

# Redhill Data Centre

## St Anne's Blvd, Redhill, RH1 1AX

Planning Application for  
Redhill Data Centre Limited  
16 January 2026  
Our Ref: 25-01396



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## Quality Assurance


This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Planner experienced in the commercial property sector.

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# 1 INTRODUCTION

1.1 Rapleys LLP ('Rapleys') are instructed by Gardiner and Theobald LLP on behalf of Redhill Data Centre ('the Applicant') to prepare a Planning Statement in support of a planning application for the development of their site at 1 St Anne's Boulevard and Redhill RH1 1PP and 2 St Annes Blvd, Redhill RH1 1AX ('The Site').

1.2 The planning application is made for:

*"The demolition of units 1 and 2 and construction of a single two-storey data centre accommodating four data halls and office block with associated plant, groundworks to site the building, fencing, landscaping and other works."* (the 'proposed development')

1.3 The wider site of 3.1 hectares comprises an existing data centre campus across 3 warehouses (Units 1 to 3) with associated plant and parking as viewed in Figure 1. Units 1 and 2 are currently at end of life and are vacant buildings not currently operating as data centres. Unit 3 remains operational and does not form part of these development proposals. Units 1 and 2 were converted from more general industrial uses in 2007/08 to sui generis data centre uses and are now needed to be modernised to meet operational standards expected of contemporary data building facilities.

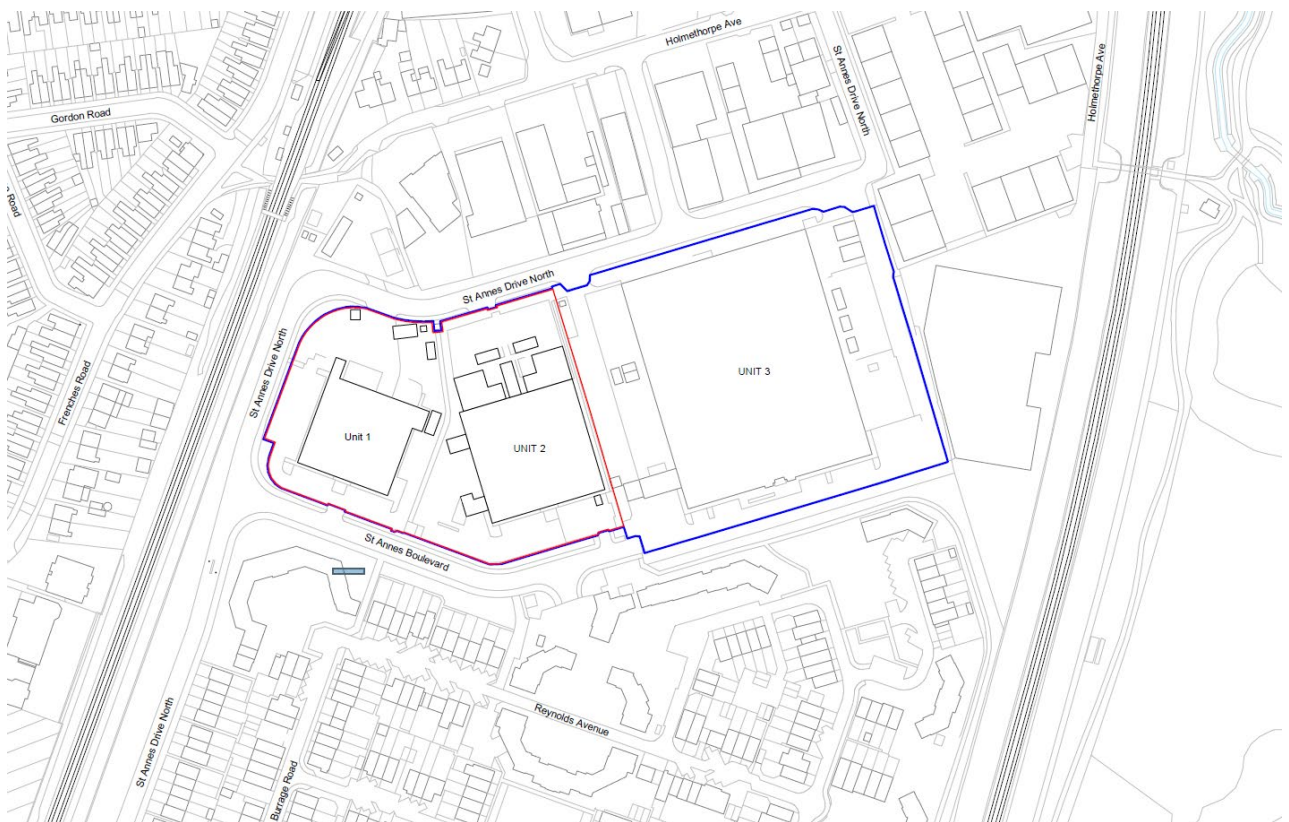


Figure 1 Location of Redhill Data Centre

1.4 This Planning Statement is set out as follows:

- Section 2 provides background on the proposed development;
- Section 3 details the Site and surroundings;
- Section 4 details the Site's planning history;
- Section 5 outlines the pre-application engagement that has taken place;
- Section 6 outlines the proposals;
- Section 7 summarises the relevant planning policy context;
- Section 8 assesses the key planning issues; and
- Section 9 concludes.

## SUPPORTING DOCUMENTS

- 1.5 This Planning Statement should be read in conjunction with the following supporting documents:
- Application form, including ownership certificates (prepared by Rapleys LLP);
  - CIL Form (prepared by Rapleys LLP);
  - Site Location Plan (prepared by TTSP)
  - Existing Site Plan (prepared by TTSP)
  - Proposed Site Plan (prepared by TTSP)
  - Existing Ground Floor Plan (prepared by TTSP)
  - Proposed Ground Floor Plan (prepared by TTSP)
  - Existing First Floor Plan (prepared by TTSP)
  - Proposed First Floor Plan (prepared by TTSP)
  - Existing Roof Floor Plan (prepared by TTSP)
  - Proposed Roof Floor Plan (prepared by TTSP)
  - Existing Elevations Unit 1 (prepared by TTSP)
  - Existing Elevations Unit 2 (prepared by TTSP)
  - Proposed Elevations - Sheet 1 (prepared by TTSP)
  - Proposed Elevations - Sheet 2 (prepared by TTSP)
  - Existing Sections (prepared by TTSP)
  - Proposed Sections - Sheet 1 (prepared by TTSP)
  - Proposed Sections - Sheet 2 (prepared by TTSP)
  - Design and Access Statement (prepared by TTSP)
  - Air Quality Impact Assessment (prepared by SLR)
  - Preliminary Ecological Appraisal (prepared by Eight Versa)
  - Biodiversity Net Gain Metric (prepared by Eight Versa)
  - Carbon Reduction Statement and Sustainability Checklist (prepared by RED Engineering Design)
  - Drainage Strategy Report (including Flood Risk Assessment) and Drainage Layout (prepared by Abstract Consulting)
  - Fire Statement (prepared by Joule Group)
  - Stage 1: Tier 1 Preliminary Risk Assessment (prepared by Impact Geotechnical Ltd)
  - Landscaping GA Plan (prepared by outerspace)
  - Arboricultural Impact Assessment (prepared by Writtle Forest Consultancy)
  - Arboricultural Method Statement and Tree Protection Plan (prepared by Writtle Forest Consultancy)
  - Tree Survey and Tree Constraints Plan (prepared by Writtle Forest Consultancy)
  - Tree Constraints Plan (prepared by Writtle Forest Consultancy)
  - Tree Protection Plan Phase 1 – Demolition (prepared by Writtle Forest Consultancy)
  - Tree Protection Plan Phase 2 – Construction (prepared by Writtle Forest Consultancy)
  - Noise Impact Assessment (prepared by SLR)
  - Transport Statement (prepared by TTP Consulting)
  - Lighting Impact Assessment (prepared by RED Engineering Design)
  - Structural Feasibility Report for Conversion of Existing Industrial Units (prepared by Abstract)
  - Statement of Community Involvement (prepared by Comm Comm UK)

## 2 BACKGROUND

### THE APPLICANT

- 2.1 Redhill Data Centre Ltd is a joint venture between the owner Castleforge Real Estate Investment and data centre operator and advisory firm Galaxy Data Centres. This partnership is committed to delivering environmentally sustainable data centres through leading design concepts, ensuring maximum energy efficiencies and lower operational costs for their customers.

