phase 1 report (2018) includes the necessary information and meets the general requirements of a Preliminary Risk Assessment. The CBRE Phase 2 report (2018) provides for a strategy for the implementation of remediation measures required to mitigate the post-development risk associated with ground gas.

8.11.2 This submission does not propose any further Phase 2 Site Investigation to be necessary from a geo-environmental perspective and the remediation/mitigation measures set out within the Ramboll report are considered to be appropriate based on the findings of the site investigations and risk assessments.

8.11.3 It is acknowledged that a pre-occupation condition relating to the submission of a Remediation Verification/Validation report will be required. It is also acknowledged that a condition will be included to ensure that any previously uncharacterised contamination encountered during the redevelopment process is managed appropriately and documented within the Validation report. A Validation Plan is therefore proposed which sets out the information which will be provided by the applicant on completion of the development.

8.11.4 This includes:

- Surface Cover System

- Ground Gas protection Measures
- Water Supply Pipe Protection
- Discover Strategy

8.11.5 Please refer to the Ground Conditions report (ref 20305B-RPS-XX-XX-RP-P-9734) for details.

8.12 Waste

8.12.1 The building will be provided with a dedicated area within the building allowing for the dedicated collection of both refuse and re-cycling, tailored to operational requirements. A bin store is provided external of the building which will be emptied periodically by an appropriately licenced waste management contractor.

8.12.2 Small quantities of hazardous wastes (such as light bulbs, waste oils, batteries, IT equipment) will be generated but will be temporarily stored in specialist storage containers prior to periodic collection by an appropriately licenced waste management contractor for recovery, recycling or disposal.

8.12.3 Waste electrical and electronic media (from data storage servers etc) will be collected by a licenced waste management contractor for recovery, recycling or final disposal. Electronic media will be sanitized within the facility for data security and confidentiality reasons, prior to collection by a licenced waste contractor. This takes place in the Decommissioning Room. No additional waste disposal is required to facilitate operation of the facility.

8.12.4 General principles of how construction waste will be managed are set out in the submitted CoCP (ref 20305B-RPS-XX-XX-RP-P-9738). A Site Waste Management Plan has been prepared and is appended to the CoCP at Appendix D setting out the likely types of waste to be generated and how they will be managed.

8.13 Sustainability, Energy & BREEAM

8.13.1 The Sustainability Statement (ref 20305B-RPS-ZZ-XX-RP-P-9726) submitted within this application and thus accordingly with the requirements of policy CS12, has evaluated the proposed development against principles of sustainability and the relevant national and local planning policies. Consideration has been given to the three objectives of sustainable development, economic, social and environmental, demonstrating how the proposals contribute to the delivery of sustainable development. The statement demonstrates how all principles of sustainability have been considered during the design of the development and how these will be further embedded throughout its lifecycle.

8.13.2 This concludes that the proposed site location and the proposed design would enable a sustainable development to be constructed. The Statement also outlines alignment with the requirements of the BREEAM UK Data Centres 2010. Credits to be targeted through the design of the development are set out within the submitted Predictive BREEAM Assessment (ref 20305B-RPS-XX-XX-RP-P-9729). The proposed development is targeted to achieve BREEAM excellent. This fully complies with emerging policy LP46 which requires all non-residential development to meet such, alongside CS10 and the Sustainable Resource Management SPD

8.13.3 An Energy Statement has been prepared (ref 20305B-CUN-XX-XX-RP-E-9736) as part of this submission, as required by policy CS12. This summarises the energy strategy devised for the development and outlines the development's approach to energy efficiency and renewable energy strategies.

8.13.4 The proposal incorporates a number of energy efficient and passive design measures to deliver significant savings on regulated energy use:

- U-values for all building fabric elements and openings have been specified to meet or exceed the levels required by Building Regulations. In addition, heat losses from infiltration have been minimised and a low air permeability target has been set.
- High efficiency evaporative cooling serves the building's data halls.
- The mechanical building services installation will be specified to achieve high annual energy efficiency in operation and will be regularly serviced to maintain their performance.
- All systems have efficiencies and controls which will meet or exceed the requirements of Part L of Building Regulations (2013).

8.13.5 As part of the analysis, a feasibility study into Low or Zero Carbon Technologies (LZC) has been carried out, with photovoltaic panels (PV) and VRF (Air source heat pump) shown as the most appropriate for this development. PV is proposed on the roof of the office element of the building, covering 200m^2. This has calculated the contribution from renewables to the office aspect as 24% of the total energy demand of the offices; meeting the policy requirement set out in CS12.

8.13.6 The Energy Statement demonstrates that the proposed development is achieving an 83% reduction in CO2 emissions compared with the Building Regulations Part L 2013 Target Emission Rate. The development is also targeting an EPC A rating: the highest available and 15 credits under the BREEAM ENE-01 – Reduction in CO2 emissions issue. The proposed development demonstrates, adherence to policies regarding sustainable design and construction, renewables and natural resources, including CS12, CS10, LP1 and emerging policy LP46 and LP47 relating to renewable and low carbon energy.

8.13.2 The Operator has a strong focus on sustainability and has programs in place to reduce its carbon footprint, with a commitment to achieve net zero carbon by 2040. To work towards the achieving this ambitious goal, the Operator focuses on energy efficiency and reducing power consumption across its operations. The Operator's facilities are already far more efficient than traditional enterprise or on-premises servers. The Operator has commissioned studies to estimate the efficiency of its infrastructure in comparison to traditional computing and found it to be more than three times as efficient, due to efficient servers and higher utilitisation rates.

8.13.3 The Operator's efforts on energy efficiency are never complete and it continuously seeks out additional opportunities to reduce energy usage from every aspect of its business. The operator custom builds its own hardware, which is designed to run workloads with high level of resource utilization to increase efficiency.

8.13.4 Beyond efficiency, the Operator is working to decarbonise the electricity that powers its facilities. The Operator purchases renewable energy by enabling new wind and solar projects, across Europe. To date, the Operator has announced renewable energy projects in eight European countries, including the United Kingdom. The UK projects will generate enough new clean energy to power the equivalent of over 165,000 average UK homes annually. The Operator is on a path to meet its global energy consumption with 100 percent renewable energy by 2025.

8.13.5 The Operator is also committed to water conservation at its data centres. The Operator prioritizes the use of outside air cooling, which means that water is rarely used to cool servers. Utilising this highly efficient cooling solution, the proposed data centre will use the equivalent annual water usage of just eight average UK households – less than 1000m^3.

9 PLANNING BENEFITS

9.1 Community Infrastructure Levy

9.1.1 The BFC Community Infrastructure Levy (CIL) Charging Schedule was adopted by Council on in April 2015. In line with the charging schedules, a development of this type does not render any CIL payments. This position was also confirmed within the formal pre-application response (January 2021).

9.2 The Section 106 Heads of Terms

9.2.1 In line with the Council's Core Policy CS6 it is acknowledged that a legal agreement may be required to be attached to any planning consent.

9.2.2 The applicant is willing to enter into discussions in respect of the development specific associated contributions and the details of this agreement. To facilitate the timely signing of such an agreement, the Applicant would like to progress drafting of the agreement alongside the determination of the application

9.2.3 The pre-ap response set out the following provisions in accordance with the Planning Obligations SPD. Applicant commentary is also provided.

- *Biodiversity - On-site Biodiversity enhancements should be made wherever possible, however, if the Biodiversity enhancements do not amount to a net gain over the site (guidance can be taken from the Council's Biodiversity Officer) the Council will look for a contribution towards Biodiversity enhancements at an agreed off-site location capable of serving the development.*

  As set out within the application submission, on-site enhancements achieve significant biodiversity enhancement, as such we consider that this is not relevant for any future S106.

- *Transport – Due to the location and nature of the development, the scheme is likely to increase walking and cycling numbers and also pressure on public transport. Any developer will need to enter into a Section 106 agreement to ensure delivery of improvements to foot/cycle ways serving the development or will need to provide a contribution towards improvements to foot/cycle ways serving the development. Further details of this exact provision can be discussed as any application is progressed.*

  The applicant is willing to discuss this requirements; as set out in the Transport Assessment, model share shows minimal increase in bus, foot, cycle, as a result of the proposed development and compared to the extant use there would be a net decrease in all modes of transport.

- *Travel Plans - In relation to the proposed B8 use, a S106 obligation will be required to secure the submission and approval of a Travel Plan prior to the occupation of any units. The Travel Plan fee of £3000 and Travel Plan deposit of £5,000 will also be secured by planning obligation.*

  An Outline Travel Plan has been submitted as part of this application; The applicant acknowledges the need for associated fees, as set out in the Bracknell Forest Planning Obligations SPD.

- *SUDS – If the development includes any SuDS infrastructure a planning obligation will be required to ensure approval of the SuDS specification and a long term Management and Maintenance Plan prior to commencing on site. A planning obligation will also be required to secure a SuDS monitoring contribution to monitor SuDS for their lifespan. Further information on the calculation of this would be provided as part of any future application.*

  A maintenance plan is proposed within the Drainage Design Philosophy (ref 20305D-RPS-XX-XX-RP-C-9605) which follows the guidance set out within the CIRIA Guide C753 SUDS Manual. On site drainage systems and SuDS features would remain under private ownership and would be maintained by an Estates management company or the owner/occupier in accordance with the guidance.

