

Design, Access and Planning Statement

Site address: Simon House, Wavell Road, Wythenshawe M22 5RA

Proposal: Change of Use from E1 (Commercial) to Sui Generis (Mixed Use - Data Centre and Offices) and the siting of a new Substation within GRP hut, and the installation of Electrical Transformer, Fuel Cell, air condensing units (precise details to be provided at condition stage) and Generator.



1.0 Site characteristics and relevant planning history

- 1.1 The application site consists of a large two storey flatroof former office building on the corner of Wavell Road and Brownley Road in Wythenshawe. It's last known use was as a job centre. It lies just to the east of the town centre, within an industrial/commercial park. The land immediately opposite to the south has been cleared ready for development.
- 1.2 The site is immediately adjacent to an existing data centre operated by the applicants, which is much larger (8 storeys) and designed in a three-pronged star shape. The application site, by contrast is of a much simpler design, being constructed of concrete facing panels and white puvvc windows and doors. It is surrounded by 2.5m high steel palisade fencing.



Image 1 – Photos of the site from the public realm

- 1.3 The surrounding area is largely commercial in nature albeit that Brownley Road establishes a boundary for this and residential properties to the north and east. The closest residential property lies to the north, on Brownley Road, but is separated by other structures from the application site.
- 1.4 The property is not listed, nor is it within a Conservation Area. It is not designated in any other manner. The site is wholly within low risk Flood Zone 1, as indicated below.

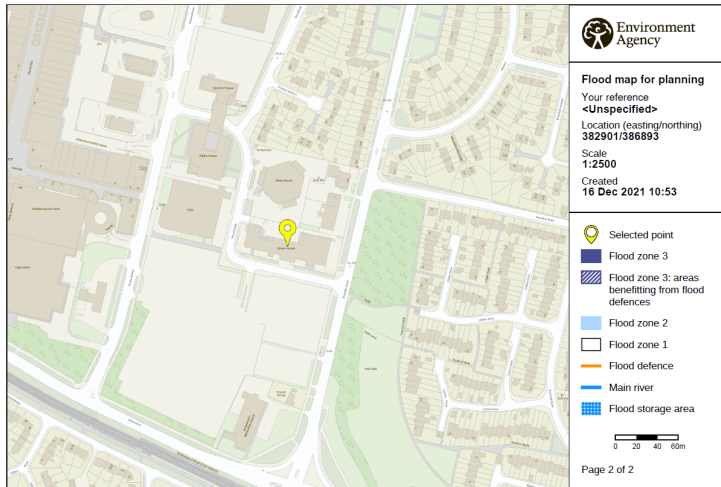


Image 2– EA Flood Map (July 2021)

1.5 The site has been subject to the following relevant planning history:

Application Reference	Description	Status
044245/FO/SOUTH393	Ground floor toilet extension and refurbished entrance	Approved
042387	Installation of 5 windows to Bronley Road elevation of building	Approved
042218	Notice of Intended Crown Development Erectin of 2.4m high palisade fencing with entrance gates	No Objection
018517	New entrance area and extension to mess room	No Objection

Table 1 – Planning History

2.0 Policy framework and design guidance

2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to determine planning applications in accordance with an up to date Development Plan unless material planning considerations outweigh it.

2.2 The Development Plan in this instance comprises Saved Policies from the Core Strategy (2012) (“CS”), City-Wide Development Control Policies and a number of Neighbourhood Plans and Supplementary Planning Documents.