### DIGITAL ECONOMY

#### Government focus on digital economy and growth

- 2.2 By 2035, experts predict data centres can add £44bn to the UK economy. The UK data centre market is experiencing robust growth, driven by cloud computing adoption and AI advancements, and is currently valued at around £8bn with an average rate of growth of 5.21%.
- 2.3 The number of operational data centres is not nearly enough to serve current demand, which is increasingly driven by Cloud Computing, AI and other emerging technologies and digital transformation (both private and public).
- 2.4 A recent report by TechUK - Foundations for the future - How data centres can boost UK economic growth [November 2024] estimates that data centres are currently contributing £4.7billion in GVA annually to the UK economy; deliver 43,500 jobs across the UK economy [indirect and direct] and £640million in tax revenue to the UK exchequer.
- 2.5 The UK Government have turned their focus to recognise this demand and evolution in the digital market with support shown for Data Centres in successive revisions of the National Planning Policy Framework (NPPF) and the Planning & Infrastructure Bill in 2024/25, whilst several high-profile planning appeals have been overturned in favour of Data Centre development.
- 2.6 Data infrastructure - the physical data centres and cloud infrastructure which provide the foundations of the digital economy are now designated as critical national infrastructure, the first such designation in almost a decade, for powering the economy and supporting jobs across the country with government support for the sector extending to safeguarding critical incidents to data centres, minimising impacts on the economy.
- 2.7 The most recent recovered appeal for a data centre in Iver, Buckinghamshire, did not dispute the 'overwhelming' scale of need for data centres as 'critical infrastructure' that are of 'national importance.' Other points agreed and not in dispute were that the wider London region need for data centres is greater at between 2,250MW to 3,100MW in the period up to 2027 (a mid-range or average of 2,665 MW) and the need will continue to rise thereafter .
- 2.8 Recent planning inquiries have considered that addressing this demand is essential for the UK to retain its competitive edge and retain a top position in the European digital economy, in that substantial weight (rather than significant weight) should be attributed 'to the need for critical national infrastructure, where the scale of need is acute and is getting worse.'
- 2.9 Data Centres are the power houses of cloud computing and the inter-connectors of the internet and are critical for running and managing applications, websites, cloud services, and data storage for businesses, Governments, and other entities. Some 92% of organisations use 2 or more public cloud providers to host their workloads. This is an increase from 82% in 2022.
- 2.10 The economic benefits of the delivery of a data centre are significant, with the aforementioned Iver scheme set to result in a significant annual economic benefit to the local economy of some £120 million GVA, with economic benefits to the wider London and South-East economy of some £270 to £350million annually.

#### Existing Buildings and modern data centre building requirements

- 2.11 Unit 1 is an unused and now vacant data centre where the building envelope and M&E services are in poor condition. It comprises a single-storey structure that is no longer suitable for adaptation into a modern data centre. The structural frame, building fabric, spatial layout, and overall condition fall short of the technical and operational standards expected of contemporary data building facilities. In particular, the mechanical and electrical services are in poor condition, with much of the electrical infrastructure having been rendered unusable due to the theft of copper cabling.
- 2.12 As such, full strip-out of all mechanical and electrical (M&E) systems is required, and demolition of the building is recommended to clear the Site for future development in line with the requirements of a

newbuild data centre scheme. The structural frame is designed for warehouse loading and is unable to support the necessary loadings associated with modern day data centres.

- 2.13 Plant such as generators and associated fuel tanks and air conditioning units extend from the building. Two electricity substations are also located in the service yard, at the northern elevation of Unit 1.
- 2.14 Unit 2 has recently ceased operation as a functioning data centre. It consists of a single-storey warehouse-type space with a two-storey administrative accommodation zone to the front. Approximately 1000sqm of the internal area is currently occupied by a box-in-box type data hall construction, with structural access provisions in place to allow access to the top of the inner hall enclosure for maintenance of existing plant equipment. The structure as currently constructed prevents optimization for current data centre requirements. An electricity substation is located at the western elevation of the Unit 2 structure.
- 2.15 While the building itself is relatively sound, neither the original warehouse structure nor the box in box structure meet modern day data centre building needs, especially with regards to required loadings. The existing M&E systems are not aligned with the specifications or performance expectations of a new data centre and would therefore also need to be fully stripped out and replaced with systems designed for flexibility, scalability and efficiency.
- 2.16 Unit 3 is a fully operational data centre with no works required. The Site contains external plant, with the current generator selection designed to operate at 75 dB(A) at 1 metre, meeting standard environmental noise limits for utility infrastructure.
- 2.17 There is a requirement to modernise the Site in line with the current market and digital technology needs. The key components of a data centre's architecture are:
- Servers: The physical or virtual machines that process data and run applications.
  - Storage Systems: Devices that store data, such as hard drives, SSDs, and storage arrays.
  - Networking: Routers, switches, and cables that enable communication between devices inside and outside the data centre Proposed infill to the existing reception atrium.
  - Power and Cooling: Backup power supplies, such as generators and uninterruptible power supplies, and cooling systems to maintain the optimal temperatures for data centres to operate efficiently.
  - Security: Both physical security (cameras, access controls) and cybersecurity measures to protect data and infrastructure.
- 2.18 As data centres continue to evolve, there is a marked shift driven by the rapid growth of AI and accelerated computing workloads. This transformation is changing infrastructure requirements, particularly around rack density and how thermal management is addressed. Data centre power density requirements have also evolved, with increasing prevalence of new IT cooling technologies.
- 2.19 Traditionally, cloud environments have operated within the 3–8 kW/rack range, supporting general purpose central processing units and storage. However, with emerging workloads such as large-scale AI training, machine learning, inference pipelines, and high-performance computing are now pushing densities to 30, 60 and 120 kW per rack.
- 2.20 The UK has around 520 data centres, mainly near London (the London Availability Region) and major cities, including smaller, older assets that need upgrades to meet the demands of growing enterprises. Castleforge have identified the Redhill Data Centre facility as being well suited to a holistic redevelopment programme to cater to current and future market demands, being strategically located close to one of the world's leading financial and commercial centres.

### 3 SITE AND SURROUNDINGS

3.1 The Site is in the Holmethorpe Industrial Estate of Redhill, approximately 1km to the northeast of Redhill Town Centre, as identified in Figure 2.