9.3 Conditions

9.3.1 To facilitate the timely delivery of the data centre we would like to work with the planning authority to provide sufficient information so that no pre-commencement planning conditions are required, with the overall objective, should planning permission be granted, of allowing construction to start in early Q3 2021.

9.3.2 We appreciate that further discussion will be required post-submission and following consultation with statutory consultees to establish whether this is possible

10 CONCLUSIONS

10.1.1 The principle of the proposed development is supported by adopted and emerging policies within the Development Plan, as has been agreed through pre-application discussions with the Council.

10.1.2 The proposals will result in a high quality development which retains and enhances the landscaping and biodiversity around the Site to deliver a scheme which works with and improves the appearance of the area, without detrimental impacts, while making the best use of the previously developed land.

10.1.3 As acknowledged, the proposed use has particular requirements which impact on the building design, function and wider site layout. The proposals are accompanied by robust technical evidence that demonstrates that any adverse impacts would be minimal and there will be no detrimental impact on the locality or the character of the area. It has also been demonstrated that it will not constrain future proposed uses and aspirations for the area.

10.1.4 The presumption in favour of sustainable development is an established planning principle at the heart of Framework and decision making. This Planning Statement and the planning application demonstrate that:

- The proposal constitutes sustainable development for the reasons set out in Section 8 above;
- There is no conflict with relevant and up to date development plan policies and emerging policies; and
- There are no adverse impacts that would significantly and demonstrably outweigh the benefits.

10.1.5 Overall, the development will accord with the relevant policies at national and local levels. In accordance with section 38(6) of the Planning and Compulsory Purchase Act (2004) and the presumption in favour of sustainable development, the application should therefore be granted planning permission.

APPENDICES

Appendix A

Screening Opinion 13th January 2021

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 SCREENING MATRIX

SECTION 1: DESCRIPTION OF THE DEVELOPMENT AND APPLICABLE THRESHOLDS AND CRITERIA

1. Case Details			
Case Reference	**20/00044/SCR**	**Brief description of the project /development**	Request for a Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) in respect of the demolition of the existing buildings and development of the site to provide a 8692sq.m data centre with approx. 1281.9sq.m of ancillary structures. The development would utilize the existing access from Cain Road with an emergency access provided to Beehive Road.
Applicant	RPS		
LPA	Bracknell Forest Council		
2. EIA Details			
Is the project Schedule 1 development according to Schedule 1 of the EIA Regulations?			The proposed development does not fall within the descriptions of development within Schedule 1 of the Regulations.
If YES, which description of development (THEN GO TO Q4)			N/A
Is the project Schedule 2 development under the EIA Regulations?			Yes
If YES, under which description of development in Column 1 and Column 2?			The proposed development falls within Schedule 2, Category 10, sub-section a) Industrial Estate Development Projects
Is the development within, partly within, or near a 'sensitive area' as defined by Regulation 2 of the EIA Regulations?			The site is not located within a defined sensitive area, however it is approximately 3.1km from a European site (Thames Basin Heaths SPA).
If YES, which area?			See above
Are the applicable thresholds/criteria in Column 2 exceeded/met?			Yes.
If yes, which applicable threshold/criteria?			The development area exceeds the 0.5 ha threshold.
3. LPA/SOS Screening			
Has the LPA or SoS issued a Screening Opinion (SO) or Screening Direction (SD)? (In the case of Enforcement appeals, has a Regulation 37 notice been issued)			No
If yes, is a copy of the SO/SD on the file?			N/A
If yes, is the SO/SD positive?			N/A
4. Environmental Statement			
Has the applicant supplied an ES for the current or previous (if reserved matters or conditions) application?			No

SECTION 2: - SCREENING ASSESSMENT: SCHEDULE 3 – SELECTION CRITERIA FOR SCREENING SCHEDULE 2 DEVELOPMENT

CRITERIA	DESCRIPTION OF THE DEVELOPMENT/IDENTIFICATION OF IMPACTS	SIGNIFICANCE OF IMPACT	SPECIFIC ACTION/ MEASURES TO PREVENT SIGNFICANT ADVERSE EFFECTS
a) Characteristics of the Development			
a) Size and design of the whole development	The site extends to 7.5ha and is located within the Western Industrial Area as defined within the development plan. The site is currently occupied by 2no. office buildings with associated parking, landscaping and amenity area. The proposal comprises a data hall (6314sq.m) with associated office and personnel space (2,105sq.m), an electrical and AHU Plant Room, loading bay, maintenance and storage space, plant (at roof level), emergency backup generators with emission stacks, diesel tanks and filling area, electrical switch room, water sprinkler pump room and storage tank, a gate house, site access, internal access roads, hard and soft landscaping. Surface water runoff currently discharges to a balancing pond to the south west off Beehive Road. This arrangement will continue for the proposed development however, attenuation for surface water will be provided on site to allow for changes in volumes due to climate change. Given the London Clay bedrock, infiltration is considered unfeasible therefore, attenuation is likely to be in the form of tanks. The capacity and location of the tanks will be confirmed in the application. The development would be accessed via Cain Road with an emergency access provided from Beehive Road. The nature of the proposed development (which is	Significant impact is unlikely in terms of townscape given location of proposed development and its size, scale and design. Impact in terms of noise/emissions currently unknown however likely to be capable of mitigation through submission of appropriate information as part of planning process, securing appropriate mitigation by condition and through controls imposed by other regulatory regimes.	Compliance with planning policy, including the Design SPD. Any application should be accompanied by a Noise Impact Assessment and conditions likely to be imposed to protect future residents from noise impact of development. Environmental Health Officer requires further information about the Environmental Permit that will be secured for the operation of the generators.

	generally accepted as being a Class B8 storage use) would be deemed acceptable in this location subject to compliance with planning policy (including design policy and SPD). The proposal (as described in the Screening Report and within the associated pre-application submission PRE/20/00220) indicates that the main building would be approximately 12.1m in height, and that each of the 11no. emergency generators would have a 15m high flue stack. The height and scale of the building has the potential to impact upon the character of the area. Furthermore, the use of these generators has the potential to generate emissions. The proposed development requires use of cooling processes and the use of these systems has the potential to cause noise impacts. At present there are no residential properties immediately adjoining the site however the land immediately to the south-west is allocated as a school site and forms part of the wider mixed-use allocation of Amen Corner South. To the north-east, on the opposite side of Cain Road is located the 'Island' site, a residential allocation within the SALP. Furthermore, there is a prior approval permission granted which, if implemented would introduce residential development to the east of the site at The Boulevard.		

b) Cumulation with other existing development and/or approved development	Future development at Amen Corner South to the west, the Island site and 3M to the north and potentially at The Boulevard to the east. However, given the previously developed nature of the current site and the fact that both Amen Corner South and the Island sites are allocations within the SALP, with the 3M site being a potential allocation within the emerging Local Plan, the cumulative impact of these developments has been previously considered acceptable by the LPA. The impact of the physical scale of the development in terms of townscape and increased traffic, noise and emissions to air and water is addressed below.	There is likely to be an effect locally as a result of the cumulative effect of development; given the location this is not likely to be significant. The quantum of development on this site and how it relates to other developments locally will be subject to scrutiny as part of the planning application and subject to conditions as appropriate.	Compliance with planning policy. Consideration of cumulative effects within technical assessments, such as Transport Assessment.
c) The use of natural resources, in particular land, soil, water and biodiversity	The site represents reuse of previously developed land, which is considered a benefit. The site has previously been identified as being potentially contaminated due to its proximity to known landfill sites. The potential impact of any contamination needs to be fully investigated as part of the planning process however it is anticipated that it can be successfully remediated. It is anticipated that, due to the reduced number of employees associated with the proposed use when compared with the lawful, office use of the site, there is likely to be a decrease in use of resources, in terms of water consumption/wastewater discharge. Biodiversity on site is currently limited; there is potential to improve biodiversity through the development process.	Significant effect unlikely since the impact on existing resources in particular, soil water and biodiversity will be subject to scrutiny as part of the assessment of any planning application with any mitigation being secured through planning conditions or associated s106 legal agreement as appropriate.	Any application will be required to be accompanied by a Sustainability Statement; Energy Statement; Ecological Impact Assessment, and Phase 1 Contamination Report (including impact of landfill gas). Ecological enhancement will be sought through the development process, including consideration of the wider ecological network.

