



Humber  
Tech  
Park

# Planning Statement





## Document Management.

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# 1. Introduction

- 1.1. This Planning Statement has been prepared by Pegasus Group to accompany a planning application that is submitted on behalf of Humber Tech Park Ltd (the Applicant). The application relates to land south of the A160 and north of the A180, to the west of South Killingholme and Immingham. The site is located close to the South Humber Bank port, an energy cluster and employment area.
- 1.2. In summary, the development proposal is for a data centre campus comprising up to 309,000 sqm of buildings, a horticultural glasshouse and other associated works. The Data Centre would provide an IT Load (the key measure of data centre capacity) of up to 384MW.
- 1.3. A more detailed description of the development proposals is set out in section 3 of this statement and the Design and Access Statement.

## The Purpose and Content of the Planning Statement

- 1.4. This Planning Statement provides a summary overview of the application proposals and identifies the Planning Policy Framework within which it should normally be considered.
- 1.5. **Section 2** provides a description of the site and its surroundings. A description of the development proposals is set out in **Section 3**. An explanation of what a data centre is set out in **Section 4**, whilst **Section 5** explains the locational requirements of the proposals and how South Humberside meets those requirements. The Planning Policy Framework that is applicable to the application is provided in **Section 6**. **Section 7** then provides an assessment of the main planning issues and provides a reasoned justification for the scale and nature of the development that is now being proposed. **Section 8** deals with the overall planning balance. The summary and conclusions are set out in **Section 9**.

## Other Supporting Documents

- 1.6. In addition to this Planning Statement, the application is supported by a number of plans and a suite of documents that comprehensively address all of the technical aspects of the development proposals. These include:-
  - a. Design and Access Statement
  - b. Acoustic Noise Assessment
  - c. Agricultural Land Classification Report
  - d. Air Quality Assessment
  - e. Arboricultural Impact Assessment
  - f. Construction Transport Management Plan
  - g. Ecological Appraisal and Biodiversity Net Gain Assessment



- h. BREEAM Pre-Assessment Report
- i. Design Presentation
- j. Economic Needs and Benefits Report
- k. Energy & Sustainability Assessment
- l. Flood Risk Assessment and Drainage Strategy
- m. Fuel Storage Report
- n. Geophysical Survey Report
- o. Greenhouse Economic & Strategic Case Report
- p. Heritage Assessment
- q. Land Contamination Phase 1 Report
- r. Lighting Impact Report
- s. Landscape and Visual Impact Assessment
- t. Statement of Community Involvement
- u. Transport Assessment
- v. Travel Plan
- w. Waste Management Plan

## **Environmental Impact Assessment (EIA)**

- 1.7. An EIA screening request was made to North Lincolnshire Council on 13 March 2024 requesting a screening opinion from the local planning authority for the proposed development, on the basis that the applicant considered that the proposals do not constitute EIA development and would not require an Environmental Statement to be submitted with a planning application.
- 1.8. On 17<sup>th</sup> April 2024 the LPA issued a formal Screening Opinion (ref: PA/SCR/2024/2) that confirmed that an EIA would not be required. The conclusion was as follows:-

**“North Lincolnshire Council advises that in light of the available information and having regard to the location and nature of the proposed development and the selection criteria for screening Schedule 2 development as set out in Schedule 3 of the 2017 Regulations, the proposal would be unlikely to have any significant environmental effects. In addition, in accordance with Regulation 5(5), having regard to the location of the site and the nature of the development, there are not considered to be any features of the proposed development and measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.**

**The proposed development, although constituting a Schedule 2 development category 10, is not considered to warrant an environmental impact assessment”.**

## 2. Site Location and Description

- 2.1. The application site is located to the south-west of South Killingholme on land south of the A160. The town of Immingham is approximately 2.5 km to the east. The suburbs of Grimsby are approximately 8km to the south-east. The whole site lies within the administrative boundary of North Lincolnshire Council and is located within the civil parish of South Killingholme.
- 2.2. The site is broadly rectangular in shape and extends to circa. 75.8 hectares in total. It is predominantly open greenfield land and comprises a number of field parcels defined in the most part by mature hedgerow and trees.
- 2.3. The Site is bounded by the A160 dual carriageway to the north and west as it curves round between the Habrough Road Roundabout and the Bocklesby Interchange. Part of the Site's northern boundary is directly adjacent to the A160. The Site's eastern boundary is defined by Habrough Road. The Site's southern boundary is defined in part by an unnamed brook/drainage ditch running east-west, and from north of Mill Hill Stables to the A160 north of the Bocklesby Interchange. Part of the southern boundary of the Site, defined by the unnamed brook/drainage ditch, forms part of the administrative boundary with North East Lincolnshire Council.
- 2.4. There are no PRowS within the site.
- 2.5. There are currently no structures, buildings, or tracks within the site.
- 2.6. The site does not form part of an AONB/National Landscape or have any other landscape designations associated with it or its immediate contextual area. The site is not recognised locally as forming part of a 'valued' landscape and when tested in accordance with Landscape Institute Technical Guidance Note O2/21 it is not assessed to meet the requirements of a valued landscape. The site does however lie within a landscape initiative area detailed in Saved Policy LC20 which seeks to improve the quality of the landscape.
- 2.7. There are no heritage or ecology designations within the site itself.
- 2.8. The entirety of the site is located within Flood Zone 1 (the zone with the lowest probability of flooding).
- 2.9. The nearest bus stops are located in Immingham on Pelham Road approximately 3.5km to the south-east of the site. The bus stops are served by bus service 5 and 5M. The applicant is willing to make a contribution to increase the frequency of local bus services.



- 2.10. There are a number of pipelines that traverse the eastern part of the site. These have been taken into account when considering the location and form of the proposed buildings so as to avoid easements and to respect HSE advice.