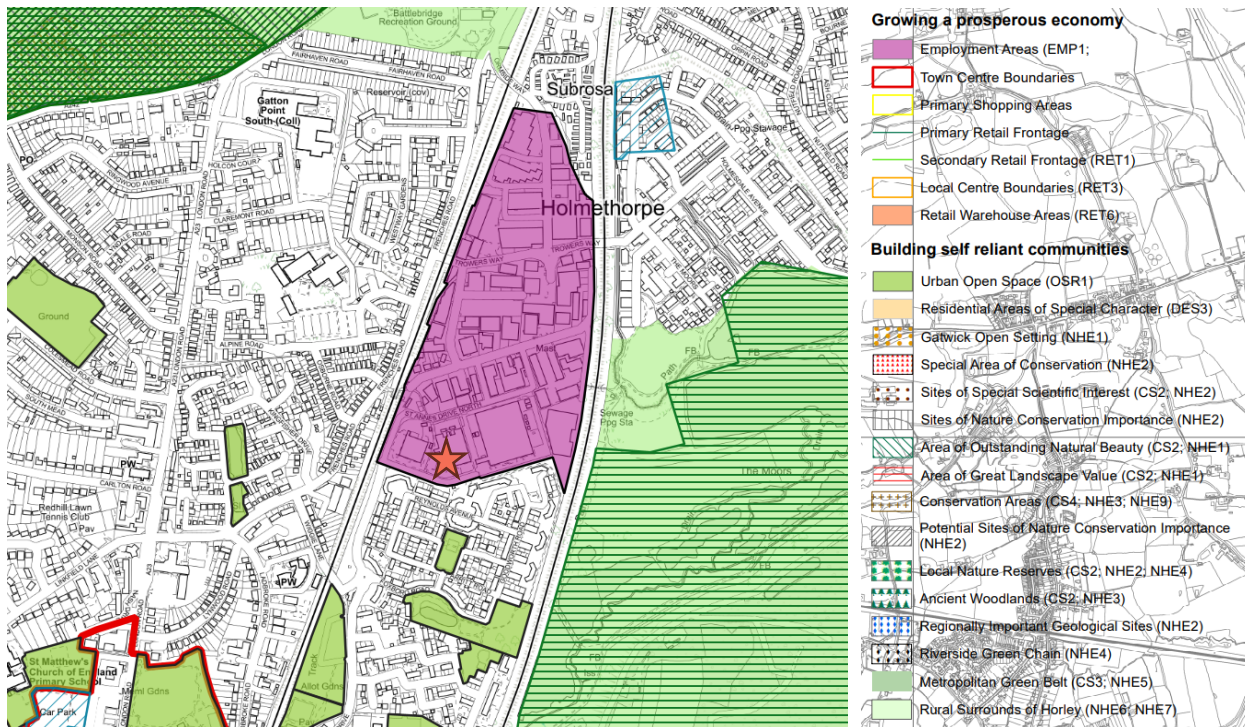


Figure 2 Development Management Plan Policy Map of Redhill with the Site starred

- 3.2 The wider site occupies an area of approximately 3.1 hectares and comprises a set of three separate buildings (Units 1 to 3) with associated plant and parking occupied by Redhill Data Centres. Units 1 to 3 consist of single storey industrial warehouses with two storey office buildings adjoining at the front of each unit.
- 3.3 The units are bound by fencing and landscaping and accessed from seven access points from St Annes Drive North and St Annes Blvd to the north and south, respectively. Units 1 and 2 have two access points each to the front and rear of the Site.
- 3.4 Holmethorpe Industrial Estate is located to the north and east of the Site. To the east and west is a railway embankment with mainline connection to Central London.
- 3.5 The Metropolitan Greenbelt is located on the opposite side of the railway embankment to the east, which includes a set of lagoons and marshes of the Holmethorpe Sandpits Complex Site of Nature Conservation Importance (SNCI). The Patteson Court Landfill Site is located to the southeast within the greenbelt and SNCI.
- 3.6 The Site is not located in a Conservation Area. The closest heritage assets are the Grade II listed buildings of St Bede's Main School Buildings, approximately 100m to the southwest on the opposite side of the railway embankment. The Surrey Hills Area of Outstanding Natural Beauty (AONB) is located approximately 800m to the northwest of the Site and outside the urban edge of Redhill.
- 3.7 The nearest accessible public transport provision consists of three bus routes, all of which provide connection to and from Redhill train station. The terminal stop for the 100 Fastway and 424 Route is located approximately 450m to the south of the Site at Park 25 on St Annes Drive. To the North, the 430 and 435 routes have bus stops along Trowers Way, a road that cuts through the centre of the Holmethorpe Industrial Park. Redhill Train Station is located a 17 minute 1.3km walk to the southeast with Southern Rail service provision to London.
- 3.8 The Environment Agency's (EA) Flood Map for Planning confirms that the Site is located within Flood Zone 1, with the adjacent industrial site to the east of Unit 3 within Flood Zone 2. There are no ecological designations within the Site, however it is near a Site of Nature Conservation Importance (SNCI) located to the east of the rail line.

## 4 RELEVANT PLANNING HISTORY

- 4.1 The planning history for Units 1-3 are outlined in the tables below. The Site received permission in 1997 for 30,000 Sqm of mixed B1/B2/B8 uses with parking and servicing areas.
- 4.2 Unit 1 received planning permission for a two-storey extension to the existing warehouse in 2007 to provide additional data storage and office. In 2012, a certificate of lawfulness for existing use or development was received for substations, generators, other plant and a bunded fuel tank and associated enclosing screening. Electrical power resilience infrastructure also received permission in 2012. A server room extension with cooling equipment serviced from above received permission in 2014.
- 4.3 Unit 2 received permission for conversion from offices to data centre use in 2009.
- 4.4 Unit 3 received planning permission in 2008 for conversion of warehouse and office for Data Centre use (Sui Generis use with ancillary B1(a) use). Alterations to the perimeter of the plant compound and service area were received through amendment to this permission in 2010.
- 4.5 After the Site receiving permission for mixed B1/B2/B8 uses in 1997, the neighbouring site to the south, Park 25 St Annes Drive Redhill Surrey, received planning permission for employment uses in 2000. After this, the residential development for 500 dwellings was approved in 2006 and delivered on Park 25.
- 4.6 Tables 1, 2 and 3 below sets out the Site's recent and relevant planning history.

**Table 1 Relevant planning history for 1 St Annes Boulevard, Redhill**

Application Reference	Proposal	Decision
14/02129/F	Erection of a single storey computer server room extension and associated roof mounted eco-cooling plant enclosure to west side of existing Data centre building and replacement of existing plant compound screening. Approved with conditions 1st December 2014. The application proposes the erection of a side and rear extension to provide additional data storage and offices. The proposal would comprise a 15m by 25m extension to the side of the building, comprising of server room with cooling equipment serviced from above; and the erection of new screening to existing plant compound located at the rear.	Approved 01/12/14
12/01392/F	Electricity power infrastructure upgrade including installation of a high voltage substation, low voltage substation, 4 no generators for backup power only with associated fuel tank, 4 no containerised uninterrupted power supply units and 2 no containerised electric cabinets along with associated profiled sheet enclosure, within the external service area ancillary to unit 1, St Anne's Boulevard, Redhill – Approved with conditions 2nd October 2013	Approved 02/10/12
12/00788/F	Installation of an evaporative eco-cooling system to unit 1 St Anne's Boulevard - Approved with conditions 18th July 2012	Approved 18/07/12
12/00443/CLE	A low voltage substation, two generators, two containerised units containing electrical infrastructure, a bunded fuel tank and an associated enclosing screening that were installed, and have been operational, since July 2006. A chiller unit designated 'E' that was installed, and has been operational, since August 2007. All within the external service area ancillary to unit 1, St Anne's Boulevard – Approved with conditions 2nd May 2012	Approved 02/05/12
12/00442/RET	Retrospective planning approval for 3 no. Chillers and associated water storage tanks and acoustic baffling within the external service area ancillary to unit 1, St Anne's Boulevard - Refused 27 July 2012	Refused 27/07/12

Application Reference	Proposal	Decision
12/00044/F	Replacement of existing generator unit, repositioning of existing profiled sheet screening and installation of a temporary containerised uninterrupted power supply (UPS) unit within the external service area ancillary to unit 1, St Annes Boulevard, Redhill – Approved with conditions 8th March 2012	Approved 08/03/12
07/00350/F	Erection of perimeter fencing 2m high with saxon finials - Approved with conditions 23rd April 2007	Approved 23/04/07
07/00181/F	Two storey extension to existing warehouse. To provide additional data storage and office - Approved with conditions 27th March 2007	Granted 27/03/07
06/00610/F	Single storey rear extension to provide housing for switch gear for electrical power upgrade - Approved with conditions 26th May 2006	Approved 26/05/06
02/02185/F	Erection of detached single storey tape store and switch room buildings, extension to existing generator and installation of 2 low voltage sub stations - Approved with conditions 29th January 2001	Approved 29/01/03
00/10730/F	Erection of external plant enclose to rear, erection of mezzanine floor and formation of louvres in rear wall - Approved with conditions 25th August 2000	Approved 25/08/00
97/07141/RM	Details of design and appearance of units D and E pursuant to Condition 1 of permission 97/07140/OUT - Approved with conditions 8th May 1998	Approved 08/03/98
97/07140/OUT	Redevelopment of site for 30,000 Sqm of mixed B1/B2/B8 uses with parking and servicing areas - Approved 23 July 1997	Approved 23/07/97

Table 2 Relevant planning history for 2 St Annes Boulevard, Redhill

Application Reference	Proposal	Decision
P/09/00766/DET03	Submission on Acoustic Attenuation details pursuant to condition No 03 of permission ref no: 09/00766/F for conversion of warehouse an office for data centre use and associated works (within B1, B8)	Approved 24/05/11
09/00766/F	AMENDED PROPOSAL: Conversion of warehouse and office for data centre use and associated works (within B1, B8) (Drawing Nos: 0263-001, 002, 010, 011, 020, 030, 100, 110, 120, 130 & 140)	Approved 21/08/09
01/00171/ADV	Non-illuminated sign	Approved 22/06/01
00/12310/F	Addition of two loading bay doors with dock levellers including excavation and formation of associated ramp to an existing building	Approved 15/09/00
00/08560/OUT	New building for office use totalling 37,500 sq.m. gross area with associated car parking for 1,170 cars and external works and landscaping	Approved 07/08/00
97/02560/CLP	Certificate of Lawfulness in respect of proposed use of the premises within use Class B1	Approved 19/05/97

Application Reference	Proposal	Decision
97/07140/OUT	Redevelopment of Site for 30,000 Sq. M. (322, 930 Sq. Ft.) of Mixed B1/B2/B8 uses with Ancillary Parking and Servicing Areas	Approved 23/07/97

Table 3 Relevant planning history for 3 St Annes Boulevard, Redhill

Application Reference	Proposal	Decision
10/01606/F	Removal of existing palisade perimeter fencing and installation of high security mesh fencing. (Drawing Nos: 0285_PL_002 rev A)	Approved 04/11/10
08/00875/NMAMD	Amendment request to 08/00875/CU: alterations to the perimeter of the plant compound, enlargement of the service area and small trees and landscaping	Approved 28/01/10
09/00666/F	Proposed erection of open sided canopy structure to service yard.	Approved 17/07/09
P/08/00875/F	Conversion of warehouse and office for Data Centre use (Sui Generis use with ancillary B1(a) use)	Approved 17/06/08
07/02151/F	Conversion of warehouse and office for Data Centre use (Sui Generis use with ancillary B1(a) use)	Approved 25/02/08
07/02150/F	Conversion of warehouse and office for Data Centre use (Sui Generis use with ancillary B1(a) use)	Approved 23/10/07
07/07140/OUT	(and associated Reserved Matters applications) – redevelopment of site for 30, 000 sqm of mixed B1/B2/B8 uses with ancillary parking and servicing areas	Approved
96/13780/F	(and associated Reserved Matters applications) - building for production and storage with ancillary offices, associated car parking and loading and unloading areas (B2 use with ancillary B1c and B8)	Approved

## 5 PRE-APPLICATION ENGAGEMENT

5.1 Pre-application has been undertaken with Reigate and Banstead Borough Council and with residents and commercial operators in close proximity to the Site.