2.3 The relevant policies are as follows:

Core Strategy	
SP1	Spatial Principles
EC1	Employment and Economic Growth in Manchester
EC2	Existing Employment Space
CC8	Change and Renewal
CC9	Design and Heritage
CC10	A Place for Everyone
EC10	Wythenshawe
C1	Centre Hierarchy
C7	Wythenshawe District Centres
T1	Sustainable Transport
EN1	Design Principles and Strategic Character Areas
EN4	Reducing CO2 Emissions by Enabling Low and Zero Carbon Development
EN7	Energy Infrastructure Opportunities
EN8	Adaptation to Climate Change
DM1	Development Management
Saved Unitary Development Plan Policies	
DC17	Telecommunications
DC26	Development and Noise

The Government published a revised National Planning Policy Framework (NPPF) in July 2021. As per the previous iterations, this document sets out the Government’s planning policies for England and how these are expected to be applied. It provides a framework within which local people and local planning authorities can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities. Given the age of the adopted Development Plan documents, where there are discrepancies between it and the new NPPF it is appropriate to consider only the NPPF.

- 2.4** At the heart of the Framework is a presumption in favour of sustainable development – Local Planning Authorities should approve proposals that accord with an up-to- date Development Plan and, alongside saved local plan policies and to which the relevant Strategic Policies will align, it too seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings, as well as taking account of the character of different areas.
- 2.5** Section 12 requires development to demonstrate good design and establishes that LPAs, when determining planning applications, should ensure that development:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

2.6 Section 10 sets out the government's support for the provision of high quality communications. It suggests that *"advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being"*. Datacentres of the kind proposed provide an essential piece of infrastructure that is necessary for the ongoing digitisation of the economy and society.

3.0 Proposal

3.1 Our existing Data Centre at Delta House has been in operation since 2007. The facility is now one of the key data centre locations in the North West of England and supports over 250 clients and their technical infrastructure. Clients range from local SMBs to the largest tech organisations in the world. Teledata has invested in and implemented significant sustainability projects such as battery storage, voltage optimisation and super low loss energy components, reducing emissions of over 500 CO2 tonnes annually.

3.2 The proposal relates to the conversion of a vacant office building into a datacentre with offices at first floor, with associated works including the provision of back-up generators, air conditioning units, and internal alterations. From a visual perspective, very little will take place externally – meaning that the proposals are negligible in their impact from the public realm.

3.3 In order to guarantee energy provision, the applicant requires the installation of generators to the rear that are used as back up to the grid connection. They intend to use the same type currently installed on their existing property next door. They are positioned away from residential units, are designed to limit the noise emissions, and will likely never actually be used (being for back up only). Indeed, this has proven to be the case on the existing data centre to the north.

3.4 Block Plan:

- SS= Substation within GRP hut (L 2902mm x W 2798mm x H2585 mm)
- TX= Electrical Transformer (L 3262mm x W 2125mm x H 2467mm)
- Fuel Cell= approximate size of standard 20ft container
- Gen= Generator compound of approx. size of standard 40ft container