### 3. The Application Proposals

3.1. The Applicant seeks planning permission for a proposed development comprising:-

**“Construction of a data centre of up to 309,000 sqm (GEA) delivered across up to 3no. buildings, including ancillary offices, internal plant and equipment and emergency back-up generators and associated fuel storage. Other works include internal roads and footpaths, cycle and car parking, hard and soft landscaping, security perimeter fence, lighting, drainage, an electricity substation, a district heating unit, horticultural glass house, and other associated works and infrastructure”.**

3.2. The application is submitted in outline with all matters of detail reserved for subsequent determination.

3.3. This is no ordinary development proposal and nor is it one that meets a generic need that could be met anywhere. The proposed development is a new type of data centre that is designed to “train” Artificial Intelligence (AI) models. These data centres require very high levels of computing and power capacity. Should permission be granted for the Data Centre it would provide for critical infrastructure, and its timely delivery is a matter of national importance.

3.4. Further explanation of what an AI-data centre is set out in Section 4 of this statement.

3.5. The main components of the scheme are as follows:-

- a. Up to three Data Centre buildings capable of 384MW of IT load with a total GEA of 309,000 sqm, including ancillary office space, with a maximum height of 13m (15m with the external gantry and flues);
- b. A new electricity substation, with a maximum height of 8 metres.
- c. Provision for emergency back-up generators and fuel storage
- d. A district heating unit, with a maximum height of 8 meters;
- e. A horticultural glass house, with a maximum height of 10m. The glass house will be heated by reusing the excess heat from the data centre;
- f. Primary access from Habrough Road to the east, and emergency access from the A160 to the north with associated internal roads, car parking, security fencing and supporting infrastructure.
- g. Comprehensive scheme of landscaping and biodiversity enhancements, including provision of Sustainable Drainage System (SuDS).
- h. Safeguard of existing boundary hedgerows and trees where possible; and

3.6. To take advantage of the excess heat from the data centre, it is proposed to construct an agricultural glass house within the site, of approximately 28,000m<sup>2</sup>. To support the glass





house proposal a Greenhouse Economic & Strategic Case Report accompanies the application.

- 3.7. A number of underground gas pipelines, a water pipeline and Hornsea One Wind Farm Export Cable cross the eastern part of the Application Site. The built elements of the development have been sited so as to avoid these areas and appropriate easements are respected in the design and layout of the proposed development.
- 3.8. The proposals have been landscape-led. This is to ensure the new built development assimilates with the site and its surroundings and it offers opportunities to limit landscape and visual effects and to provide for landscape and biodiversity enhancements.
- 3.9. Whilst the application is an outline application it can be seen that considerable thought has also been given to the design and appearance of the proposed data centre buildings. The architectural treatment reflects and responds to the Government's policy to create high quality, beautiful and sustainable buildings and places. Conditions can be used to ensure that the guiding principles are carried forward into the final detailed design of the scheme.
- 3.10. The Design and Access Statement provides further detail on the proposed design and layout of the scheme. The scheme has been designed to meet as a minimum the BREEAM 'very good standard'.
- 3.11. Whilst access is a reserved matter, it is proposed to serve the proposed development via a new priority T-junction arrangement with a dedicated right-turn lane onto Habrough Road.
- 3.12. It is proposed to provide a 3.0m wide shared footway/ cycleway on the Harborough Road linking into the existing shared footway/ cycleway across the A160 Humber Road into South Killingholme.
- 3.13. The Proposed Development will take approximately 3 years to complete once the construction phase commences. Given that there would be up to three separate buildings they are likely to be delivered in phases as opposed to all being completed at the same time.

### **Site Layout and the Parameter Plans**

- 3.14. An illustrative Site Development Strategy Plan is submitted as part of the application. This demonstrates how the proposed development could be laid out.
- 3.15. In addition to the Illustrative Site Development Strategy Plan, the planning application includes a series of Parameter Plans. These would be the approved plans that would be referred to in the decision notice if the application is approved. They would ensure that the key guiding principles of the outline proposals are carried forward into future RM applications.



- 3.16. All other plans should be treated as being illustrative or providing supporting information and would not be listed as being approved.

### **Plans for approval**

- 3.17. If planning permission is granted then the following plans would be the approved plans at the Outline planning stage:-

<u>Drawing Title</u>	<u>Drawing Reference</u>	<u>Revision</u>
1. Site Location Plan	23217.901	
2. Land Use Parameters Plan	23217.301	B
3. Development Zones Parameters Plan	23217.302	A
4. Building Heights Parameters Plan	23217.303	A
5. Building Lines Parameters Plan	23217.304	A
6. Indicative Green Infrastructure Parameters Plan	23217.305	B
7. Access And Movement Parameters Plan	23217.306	B

### **Other Plans**

- 3.18. An indicative layout is presented for the scheme on the following plan:

<u>Drawing Title</u>	<u>Drawing Reference</u>	<u>Revision</u>
Site Development Strategy	23217.101	F

## 4. What is an AI-Data Centre?

- 4.1. Data Centres in general are warehouse-type complexes which house IT and telecom infrastructure in the form of racks of computer servers. Essentially the purpose of a Data Centre is to process, store, manage and disseminate IT capacity. Data Centres act as the power houses of the internet, processing and disseminating information to consumers, from producers of data.
- 4.2. The growth of the digital economy depends heavily on the capacity process, store and access data. Due to their strategic importance, Data Centres are corporate or even national 'mission critical' infrastructure.
- 4.3. The need for data centres capacity to store and process all the data generated by human activity has been growing very rapidly (at about 20% annually). This is being driven by the rapid growth of the use of data in almost every aspect of human activity. The growth in data centres is responding to the economic, societal and technological drivers.
- 4.4. The launch of ChatGPT (Chat Generative Pre-trained Transformer) by OpenAI in November 2022 has accelerated interest in the development of AI across a wide range of applications. By January 2023, ChatGPT had become what was then the fastest-growing consumer software application in history, gaining over 100 million users.
- 4.5. Governments and businesses are considering how to respond to the opportunities and challenges from Artificial Intelligence. Major tech companies are seeking to develop new and improved AI models. These require large scale computing power to 'train' these models. This is leading to extremely strong interest in "AI training data centres" with the computing power to train and develop these models in a safe environment.
- 4.6. Robust incoming fibre connectivity is required for the flow of information to/from the Data Centre. Computer servers produce heat while operating, meaning that to ensure their optimum performance, the environment within a Data Centre must be carefully controlled. To achieve this, Data Centres must be equipped with specialised cooling and humidity control infrastructure, in the form of air handling units ("AHUs"), chilled water ("CHW") pumps and chillers. Accommodating this equipment, ordinarily installed on the roof, influences the size and layout of Data Centre design.
- 4.7. Given that a Data Centre houses sensitive 'mission critical' data and computer processes for organisations and individuals, they must incorporate effective security measures. These can include physical security incorporated into the building's structural design, as well as measures such as biometric access control and CCTV. Data Centres aim to be 'invisible', given the critical function they deliver for the UK population and businesses.