### PRE-APPLICATION MEETING

- 5.2 Pre-application engagement has been undertaken with Reigate and Banstead Borough Council in September 2025.
- 5.3 The Pre-application response noted that the established use of the Site is as a data centre within the designated Principal Employment Area of Holmethorpe Industrial Estate, whereby the proposal would comply with DMP Policy EMP1 which allows for the development of new upgraded floorspace for existing uses. The principle of development is therefore considered acceptable.
- 5.4 The response also considered design as new development should promote and reinforce local distinctiveness and should respect the character of the surrounding area. DMP Policy DES1 states that new development will be expected to use high quality materials, landscaping and building detailing and have due regard to the layout, density, plot sizes, building siting, scale, massing, height, and roofscapes of the surrounding area, the relationship to neighbouring buildings, and important views into and out of the Site.
- 5.5 It was noted that the proposed building would be of a larger scale and mass than the existing buildings on the Site and so the design evolved to position the administrative wing between the two technical data hall wings to break up the mass of the built form. The building would be divided into three volumes. The additional height created by the enclosure around the cooling equipment would also have to be carefully considered to ensure that the impact of the enclosure is mitigated. These suggested amendments to the overall scale and mass of the proposed building, complete with carefully considered elevational treatments, were considered to be acceptable to explore further ahead of submission of a planning application.
- 5.6 In addition to the design comments received, the Officer stated that DMP Policy DES1 also requires new development to not adversely impact on the amenity of occupants of existing nearby buildings, including by way of overbearing, obtrusiveness, overshadowing, overlooking and loss of privacy. It was noted that the southern elevation of the building facing towards the residential development to the south would be on a similar line to the existing buildings on the Site. At its closest point, the new building would be approximately 31m away from the closest residential building. The location of the front/back office area to the centre of the Site also includes a further setback, but it was noted that this section of the building may have a glazed frontage, facing directly towards the rear of residential properties in Reynolds Avenue. The development therefore would need to ensure that the amenities of neighbouring properties are not adversely affected by an increase in overlooking, a loss of privacy or an overbearing impact.
- 5.7 On parking, it was confirmed that the Council's adopted parking standards do not identify a parking standard for a data centre use (sui generis use) and therefore any application will need to be accompanied by an assessment which demonstrates that the amount of parking proposed is sufficient to service the needs of the development.
- 5.8 On sustainability measures, DMP Policy CCF1 (2) requires new non-residential developments of 1,000 square metres or more of gross floorspace to include renewable or low-carbon energy generation to provide 10% of the expected energy usage of the development, unless it can be demonstrated not to be viable. This could be through renewable energy technologies (i.e. solar photovoltaics), implementation of or connection to a district heating network, or any other method that demonstrably reduces carbon emissions from energy usage.
- 5.9 A future application will need to demonstrate compliance with this policy. It is recognised that the energy demand for a data centre differs from most other forms of commercial development, however, there may be aspects of the development which benefit from renewable energy, or which contribute to the energy demands of neighbouring developments.

### COMMUNITY AND STAKEHOLDER ENGAGEMENT

- 5.10 The Applicant has also carried out engagement with residents and community stakeholders.
- 5.11 The engagement and consultation focused on RBBC members and officers, community and amenity groups, along with local residents and businesses in the surrounding area of Holmethorpe Industrial Estate, Foxboro Business Park and Park 25 residential estate. The aim of the consultation was to increase awareness of the proposals, ensuring that the community understood what was being proposed and why. The project team was keen to provide opportunities for stakeholders to feed back

on the proposals, developing areas for potential investment in the wider community as a result of the knowledge and views of key stakeholders.

- 5.12 A thorough, inclusive community consultation programme has been undertaken, including communication with the local community and stakeholders via letters and newsletters explaining the plans and consultation, the launch of a dedicated consultation website that outlines the proposals and a digital feedback survey on the website that can be used to provide comments. A number of meetings with local councillors and key stakeholders have also taken place.
- 5.13 Feedback received from local residents has been generally supportive of the development, particularly the opportunity to improve mitigation measures for noise and privacy, as well as the aspiration to provide excess heat to the district heat network.
- 5.14 Issues raised focused predominantly on the design, including the potential loss of privacy and disturbance from the increased height of the new development. Other concerns included the impact of construction on neighbouring properties.
- 5.15 The applicant has sought to respond to, and engage with, the issues raised throughout the consultation, and in the comments contained in this report. Subject to planning permission, the applicant remains committed to engaging with local residents and stakeholders across the lifespan of the development.

## 6 THE PROPOSED DEVELOPMENT

6.1 The planning application is made for:

*“The demolition of units 1 and 2 and construction of a single two-storey data centre accommodating four data halls and office block with associated plant, groundworks to site the building, fencing, landscaping and other works.”*

6.2 The proposals comprise of demolition of units 1 and 2 and construction of a single two-storey data centre building featuring three built elements accommodating four symmetrical Data Halls (each with an IT capacity of 3.6 MW), two on each floor, with an office block sited between the two data hall wings. The office block will consolidate reception, security, control rooms and support areas for the wider campus hub. The proposed building is two storeys split into 3 main blocks: a central ancillary block and two side wings of technical suites. There is an external gantry to the rear of the two technical blocks to accommodate plant, which will span clear over the loading bay at the rear of the ancillary admin block.

6.3 The proposals require groundworks to site the building with enhanced landscaping along the Site boundary. The Site geometry pushes the building footprint closer to the Site perimeter to allow for more external space for plant equipment to the rear. The Site will be regraded and reconstructed to accommodate a modern, high-capacity data centre campus with a focus on resilience, efficiency, and future scalability, providing sufficient space to support day to day operations via an administrative office block.

6.4 The Site will have the ability to stand alone and self-sufficient in respect of its power supply. Power is to be provided to the Site via dedicated onsite 2 No. substation buildings (each building containing 2 No. substations, giving 4 No. in total for the development), with a 11kV supply from the utility operator being supplied to both substations, each fully rated for the Site and building power load. A Sprinkler Pump, Sprinkler Tank and Hydrant Pump structures are provided near the substations.

6.5 The proposals require N+1 resilience using 8no enclosed back-up diesel generator sets (of 11kV Medium Voltage or equivalent) located on the northern side of the Site, away from the more sensitive residential receptors to the south. This means there will be no building power outage even if a generator fails. The “N” refers to the number of backup generators needed to support the data centre during a power outage and the “+1” means an additional generator is added so if in the event of a mains power failure and at the same time one generator fails or is unusable as undergoing maintenance, the building power supply will still be retained.

6.6 The generators will have the capacity to support the entire building’s critical and non-critical loads during utility outages. The generators are sited externally and to the rear of the building at ground floor level. Above which and located on a gantry, 13 No. LV Pods are provided for electrical distribution to the data halls. 1 No. Admin LV Pod is located alongside the ground floor generators. The steel framed gantry structure is fixed directly to the main building structure.

6.7 Mechanical plant will be supported at roof level to all 3 blocks. Rooftop plant comprises of 12 No. air cooled chillers set back from the principal façade and surrounded in an acoustically treated open top enclosure. The chiller units are accompanied by 12 No. buffer vessels (or thermal stores) that captures thermal energy (heating or cooling) allowing continuous cooling provision. 9 No. air handling units complete with external condensers are located on the rooftop of all three blocks serving data halls, administrative block and ancillary electrical rooms cooling. The mechanical plant above the two technical blocks are to be supported on a raised chiller deck, suspended above the roof.

6.8 3 No. chilled water packaged plantrooms are situated on the rooftop of the administrative office Building, 2 No. being located within one room. Rooftop mounted PV panels are proposed to be installed on the unshaded low level roof on the south side of the building rooftop. This location maximises energy generation due to good orientation and no overshadowing. A Hybrid Variable Refrigerant Flow cooling/heating system will serve the admin block, while a Variable Refrigerant Flow cooling system will serve electrical rooms, both having roof mounted condensers. Approximately 318 sqm of roof-mounted PV panels are proposed.

6.9 Vehicle access to the datacentre will remain as existing, with car park entry and exit from the south side (St Anne’s Boulevard) and service vehicle access from the north side (St Anne’s Drive North). The southeast access point (former Unit 1 access) on St Anne’s Boulevard will be closed and replaced with continuation of fencing and landscaping.

6.10 With regard to car parking provision, 25 parking spaces are proposed for staff and visitors located along the principal façade. External lighting has been designed to reduce the impact of nuisance light spill and reduce the negative impact on local flora and fauna.