CRITERIA	DESCRIPTION OF THE DEVELOPMENT/IDENTIFICATION OF IMPACTS	SIGNIFICANCE OF IMPACT	SPECIFIC ACTION/ MEASURES TO PREVENT SIGNFICANT ADVERSE EFFECTS
d) The production of wastes	The production of wastes would be associated with the demolition of existing buildings and construction waste. Waste material whether used on site or disposed off-site would be controlled through planning legislation or other environmental controls. There would also be some operational waste from normal office working and waste electrical and electronic equipment (WEEE) at the end of its life. The application would not individually or, by virtue of the cumulative impact of other development, have a significant impact on the production of waste.	Significant effect unlikely since the production of wastes generated by the development would be subject to control through the use of planning conditions or through the Environmental Protection Act 1990.	Any impacts will be required to be identified within a Site Waste Management Plan (to include the construction period and the lifetime of the development). This could be secured by planning condition.
e) Pollution and nuisances	Impacts include: - dust, noise and vibration associated with the demolition and construction phases; - vehicle emissions associated with the construction and post development (i.e. occupation phase); - ground contamination associated with previous use; - noise during the construction process and post-construction (i.e. from cooling equipment) - lighting – during construction period and post construction (e.g. security lighting) - surface water run off i.e. potential contamination of surface water during the construction process and thereafter.	Significant effect unlikely since the generation of pollution and nuisances associated with the development would be subject to control through the use of assessments and planning conditions, for example, a Construction Environmental Management Plan (CEMP) and Construction Traffic Management Plan attached to any permission. This would mitigate the impact of the construction of the development and additional controls would be available through the Environmental Protection Act 1990.	Any potential impacts and necessary mitigation will be required to be identified within a Surface Water Drainage Strategy; Contaminated Land Report, Noise Impact Assessment, Construction Traffic Management Plan, Air Quality Assessment and a CEMP all of which will need to be approved in writing and adhered to throughout the development process.

f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge.	Impacts include: - Potential for accidents during the construction period that would have an impact on people or the environment; - Potential for impacts associated with the storage or spillage of hazardous materials associated with construction. - Risk of accidents associated with storage of diesel on site required to power 11no. back-up diesel generators. These will be sited within a compound and will each have a 15m high flue stack. Diesel will be stored on site with the main top-up tank holding 40,000 litres in addition to the 16,000 litre tanks associated with each generator. - Potential for Flooding	Significant effect unlikely since the risk of major accidents and/or disasters associated with the development could be managed through the use of conditions (including a CEMP) attached to the application to mitigate the impact of the construction of the development. Other risks, associated with the future operation of the site can be managed through other regulatory regimes. The applicants have confirmed that all tanks will comply with the Oil Storage Regulations 2015 (as amended) and will be regulated by an Environmental Permit under a separate consenting regime. This will secure the preparation of an Accident Management Plan. Additional controls would be available through the Environmental Protection Act 1990 relating to the storage of hazardous substances and both the EA and HSE regulate this issue.	A CEMP will be required (secured by condition) to govern the impact of development during the construction period. A Surface Water Drainage Strategy will be required in order to mitigate against the risk of surface water flooding.

		-The site is in FZ1 and any changes to the levels of hardstanding can be taken into account in the detailed drainage scheme for the site.	
g) The risks to human health (for example, due to water contamination or air pollution).	Impacts include: - Risks to human health – through existing on-site contamination both during construction and post construction i.e. during the occupation. - Risks to human health – through dust during the construction period and vehicle emissions associated with the construction phase and post construction i.e. during the occupation. - Risk of contamination of water source - Risk arising from foul water discharge.	Significant effect unlikely since the risks to human health could be managed through the use of conditions (including a CEMP) attached to the application to mitigate the impact of the construction of the development.	A CEMP will be required (secured by condition) to govern the impact during the construction period.
b) Location of the Development			
a) The existing and approved land use.	The site is previously developed land within an existing industrial estate.	Significant effect unlikely. Reuse of previously developed land has a positive impact.	
b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground.	The site is located within Flood Zone 1 and is at a low risk of flooding from rivers. It is not located within a Ground Water Protection Zone. In terms of biodiversity there are no specific designations. The site is not in a minerals area.	Significant effect unlikely since the impact on natural resources would be subject to scrutiny as part of the application with use of planning conditions to safeguard existing resources or secure mitigation as appropriate.	Any potential impact will be required to be identified through the submission of baseline studies submitted as part of the application.

CRITERIA	DESCRIPTION OF THE DEVELOPMENT/IDENTIFICATION OF IMPACTS	SIGNIFICANCE OF IMPACT	SPECIFIC ACTION/ MEASURES TO PREVENT SIGNFICANT ADVERSE EFFECTS
c) The absorption capacity of the natural environment, playing particular attention to the following areas:			
i) wetlands, riparian areas, river mouths;	The site is located within Flood Zone 1 and is at a low risk of flooding from rivers. However a recent Strategic Flood Risk Assessment identifies a 13.6% surface water flood risk across the site. In this urban location this level of surface water flood risk is likely to be able to be dealt with through a site Flood Risk Assessment and SuDS.	Significant effect unlikely since the proposed development will be subject to scrutiny to ensure that the development is supported by a Flood Risk Assessment and that the design of the SuDS based drainage strategy will adhere to the guidance given in the CIRIA report C753 'The SuDS Manual' and adhere to DEFRA guidance.	Any potential impacts will be required to be identified within the site Flood Risk Assessment.
ii) coastal zones and the marine environment;	N/A	N/A	
iii) mountain and forest areas;	N/A	N/A	
iv) nature reserves and parks;	N/A	N/A	
v) European sites and other areas classified or protected under national legislation;	The site is within 5 km of the Thames Basins Heath Special Protection Areas (SPA). Since the proposal is for non-residential development no specific impacts upon this sensitive site, e.g. pressure from recreational use, have been identified.	Significant effect unlikely since development proposed non-residential.	
vi) areas in which there has already been a failure to meet the environmental quality	None identified		

CRITERIA	DESCRIPTION OF THE DEVELOPMENT/IDENTIFICATION OF IMPACTS	SIGNIFICANCE OF IMPACT	SPECIFIC ACTION/ MEASURES TO PREVENT SIGNFICANT ADVERSE EFFECTS
vii) Densely populated areas;	The site lies within an existing industrial estate and proposes a use compatible with this in planning policy terms. At present the adjacent sites to the south-west and north-east are undeveloped, and there is a commercial use to the south-east. The surrounding area cannot be described as densely populated.	Significant effect unlikely within the context of the urban area. The development would be expected to be designed to take account of the future residential development that will occur in the area and to mitigate its impact upon this and the existing population.	The application will be expected to demonstrate how any impact upon the transitional character (from commercial to mixed commercial/residential) area would be mitigated.
viii) Landscapes and sites of historical, cultural or archaeological significance.	The site is located within an existing industrial area which is not subject to any specific landscape designation. The site comprises previously developed land. Initial evidence provided by the applicant suggests that the proposals would result in a building some 5m lower in height than the existing. Information submitted in support of PRE/20/00220 indicates potential provision of tree planting as landscaped buffers along 3no. of the site's boundaries. The site lies within an area of modern industrial and commercial development with no recorded designated heritage assets on site. However, there is potential for unknown archaeological remains to be present on site. The Council's Archaeological Advisor confirms that the site has already undergone a satisfactory level of archaeological evaluation and no archaeological features have been identified as surviving below ground level. As a result no further investigation or mitigation is required.	Significant effect on the landscape, historical, cultural or archaeological environment is not anticipated. Any effect would be subject to scrutiny as part of the assessment of the development and mitigation secured, if appropriate through the design and layout of the development and the use of planning conditions.	Any application will be required to demonstrate that the development will not have an adverse impact upon the townscape character of the area. Any changes in the quantum or nature of development (as provided within the EIA screening request and the pre-application information) may necessitate further screening under the EIA regulations.

RITERIA	DESCRIPTION OF THE DEVELOPMENT/IDENTIFICATION OF IMPACTS	SIGNIFICANCE OF IMPACT	SPECIFIC ACTION/ MEASURES TO PREVENT SIGNFICANT ADVERSE EFFECTS
c) Types and Characteristics of the potential impact			
The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on factors specified in regulation 4(2) taking into account:			
a) The magnitude and spatial extent of the impact (for example geographical area and size of the population to be affected)	A number of impacts will be restricted to the site and immediate surrounding area and will be typical of commercial development. Effects with a larger spatial extent include impact on townscape, surface water flood risk, air quality and noise. The individual impacts will be assessed as part of the application.	Significant effect unlikely since the development would be expected to be designed appropriately and any environmental impact upon the existing/future population of the area mitigated.	The application will be expected to be supported by baseline studies to enable an assessment to be undertaken of the impact of the development.
b) The nature of the impact	Short term impacts associated with the noise and activity of the construction period (vehicle movements/machinery); air quality (dust/vehicle emissions); disturbance of contaminated ground; and surface water drainage. Long term impacts following occupation in terms of visual impact; light; noise; traffic generation; impact on air quality; and surface water drainage.	Significant effect unlikely since impacts would be subject to mitigation being provided and secured through conditions and controls thorough the Environmental Protection Act 1990	Any potential impacts will be required to be identified within the individual reports
c) The transboundary nature of the impact	None	N/A	
d) The intensity and complexity of the impact	The impacts are not anticipated to be intense or complex.	Significant effect unlikely.	Any potential impact will be required to be identified through the submission of baseline studies/mitigation strategy submitted as part of the application.