## 5. Why South Humberside as a Location?

- 5.1. Major tech companies are seeking to develop a series of strategically located “AI GigaSites”. These data centres need to be on large scale to provide the concentrated computing power and will require a minimum of around 200MW of IT load<sup>1</sup>. This need is developing extremely rapidly, and major tech firms have already embarked on searches for suitable sites for investment in such facilities. The need is an imminent one and **the area of search is on a European and global scale**. With the rapid expansion of AI, competition to attract these facilities is fierce.
- 5.2. The activity in AI training data centres can be carried out at greater distances from other data centres and so they are more footloose in locational terms than many other types of data centres, however they have specific locational requirements.
- 5.3. The current and growing need for AI-Data Centres requires large buildings arranged in a way that ensures they are highly connected, highly available and resilient. Recent research by property advisory firm JLL<sup>2</sup> has highlighted several key location factors for AI data centres:-
- access to large scale supply of power, ideally renewal power;
  - high-speed and reliable network connectivity (vital for transferring large volumes of data during AI model training);
  - large scale supply of land, cooler climates and access to water;
  - stability of the political and legal landscape; and
  - a thriving research and innovation ecosystem.
- 5.4. These factors operate at different spatial levels. The last two operate more at a national level. The UK in the sense of its stable legal and regulatory framework and strong tech innovation system is ideally placed to attract AI training centres. However, within the UK, access to scale of power required, connectivity and large sites available for immediate use is much harder to provide due to major issues with grid connectivity.
- 5.5. The need for large amounts of secure and resilient electrical power, which will facilitate the operation of the servers on a 24/7 basis is a critical locational requirement. Therefore locating a Data Centre close to existing electricity infrastructure is a key consideration in the site-selection process.
- 5.6. A Data Centre’s power supply must be guaranteed even in the event of a main utility power failure. Accordingly, a Data Centre must also be equipped with ‘back-up’ power

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<sup>1</sup> A site requiring 200MW of IT load would typically need to be at least 20 to 30 hectares in size.

<sup>2</sup> [4 strategic location factors for AI training data centres, September 27, 2023](#)



infrastructure, specifically comprising on-site generators with sufficient capacity to power the full electrical requirements of a Data Centre in an emergency utility failure.

- 5.7. In a UK context the South Humber Bank area is an ideal location for a large-scale AI training data centre due to its large-scale energy supply from both North Sea gas and now offshore wind. The proposed Viking Carbon Capture and Storage (CCS) scheme<sup>3</sup> offers the potential for large scale net zero energy supply, with construction anticipated to start by 2025. There are few other locations that offer the scale of power supply, immediate availability as well as other important location characteristics.
- 5.8. In the South Humber Bank context, the proposed site at South Killingholme is suited to a large-scale AI training data centre complex as:
- It has access to the energy supply and grid capacity and the Hornsea wind cables pass close by the site;
  - It is robust physically and not susceptible to flood risk (sitting on land that is 10 to 20 meters above sea level); and
  - It is a large site in single ownerships and therefore immediately deliverable (subject to planning).
- 5.9. At a broader national scale, AI Data Centres are not as locationally constrained as cloud based data centres. Cloud based Data Centres need to locate in 'Availability Zones' (AZs) where they can triangulate with other Data Centres to share data and provide the necessary guarantees to customers on data availability. AI Data Centres are more footloose, and this allows them to be located away from the AZs around London. It presents a major investment opportunity for South Humber Bank area and aligns with the Government's Levelling Up agenda.
- 5.10. As explained later in this Planning Statement, the application proposals represent an opportunity to secure a £2.2bn to £3 bn investment in North Lincolnshire and to also assist with the further diversification of the local economy into the digital economy.

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<sup>3</sup> Led by Harbour Energy, Viking CCS is a CO2 capture, transport and storage network targeting start-up in 2027. Working with a wide range of cluster members including Associated British Ports, Phillips 66, RWE, VPI And West Burton Energy the network is targeting a reduction of 15 million tonnes of UK emissions per annum by 2035

## 6. Planning Policy and Guidance

- 6.1. This section outlines the relevant national planning policies and Development Plan policies that provide the planning policy framework within which this application should be considered.

### **National Planning Policy (NPPF) – December 2023**

- 6.2. The National Planning Policy Framework (NPPF) was published in December 2023 and replaced the first NPPF published in March 2012, and minor amendments that were published in July 2018, February 2019, July 2021 and September 2023.

#### Sustainable Development

- 6.3. The NPPF sets out at paragraph 10 that:-

**“... at the heart of the Framework is a presumption in favour of sustainable development.”**

- 6.4. Paragraph 8 identifies the three dimensions to sustainable development which include economic, social and environmental roles. Paragraph 8 explains that these roles are interdependent and need to be pursued in mutually supportive ways.

- 6.5. Paragraph 9 explains that:-

**“These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area” (emphasis added).**

#### Decision Making

- 6.6. For sustainable development and decision making, paragraph 11 sets out that development should be approved without delay where it accords with an up-to date Development Plan. In the circumstances where there are no relevant policies, or the relevant policies are out of date, permission should be granted unless there are restrictive policies in the NPPF for that area or in circumstances where the adverse impacts would significantly and demonstrably outweigh the benefits.