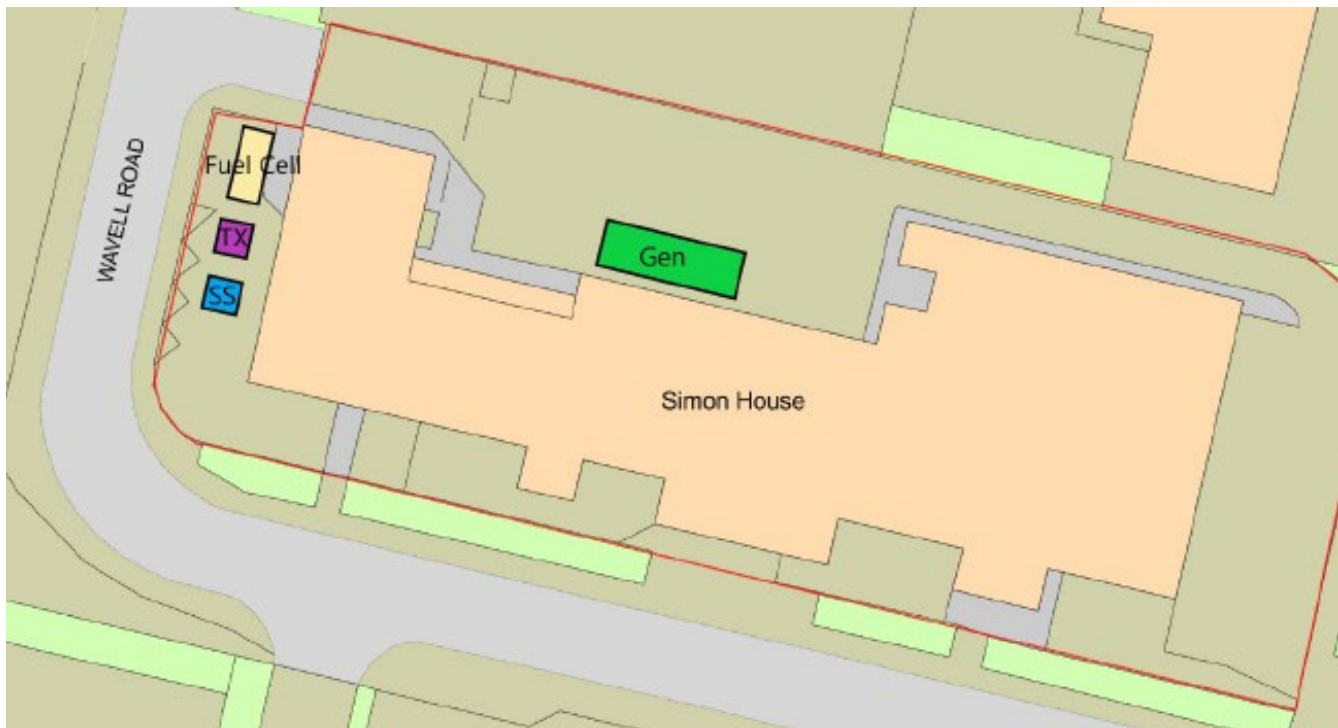


Image 3 – Proposed Block Plan

3.5 In terms of the placement of CR50 condensers on the roof space, these will be CR50 Manual (https://www.airedale.com/wp-content/uploads/2020/01/TM_CONDENERS_CR12-165_50HZ_60HZ_6666879_V2.0.1_02_2020.pdf). The link includes a lot of noise and dimension data for a number of condenser models which are broadly similar, but its likely we will use the CR50s. There will be approx. 20-25 of these on the roof when the site is running at large capacity. Initially we're expecting around 8-12. They will be mounted with the fans pointing upwards with the units laid flat to minimise visibility and noise impacts. Only approx. 70pct of the units will run at any one time as some are there for redundancy/standby in case of unit failure. Given the need to place orders and finalise the details of these units, it is suggested that this matter be finalised via a condition requiring details prior to commencement (as the costs involved are unreasonable without planning permission in place).

4.0 Considerations

4.1 The key issues to consider for this application are:

- Principle of Development;
- Design and Character;
- Sustainability;
- Residential Amenity;
- Transport Impact;
- Noise;
- Air Quality

Principle of Development

4.2 The site is wholly suitable for the form of development proposed. The applicant already operates a datacentre from the adjacent property; fulfilling an essential role in the UK's digital infrastructure. Though the proposals would involve the loss of one form of employment use, they would replace it with another – and one that is essential in the modern world.

4.3 The Development Plan requires that an assessment of the economic impact of the proposals is undertaken so as to ensure that a robust decision can be reached. This includes consideration of the following matters:

- The floorspace being lost = though the ground floor will be converted into a data centre, the upstairs offices will remain as such.
- The number of jobs being lost and/or relocated = the property has been vacant for a number of years and so no jobs will be lost. 20 new jobs will, however, be created.
- Why the site is no longer capable of offering accommodation for employment use = there is no evidence that the existing office space is in demand. Having been on the market for a number of years
- A relocation strategy for existing employment uses = the property has been vacant for a number of years
- Why an alternative use offers a greater benefits = the proposed datacentre will play an essential role in the country's digital economy. The data centre will further expand the availability of fibre networks in the local area, which will benefit local businesses and be attractive to future potential tenants of the area as third party fibre and telco operators invest to connect their assets into the site. This was proven to be the case following the installation of the existing data centre next door.