CRITERIA	DESCRIPTION OF THE DEVELOPMENT/IDENTIFICATION OF IMPACTS	SIGNIFICANCE OF IMPACT	SPECIFIC ACTION/ MEASURES TO PREVENT SIGNFICANT ADVERSE EFFECTS
e) The probability of the impact	The development will have an impact on the environment.	Significant effect unlikely since the submission of baseline studies will be able to identify the probability/scale of the impact and mitigation to be provided.	Any potential impact will be required to be identified through the submission of baseline studies/mitigation strategy submitted as part of the application.
f) The expected onset, duration, frequency and reversibility of the impact	The impact of the development would be experienced on the commencement of the development i.e. following the discharge of planning conditions unless otherwise agreed through a definition of commencement within an associated s106 agreement (i.e. where the definition of commencement excludes site set up/ investigations). The impact would be greater throughout the construction period (contaminated land/noise/traffic /air quality/landscape) and would whilst not reversed would be expected to be mitigated as part of the development proposal.	Significant effect unlikely since the submission of baseline studies will be able to identify the duration and frequency of the impact and mitigation to be provided.	Any potential impact will be required to be identified through the submission of baseline studies/mitigation strategy submitted as part of the application.
g) The cumulation of the impact with the impact of other existing and/or approved development	The development is located within an area that is currently subject to change as a result of both existing and proposed development plan allocations. As such there is potential for cumulative effects.	Significant effect unlikely since the submission of baseline studies will be able to identify the nature of the impact and mitigation to be provided.	Any potential cumulative impact will be required to be identified through the submission of baseline studies/mitigation strategy submitted as part of the application.
h) The possibility of effectively reducing the impact	The impact of the development can be reduced to some extent through design modifications particularly in respect of: - Townscape/ visual impact - Contaminated land - Noise - Emissions - Ecology (protection/enhancement)	Further assessment and design are likely to be able to reduce the impact (and provide enhancement) to reduce the significance of impacts.	Any potential impact will be required to be identified through the submission of baseline studies/mitigation strategy submitted as part of any future application.

5. Conclusions – ACCORDING TO EIA REGULATIONS SCHEDULE 3
The proposed development falls within Schedule 2, 10 (a) of the EIA Regulations. It would be located on previously developed land within an existing Industrial Area. The environmental impact of the development would relate to the construction period (contaminated land, dust/air quality, noise, traffic); and longer term use (townscape/visual impact; surface water flood risk; water resource use; noise; air quality). Based on the information provided within the screening request (received 14th December 2020) and the pre-application information (PRE/20/00220) the environmental impacts are not considered likely to be significant, and are capable of being identified and assessed through baseline studies and reports and mitigated through the use of conditions attached to any grant of planning permission. Should the quantum or nature of development change through the design and planning application process, it may be appropriate to re-evaluate this screening decision.

6. Screening Decision	
If a SO/SD has been provided do you agree with it?	N/A
Is it necessary to issue a SD?	Yes
Is an ES required?	No
7. Assessment (EIA Regs Schedule 2 Development)	**OUTCOME**
Is likely to have significant effects on the environment	No
Not likely to have significant effects on the environment	Yes
More information is required to inform direction	No

Name	**Checked:** Max Baker
Date	12/01/2021

Appendix B

Pre-Application Response 11th February 2021

Pre-Application Planning Report for:

Hewlett Packard Site,
Cain Road, Bracknell.

REFERENCE:	PRE/20/00220
DESCRIPTION:	Redevelopment of site as data centre with ancillary facilities
LOCATION:	Hewlett Packard Ltd, Cain Road, Bracknell
CASE OFFICER:	Jo Male Tel: direct line 01344 351128 Email: jo.male@bracknell-forest.gov.uk
CHECKED BY:	Max Baker

This report is the Council's response to your pre-application enquiry reference PRE/20/00220. The pre-app process included a meeting via Teams on 22nd January 2021 at which some initial feedback was provided.

1. The Proposal

This advice is based on information contained in the pre-application submission dated 14th December 2020 and the accompanying documents, namely:

- Covering Letter
- 20305B-RPS-00-XX-DR-A-9500 Site Location Plan
- 20305B-RPS-00-XX-DR-A-9501 Master Site Plan
- 20305B-RPS-01-XX-DR-A-9522 Data Centre Building Elevations
- 20305B-RPS-SI00-XX-DR-A-9532 Site Layout Plan Option 3 Landscaping
- Figure 2 Zone of Theoretical Visibility

The information relates to a proposal to demolish the existing office buildings on site and the development of a new Data Centre (containing data halls, associated electrical and AHU Plant Rooms, loading bay, maintenance and storage space, office administration areas and plant at roof level), emergency back-up generators and emission stacks, diesel tanks and filling area, electrical switchroom, a water sprinkler pump room and storage tank, a gate house, site access, internal access roads, drainage infrastructure and hard/soft landscaping.

Specific advice was requested in respect of the following matters:

1. The proposed planning application approach;

2. The principle of development for a new data centre in this location;

3. Agreement on the proposed planning application scope and the level of detail for the accompanying environmental reports;

4. Feedback from Bracknell Forest Council and relevant consultees as part of this pre-application process;

5. Comments on the proposed masterplan layout; and

6. Likely matters to be covered in a section 106 agreement/heads of terms.

A separate request for a Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) was submitted concurrently with this pre-application request (ref: 20/00044/SCR). The Screening Opinion has been issued indicating that the Local Planning Authority (LPA) does not consider that the proposed development would fall within the category of development requiring an Environmental Impact Assessment.

2. Summary of Response

The Local Planning Authority considers that the proposed data centre comprises a use within Class B8 of the Town and Country Planning (Use Classes) Order 1987 (as amended). The site is located within the Western Employment Area for the purposes of the development plan. Within defined employment areas, the principle of redeveloping sites for Class B8 uses is acceptable and therefore there is considered to be no objection to the principle of the proposed development.

Whilst being a designated Employment Area, the character of the immediately surrounding area is changing, with residential development being introduced to the east,

north and west of the site. It is essential that any future development responds appropriately to this changing character. It is recognised that the nature of the use has certain design and operational requirements and, as a result the landscaping of the site, it is considered key to achieving a successful development that will not have an over-dominant impact within the streetscene and which will provide a high quality public realm.

There is some concern that the submitted Masterplan appears to indicate the loss of existing planting. In the absence of an Arboricultural Impact Assessment, replacement landscaping plans or details of levels, it has not been possible to assess the acceptability of this tree loss or the visual impact of the proposed development, and these will be key considerations for any forthcoming application.

The scheme fails to provide adequate parking for the development proposed when judged against the Council's adopted parking standards and the proposed emergency access onto Beehive Road is considered unacceptable and should be deleted from the proposal.

Further information is required in relation to landscaping, biodiversity, visual impact, contamination, flooding, sustainability, renewable energy and environmental impact as set out in this report and the pre-application submission indicates that each of the issues will be addressed through the provision of appropriate reports.

In summary, it is considered that a building of the nature and scale proposed could be successfully accommodated on this site, subject to careful consideration of its impact within the streetscene which will be dependent upon the quality and extent of any landscape planting, and to other issues being addressed as identified within the following report.

3. The Site

The main part of the site extends to approximately 7.24ha and is currently occupied by 2no. three-storey office buildings surrounded by large areas of hardstanding providing parking for the offices. It is accessed along its north-eastern boundary with Cain Road from two separate roundabouts.

To the south-west, divided from the main site by Beehive Road is an associated area extending to approximately 2.4ha and comprising a disused sports pitch, pavilion building and drainage pond. This latter site, known as the 'Recreation Ground' forms part of the Strategic Allocation known as Land at Amen Corner South, allocated by virtue of Policy SA8 of the Site Allocations Local Plan (2013). A number of trees along this site's western boundary, and a single willow tree on its southern edge are covered by Tree Preservation Order No. 294. This land is subject to an Active Open Space Agreement dated 20th September 1991 which was entered into to satisfy a deed of covenant requirement contained within a Supplemental Section 52 Agreement dated 22nd September 1987.

The office accommodation is set back from the site's frontage with Cain Road, and is separated from it by an area of parking. The site benefits from mature landscaping throughout the car park. Of primary importance is the established boundary planting along Cain Road and Beehive Road and an area of emerging woodland in the site's south-western corner. This latter area appears to be identified as an area of passive open space and its maintenance is secured under the terms of a specific legal agreement dated 20th September 1991.

The site is located within the settlement boundary and a defined Employment Area for the purposes of the development plan. An Article 4 Direction relates to the Western Business Area which includes the site and which restricts permitted development rights relating to

the change of office premises to residential. The route along Beehive Road along the site's western boundary is identified as a Ramblers Route.

The site lies in a mixed-use area on the western edge of the Employment Area. Land to the west of the main site (and to the north of the Recreation Ground) is the subject of a current application for a primary school (ref: 18/00217/OUT) as part of the Amen Corner South allocation. Land to the north, the 'Island' site, is identified as a residential allocation within the Site Allocations Local Plan 2013 (SALP) and is the subject of a current planning application (ref: 20/00947/FUL) for residential uses and the site to the east also has permission to accommodate residential uses.

4. Planning Policy

At a national level the key planning policy guidance relevant to this proposal is the National Planning Policy Framework (NPPF). Chapter 6 relates to building a strong, competitive economy with para. 82 stating that:

'planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations'.

Chapter 9 promotes sustainable transport and Chapter 12 requires good design. Chapter 14 includes guidance on flooding issues and Chapter 15 relates to Conserving and Enhancing the natural environment.