- 6.7. Paragraph 12 confirms that the NPPF does not change the statutory status of the Development Plan as the starting point for decision making. Where a planning application conflicts with the development plan it should be refused unless other material considerations indicate otherwise.

6.8. Paragraph 38 states that:-

**“Local planning authorities should approach decisions on proposed development in a positive and creative way”.**

6.9. It continues: -

**“...and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.**

6.10. Paragraph 47 restates that:-

**“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise”.**

6.11. Chapter 8 of the NPPF outlines the role planning has in building a strong, competitive economy. Paragraph 85 emphasises that:-

**“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.”**

### **National Planning Policy Guidance (PPG)**

6.12. Published in March 2014, and regularly updated, this web-based document supplements the NPPF and seeks to guide development on a number of more technical issues, expanding the overarching policies contained within the NPPF. Of particularly relevance to this application is the section regarding housing and economic needs assessment.

6.13. Section 7 of this Planning Statement explains how the NPPF and PPG are an important material consideration in the determination of this application.

### **The Development Plan**

6.14. The Development Plan for the area comprises:-

- The North Lincolnshire Core Strategy, adopted June 2011
- The North Lincolnshire Housing and Employment Land Allocations DPD, adopted March 2016
- Saved Policies of the North Lincolnshire Local Plan, adopted May 2003

6.15. It is considered the following Development Plan policies are most relevant to the determination of the application:-

- **CS1: Spatial Strategy for North Lincolnshire**
- **CS2: Delivering More Sustainable Development**
- **CS3: Development Limits**

- **CS11: Provision and Distribution of Employment Land**
- **CS12: South Humber Bank Strategic Employment Site**
- **LC20 – South Humber Bank– Landscape Initiative**

6.16. It is considered the following Development Plan policies are also relevant to the determination of the application:-

#### **Core Strategy Policies**

- **CS5: Delivering Quality Design in North Lincolnshire**
- **CS6: Historic Environment**
- **CS16: North Lincolnshire’s Landscape, Greenspace and Waterscape**
- **CS17: Biodiversity**
- **CS18: Sustainable Resource Use and Climate Change**
- **CS19: Flood Risk**
- **CS20: Sustainable Waste Management**
- **CS21: Minerals**
- **CS22: Community Facilities and Services**
- **CS23: Sport, Recreation and Open Space**
- **CS25: Promoting Sustainable Transport**
- **CS27: Planning Obligations**

#### **The North Lincolnshire Housing and Employment Land Allocations DPD Policies**

- **Policy PS1: Presumption in Favour of Sustainable Development**

#### **Extant Saved North Lincolnshire Local Plan Policies**

- **RD2: Development in the open countryside**
- **T1: Location of Development**
- **T2: Access to Development**
- **T3: Transport Assessments**
- **T6: Pedestrian Routes and Footpaths**
- **T8: Cyclists and Development**
- **T19: Car Parking Provision and Standard**
- **LC1: Special Protection Areas, Special Areas of Conservation and Ramsar Sites**
- **LC6: Habitat Creation**
- **LC7: Landscape Protection**
- **LC12: Protection of Trees, Woodland and Hedgerows**



- **HE9: Archaeological Evaluation**
- **M8: Safeguarding Aggregate Minerals**
- **DS1: General Requirements**
- **DS3: Planning Out Crime**
- **DS9: Development of Land in the Vicinity of Established Hazardous Installations and Pipelines**
- **DS11: Polluting Activities**
- **DS12: Light Pollution**
- **DS13: Groundwater Protection and Land Drainage**
- **DS14: Foul Sewage and Surface Water Drainage**
- **DS16: Flood Risk**

6.17. To avoid unnecessary repetition, further analysis of the Development Plan policies and proposals is included in the assessment of the proposals at **Section 7** and in the Planning Balance at **Section 8** of this Planning Statement.

#### **The emerging North Lincolnshire Local Plan**

6.18. The LPA has commenced work on a New Local Plan which will set out a vision and policy framework for the future levels of growth up until 2036.

6.19. On November 11 2022, North Lincolnshire Council submitted its draft Local Plan to the Secretary of State for an Examination in Public, under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. An exploratory meeting between the Local Plan Examination Inspectors and the Council was held on 23 January 2024.

6.20. As the Examination is at an early stage and outstanding objections have yet to be resolved, the emerging Local Plan can only be afforded no more than limited weight at this stage.

6.21. Further commentary on the emerging plan is provided in the following section of this Planning Statement.

## 7. Assessment of the Proposals

7.1. This section of the Planning Statement identifies the main planning policy considerations for this application. They include:-

<b>Issue 1</b>	<b>The principle of development</b>
<b>Issue 2</b>	<b>Other considerations which weigh in favour of the proposal</b>
<b>Issue 3</b>	<b>Other technical matters</b>

7.2. The overall planning balance is dealt with in **Section 8**. It will identify the main benefits and other considerations that weigh in favour of the proposals and the weight to be attributed to each of these. The same will be done for any potential adverse effects.

### **The Context for the Assessment of the Proposals**

7.3. Before assessing the proposals against the issues identified above it is important to consider the context in which the application is made.

7.4. As previously stated in Section 3, this is no ordinary development proposal and will be the first of its kind to be considered by the LPA.

7.5. Access to data is becoming increasingly essential for a successful and effectively functioning economy. There are strong technological and other drivers that are increasing the demand and need for data globally and in the UK. Nicol Economics identifies four key drivers to this growth:

- The rise of cloud computing
- The growth of the 'Internet of Things'
- The rise of data analytics
- The rapid growth of Artificial Intelligence/Machine Learning

7.6. The importance of the digital economy, tech sectors or digital sectors is a very strong thread that runs through all recent significant economic policies and plans from government, including:

- The Industrial Strategy (2017)
- The Plan for Growth (2021)
- The 2023 Autumn Statement
- The UK Digital Strategy (2017 and 2022)
- The National Data Strategy (2020)
- The UK National Cyber Strategy (2022)