- 6.11 A new 3m boundary fenceline is proposed with enhanced buffer planting abutting the highway and within the Site.

## 7 RELEVANT PLANNING POLICY

7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications is made in accordance with the Development Plan unless material considerations indicate otherwise.

7.2 The Development Plan for the Site comprises:

- Reigate and Banstead Local Plan: Core Strategy (Adopted July 2014 and reviewed most recently in 2024).
- Reigate and Banstead Local Plan Development Management Plan (2019).
- Reigate & Banstead Local Plan Policies Map -Central Sheet (2019)

7.3 Other material considerations include the RBBC Local Character & Distinctiveness Design Guide Supplementary Planning Document (2021); Developer Contributions Supplementary Planning Document (2016) and the Climate Change and Sustainable Construction SPD (2021); the National Design Guide (2021); BRE – Site Layout Planning for Daylight and Sunlight (2022); the National Planning Policy Framework (NPPF) (2025); and the National Planning Practice Guide (NPPG).

7.4 Section 8 of this Planning Statement assesses the proposed development against the relevant planning policies and guidance from the above documents.

### SITE DESIGNATIONS

7.5 The Site is within the Holmethorpe Principal Employment Area designated through Policy EMP1 of the Development Plan.

7.6 The Site is located in close proximity to Holmethorpe Sandpits Complex, a Site of Nature Conservation Importance located beyond the rail corridor to the east.

## 8 KEY PLANNING CONSIDERATIONS

8.1 Having regard to the planning policy context and pre-application discussions with Reigate and Banstead Borough Council, the key planning matters relating to the proposed development are considered to be:

- Principle of development;
- Design, scale and massing;
- Energy and sustainability;
- Air quality;
- Noise;
- Landscaping;
- Ecology, trees and biodiversity net gain; and
- Transport.

### THE PRINCIPLE OF DEVELOPMENT

- 8.2 The Site is within the designated Principal Employment Area of Holmethorpe Industrial Estate, Redhill, where in accordance with Development Management Plan Policy EMP1, planning permission will be granted for change of use to offices, industrial, and storage and distribution, and for the development of new, upgraded or extended floor space within these uses. The proposed development seeks to demolish former industrial warehouses that have been converted to data centre uses. These buildings are at end of life and require redevelopment to meet modern day data centre building needs.
- 8.3 Core Strategy policy CS8: Areas 1-3 sets area specific employment floorspace targets over the plan period, with approximately 20,000 sqm for Area 2a Redhill and Area 2b: Reigate (including 7,000 sqm in Redhill Town Centre), predominantly to be delivered through reuse and intensification of existing employment land, including office-based jobs provided through redevelopment of key sites in Redhill Town Centre. In accordance with Core Strategy Policy CS8, the Council will seek to deliver 46,000sqm of employment floorspace by 2027. The proposed development will deliver 11,764m<sup>2</sup> of employment floorspace for the area through reuse and intensification of employment land, contributing significantly to meeting floorspace targets.
- 8.4 Policy CS10 supports proposals that make an efficient use of land at an appropriate density. Proposed development seeks to reuse previously developed land, at an appropriate density for a designated industrial employment area, making the best use of a non-rectangular site to deliver four data halls in two technical wings and a central administrative office. The increase in height is offset through design of massing elements being setback from the nearest sensitive receptors of residential homes south of St Annes Blvd, resulting in no loss of daylight and sunlight.
- 8.5 Proposals seek to strengthen Redhill and the Borough of Reigate and Banstead as an economic hub and strategic location for business. In line with Policy CS5 development proposals reinforce Redhill as an economic location, retaining investment in data centre provision within the town, which in turn will support businesses in the wider area. This is in line with paragraph 86 of the NPPF where planning policies should seek to build a strong, competitive economy and pay particular regard to facilitating development to meet the needs of a modern economy that is served by state of the art data centres and digital infrastructure.
- 8.6 Overall, the principle of development is considered acceptable, and the proposed development accords with Development Management Plan Policy EMP1 and Core Strategy Policies CS5, CS8 and CS10.

### DESIGN SCALE AND MASSING

- 8.7 Core Strategy Policy CS10 requires new development to minimise the use of natural resources, maximise energy efficiency and reduce carbon emissions through sustainable design and construction. The policy also seeks to ensure that development is resilient to the impacts of climate change, including increased temperatures and flood risk, and encourages the integration of renewable and low-carbon technologies.
- 8.8 Development Management Policy DES1 expects all new development to be of a high quality design that makes a positive contribution to the character and appearance of its surroundings. Planning permission will be granted for new development where it uses high quality building materials, reinforces local distinctiveness, incorporates landscape and building detail; and has due regard

amongst other things to the relationship to neighbouring buildings, and important views into and out of the site.

- 8.9 Given the Sites location at the transition between industrial and residential environments, the Site demands a carefully considered design approach that balances operational requirements with the need to respond sensitively to nearby residential receptors. Redevelopment of the Site provides an opportunity to replace outdated infrastructure with a modern facility that responds more positively to its contemporary context and improves the site's contribution to the surrounding townscape.
- 8.10 The urban character of the area is defined by a clear transition between the residential environment of Park 25 and the functional, infrastructure led character of the industrial estate. Within the employment area, buildings are typically larger in footprint and height, with simple forms and limited articulation, reflecting their operational focus.
- 8.11 In contrast, the residential areas are more finely grained, with active frontages, landscaped public realm and a pedestrian-oriented character. This contrast places particular importance on how development on the application Site addresses its southern and western elevations, which are visible from nearby homes and public spaces.
- 8.12 The proposed data centre has been designed to mediate between these contrasting urban conditions. Particular emphasis has been placed on the south elevation facing the residential area, with careful consideration given to massing, articulation and material selection to reduce perceived bulk and create a more composed, appropriate frontage.
- 8.13 The redevelopment of the site presents a number of significant opportunities, including:
- The replacement of ageing and visually dated buildings with a high quality, contemporary development;
  - The creation of a strong and well-considered frontage at a gateway to the industrial estate;
  - An improved relationship between employment land and adjacent residential uses through design, landscaping and boundary treatment;
  - The opportunity to enhance landscaping and site edges, softening the transition between uses;
  - The delivery of a more efficient, resilient and environmentally responsible data centre facility that meets modern standards.
- 8.14 Collectively, these opportunities allow the site to continue its established employment function while making a more positive contribution to the surrounding area.
- 8.15 The design has been developed through close collaboration between the architectural, engineering and planning teams, ensuring that operational efficiency is achieved without compromising design quality. Passive and active design measures have been integrated to promote energy efficiency, a healthy working environment and long-term adaptability.
- 8.16 Material choices have been carefully evaluated not only in terms of performance and cost, but also in relation to embodied carbon, durability and visual quality.
- 8.17 Security is fundamental to the operation of the facility; however, wherever possible, physical security measures are integrated discreetly within the architectural and landscape design, avoiding an overtly defensive appearance and supporting a more positive relationship with the surrounding context.
- 8.18 The form and massing of the proposed development have been shaped by the specific operational requirements of a modern data centre, alongside the physical constraints and sensitivities of the site. A comprehensive massing study was undertaken to test alternative configurations against a range of criteria, including operational efficiency, construction feasibility, visual impact, relationship to neighbouring residential uses and opportunities for architectural articulation.
- 8.19 The proposed massing design adopts a ramped site strategy that works with existing levels, minimising earthworks and reducing the environmental impact of construction. This approach enables the data centre to be expressed as two distinct data hall modules, accommodating existing and future IT loads separately, with a centrally positioned administration and operations block. This configuration improves operational resilience, simplifies phased delivery, and allows the overall mass to be broken into smaller, more legible components.
- 8.20 The separation of the building into three principal volumes significantly reduces perceived bulk when viewed from the surrounding area. It also creates opportunities for differentiated elevational treatment, setbacks and variation in materiality, allowing the architecture to respond more effectively to its

context. The central administration block acts as a visual and functional hinge between the larger data hall volumes, providing a human-scaled element that softens the overall composition.

- 8.21 Roof-level plant, while essential to the operation of the facility, has been carefully considered as part of the massing strategy. Plant enclosures are set back from the primary elevations and are integrated into the overall building form, reducing their prominence in key views and limiting their visual impact on neighbouring residential areas.
- 8.22 Overall, the chosen massing strategy represents a balance between operational necessity and architectural restraint, delivering a building that is efficient, robust and visually composed. Further assessment of the proposed development's design, appearance and materials is set out within the supporting DAS and elevation drawings.
- 8.23 The design, scale and massing of the proposed development is appropriate, responding to the Site's existing and industrial policy context. The proposed development results in a high-quality design in line with Policies CS10 and DES 1.