At a local level, the Development Plan includes the following:

- Policy NRM6 of the South East Plan (May 2009)
- Core Strategy Development Plan Document (February 2008) (CSDPD)
- Bracknell Forest Borough Local Plan (Saved Policies) (January 2002) (BFBLP)
- Site Allocations Local Plan (July 2013) (SALP)
- Bracknell Forest Policies Map (2103)

The most relevant planning policies relating to the current proposal are CP1 of SALP which reflects the presumption in favour of sustainable development set out in the NPPF; Policy CS1 of the CSDPD which identifies principles for achieving sustainable development; Policy CS2 which provides the locational principles for new development; BFBLP Policy EN20 and Policy CS7 of the CSDPD which deal with design considerations; Policy CS6 which relates to infrastructure provision; Policies CS10 and CS12 relating to issues of sustainability; Policies CS19 and CS20 relating to new employment development; Policy EN25 of the BFBLP which relates to Noise and Pollution; Policies EN1, EN2 and EN3 of the BFBLP which relate to Tree Protection, Landscaping and Nature Conservation respectively; and BFBLP Policy M9 and CSDPD Policies CS23 and CS24 which cover vehicle and cycle parking and guide transport and new development.

Other documents which are a material consideration in the consideration of the proposal include:

Parking Standards SPD
Planning Obligations SPD
Design SPD
Streetscene SPD

5. Summary of relevant planning history

The site has an extensive planning history. Of relevance to the current buildings on site is outline planning permission (ref: 610511) granted in 1987 for development comprising business Class B1 floorspace and warehousing (Class B8) development on 14.72 hectares with 0.49 hectares of open space. This permission related to a wider area, but included the current site. The existing buildings were constructed pursuant to reserved matters application ref: 614324.

A number of other reserved matters approvals and s73 applications to allow an extended time period for the submission of reserved matters pursuant to the original outline permission (and subsequent permissions granted), have been permitted. Despite, the fact that no other buildings have been constructed pursuant to this original outline permission, the LPA considers that there remains extant permission to construct further office accommodation and a multi-storey car park on site as part of a permission relating to a wider site.

The main site was submitted for consideration for residential development during consultation in relation to the Draft Bracknell Forest Local Plan in spring 2018. It was subject to a focused public consultation in September 2018. In October 2019, the Draft Bracknell Forest Local Plan revised Growth Strategy was published for public consultation. This did not include the site as a proposed housing allocation, to reflect results of evidence of need for employment land and changes in market conditions. Within this version of the emerging Local Plan the site is shown as remaining within a Designated Employment Area. The publication of a further Regulation 19 version of the draft Local Plan is anticipated within the next couple of months. Weight will be given to its emerging policies in accordance with para.48 of the NPPF.

There is a current, as yet underdetermined, application submitted for the site (ref: 20/00563/FUL) which proposes the 'erection of commercial units for B1c, B2, and B8 uses together with associated first floor offices, access, parking, and landscaping following the demolition of the existing buildings'.

6. Principle of development

Policy CS2 of the CSDPD sets out the locational principles for development and confirms that development will be permitted within defined settlements and on allocated sites. Development will be required to be consistent with the character and accessibility of the settlement.

The site lies within a defined Employment Area for the purposes of the development plan. Policy CS19 'Location of Employment Development' of the Core Strategy confirms that *'employment-generating development will be permitted in Bracknell town centre and the Borough's defined employment areas'*. This is also reflected in Policy CS20 'New Development in Employment Areas'.

For the purposes of these policies, *'employment generating development'* is defined as uses falling within Use Classes B1, B2 and B8 together with any sui generis uses that share a significant number of characteristics with those uses. These policies are considered to be predominantly consistent with para. 82 of the NPPF and therefore should be given significant weight in the determination of the any forthcoming application.

It is recognised that a data centre use does not fit comfortably into any use class. However, the Inspector in the Magna Park appeal decision APP/Y0435/X/09/2103771, specifically considered the use and held that it fell within Class B8. This approach has been relied upon by other local authorities and my assessment of the submitted information, in

particular the design of the building and the nature of the end user, does not lead me to an alternative conclusion. As a result, the LPA would deal with any forthcoming application on the basis that it represents a B8 use.

There is therefore no objection to the principle of redeveloping the current site to provide a data centre as proposed as part of the pre-application submission which is considered to be consistent with Policies CS2, CS19 and CS20 of the development plan.

It should be noted that paragraph 225 of Policy CS20 of the CSDPD requires planning applications for large employment developments (involving a net increase of at least 2,500 sq.m GEA) to be accompanied by an Employment Impact Statement to demonstrate a number of requirements including the need for the development. This requirement is considered onerous compared with the Government's desire to support economic growth and increase productivity. The Government's Industrial Strategy: building a Britain fit for the future (2017) refers to the need to build on our existing strengths and assist in the development of new strengths in emerging sectors. The Government is keen that every part of the country realises its full potential and plays a role in transforming our levels of productivity. Furthermore, the COVID-19 outbreak is clearly causing a high degree of uncertainty and downturn in the economy which may have a considerable impact for a number of years to come.

As a result, it is considered that the requirement to submit an Employment Impact Statement is not consistent with national policy and therefore the LPA will not require one to support any future application.

It is noted that the development will result in a loss of employment floorspace at the site, however the quantum of floorspace provided within Employment Areas is not protected under Policy CS20 and the provision of a data centre on this site is considered consistent with para. 82 of the NPPF given the specific locational requirements of this sector for example the need to access appropriate power and communications infrastructure. Accordingly, the proposed development is considered acceptable in principle.

7. Impact on Character and Design of the Area

Core Strategy Policy CS1 deals with sustainable development and expects new development to make efficient use of land, buildings and infrastructure. Policy CS7 deals with the design of new development and expects proposals:

- to build on existing urban character, respecting patterns of development; to provide safe communities;
- to enhance the landscape and promote biodiversity;
- to aid movement through accessibility, connectivity, permeability and legibility; and,
- to provide a high quality public realm and innovative architecture.

BFBLP Policy EN20 requires development to be in sympathy with the character and appearance of the local environment and appropriate in scale, mass, design, materials, layout and siting, both in itself and in relation to adjoining buildings, spaces and views.

These policies are consistent with Chapter 12 of the NPPF and are therefore considered to have significant weight. The NPPF attaches great importance to the creation of high quality buildings and places (para.124). Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

The existing buildings on site are set significantly back from the road and are surrounded by areas of parking with established landscaping set along the site's boundaries and within the parking areas. This planting serves to visually soften the impact of the development

within the streetscene and break up areas of parking within the site. There is a difference in levels between Cain Road and the site which varies across its width. No details of this change in levels have been provided, however this information will be material to an assessment of the visual impact of any development.

The transitional character of this area is a key consideration for any redevelopment of this site. Whilst currently surrounded by vacant or commercial uses, this is due to change as permission exists to introduce a residential use on land to the south-east, the site immediately to the north is a residential allocation and land to west is currently the subject to an application for a primary school.

The Urban Design Officer has been consulted in respect of the proposals and raises a number of issues that should be addressed as part of any forthcoming application:

i) Landscaping
The submitted plans appear to indicate the removal of much of the existing planting along the site's boundaries. In the absence of an Arboricultural Impact Assessment, it has not been possible to evaluate the value of these trees or to determine the visual impact of their loss. However existing/proposed landscaping is considered key to the successful integration of a building of this nature into a mixed use area. The intention should be to provide sufficient screening from the public realm such that only glimpses of the building are available. Full details of all landscape planting should be provided at the application stage (not left to be covered by condition), and details of levels and streetscenes should be provided in order to determine the visual impact of the proposed development within the streetscene.

It is noted that there is no landscaping proposed along the site's south-eastern edge, rendering the building very visible from beyond the site. The LPA would wish to understand the security requirements in relation to the site in order to be able to judge the appropriateness of any proposed landscaping when balanced against the operational needs of your client.

ii) Building Design
Whilst it is appreciated that efforts have been made to break up the bulk of the building through use of vertical cladding panels in 6 alternating colours, it is considered that a simpler, less visually intrusive result would be achieved if wider panels and a more limited colour palette were used. At present, no details of the utility compound are provided other than its proposed height of 5.6m. Its location is relatively close to the road frontage, however its visual impact may be mitigated by the levels in this area. Full details should be provided as part of the application.

iii) Emergency Access
The Beehive Road frontage has always been considered sensitive and this sensitivity will increase when a school or residential development comes forward on the opposite site. The location of the emergency access prohibits planting in this location and facilitates views into the site along the formal access and towards both the main building and the MV compound. The Highways Authority has requested its removal (see below) and the concerns are endorsed by design considerations set out above.

iv) Lighting/Fencing
It is appreciated that the nature of the proposed use has security requirements which will necessitate security lighting and fencing. Full details of the design of these will be required at application stage in order to judge the visual impact on adjoining uses and, in the case of the lighting, upon biodiversity.

In conclusion, it is understood that the scale and design of the building is largely determined by its proposed use, however in order to ensure that it complies with the

development plan, it is necessary for it to be demonstrated that it retains and enhances beneficial landscape features, and would not have a negative and dominant impact on the public realm. Given its location within the site and the potential for landscape planting, it is feasible that a scheme could be advanced where the visual impact of the building is mitigated and the proposed landscaping is considered key to this. Full details of levels across the site, street scenes showing the building from Cain Road, and proposed and existing landscaping will be required in order that the LPA can make this assessment.