- 7.7. The Nicol Economics Report reviews these national strategies and papers and draws out the following conclusions:-
- First, the recognition of the importance of the digital economy to UK prosperity and effective functioning of our public services, government and society.
  - Second, further recognition that this role is becoming ever more important, presenting great opportunities but also challenges.
  - Third, the importance of a secure and reliable digital infrastructure to ensure the smooth functioning and maximise the growth prospects of the economy.
  - Fourth, a recognition that data centres are a critically important part of that digital infrastructure.
  - Fifth, a clear desire to be at the forefront globally of the development of AI.
- 7.8. The need for data centres capacity to store and often process all the data generated by human activity has been growing very rapidly (at about 20% annually). In particular, the need for AI Training Centres is developing extremely rapidly and major tech firms have already embarked on searches for suitable sites for investment in such facilities. The need is an imminent one with potential locations across Europe in a rapid race to attract these large scale investments.
- 7.9. As set out in Section 5 to this Planning Statement, AI-data centres have very particular locational requirements such that they can be provided with the necessary power and digital infrastructure and where they can meet stringent customer and regulatory requirements.
- 7.10. As well as infrastructure requirements, the specific location is important in terms of the physical resilience of the site. This means that sites at flood risk, earthquakes, potential accidents (eg airport flightpaths or hazardous processes) and several other factors are not suitable for data centres.
- 7.11. The identified site at South Killingholme meets all the locational requirements for the proposed data centre.
- 7.12. However, the UK planning system has simply not kept pace with addressing this need and specific locational requirements of data centres. Whilst this may be the case, the market will not and cannot wait, such that there will be serious consequences for the UK economy, and society in general, if these needs are not met. There would also be serious implications for the environment which must not be overlooked.
- 7.13. Without the necessary data centre infrastructure and investment, the UK will not achieve its ambition to be a global leader in areas such as research & development (e.g. medicines, energy production, electronics, engineering or defence) and nor will it be able to maintain its position in the financial markets. The scope for economic diversification away from

traditional industries and the ability to keep pace with other competing and emerging economies during the 21st century will be restricted.

- 7.14. This gives rise to real world land use planning issues that need to be addressed and solutions must be found. The application development proposals are one such solution in the context of the identified growing demand.
- 7.15. As well as meeting a specific need, the social and economic benefits of this scheme are considerable and are also far from the ordinary. The direct inward investment alone amounts to **£2.2 to £3bn**. These and other benefits are detailed in Issue 2.

### **Issue 1 – The principle of development**

- 7.16. The planning system is “plan led” and planning law requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.17. Neither the adopted or emerging Development Plan allocate the site for a particular use and with reference to the Polices Map located it is outside of a settlement boundary.
- 7.18. Core Strategy Policy CS2 sets out the sequential approach to delivering the sustainable strategy of the area. In doing so it specifies that:
- “Any development that takes place outside the defined development limits of settlements or in rural settlements in the countryside will be restricted. Only development which is essential to the functioning of the countryside will be allowed to take place”.**
- 7.19. Similarly, Core Strategy Policy CS3 (Development Limits) states that:
- “Development outside these defined boundaries will be restricted to that which is essential to the functioning of the countryside. This will include uses such as that related to agriculture, forestry or other uses which require a countryside location or that which will contribute to the sustainable development of the tourist industry”.**
- 7.20. It is acknowledged that the proposals do not meet any of the criteria in the Development Plan permitting development in the countryside, and, in this respect, there is conflict with it.
- 7.21. This site, however, is without any other restrictive designation and there is opportunity to deliver a form of development not anticipated by the Development Plan. There are also opportunities for landscape and biodiversity enhancements. Furthermore, Government Policy and Guidance provide a significant material consideration in the proposals’ favour as set out in the paragraphs below.

## National Policy

7.22. National policy as set out in the NPPF identifies that the purpose of the planning system is to provide for sustainable development. NPPF paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

**“a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;”** (our emphasis)

7.23. Data centres are now essential infrastructure to deliver growth at both the local and national levels.

7.24. Whilst the term “data centre” does not appear in national policy, there is strong national planning policy support for this type of development. NPPF Paragraph 85 is of particular relevance: –

**“85. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation<sup>44</sup>, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”** (our emphasis)

7.25. The applicant would make the following observations:-

- Data centres are essential for creating conditions for investment, expansion and adaptation.
- They support economic growth and productivity.
- The future will be increasingly reliant on the efficient and effective storage and processing of data.
- Such development as being proposed is essential if the UK is to be a global leader in driving innovation.

7.26. NPPF footnote 44 should not be overlooked. It refers to the Government’s Industrial Strategy and states that: –

**“The Government’s Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data;**

**clean growth; future mobility; and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future.” (our emphasis)**

7.27. AI-data centres are therefore recognised as a key component to driving productivity improvements across the UK and facilitating the Government’s aim for Britain to be a global leader in driving innovation.

7.28. The Nicol Economics Report examines this further as well as other related Government strategies. The DIT confirms that data centres are at the heart of the UK’s digital infrastructure and represent the focal point where the Government’s Industrial Strategy and the Digital Strategy meet. These are all relevant expressions of Government Policy and attract weight as per NPPF paragraph 6.

7.29. National Policy at paragraph 86 explains that planning policies are also expected to amongst other things:

“.....

**c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and**

**d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.** (our emphasis)

7.30. Overcoming barriers to investment and be flexibility to unforeseen challenges are therefore a material consideration where local policies are absent or out-of-date.

7.31. NPPF paragraph 87 also recognises the specific locational requirements of different sectors. It states:-

**“87. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.” (our emphasis)**

7.32. The final part of paragraph 87 may be read with traditional logistics development in mind. However, the same principles also apply to data centres. Data centres need to be located where they have access to power and fibre and meet the other site-specific locational requirements as identified above.

7.33. National policy also supports high quality communications. Whilst much of NPPF Chapter 10 relates to mobile phone networks it also applies to the proposals. It states at paragraph 118 that:-

**“118. Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)”** (our emphasis).

7.34. The development proposals will make a significant contribution to the provision of high-quality digital infrastructure.