#### **ENERGY AND SUSTAINABILITY**

- 8.24 The Reigate & Banstead Local Plan sets clear expectations for sustainable development. Core Strategy Policy CS10 requires new developments to minimise the use of natural resources, maximise energy efficiency, and reduce carbon emissions through sustainable construction methods. It also encourages the integration of renewable and low-carbon technologies while ensuring resilience to climate change impacts such as higher temperatures and increased flood risk.
- 8.25 Core Strategy Policy CS11 focuses on sustainable construction standards. It expects relevant non-residential developments to achieve a minimum of BREEAM 'Very Good', and encourages the use of decentralised, renewable, or low-carbon energy, including combined heat and power where appropriate. For major developments in areas of significant heat density, the potential to create or connect to a district heating network should be fully investigated, and developments should be designed to facilitate future connection where feasible and viable.
- 8.26 The proposals are targeting a BREEAM rating of Very Good, which requires a minimum score of 55% including the mandatory requirements for the rating, as set out in the BREEAM technical guidance. BREEAM requirements are set for this scheme predominantly to assess the environmental impacts of buildings arising as a result of new and major refurbishment construction works. The BREEAM Pre-Assessment targets a credits score of 65.18% of Very Good with a possible additional credits scoring of 73.01% Excellent to be potentially achieved. In line with Policy CS11 : Sustainable construction the building will be designed to comply with BREEAM, achieving a rating of "Very Good".
- 8.27 An Energy & Carbon Reduction Statement prepared by RED Engineering Design Ltd finds that the proposals have been designed in accordance with the energy hierarchy. The scheme includes low and zero carbon technologies such as Air Source Heat pumps and Virtual Routing and Forwarding (VRF) technology that provides low carbon heating to the offices, with solar photovoltaic panels (318kWp) on the data hall rooftops to generate zero carbon electricity. Approximately 318 sqm of roof-mounted PV panels are proposed, capable of generating around 52,487 kWh per annum, delivering estimated carbon savings of approximately 6,574 kg CO<sub>2</sub> per year.
- 8.28 The scheme produces waste process which will be reused on site, and the development will be designed to facilitate future heat export of waste heat to the neighbouring residential heat network, should it prove feasible to do so. The Statement sets out that unregulated energy consumption will be minimised, the data centre process cooling system is highly energy efficient, including high efficiency air cooled chillers with free cooling function.
- 8.29 Regulated carbon emission savings of 20.9% are demonstrated in comparison to a Building Regulations compliant baseline, above and beyond the Reigate & Banstead Borough Council's minimum 10% carbon reduction as set in Policy CCF1: Climate change mitigation.
- 8.30 Unregulated energy consumption will be minimised, the data centre process cooling system is highly energy efficient, including high efficiency air cooled chillers with free cooling function. Meanwhile, the all-electric design ensures that as the UK electricity grid continues to decarbonise, the building's operational carbon emissions will reduce further over time.

#### **AIR QUALITY**

- 8.31 An air quality impact assessment (AQIA) was undertaken to assess the potential effects of the construction phase and operational emissions from emergency power back-up diesel-fuelled generators which would support operations of the data centre facility. All existing and proposed new generators are for emergency provision only in the event of a grid power outage. The unchanged Unit

3 and the new Units 1&2 have feed from two electrical substations (Three Bridges and Caterham), limiting the likelihood of standby generators being required to run. Routine operations are therefore limited to testing and maintenance. The provision of generators however remains a security requirement for any data centre.

- 8.32 The AQIA includes an assessment of the impact of routine and emergency emissions from the proposed Units 1&2 separately and combined with the routine and emergency emissions from Unit 3. While it is considered likely that all three Units will operate under a varied Environmental Permit and there will therefore be no simultaneous testing, a cumulative assessment representing a worst-case scenario for emissions from the Site was undertaken. The assessment seeks to quantify and address the impact of emissions against the relevant air quality standards for the protection of human health and the relevant critical levels and critical loads for the protection of designated ecological receptors.
- 8.33 A detailed dispersion modelling assessment was submitted to the EA with the permit application for the current Units 2&3. The process contribution to the maximum predicted annual mean concentrations of PM10 and PM2.5 (particulate matter) at a human receptor was 0.2% and 0.4% of the relevant air quality assessment levels at human receptors respectively. The proposed new generators for Units 1&2 therefore have lower emissions of PM than those previously assessed.
- 8.34 Development Management Policy DES9 requires development proposals to demonstrate they will not result in a significant adverse or unacceptable impact on the natural or built environment with respect to health and safety due to air pollution.
- 8.35 The assessment finds there are no predicted exceedances of any of the relevant air quality assessment levels for NO<sub>x</sub> (oxides of nitrogen) and NO<sub>2</sub> (nitrogen dioxide) at human or ecological receptors when considering the routine testing operations for the proposed development at Units 1&2 only.
- 8.36 When considering the potential impacts of emissions from Units 1&2 simultaneously with emissions for the unchanged Unit 3, there are predicted exceedances of the 1-hour mean air quality assessment levels assuming one generator from each site is tested at the same time. This however is a highly unlikely scenario and the probability of exceedance is <1% and therefore concluded to be “Highly Unlikely”.
- 8.37 In the event of a grid outage at each part of the site and all standby generators firing up at 100% load simultaneously, the probability of exceeding the 1-hour mean air quality assessment level is <1%, “Highly Unlikely” for the 24-hour outage and >5% for the 72-hour outage resulting in “Potential for Exceedance”.
- 8.38 In this scenario, there is “Potential for Exceedance” of the daily mean NO<sub>x</sub> critical levels at one ecological receptor in the event of a grid failure and all standby generators firing up at 100% load across Units 1 &2 and Unit 3 simultaneously.
- 8.39 The AQIA concludes that all grid outage scenarios are worst-case as some of the standby generators would ramp down after a few hours and both sites have connections to two substations meaning any emergency standby generators event should be shorter than the modelled 24- or 72-hour scenarios.
- 8.40 The proposed development is therefore considered to accord with the requirements of Development Management Policy DES9, and other guidance regarding air quality.

#### **NOISE**

- 8.41 Core Strategy Policy CS10 requires development to be designed to minimise noise. Development Management Policy DES9 requires development proposals to demonstrate that (on its own or cumulatively) it will not result in a significant adverse or unacceptable impact on the natural or built environment; amenity; or health and safety due to noise or vibration.
- 8.42 A Noise Impact Assessment (NIA) has been prepared to support the planning application for the Site, and has been prepared in accordance with national and local planning policy technical noise guidance.
- 8.43 Prior to undertaking the noise assessment, consultation was carried out with the Environmental Health (Noise) team at Reigate and Banstead Borough Council to agree the proposed methodology for the NIA, including the approach for evaluating potential impacts on nearby receptors and identifying any noise mitigation measures required to ensure compliance with relevant planning conditions and guidance.
- 8.44 A BS 4142 assessment has been undertaken to consider the potential noise impact of the proposed development, and is based on the Site layout plans, and information provided as part of the mechanical and electrical design, and the size and scale of the proposed plant. The main source of

noise at the proposed development will be external plant of backup generator testing and exhaust stacks, LV Pods, Chillers and Air Handling Units.

- 8.45 As part of the iterative design process, noise mitigation measures have been considered to mitigate and minimise potential adverse impacts. These measures have focused on the layout and specification of plant, with acoustic measures targeted at the most dominant source.
- 8.46 The BS 4142 assessment demonstrates that, with mitigation applied, rating levels during normal operations are below the background sound level during the daytime, and at worst 3 dB above during the night-time, at upper floors of the nearest receptors. When assessed in accordance with BS 4142, this difference would result in no adverse impact at the receptors.
- 8.47 Routine generator testing results in rating levels significantly below the background sound level at all receptors and is therefore considered negligible. Emergency outage scenarios also result in rating levels below or only marginally above the background sound level but would also result in a maximum difference of +3 dB at night-time. Overall, generator operation during routine testing and emergency outage scenarios would not introduce any additional impacts above normal operations.
- 8.48 When placed in context, the proposed development represents a clear improvement over previously approved operations for Unit 1 and 2, which were associated with higher sound levels at some receptors. The enhanced design and mitigation measures significantly reduce the contribution of noise compared to historic conditions. Furthermore, the context of the Site's long-standing industrial use, and continued operation of Unit 3, means sound from the Site is less likely to be perceived as unusual or intrusive.,
- 8.49 Taking this context into account, the overall BS 4142 assessment can be modified to indicate a low impact. Overall, the proposed development is not expected to result in any significant or adverse noise impacts at receptors.
- 8.50 The proposed development involves the redevelopment of Unit 1 and 2, while Unit 3 will remain unchanged and continue operating as an existing data centre. As agreed with Reigate and Banstead Borough Council, a cumulative assessment has been undertaken to consider the combined impact of all three data centre units operating simultaneously, operating under typical conditions.
- 8.51 When considered cumulatively, the combined effect of all three units compared to the baseline of Unit 3 operating alone, would result in only minor increases in noise which are unlikely to be perceptible. Therefore, potential cumulative effects are therefore considered to be negligible.
- 8.52 The NIA demonstrates that the development is consistent with Reigate and Banstead Borough Council's Development Plan, including Core Strategy Policy CS10 and Development Management Policy DES9, which require that development does not result in unacceptable levels of noise and that appropriate mitigation is provided. The assessment confirms that the proposed operations will not cause significant adverse impacts and that mitigation measures have been integrated into the design to minimise noise.