- 4.4 The proposals would adhere to the City Council's growth objectives set out in the Core Strategy, Manchester Strategy (January 2016), Stronger Together: Greater Manchester Strategy 2013 and relevant Strategic Regeneration Frameworks. Data centres - a physical facility where (open) data can be stored and processed - will play a more important role in the future data economy. As the world moves increasingly to the web, users and businesses demand quick information. The closer a business is to a data centre, the higher the performance of the service.
- 4.5 Data centres host computing and storage systems to enable the delivery of web services. The design of the facility depends on the computing and storage resources. The key components of the design include routers, switches, firewalls, storage systems, servers, and application-delivery controllers. Different types of data, including open data, is stored in data centres.
- 4.6 The need for data centres has risen steadily across the globe, even before the pandemic. For example, the number of data centres in Africa has doubled in the past three years. The pandemic and lockdowns have only accelerated this existing trend. It is expected that data centres will continue to play a crucial role in the data economy of cities and countries across the world.
- 4.7 As such, and in full accordance with the guidance contained within the Development Plan, the proposals are considered to be sustainable development with respect to the NPPF.

Design and character

- 4.8 The scale, design and detail of the new development have been developed so as to ensure that the development would not look out of place within the surrounding area. Indeed, for the most part there will be no discernible differences between the existing property and the proposed datacentre. The only real changes will involve the provision of a back-up generator, the installation of a new sub station and transformer and air conditioning condensers on the roof.
- 4.9 All are positioned to minimise their visibility and impact with respect to noise, as can be seen on the accompanying plans. Should this application be approved, the applicants intend a further application to seek permission for new perimeter security fencing (similar to that on the existing adjacent site) and replacement cladding on the external aspect of the building.
- 4.10 As a result it is considered that the proposals are acceptable in terms of their design, character and impact on the surrounding area with respect to the requirements of the Development Plan and the NPPF.

Sustainability

- 4.11** The NPPF and the Development Plan are clear that development should incorporate measures to ensure high standards of resource and energy efficiency and reduction in carbon emissions.
- 4.12** The applicant's have a track record of delivering above and beyond when it comes to sustainability. They are participant members in the CCL scheme for data centres - where we provide energy usage data year on year to demonstrate continued improvements in efficiency and carbon reduction
- 4.13** In 2019, they installed a smart energy battery storage system at their adjacent Delta House facility - reducing its carbon footprint by over 700 tonnes per year since installation. The 2MW capable solution was designed and deployed by leading smart energy solutions provider, Powerstar, and will enable TeleData to store electricity from the national grid at times of low demand and discharge it during the most beneficial periods, acting as a reserve during peak tariff times. The so-called VIRTUE system will also offer integrated variable voltage optimisation to deliver a stabilised voltage, thus boosting the resilience of the facility by improving the shelf life of equipment, while reducing unnecessary energy waste and optimising the incoming power supply. The intention is to take the same approach with Simon House as part of this application.
- 4.14** The applicant has also invested £100,000 into additional cooling infrastructure at its Delta House data centre, in order to keep pace with increasing customer demand for colocation and cloud hosting services. The additional units will not only increase cooling capacity for customers by 150kW, but will also add additional resilience to the existing systems. TeleData follows best practice environmental guidelines to maximise the effectiveness of its data centre cooling systems. Cold aisle containment and blanking plates prevent the escape of cold air, and variable speed motors and specialist units enable the company to utilise free air cooling when the outside temperature is of sufficient quality and low temperature. All of these steps minimise the amount of energy required to maintain temperatures at the correct levels to ensure longevity of life for technical equipment. Again, the intention is to learn from previous successes and ensure that this technology is installed from the start at Simon House.
- 4.15** This approach has led to Teledata winning the prestigious DCS Award – Data Centre Energy Efficiency Project of the Year 2020. Founded 10 years ago, the DCS Awards are firmly established as the premier annual celebration of the data centre industry, recognising the achievements of vendors, their business partners, their staff and their customers. Teledata was a finalist in three categories, including the Excellence in Data Centre Services Award and the Data Centre ICT Cloud Storage Innovation of the Year award. The company achieved second place in both these categories. DCS had the following to say:

“The award for Data Centre Energy Efficiency Project of the Year recognises the work that Teledata has undertaken to improve its efficiencies and reduce its carbon output. Part of this work included a £1.5 Million investment into a new battery storage system which enables Teledata to store electricity from the national grid at times of low demand and discharge it during the most beneficial periods, acting as a reserve during peak tariff times. This system also offers integrated variable voltage optimisation to deliver a stabilised voltage, thus boosting the resilience of the facility by improving the shelf life of equipment, while reducing unnecessary energy waste and optimising the incoming power supply. Teledata is the first collocation provider to implement this type of system in the UK, making this project an industry first.

Furthermore, and as part of the same overall project TeleData replaced its existing 2MW private transformer with a ‘super-low-loss’ transformer which utilises patented energy harnessing technology to reduce energy wastage, in turn reducing overall energy consumption from the grid by a further ~2%.

Teledata worked closely with The Business Growth Hub on this project, intelligently reducing carbon emissions in all areas, including - as well as the battery storage system - intelligently controlled cooling consumption and cold aisle containment, variable fans with condenser units, highly efficient cooling pumps, free air cooling systems, cold aisle blanking and office space air conditioning controls to minimise wastage.

The project has resulted in total annual carbon emission savings of over 700 tonnes CO2 per year to date, and annual financial savings of over £150,000 per year.”

- 4.16** The proposed energy cells make use of cutting edge technology, and will ensure that the new centre leads the way in energy provision and efficiency. Bloom Energy’s solid oxide power generation platform – a fuel-flexible, non-combustion Energy Server - combine ambient air and biogas, hydrogen, or natural gas to create electricity through an electrochemical process without combustion at high efficiency. The result is a reduction in carbon emissions, air pollutants, and water usage. When hydrogen or biogas are used as the fuel source, the Energy Servers deliver on-site, 24/7, zero-carbon electricity — all in a simple, modular and flexible design.
- 4.17** Hydrogen is well-suited for an array of applications and unlocks a net-zero emissions future for hard-to-decarbonize heavy industries. Industrial stakeholders in the UK will be able to transition toward a green energy supply as hydrogen production infrastructure continues to mature with the support of aggressive UK government targets. The collaboration (between Bloom, Conrad Energy and Electricity North West Construction and Maintenance) creates a strong foundation that will help the UK achieve its net zero carbon emissions goals by 2050, including a hydrogen strategy that aims for five gigawatts of low carbon hydrogen production capacity by 2030. Teledata are proud to be early adoptors of this game-changing technology.

4.18 The design also incorporates the use of cutting-edge LED lighting, which is considerably more efficient than the use of traditional lighting methods. As such the whole development has been designed and will be constructed with resource efficiency in mind where energy use is minimized and opportunity to harness renewable energy is optimized.

4.19 With regards to access requirements, it is certain that the new development will provide a very high category 'A' EPC rating and will be in accordance with building regulations requirements and also in compliance with the latest part M building regulations. As such, it is considered that the proposals are fully in accordance with the requirements of national and local policy in relation to sustainability considerations, indeed they far exceed the minimal levels required.

Residential amenity

4.20 Careful consideration to the nature of the proposed structures in relation to their potential impact on adjoining properties and each other has also been given. There would be no loss of light, loss of privacy or overbearing impact as a result of the proposed change of use, given that the existing property is simply being re-used and there is a considerable distance between it and the nearest residential properties. As such, it is contended that the proposals are therefore in full accordance with the requirements of the NPPF and Development Plan in so far as they have regard to residential amenity and the importance of protecting it.