8. Trees and Landscape

The site has extensive landscaping that was part of the original development of the site. This planting has matured such that it enhances the visual amenity of the streetscene and overall landscape of the area. Of interest are the boundary landscaped areas that have grown to develop into screens between the road and the interior of the site. Although some of that screening is essentially hedging, it has been regularly maintained and so now presents a mature feature. In addition, within the site and scattered between extensive areas of hard surfacing, are numerous individual and small groupings of trees & shrubs. There is an area of passive open space within the site's south-western corner which is subject to a legal agreement dated 20th September 1991.

It is noted that an Arboricultural Impact Assessment will be submitted in support of any application and this will allow the Tree Service to undertake a full assessment of the development's impact on existing trees and means indicated for their protection during any demolition/construction phase.

The submitted masterplan shows the removal of some of the existing planting around the site's boundaries with Cain Road and Beehive Road and it being supplemented with further tree planting. A proposed Landscaping Plan (Option 3) has been provided which indicates areas for tree removal, broadleaf, conifer and shrub planting and the provision of wildflower grassland and turf around the buildings. The loss of the existing planting, much of which has reached a significant degree of maturity, raises concern. However, in the absence of any more information, no further comment can be made. The Landscape Officer confirms that the proposed approach to the landscape strategy, based on native species and biodiversity enhancement to the site is supported.

A drawing (Figure 2) showing a Zone of Theoretical Visibilty (ZTV) has been submitted, intended to inform the Landscape and Visual Assessment (LVIA) which will accompany a future application. The Landscape Officer has confirmed that the selected viewpoints appear to cover the ZTV although she has been unable to check on site to see if there are any other views that should be included. She suggests possible viewpoints to the south east of the site where the proposed development would be more open and is shown without a planted buffer. This could include locations within Jennett's Park and Wildridings. She notes that, without any section drawings covering the wider area, it is not possible to assess the impact of the scale of the building on the surrounding areas and confirms that the LVIA should focus on the visual impact of the proposal.

She also notes that the north western corner of the proposed building would be clearly visible and largely unscreened from the roundabout and from the area of land to the north of the roundabout where there is currently an application for a housing development. Additional planting to this area should be considered. It is noted that the submission indicates that there are specific security considerations that impact on landscaping and requirements for security fencing and the LPA would want to understand these as part of any future application.

9. Biodiversity

The covering letter recognises that the site provides a suitable habitat for nesting birds and for roosting, foraging and commuting bats. It confirms that a Phase 1 Habitat Survey, and follow-up surveys have been undertaken for the site and will accompany any future application.

The Council's Biodiversity Officer acknowledges that the proposed development would reduce the area of hardstanding at the site and has the potential to create new habitats that would be of benefit to biodiversity and which would therefore be welcomed. She also notes that the scheme has the opportunity to generate credits through biodiversity net gain that could be traded with nearby sites.

In accordance with the Core Strategy policies CS1 and CS7, development will be encouraged which demonstrates that it protects and enhances biodiversity. The Royal Town Planning Institute in "Planning for Biodiversity" achieves this through the following approach:

1) Information – survey information

2) Avoidance – avoiding impacts

3) Mitigation – reducing impacts

4) Compensation – offsetting impacts

5) New Benefits – opportunities for enhancement

This stepped mitigation hierarchy is supported and explained further by Planning Practice Guidance at para 175 of the NPPF.

It is noted that security lighting will be required at the site and this should take into account its potential impact on Biodiversity which should be specifically addressed within an Ecological Impact Assessment.

10. Transportation issues

The site is located to the south of the adopted highway of Cain Road and is served by two access points, both of which connect to Cain Road at a roundabout. Cain Road is a local distributor road between Western Road to the east and John Nike Way / Beehive Road to the west where, in the future, a connection via the Amen Corner South relief road will be provided. Cain Road serves predominantly commercial developments, with a small number of locations converted to residential in recent years. Opposite the site to the north, and accessed via the western site access roundabout on Cain Road, is a site allocated for residential development within the Site Allocations Local Plan 2013.

<u>Access</u>
The site has two existing access points onto Cain Road, which are referred to herein as the eastern and western accesses respectively. The pre-application plans annotate the western access as the Primary Entrance, for which swept paths have been provided, and the eastern access as a Secondary Entrance. It is unclear whether a Section 278 agreement will be needed to tie in a proposed realigned road within the site to the western access.

A route is shown to the north of the areas marked for MV Compound, but no details about the use of this route have been provided. Where this route connects to the main access road within the development, this should be at a right-angle and a bell-mouth may need to be provided here. The location is also currently close to a proposed pedestrian crossing.

Around the data centre itself, a vehicular route is proposed with a one-way anticlockwise circulation. No details of vehicle types anticipated nor swept paths have been provided for this route.

An egress is shown out onto Beehive Lane. The purpose of this egress is questioned, given that there are two access points to the north. It is likely that the Council's tree and biodiversity teams may have concerns about this access. It is considered unnecessary by the Highway Authority and it is recommended that this is removed.

Parking
The Councils Parking Standards SPD (March 2016) provides standards for data centres as:

Standard Car Parking 1:47 sq. m
Cycle Parking 1:200 sq. m
Disabled Parking 5% of total parking capacity
Motorcycle Parking 1 space per 35 car spaces
Electric Vehicle Charging 20% of spaces

The Application Form states that the proposed data centre is 6,892 sq. m, accordingly this would equate to a requirement for 147 car parking spaces based upon the Council's Parking Standards 1:47 ratio. However, it is noted that the Parking Standards SPD places Data Centres in use class B1, where a number of appeals have resulted in the standard use class for Data Centres being B8. Accordingly, the B8 parking standard is 1:70 sq.m, which would result in a requirement for 98 car parking spaces. 34 cycle parking spaces are required.

The submitted plans show 32 standard car spaces, 5 of which are enabled for electric vehicles, and three disabled spaces, along with a small cycle store. Overall the proposed car and cycle parking does not appear to accord with the Councils Parking Standards SPD.

Conclusion
The submitted pre-application plans for the proposed data centre do not appear to demonstrate that the Councils Parking Standards SPD (March 2016) have been met for either vehicle or cycle parking and the proposal currently drafted would therefore be contrary to policy M9 of the Local Plan. Additional car and cycle parking needs to be shown before this proposal is submitted as a planning application. The proposed egress onto Beehive Lane should be deleted from the plans.

11. Heritage issues

It is noted that a Heritage Statement will be submitted as part of the forthcoming application and this will assess the impact of the development on the significance of all designated heritage assets within the vicinity of the site.

The Council's Archaeological Advisors, Berkshire Archaeology, were consulted as part of this pre-application enquiry. They confirm that since the site has already undergone a satisfactory level of archaeological evaluation and no archaeological features have been identified as surviving below ground, they are satisfied that nothing further is needed by way of investigation or mitigation.

12. Environmental Issues

The site comprises a former clay pit which was infilled with industrial and commercial waste as part of the Beehive South-West landfill. The Environmental Health Officer has confirmed that a full Phase 1 Contaminated Land Report would be required to accompany any application to ensure that there is no pathway to receptors, or a new pathway made. An updated Landfill Gas Report and Survey would also be required.

An Air Quality Assessment is due to be submitted with the application and the Environmental Health Officer has confirmed that she is satisfied with the testing scenarios for the back-up generators as set out in the covering letter.

A Construction Environmental Management Plan (CEMP) will be required by condition of any permission granted and this would cover the issue of noise associated with construction works. However, a Noise Impact Assessment will also be required in relation to the operational phase of the development to assess the impact of use of the generators on existing and future residents. In providing this assessment, regard should be had to the location of proposed residential development immediately opposite the site on the northern side of Cain Road.

It is noted that the site would be staffed 24 hours a day, and any application should be accompanied by information about staff numbers/delivery times/shift patterns in order that the noise arising from the operation of the site outside standard working hours can be assessed.

Full details of the Environmental Permit (Part A or Part B) will be required. The Environment Agency and the Health and Safety Executive will also be consulted as part of any application.

13. Surface Water Drainage/ Flood risk

No specific drainage information has been submitted as part of the pre-application enquiry however it is noted that a detailed Flood Risk Assessment (FRA) will be carried out and a detailed drainage strategy provided as part of the application.

From past investigations it is known that the site is subjected to areas at high risk of surface water flooding. As such it is important that flow routes and the existing drainage arrangements are considered at the outset.

It should be noted that, in accordance with the Bracknell LFMRS, a 10% increase in impermeable area is required for urban creep. In addition, FEH Rainfall should be used for drainage design not FSR.

Standard advice relating to drainage and SUDS is attached at Appendix 1.

14. Sustainability

Policy CS10 requires the submission of a Sustainability Statement covering water efficiency and Policy CS12 requires submission of an Energy Demand Assessment which should demonstrate how 20% of the development's energy requirements will be met from on-site renewable energy generation and how potential carbon dioxide emissions will be reduced by at least 10% to comply with the requirements of Policy CS12. Both of these documents should accompany any future application.

It is understood that data centres have very high energy requirements. The Council's Renewable Energy Officer has been consulted and recommends that the roof could be covered with solar PV and heating could be by means of an air source heat pump. A report should be submitted to demonstrate that the maximum on-site renewable energy has been installed.

15. Securing necessary infrastructure

Community Infrastructure Levy (CIL)

Bracknell Forest Council introduced charging for its Community Infrastructure Levy (CIL) on 6th April 2015. CIL is applied as a charge on each square metre of new development. The amount payable varies depending on the location of the development within the borough and the type of development.