## **DRAINAGE**

- 8.53 Core Strategy Policy CS10 requires development to be designed reflecting the need to adapt to the impacts of climate change such as increased flooding and be located to minimise flood risk.
- 8.54 Development Management Policy CCF2 on Flood Risk requires a Flood Risk Assessment where Sites are greater than 1 hectare in area. Proposals must not increase the existing and future risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding for existing and proposed development.
- 8.55 The existing site currently discharges surface water to a private surface water sewer to the south of the site within St Annes Boulevard.
- 8.56 The EA flood zone map shows that the site is classified as Flood Zone 1, representing a less than 1:1000 year probability of flooding from fluvial sources. The proposed site layout shows that impermeable area will remain similar to the pre development condition post development, however by employing the drainage strategy surface water flood risk can be ensured to be reduced as a result of the development through the use of reduced discharge rates with attenuation. Therefore, the overall risk of pluvial flooding to the site can be considered low.
- 8.57 The attenuation has been designed to accommodate all storms up to and including the 1:100 year event with a 40% allowance for climate change which is in accordance with the Environment Agencies recent changes (May 2022), to how Climate Change Allowance is assessed and incorporated within developments.

- 8.58 The drainage design undertaken by Abstract Consulting has considered the discharge of both foul and surface water from the site, whilst minimising the flood risk both on and off site. It is shown that all foul water will be collected and conveyed to the Thames Water public foul sewer network via an existing private foul drainage system and surface water will be collected and discharged to the Thames Water public surface water sewer network via an existing private surface water drainage system.
- 8.59 It is also shown that surface water will be adequately treated, prior to discharge to the sewer, and be maintainable during the life of the development. The drainage strategy is in line with policies CS10 and CCF2

## **LANDSCAPING**

- 8.60 The landscape strategy aims to enhance the quality of the development through the incorporation of additional trees and plantings, which will support local biodiversity and improve the aesthetic outlook for neighbouring properties. While security is a key consideration for this type of development, great care has been taken to minimize the visual impact of high fences and security measures.
- 8.61 This landscaping approach helps integrate the facility seamlessly into the surrounding urban fabric, while preserving the integrity of the existing vegetation around the Site. The tree planting strategy seeks to enhance and complement the existing site conditions through proposed native and naturalistic species around the Site boundary. In line with Policy NHE1, proposed landscaping respects the existing features of the area and enhances the buffer between the industrial and residential areas, with views of the data centre softened.

## **ECOLOGY, TREES, BIODIVERSITY NET GAIN**

### **Ecology**

- 8.62 Development Management Plan Policy NHE2 requires development proposals to manage impacts on biodiversity and to protect Sites of Nature Conservation Importance (SNCIs).
- 8.63 A Preliminary Ecological Appraisal ('PEA') has been undertaken and forms part of this planning application. The key findings and recommendations are summarised below.
- There are no internationally designated sites within a 10km of the site. There is one nationally designated site within a 2km radius of the site. There are four non-statutory designated sites within a 2km radius of the site, such as Local Wildlife Sites (LWS); these are known as Sites of Nature Conservation Importance (SNCIs) in Surrey.
  - Introduced shrub, modified grassland and an individual urban trees are present on site. The trees are considered to be of local ecological importance.
  - The individual trees and buildings have potential to support common species of nesting birds. Where these features are to be affected with suitability for nesting birds, they should be removed outside of the nesting bird season or cleared following a nesting bird check by a suitably qualified and experienced ecologist up to 48 hours prior to work commencing.
  - A cotoneaster species was recorded within the introduced shrub habitats on site. Several Cotoneaster species are listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). As a precautionary measure, it is recommended that any Cotoneaster species be assumed to be Schedule 9-listed unless positively identified otherwise, and that appropriate measures are implemented to prevent their spread.
- 8.64 Recommendations have been made to mitigate against the loss of ecological features, and to enhance the site in line with Reigate & Banstead Council biodiversity policies, with the aim to provide a net gain for biodiversity on the site:
- Application of the mitigation hierarchy to retain and protect habitats of highest ecological importance.
  - Provision of soft landscaping which can include tree planting, herbaceous and shrub planting, and ornamental planting. These in turn will provide opportunities for invertebrates, bats and birds.
  - Provide a 10% net gain in line with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
  - Inclusion of species-specific bat boxes and bird boxes.
  - External lighting should be sensitive carefully designed in accordance with the Bat Conservation Trust (BCT) and the Institute of Lighting Professional (ILP) guidance.

8.65 Such measures would align with the mitigation hierarchy and policy NHE2, which seeks to promote biodiversity enhancement across all developments.

### **Biodiversity Net Gain**

8.66 In England, BNG became mandatory on the 12th of February 2024 for major developments (subject to a number of exemption) under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This is to make sure that habitats for wildlife are left in a measurably better state than they were before the development. In line with BNG, developers must deliver a BNG of at least 10%.

8.67 The Statutory BNG Metric has been used to calculate the pre- and post-development habitat units as a result of the proposed development. Appropriate compensatory planting including habitat creation has been incorporated into the proposed landscaping to replace habitats being lost. The habitats proposed are considered appropriate for the sub-urban location of the site and nature of the proposals.

8.68 The proposed development will result in a total biodiversity net unit change of 0.38 habitat units, equating to 10.89%. The habitat net unit change achieves the 10% mandatory requirement as set out under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). The trading rules of the metric have been satisfied through the creation of modified grassland and the addition of urban trees.

8.69 In addition to the above, a number of measures are proposed to provide additional ecological enhancements for protected and priority species known or with potential to be present within the site and local area and are detailed within the PEA. Although these measures cannot be captured in the Defra BNG Metric, they will contribute to enhancing the conservation status of these species, contributing to further biodiversity gains at the site.

### **Trees**

8.70 Development Management Policy NHE3 requires development proposals to include an assessment of existing trees and landscape features on site, including their suitability for retention. Where replacement tree and hedge planting is required, appropriate species of trees should be used and sufficient space must be provided at the design stage for tree provision, including space to allow trees to reach their optimum size.

8.71 A Tree Survey, Arboricultural Impact Assessment and Method Statement, Tree Constraints Plan and Tree Protection Plan form part of the planning application.

8.72 Most existing trees on Site will be retained. The Arboricultural Impact Assessment confirms that the proposed works will necessitate the removal of 2no. trees that are classified as low 'C' Category value. It is considered that the development will not have a significant impact on the overall tree population.

8.73 There is sufficient space within the site boundaries for replanting, which is expected to enhance the long-term viability of the tree population within the surrounding area. Replacement trees will be carefully selected with high-quality specimens to ensure a diverse, healthy, and sustainable tree stock for the future.

8.74 The proposed tree planting strategy seeks to enhance and complement the existing site conditions. Native and naturalistic species have been proposed to the site periphery to complement the existing species.

8.75 19 new trees are proposed as part of the landscape design and will more than mitigate for the two being removed by providing robust long term tree cover in keeping with the proposal and surrounding properties. Proposed tree species will include *Acer campestre* 'Streetwise', *Amelanchier lamarckii*, *Betula pendula*, *Betula utilis* var. *jacquemontii* and *Tilia cordata*.

8.76 The proposed development therefore accords with Policy NHE3.

### **TRANSPORT**

8.77 Proposals seek to reduce the amount of parking on site from 99 car parking spaces to provide 25 parking bays. This is in line with the specific nature of the Sui Generis use of the data centre operations. Policy TAP1 of the Development Management Plan sets out local parking standards for non-residential development, whereby Sui Generis uses should provide parking through individual assessment. Likewise Surrey County Council parking standards requires an individual assessment or justification for parking for Sui Generis uses.

8.78 The datacentre is demonstrated to be accessible by a choice of travel modes, being in close proximity to Redhill town centre and its rail station, with walking routes supporting those staff that may choose

to live within the local area and cycle infrastructure for those living further afield. In respect of its operation, the datacentre will host in the order of 10 office staff, with irregular visitor trips.

- 8.79 With regard to car parking provision, the 25 parking spaces proposed offers 30% headroom on staffing numbers, although it is probable on any given day that one or more staff members may car share, cycle, walk or have used public transport to travel to their workplace. As such the proposed parking level is considered appropriate, having regard to the need to accommodate additional visitor vehicles whilst balanced against ensuring there is not a significant overprovision (as is the case under existing conditions). The reduction in parking provision is therefore compliant with NPPF objectives and Development Plan policy.
- 8.80 Car parking access will be through the existing Unit 2 access from St Annes Blvd, with maintenance and delivery access to and from the rear of the Site onto St Annes Drive North. The proposed development will not be a major generator of travel demand in the context of the NPPF and as such is an acceptable redevelopment proposal in transport-policy terms.