Image – Proximity of residential units

Transport Impact

- 4.21 The proposed change of use will result in a significant fall in the number of vehicular and pedestrian movements associated with the site, given the relative numbers of employees expected for a datacentre compared to a large office building.
- 4.22 Along side this, the site is located in a truly sustainable site – close to a number of public transport routes and within walking distance of the town centre. As such, it is accessible through a number of sustainable modes of transport. The parking provided can include EV charging points, and the applicant is happy for this to form a condition on any approval.

The propose data centre will continue to benefit from off road parking commensurate with its size and likely number of vehicles movements. The existing access to the rear will be made use of, as well as the existing parking spaces to the rear and sides

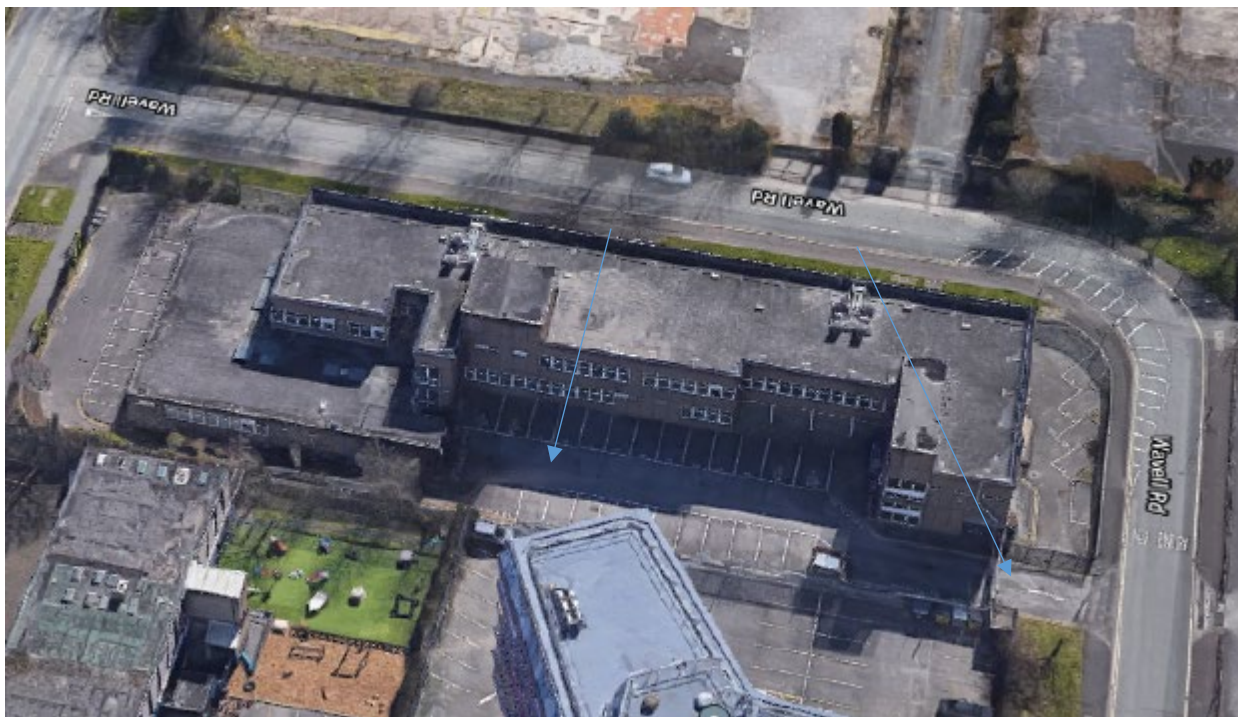


Image – Parking arrangement

- 4.23 As such, it is contended that the proposals are therefore in full accordance with the requirements of the NPPF and Development Plan in so far as they have regard to the development's impact on the highway network.