7.35. National Planning Policy Guidance in addressing the specific locational requirements of specialist or new sectors states:-

**“When assessing what land and policy support may be needed for different employment uses, it will be important to understand whether there are specific requirements in the local market which affect the types of land or premises needed”** (Our emphasis). (Paragraph: O32 Reference ID: 2a-O32-20190722).

7.36. As previously explained, data centres have very specific locational requirements which should be acknowledged through the decision making process.

7.37. In summary there is no policy vacuum at the national level. The Government is clear that planning policies and decisions should support economic growth, particularly in respect of enabling innovation and investment. It also recognises the need to address the specific locational requirements of different sectors, and the importance of a high-quality digital infrastructure.

### **Adopted and Emerging Local Planning Policy**

7.38. The Local Development Plan in this case comprises, in part, a Core Strategy that was adopted in June 2011 which pre-dates both the current NPPF and even the original NPPF. The evidence base that supported that plan is even older.

7.39. The Development Plan does not make any specific provision for meeting the needs for data centres. This is not surprising given that most of us probably did not have a smart phone or even broadband when the plan was being formulated nearly two decades ago. Even the emerging Plan has yet to catch up with the recent growth in the requirement for data storage. However, the NPPF is clear that planning policies need to be flexible enough to accommodate needs not anticipated in the plan. To put it simply, the adopted Development Plan does not provide for the current needs for development or provide the flexibility to respond to changed circumstances as the NPPF requires.

- 7.40. Yet these are the policy documents that we must use when making decisions about the critical infrastructure that homes, business and research institutions will rely upon as we move into the 2<sup>nd</sup> quarter of the 21<sup>st</sup> Century. It would be inconceivable that those companies developing AI-data centres would consider basing their business decisions on out of date plans and strategies of that vintage.
- 7.41. The conclusion is that the immediate needs must be addressed through the development management process.
- 7.42. Although the development Plan is not up to date for the purposes of this application, the context of the North Lincolnshire Core Strategy is relevant in the determination of the application.
- 7.43. Chapter 3 of the Core Strategy provides the context for the Local Development Framework. At paragraph 3.11 it explains that the Core Strategy is the spatial expression of North Lincolnshire's Sustainable Community Strategy 2006 – "Many Faces, One Community". The Strategy which was prepared by the North Lincolnshire Strategic Partnership (NLSP) presents four shared ambitions and priorities. The first of these is of particular relevance:-
- "An area that is thriving – our first ambition is that North Lincolnshire is a place where the economy is thriving and where everyone enjoys sustainable growth. Central to this is an economy that is diverse, dynamic and competitive, and which reflects the needs of the 21st century" (our emphasis).**
- 7.44. Data, and thereby data centres, are intrinsic to meeting the needs of the 21<sup>st</sup> Century and enabling a diverse, dynamic and competitive economy.
- 7.45. The agreed Spatial Vision for the future development of North Lincolnshire is:-
- "By 2026, North Lincolnshire will be the north of England's Global Gateway. It will have a strong economy, thriving towns and villages, a protected world class environment and will be a place where people are proud to live" (our emphasis).**
- 7.46. The Core Strategy includes 10 spatial objectives which show how the spatial vision will be delivered. Those that are most relevant to the application proposals will include:-
- Spatial Objective 1: An Area Wide Renaissance – To deliver area wide renaissance in North Lincolnshire which creates a step change in the area's role both regionally and nationally and creates a high quality of life for the area's residents, with Scunthorpe providing the sub-regional focus for development supported by the market towns of Barton upon Humber, Brigg, Crowle, Epworth, Kirton in Lindsey and Winterton.**
- Spatial Objective 2: Delivering the Global Gateway – To secure North Lincolnshire's major growth potential in the Yorkshire and the Humber region based on the benefits of the unique opportunities provided by**



the South Humber Bank ports, Humberside Airport, Doncaster Robin Hood Airport and the area's transport network.

**Spatial Objective 4: Creating Greater Economic Success - To create a strong, competitive and diverse economy by encouraging business growth and employment opportunities supported by the delivery of strategic employment sites and improvement of the range and level of skills by developing a higher education sector.**

**Spatial Objective 6: Protecting and Enhancing The World Class Environment - To conserve and enhance our world class environments of the Humber Estuary and Crowle Moors and improve our other natural, historic and built landscapes as well as guiding changes in a way which reduces and takes proper account of environmental impact, climate change and sea level rise.**

**Spatial Objective 7: Efficient Use and Management of Resources - To ensure the efficient use of resources, maximising recycling of minerals and waste products, minimising pollution, maintaining and improving air, soil and water quality, and employing sustainable building practices in new development.**

**Spatial Objective 10: Creating A Quality Environment -To transform North Lincolnshire's image by ensuring that all new development exhibits a high standard of design and architectural quality that respects and enhances the distinctive landscapes and townscapes of North Lincolnshire's towns and villages.**

7.47. As will be demonstrated below, the development proposals will contribute to meeting these spatial objectives.

7.48. The Spatial Objectives of the emerging North Lincolnshire Local Plan provides a more up to date context for the determination of the planning application. Spatial Objective 1 is focused on growing the local economy:-

**"To promote economic growth in North Lincolnshire that increases the area's prosperity through supporting business growth and investment, enterprise and job creation.**

**The area will make the most of its strategic location adjacent to the Humber Estuary, infrastructure and international connections to be a key location for businesses, whilst sufficient employment land will be delivered in sustainable locations that meets the needs of existing and future businesses. Employment levels will be increased, creating more and better job prospects. The vitality and viability of Scunthorpe, our Market Towns, district and local centres as places for shopping, leisure, cultural and community activities will be encouraged and supported" (our emphasis).**

7.49. Supporting paragraph 6.5 states:

**“The Council places great emphasis on economic growth and the benefits that a prosperous economy will bring about for the residents of North Lincolnshire. This is supported through the Council Plan, Economic Growth Plan and the Local Economic Assessment. The North Lincolnshire Council Plan 2018/2019 as a priority, seeks to grow the economy. It aims to achieve a more prosperous North Lincolnshire, to help the Council to invest further in communities and to create jobs and opportunities for everyone”** (our emphasis).