CIL applies to any new build (except outline applications and some reserved matters applications that leave some reserved matters still to be submitted) including new build that involves the creation of additional dwellings. The Council currently applies a nil rate to non-residential development (other than retail development), such that the current proposal for employment floorspace would not be CIL liable.

s106 agreement

Core Strategy Policy CS6 expects development to contribute to the delivery of infrastructure needed to support growth and infrastructure needed to mitigate impacts upon infrastructure. As CIL does not cover these requirements in the case of your proposed development it is likely that the Council will seek to enter into a s106 agreement to secure the following provisions in accordance with the Council's Planning Obligations SPD:

(a) Biodiversity - The NPPF (Para 175d, 2018) states that: *"opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity".*

On-site Biodiversity enhancements should be made wherever possible, however, if the Biodiversity enhancements do not amount to a net gain over the site (guidance can be taken from the Council's Biodiversity Officer) the Council will look for a contribution towards Biodiversity enhancements at an agreed off-site location capable of serving the development.

(b) Transport – Due to the location and nature of the development, the scheme is likely to increase walking and cycling numbers and also pressure on public transport. Any developer will need to enter into a Section 106 agreement to ensure delivery of improvements to foot/cycle ways serving the development or will need to provide a contribution towards improvements to foot/cycle ways serving the development. Further details of this exact provision can be discussed as any application is progressed.

(c) Travel Plans - In relation to the proposed B8 use, a S106 obligation will be required to secure the submission and approval of a Travel Plan prior to the occupation of any units. The Travel Plan fee of £3000 and Travel Plan deposit of £5,000 will also be secured by planning obligation.

(d) SUDS – If the development includes any SuDS infrastructure a planning obligation will be required to ensure approval of the SuDS specification and a long term Management and Maintenance Plan prior to commencing on site. A planning obligation will also be required to secure a SuDS monitoring contribution to monitor SuDS for their lifespan. Further information on the calculation of this would be provided as part of any future application.

Existing Legal Agreements

As your clients will be aware, there are a number of existing legal agreements that impact on the site. These include a Supplemental Section 52 Agreement dated 22nd September 1987 which relates to the 'Recreation Land' which forms part of this pre-application enquiry. I am advised that prior to any planning permission being granted for this site, it would be necessary for a deed of release to be entered into in respect of obligation 8(b) of this agreement and this could be undertaken as part of the s106 process.

16. Planning Considerations and Conclusions

The site is located within a defined employment area and Policies CS19 and CS20 of the Core Strategy confirm that development proposals for employment generating development, such as the Class B8 use currently proposed, will be permitted within such areas. As a result there is no objection, in principle, to the currently proposed development.

However, any application needs to recognise both the existing and the changing character of the area. As existing, the proposed development is set well back from the Cain Road and Beehive Lane frontages and extensive landscaping, secured as part of the original office development, has been allowed to mature. This now makes a significant contribution to the character of the area and softens the impact of the commercial development on its immediate surroundings. It is noted that some of this existing planting is proposed to be removed, however no further details are provided.

It is accepted that the proposed use has particular requirements which impact on the design of the building and the associated infrastructure. As a result, the proposed landscaping is considered key to ensuring that the building has an acceptable impact within the streetscene and upon the character of the area. This relationship is considered to be of particular importance, given the transitional character of development within the immediate vicinity. Development plan policies require a high quality of design for all new development and one that respects local patterns of development and builds on the character of the area.

The submitted proposals fail to demonstrate that adequate parking, to meet the Council's adopted Parking Standards, can be provided to serve the development and includes an emergency access to the site which will have a detrimental impact upon the character of the area and on landscaping/biodiversity so should be removed.

As recognised in the pre-application enquiry, an FRA will be required to accompany any application and a detailed drainage scheme submitted. Further details in relation to landscaping, visual impact, lighting, biodiversity enhancement, heritage, sustainability, renewable energy, contaminated land and environmental protection will be required as set out within this report.

In conclusion, this report confirms that the LPA will consider this application on the basis that it proposes a Class B8. There is no 'in principle' objection to the proposal which relates to a designated employment site where such storage uses are appropriate. The report sets out a range of considerations/issues that the LPA will require to be addressed and it is confirmed that the list of documentation to accompany a future application as set out in the covering letter, is appropriate. It sets out the comments provided by relevant consultees and indicates, where appropriate, which additional officers/bodies will be consulted as part of the application process. Finally, it provides details of potential matters for any s106 legal agreement, as far as is possible given the pre-application nature of the proposals.

Please note that the advice contained within this report is provided by an officer of Bracknell Forest Council without prejudice to any decision the Council might make on any planning application.

If you decide to submit a planning application further guidance on how to do this can be found on the Council's website:
http://www.bracknellforest.gov.uk/planningapplicationformsandleaflets

You can submit a planning application via the Council website: https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-applications

APPENDIX 1

General Advice relating to Flood Risk and Sustainable Drainage Systems (SuDS)

Flood Risk Advice
If the possible application site is situated in flood zones 2 and 3 as shown on the Environment Agency flood risk map the EA would be a statutory consultee in addition to the Lead Local Flood Authority (LLFA). In this eventuality, the applicant should seek professional advice regarding the true extent of the flood zones in the vicinity of the possible development.

If the possible development is still within flood zones 2 and/or 3 then Exception and Sequential testing would be applied. Depending on these results, if the development were acceptable for planning purposes, then mitigation may be required for flood resistance and compensatory flood plain.

General Surface Water Advice
Bracknell Forest Borough Council has published its Local Flood Risk Management Strategy (LFRMS) which can be found here: http://www.bracknell-forest.gov.uk/local-flood-risk-management-strategy.pdf.

The strategy for dealing with flood risk within the borough says that surface water drainage for development should use Sustainable Drainage systems (SuDS) and this is re-iterated in standing advice from the Environment Agency.

The National Planning Policy Framework (NPPF) says that the LPA should ensure the use of SuDS on “major” development. For “minor” development priority should be given to the use of SuDS. It is essential that the consideration of sustainable drainage takes place at an early stage of the development process, ideally at the master-planning stage. This will assist with the delivery of well-designed SuDS.

It is recommended that the applicant refers to: “Planning for SuDS – making it happen” CIRIA C687 2010.

When a planning application is made for any development within the borough the level of information required will vary according to the type of application. Submission of a drainage strategy will be a “Local list” requirement for validation purposes. Details of the information to be supplied can be found here: http://www.bracknell-forest.gov.uk/drainage-strategy-information.pdf

The information being submitted should show that the application complies with the revised Planning Practice Guidance and the Defra Non-statutory Technical Standards, together with the council’s LFRMS.

The LPA will need to be satisfied that the SuDS for any proposed development can be operated and maintained for the envisaged lifetime of the development e.g.100 years for residential development. This will normally be satisfied with the submission of a management plan setting out how and by whom the SuDS will be operated and maintained.

If it is envisaged that infiltration will be used for the surface water drainage then tests results and calculations in accordance with BRE Digest 365 should also be submitted as part of the application In some circumstances it may be possible that these details could be made the subject of a planning condition requiring that they be submitted and approved prior to the commencement of development and/or occupation as appropriate. However in this case, an alternative scheme will also need to be submitted as a fall back solution should the subsequent testing show that infiltration is not viable.

It is important to note that any permission required for the culverting or alteration of watercourses is not a part of the planning process. For ordinary watercourses it is separately dealt with by the Council in its role as Lead Local Flood Authority. For Main River it is dealt with by the Environment Agency.

Outline Application

A surface water drainage strategy should be submitted. The strategy should show that the existing drainage of the site and its surroundings has been investigated, and that the means of draining the proposed development have been considered together with any routes for exceedance.

With regard to an application, it will be necessary to show that the development could be constructed so as to comply with the guidance and technical standards. The strategy should set out clearly the parameters which the subsequent details design. Conversely, the strategy should not be too prescriptive in detailing a possible solution which could prejudice the choice of SuDS for the development.

If a Masterplan is being proposed for the site, this should indicate how the site could be drained. The plan should include details of any existing drainage features, i.e. watercourses, rivers, culverts, public sewers, etc.

If required a separate flood risk assessment (FRA) should also be submitted.
The provision of a detailed drainage design prior to the commencement of any development will usually be required by the use of a Condition(s).

Full or Reserved Matters Application

It is essential that SuDS are designed into the layout of the development from the beginning. This will ensure the full use of the available land for the routing and storage of surface water, together with the multi-use of land so as to maximise the development potential.

The retrofitting of SuDS into a previously approved planning layout will not generally lead to the most effective surface water drainage solution.

A detailed drainage strategy should be submitted, which must demonstrate that the application complies with the revised Planning Practice Guidance and the Defra Non-statutory Technical Standards published in March 2015.