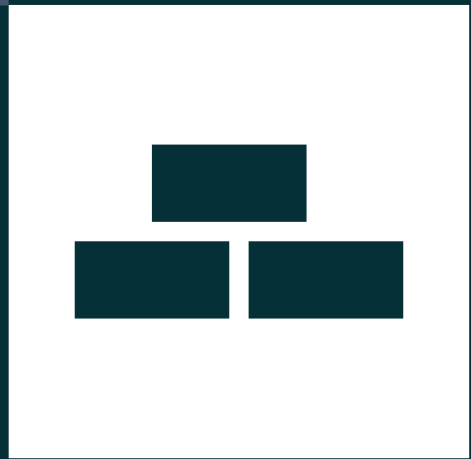
## 9 CONCLUSION

- 9.1 This planning application is for the redevelopment of the existing Redhill Data Centre. With the evolution of data centre power density requirements, and the increasing prevalence of new IT cooling technologies, Redhill Data Centre Ltd (a joint venture between the owner Castleforge Real Estate Investment and data centre operator and advisory firm Galaxy Data Centres have identified the Site as being well suited to a holistic redevelopment programme to cater to current and future market demands.
- 9.2 The proposals seek demolition of units 1 and 2 and construction of a single two-storey data centre building featuring three built elements accommodating four symmetrical data halls, with an office block sited between the two data hall wings. Units 1 and 2 are currently at end of life and are vacant buildings not currently operating as data centres. The Site will be regraded and reconstructed to accommodate a modern, high-capacity data centre campus with a focus on resilience, efficiency, and future scalability, providing sufficient space to support day to day operations via an administrative office block.
- 9.3 The Site is located within the designated Principal Employment Area of Holmethorpe Industrial Estate, whereby the proposal would comply with DMP Policy EMP1 which allows for the development of new upgraded floorspace for existing uses. The principle of development is therefore considered acceptable.
- 9.4 The proposed development includes the provision of an additional 6,573sqm (GIA) of data centre floorspace in Redhill, which significantly contribute to area specific employment floorspace targets over the plan period as set by Core Strategy policy CS8 delivered through reuse and intensification of existing employment land. Proposals are an efficient use of land at an appropriate density within an employment area, making the best use of a non-rectangular site to deliver four data halls in two technical wings and a central administrative office. The increase in height is offset through design of massing elements being setback from the nearest sensitive receptors of residential homes south of St Annes Blvd, resulting in no loss of daylight and sunlight.
- 9.5 Proposals seek to strengthen Redhill and the Borough of Reigate and Banstead as an economic hub and strategic location for business. In line with Policy CS5 development proposals reinforce Redhill as an economic location, retaining investment in data centre provision within the town, which in turn will support businesses in the wider area. This is in line with paragraph 86 of the NPPF where planning policies should seek to build a strong, competitive economy and pay particular regard to facilitating development to meet the needs of a modern economy that is served by state of the art data centres and digital infrastructure.
- 9.6 By modernising critical infrastructure on a previously developed site, the proposed development supports the local and wider economy, aligns with principles of sustainable development, and ensures the continued provision of essential digital infrastructure within the borough. The proposed data centre has been designed to mediate between contrasting urban conditions of its industrial location and residential neighbours. Particular emphasis has been placed on the south elevation facing the residential area, with careful consideration given to massing, articulation and material selection to reduce perceived bulk and create a more composed, appropriate frontage.
- 9.7 The proposals are targeting a BREEAM rating of Very Good, which requires a minimum score of 55% including the mandatory requirements for the rating, as set out in the BREEAM technical guidance. The BREEAM Pre-Assessment targets a credits score of 65.18% of Very Good with a possible additional credits scoring of 73.01% Excellent to be potentially achieved. In line with Policy CS11 : Sustainable construction the building will be designed to comply with BREEAM, achieving a rating of "Very Good".
- 9.8 The scheme includes low and zero carbon technologies such as Air Source Heat pumps and Virtual Routing and Forwarding (VRF) technology that provides low carbon heating to the offices, with solar photovoltaic panels (318kWp) on the data hall rooftops to generate zero carbon electricity.
- 9.9 The scheme produces waste process which will be reused on site, and the development will be designed to facilitate future heat export of waste heat to the neighbouring residential heat network, should it prove feasible to do so.
- 9.10 Regulated carbon emission savings of 20.9% are demonstrated in comparison to a Building Regulations compliant baseline, beyond the Reigate & Banstead Borough Council's minimum 10% carbon reduction as set in Policy CCF1: Climate change mitigation.
- 9.11 In terms of air quality, when considering the potential impacts of emissions from Units 1&2 simultaneously with emissions for the unchanged Unit 3, there are predicted exceedances of the 1-hour mean air quality assessment levels assuming one generator from each site is tested at the same

time. This however is a highly unlikely scenario and the probability of exceedance is <1% and therefore concluded to be “Highly Unlikely”.

- 9.12 In the event of a grid outage at each part of the site and all standby generators firing up at 100% load simultaneously, the probability of exceeding the 1-hour mean air quality assessment level is <1%, “Highly Unlikely” for the 24-hour outage and >5% for the 72-hour outage resulting in “Potential for Exceedance”.
- 9.13 In this scenario, there is “Potential for Exceedance” of the daily mean NOx critical levels at one ecological receptor in the event of a grid failure and all standby generators firing up at 100% load across Units 1 & 2 and Unit 3 simultaneously.
- 9.14 The AQIA concludes that all grid outage scenarios are worst-case as some of the standby generators would ramp down after a few hours and both sites have connections to two substations meaning any emergency standby generators event should be shorter than the modelled 24- or 72-hour scenarios. The proposed development is therefore considered to accord with the requirements of Development Management Policy DES9, and other guidance regarding air quality.
- 9.15 The NIA demonstrates that, with the specified mitigation measures applied to the chiller units, the predicted rating levels during all operations, would be below the representative background sound level during the daytime, and at worst 3 dB above during the night-time at the most exposed receptors (upper floors of NSR1 and NSR2). When taking context into account, the BS 4142 assessment indicates a low impact.
- 9.16 Furthermore, the proposed development represents an improvement over previously approved operations for Unit 1 and 2, as the enhanced design and mitigation measures substantially reduce the contribution of noise from the site compared to historic conditions.
- 9.17 When considered cumulatively, the combined effect of all three units compared to the baseline of Unit 3 operating alone, would result in only minor increases in noise which are unlikely to be perceptible. Therefore, potential cumulative effects are therefore considered to be negligible.
- 9.18 The development aligns with Core Strategy Policy CS10 and Development Management Policy DES9, which require that development does not result in unacceptable levels of noise and that appropriate mitigation is provided. The assessment confirms that the proposed operations will not cause significant adverse impacts and that mitigation measures have been integrated into the design to minimise noise.
- 9.19 The proposed development incorporates high-quality landscaping including additional trees which focuses on creating a sustainable and biodiverse environment that enhances ecological integrity, includes more wildlife friendly species and creates areas of habitat for pollinators, whilst increasing the visual interest of the Site.
- 9.20 No designated ecological sites will be impacted by the proposed development. The PEA makes recommendations to mitigate against the loss of ecological features, and to enhance the site in line with Reigate & Banstead Council biodiversity policies, with the aim to provide a net gain for biodiversity on the site.
- 9.21 The proposed development achieves 10.89% BNG, over and above the 10% required for major developments. The trading rules of the statutory BNG metric have been satisfied through the creation of modified grassland and the addition of urban trees.
- 9.22 Two trees will be removed to accommodate proposed development, both classified as low ‘C’ Category value. It is considered that the development will not have a significant impact on the overall tree population.
- 9.23 The proposed tree planting strategy seeks to enhance and complement the existing site conditions. Native and naturalistic species have been proposed to the site periphery to complement the existing species. 19 new trees are proposed as part of the landscape design and will more than mitigate for the two being removed by providing robust long term tree cover in keeping with the proposal and surrounding properties.
- 9.24 25 parking spaces are proposed for the Site, offering 30% headroom on staffing numbers This is in line with the specific nature of the Sui Generis use of the data centre operations. Policy TAP1 of the Development Management Plan sets out local parking standards for non-residential development, whereby Sui Generis uses should provide parking through individual assessment. As such the proposed parking level is considered appropriate, the reduction being considered compliant with NPPF objectives and Development Plan policy.

- 9.25 Overall, the proposed development is considered to accord with the Reigate and Banstead Borough Council Development Plan, and other material considerations.
- 9.26 The Planning Statement concludes that planning permission should be granted in line with the presumption in favour of sustainable development of Policy CS1 of the Core Strategy and Rapleys look forward to working with the Council during the application process.



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