7.50. The North Lincolnshire Economic Growth Plan focusses on the next five years and lays the foundations for continued growth from 2023 and beyond. If fully realised, the ideas in the plan could see 14,000 new jobs created and £721m more pumped into North Lincolnshire’s economy.

7.51. One of the Key Priorities for the emerging Local Plan is to ‘Grow the Economy. In particular to:

- achieve a more prosperous North Lincolnshire.
- invest in communities.
- create jobs and opportunities for everyone.

7.52. Paragraph 6.7 states:

**“It is important that North Lincolnshire builds on its strengths, with the Economic Growth Plan focusing on both the energy corridor stretching from the coast to South Yorkshire, encompassing energy production and consumption, steel and process engineering, chemicals and associated logistics and the food sector, and the food belt corridor from York to Lincoln encompasses growing, logistics, processing and research and development. Central to both approaches is the recognised need to add value and increase productivity”** (our emphasis).

7.53. Thus, both the adopted and emerging Development Plan places great emphasis on promoting economic growth in North Lincolnshire through investment and job creation.

7.54. The proposed development would represent a “very substantial capital investment.” This being at a time when the country needs to find sources of new economic growth to aid recovery. The range of total construction cost for the completed data centre will depend on the precise specification is likely to range from as a very minimum **£2.2 billion to well over £3 billion**. A proportion of these costs will filter through to the local economy.

7.55. The likely number of jobs at the proposed scheme when it is fully operational is around **370 FTE jobs**, although the actual number will depend on the precise configuration of the activities.

7.56. However, the development proposal is not just simply about job creation. It would also provide critical infrastructure to meet the needs of the 21st century UK economy. It can

provide a catalyst to further economic growth in North Lincolnshire and provide digital connections to UK and international tech giants.

7.57. Core Strategy Policy CS1 sets out the broad framework around which the spatial development strategy for North Lincolnshire will be based. The proposed development is of a scale that simply cannot be delivered within existing settlement boundaries. The proposals should nonetheless be viewed as complimenting the Spatial Strategy for North Lincolnshire rather than being in conflict with it.

7.58. Policy CS1 also states:

**“All future growth regardless of location should contribute to sustainable development in particular in respect of those criteria set out in policy CS2 as well as the other policies of the plan. All change will be managed in an environmentally sustainable way by avoiding/minimising or mitigating development pressure on the area’s natural and built environment, its existing utilities and associated infrastructure and areas at risk of flooding. Where development unavoidably has an environmental impact adequate mitigation measures should be used for the development to be acceptable”**

7.59. Policy CS2 also states that: all future development in North Lincolnshire will be required to contribute towards achieving sustainable development and that proposals should comply with the overall spatial strategy together with a defined list of sustainable development principles. How the application addresses these sustainability principles is set out later in this Planning Statement and the accompanying supporting documents.

7.60. Core Strategy Policy CS11 concerns the provision and distribution of employment land. The first part of the policy states:-

**“The council will support the continued expansion and improvement of North Lincolnshire’s economy in order to create a step change in the area’s role regionally and nationally. This will be achieved through the identification and allocation in the Housing and Employment Land Allocations DPD of a range of appropriate sites for employment and economic uses that will meet the requirement for an additional 40 hectares of employment land between 2006 and 2021 as identified within the Regional Spatial Strategy. This land will accommodate traditional land use (use classes B1, B2 & B8) as well as key priority growth sectors”** (our emphasis).

7.61. The supporting text at paragraph 9.1 explains that a thriving economy and strong skills base is key in helping North Lincolnshire to grow and compete in an ever-changing global economy. It goes on to say that to ensure the full economic potential of North Lincolnshire is achieved and the area becomes the north of England’s Global Gateway, further growth and diversification is still required.

7.62. The development proposals would align with the ambition of the policy to create a step change in the role of North Lincolnshire both regionally and nationally, and enable the area to compete in the global market. As previously highlighted, the Development Plan, and the Regional Spatial Strategy on which it is based, pre-date the recent expansion in data centres and therefore does not contemplate their specific locational requirements. Consequently, the quantum of employment land does not include an allowance for data centres, nor does the subsequent Housing and Employment Land Allocations DPD make provision for data centres.

7.63. Emerging Local Plan Policy RD1: Supporting Sustainable Development in The Countryside – states, inter alia, that:-

**“Employment uses where it is an appropriate scale to its location and it respects the character of the surrounding landscape. Proposals should:**

- **Be within or adjacent to an existing industrial estate or business park; or**
- **Involve the expansion of an existing business; or**
- **Involve the conversion of an existing building; or**
- **Have a functional need to be in that particular location that cannot be met either on a nearby allocation, or on a site that satisfies any of the above criteria**” (our emphasis).

7.64. As described above, data centres generally, and the development proposal in particular, has specific locational requirements. Later in this section we touch upon the lack of suitable alternatives in more detail but given the functional needs of the proposal it would be in accordance with the emerging policy.

7.65. Also of relevance is adopted Policy CS12: South Humber Bank Strategic Employment Site – A Broad Location. The aim of this policy is to recognise the economic advantages of developing the site for employment use and port extension and to acknowledge the importance of the environmental and ecological assets of the area. Any proposed development must harmonise with these assets. The development of the SHB is fundamental to achieving the economic potential for the area. The Core Strategy notes that the site is ideal for a range of port-related industries or those requiring proximity to a deep-water frontage. It also goes on to say:

**“The South Humber Bank employment area is currently occupied by a range of estuary-related industrial operators such as large oil, gas and electricity companies, riverside terminal facilities and associated activities including storage, processing and distribution. The area is also fast becoming an energy capital.”** (our emphasis).

7.66. The development proposals have strong synergies with the vision for the South Humber Bank and will complement its development.