Practice guidance for the Defra Technical Standards is available from:
http://www.lasoo.org.uk/wp-content/uploads/2015/06/155639-SUDS-Booklet-A4_LR1.pdf

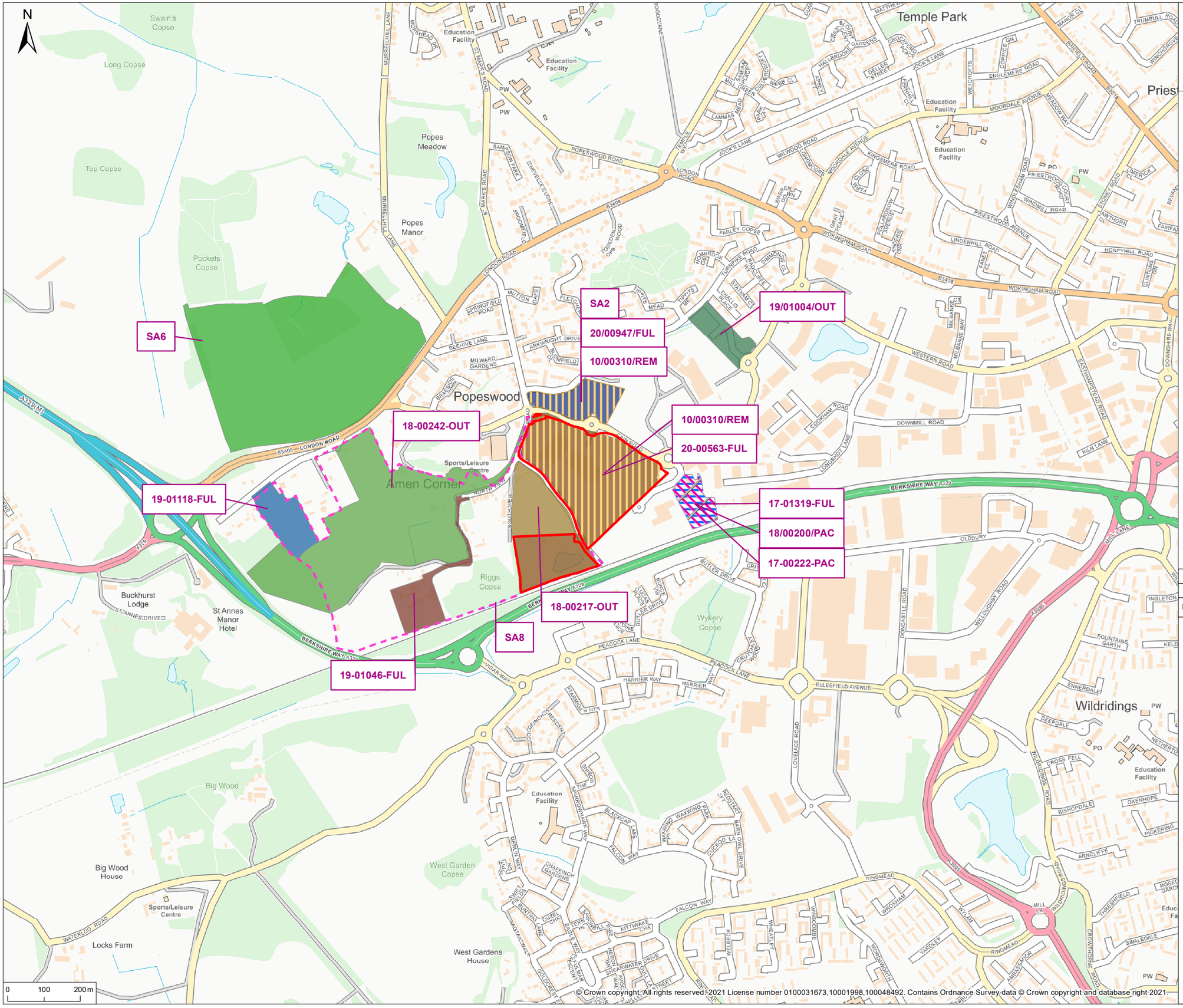
In addition any detail design should be in accordance with CIRIA's "The SuDS Manual" (C753) which is available from:
http://www.susdrain.org/resources/SuDS_Manual.html

Appendix C Cumulative Table & Figure

Ref	Name	Application Ref	Description	Distance from Site	Planning Status
1	Hewlett Packard Ltd Cain Road Bracknell Berkshire RG12 1HN	20/00563/FUL	Erection of commercial units for B1c, B2, and B8 uses together with associated first floor offices, access, parking, and landscaping following the demolition of the existing buildings.	0km	Pending
2	Land North of Cain Road, RG12 1HN	20/00947/FUL	Erection of 70 bed care home (Class C2) with garden, parking and dedicated access off Turnpike Road and erection of 55 dwellings (7no. one bedroom, 13no. two bedroom, 28no. three bedroom and 7no. 4 bedroom) with associated parking, landscaping and access off Cain Road		Pending
3	Land At Former Golf Driving Range South View Binfield Bracknell Berkshire	18/00217/OUT	Outline application for erection of one-form entry primary school and associated playing fields with access from Beehive Road.	20m	Pending
4	Technology House The Boulevard Cain Road Bracknell Berkshire RG12 1WP	18/00200/PAC	Application for Prior Approval for the change of use from Office (B1) use to Residential (C3), forming 81 no. units.	50m	Approved
5	Technology House The Boulevard Cain Road Bracknell Berkshire RG12 1WP	17/01319/FUL	Creation of 12 apartments in the roof space of the building with the inclusion of dormer windows in the existing roof structure together with associated infrastructure and works.	50m	Approved
6	Building 2 Technology House The Boulevard Cain Road Bracknell Berkshire RG12 1WP	17/00222/PAC	Application for Prior Approval for the change of use of 1st, 2nd and 3rd floor from Office (B1) use to Residential (C3) to form 60 no. flats. (Re-submission of 16/01062/PAC and 17/00041/PAC).	50m	Approved
7	Land Adjoining Coppid Beech House, South Of London Road Binfield Bracknell Berkshire	19/01118/FUL	Erection of 54 dwellings with associated open space, landscaping, amenity space, car and cycle parking, access and other associated works.	0.6KM	Pending
8	Land At Buckhurst Moors Moor Lane Binfield Bracknell Berkshire	19/01046/FUL	Phased redevelopment of site, following demolition of existing buildings, for commercial development comprising 8 units totalling 5,294sqm GEA floor space within four buildings for B1c (light industrial), B2 (general industrial), and B8 (storage and distribution) purposes, together with associated car parking, landscaping and works to Moor Lane.	0.3km	Pending
9	Land At Amen Corner South London Road	18/00242/OUT	Hybrid planning application for a residential-led mixed-use development comprising: outline planning application for commercial development (Use Classes A2 (financial and professional services)/B1 (business)/B8 (storage or distribution)) on 0.95ha (all matters reserved); and full	30m	Pending

Ref	Name	Application Ref	Description	Distance from Site	Planning Status
	Binfield Bracknell Berkshire		planning application for 422 residential dwellings, public open space, replacement car park and spine road.		
10	3M United Kingdom Cain Road Bracknell Berkshire RG12 8HT	19/01004/OUT	Outline application for erection of up to 27 dwellings, with principal access from Turnpike Road, and associated vehicle parking, landscaping and ancillary works following demolition of existing buildings and clearance of the site. [All matters reserved apart from Access]	0.4km	Pending
11	Hewlett Packard Cain Road Binfield Bracknell Berkshire RG12 1HN	610511	Outline Application for the development comprising business Class B1 and warehousing Class B8 on 14.72 hectacres and 0.49 hectacres open space.	0km	Approved
12	Hewlett Packard Cain Road Bracknell Berkshire RG12 1HN	10/00310/REM	Submission of details of scale, appearance and landscaping for the erection of a 2 storey office building and associated car parking and landscaping on the Island Site and 2no. linked 4 storey office buildings, and a 4 level multi-storey car park, together with associated surface parking, alterations to internal road system and landscaping on the Main Site pursuant to outline permission 09/00792/OUT	0km	Approved
13	Site Allocations Local Plan Policy SA2: Land North of Cain Road	Policy SA2	75 dwelling capacity. 1.88Ha site area. 1.69Ha developable area (SHLAA stats)	15m	Site proposed for housing on land within defined settlements
14	Site Allocations Local Plan Policy SA6: Land at Amen Corner (North)	Policy SA6	Land at Amen Corner North is allocated for a comprehensive well designed development that maintains a gap between Binfield, Wokingham and Bracknell, including the following: 400 residential units (including affordable housing). On-site open space and Suitable Alternative Natural Greenspace (SANG). Maintenance of a gap between Binfield, Wokingham and Bracknell (comprising on-site open space and/or SANG).	0.4km	Urban extension site
15	Site Allocations Local Plan Policy SA8	Policy SA8	Land at Amen Corner South, Binfield is allocated for a comprehensive well designed mixed-use development that maintains a gap between Wokingham and Bracknell, including the following: 725 residential units (including affordable housing). Employment. Neighbourhood Centre.	10m	Allocation of land covered by Core

Ref	Name	Application Ref	Description	Distance from Site	Planning Status
			Primary School. On-site open space and Suitable Alternative Natural Greenspace (SANG).		Strategy Policies CS4 and CS5



Notes
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Legend

- Site Boundary

Approved

- 18/00200/PAC
- 10/00310/REM
- 17-00222-PAC
- 17-01319-FUL

Pending

- 18-00217-OUT
- 18-00242-OUT
- 19-01046-FUL
- 19-01118-FUL
- 19/01004/OUT
- 20-00563-FUL
- 20/00947/FUL
- SA2
- SA6
- SA8

Rev	Description	By	CB	Date

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Project -

Title Bracknell Data Centre Site Cummulative Search

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