Noise

- 4.24 Policy DM1 of the Core Strategy and Policy DC26 of the UDP require that new development should be prevented from contributing to or being adversely affected by unacceptable levels of noise, this is to ensure quality of life and safer and healthier communities. Chapter 15 of the revised NPPF gives advice on how local planning authorities should prevent new development from being adversely affected by unacceptable levels of noise pollution. The NPPF further advises that decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development.
- 4.25 The PPG offers detailed advice on Noise which was updated on 24 December 2014. It should be identified that the council's environmental protection service has powers to deal with any unacceptable noise the development may create as necessary under the provisions of the Environmental Protection Act 1990.

-
- 4.26 The council's environmental protection service has powers to deal with any unacceptable noise caused by building works as necessary under the provisions of the Environmental Protection Act 1990 and it has published a leaflet entitled 'considerate contractor advice note'.
- 4.27 The application site is located some distance from the nearest residential units, as set out above. Noise Assessments are, however, extremely expensive, and the applicant asks that the LPA and Environmental Health Officer consider whether one is entirely necessary pre-determination, or whether the same level of control could be retained through the use of a suitable condition. The assessment would take into account noise from the installation and very rare operation of the additional generator, plant and equipment in the datacentre. Any proposed mitigation will ensure that the internal noise climate for each habitable room in the nearest residential units should achieve suitable levels.
- 4.28 The above guidance will be adhered to where possible, though it must be accepted that ambient noise levels will always be higher in town centre locations such as this – a fact reflected in the government's advice on the matter.
- 4.29 As such it is considered that the proposals will be able to meet the requirements of Development Plan and Chapter 15 of the revised NPPF with respect to impact from noise.

Air Quality

- 4.30 To ensure quality of life and safer and healthier communities Policy EN16 requires development not to have an unacceptable impact on amenities by reason of pollution, and that both new and existing development should be prevented from contributing to or being adversely affected by unacceptable levels of air pollution.
- 4.31 Chapter 15 of the revised NPPF offers broad advice on how local planning authorities should prevent both existing and new development from being adversely affected by unacceptable levels of air pollution.
- 4.32 The PPG at paragraph 001 of the air quality section dated 6 March 2014 states that "*It is important that the potential impact of new development on air quality is taken into account in planning where the national assessment indicates that relevant limits have been exceeded or are near the limit*". The PPG at paragraph 009 demonstrates how considerations about air quality fit into the development management process.
- 4.33 As the proposed development includes provision for vehicle parking it is possible to include EV charging points. The applicant is happy for this matter to be dealt with via condition. The proposals will likely reduce the number of vehicle movements associated with the site from the worst case scenario involved in the

existing lawful use. A datacentre as per that proposed simply carries a lesser number of vehicle movements than an office building. As such the proposals should result in an improved impact on air quality in the surrounding area.

- 4.34** The result of which is that the proposals are deemed to be in accordance with the requirements of both local and national policies with respect to air quality.

5.0 Summary

- 5.1** This application provides a clear and logical assessment of the site's constraints such that the scale, design and layout of the site as described in the sections above, and illustrated within the accompanying plans, provides an appropriate response to the site's status.
- 5.2** The scheme will deliver a new data centre facility that will augment the existing facility at Delta House and contribute to the wider area's digital storage needs. It makes use of an existing under-used commercial building, within a commercial setting – and is wholly in keeping with the character of the site and its surroundings.
- 5.3** The scheme would not have a detrimental impact on the amenity enjoyed by existing or future occupiers of nearby residential properties.
- 5.4** The proposals would have a minor positive impact on the highway network.
- 5.5** Matters relating to noise can be successfully dealt with via condition, and the applicant is keen to ensure that the strong track record achieved on its existing site at Delta House is continued in this regard.
- 5.6** The development can therefore be considered to accord with the relevant planning policies as detailed above and to be consistent with the aims and objectives of the NPPF that provides overarching guidance. In line with Paragraph 11 of the NPPF, the application accords with the Development Plan and should be approved without delay.