7.67. Also of relevance is saved Policy LC20 (South Humber Bank Landscape Initiative), of the North Lincolnshire Local Plan Adopted May 2003. The South Humber Bank Landscape Initiative aims create a showcase where both industry and agriculture are placed in greater harmony with their surroundings. Policy LC20 sets the following:-

**“It is proposed that the following measures will be undertaken throughout the South Humber Bank Landscape Initiative area:**

- i. softening – provision of stepped-back security fences, fringed with shrubs and trees;**
- ii. screening establishment of mixed broad-leaf and conifer belts;**
- iii. habitat conservation maintenance of wet areas and other existing features, such as woods and hedges, to provide a good framework for future improvements; i**
- iv. habitat creation introduction of lakes, ponds and marshes;**
- v. field boundary management – careful management of existing hedges to increase height;**
- vi. tree and hedge planting – new planting, carefully positioned for maximum effect, with minimum impact on farm management industry’s operational needs and sites of archaeological importance”.**

7.68. As further set in the Landscape and Visual Impact Assessment and by reference to the Site Development Strategy Plan it can be seen that Policy LC20 has been taken into account in the design of the scheme, and once implemented will be considerable benefit to the South Humber Bank Landscape Initiative.

### **Alternative Sites**

7.69. An assessment has been made of land allocated for industrial use in the development plan to consider whether any such land might provide an alternative location for the proposed scheme.

7.70. As with all data centres the specific site location is important in terms of the physical resilience of the site. This means that sites at risk of flood, earthquakes, potential accidents (e.g. airport flightpaths or hazardous processes) and several other factors are not suitable for data centres.

7.71. In a UK context, the broader South Humber Bank area is an ideal location for a large-scale AI training data centre. The location’s large scale energy supply from both North Sea gas and now offshore wind is a key locational advantage. There are few other locations in the UK that offer the scale of power supply and immediate availability of power as well as other important location characteristics.

7.72. There are large existing allocated sites in the South Humber Bank area some of which are part of the new Humber Freeport and some part of the older Enterprise Zone. In North Lincolnshire these include: the Able Humber Port site, Able Marine Energy Park and Able Logistics Park and the North Killingholme Airfield strategic site. These are part of the proposed North Lincolnshire Local Plan's two Strategic Employment sites allocations that total over 1,000 hectares. All other allocated sites can be discounted due to their size and availability.

7.73. However, neither of these locations are suitable for a data centre. The South Humber Bank site is primarily aimed at heavy industry and port operational activities and most importantly it is within Flood Zone 3. As with the South Humberside Tech Park site, North Killingholme sits within a low flood risk zone. However, although the overall site is large enough in theory to accommodate an AI GigaSite, it has surface water flooding problems. The market will not entertain a site which has even a remote possibility of flooding.

### **Summary**

7.74. To summarise on the principle of development:-

1. It is acknowledged that the development proposals are not in accordance with the development plan in that the site is not allocated for development and it is not located within a settlement boundary.
2. However, the adopted and emerging Development Plans do not plan for the rapidly growing need to deliver critical digital infrastructure of this scale and form.
3. This is no ordinary development proposal and nor is it one that meets a generic need that could be met anywhere. The application proposals are about meeting the need for critical digital infrastructure where and when it is required. It would provide for an AI data centre in a broad location where the adopted and emerging development plan seeks to secure new employment opportunities and major inward investment.
4. There is a rapidly growing need for data storage being driven by the rapid growth of the use data in almost every aspect of human activity – social, economic and governmental. This growing need is set to accelerate even further with the forecast growth in AI activity. The timely delivery of the development proposals is a matter of national importance to support economic growth and society more generally.
5. The proposals attract considerable support from national policy. NPPF paragraph 85 states that significant weight should be placed on the need to support economic growth and productivity. Areas should build on their strengths and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation.
6. The NPPF requires policies to address potential barriers to investment, such as inadequate infrastructure and to enable a rapid response to changes in economic circumstances. Those types of policies are absent from the Development Plan here [NPPF paragraph 86].

7. NPPF paragraph 87 is supportive of this type of proposal. It says decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations in suitably accessible locations.
8. The NPPF requires the planning system to meet development needs and to align growth and infrastructure. Paragraph 118 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.
9. Nicol Economics explain that the Government recognises the importance of the digital economy to UK prosperity and effective functioning of our public services, government and society and this role is becoming ever more important, presenting great opportunities, and also challenges.
10. It also recognises the importance of a secure and reliable digital infrastructure to ensure the smooth functioning and to maximise the growth prospects of the economy to the extent that data centres are referred to as a critically important part of that digital infrastructure.
11. The Development Plan is out of date in that it pre-dates the NPPF and it does not respond to up to date development needs including the challenges that we now face with regards digital infrastructure.
12. The Development Proposals are in broad agreement with the vision and spatial objectives of the adopted and emerging Development Plan for North Lincolnshire and compliment the development of the South Humber Bank.
13. The Development Proposal are in accordance with, and make a substantial contribution to, the South Humber Bank Initiative.
14. There are no other more suitable, available and deliverable sites.

## **Issue 2 - Other considerations which weigh in favour of the proposals**

- 7.75. The need for new data centres is overwhelming and it continues to grow exponentially. The need is national in character, and it also has a local dimension. As such there is a clear and demonstrable need for the proposed scheme.
- 7.76. The proposed scheme would also deliver significant direct and indirect benefits to the local area as we will now explain.

### Temporary employment during the construction phase

- 7.77. The construction industry is an important sector in the UK economy. Nicol Economics present evidence to show that the application proposals would **support 2,500 to 3,000 jobs** a year on and off site over the anticipated 3 year build out.



#### Contributions to the Economy during construction

7.78. The proposed development would represent a “very substantial capital investment.” This being at a time when the country needs to find sources of new economic growth to aid recovery. The range of total construction cost for the completed data centre will depend on the precise specification is likely to range from as a very minimum **£2.2 billion to well over £3 billion.**

7.79. As well as supporting jobs, the investment in the new facility would provide a GVA boost for the local and sub-regional economies during the construction period. At a national level, the ratio of GVA to direct turnover in the construction sector was 39% in 2021 (based on the Annual Business Survey data). Applied to the estimated value of the scheme, this would imply an initial direct GVA boost of some **£850 to £1,100 million.**

#### Employment when fully operational

7.80. The likely number of jobs at the proposed scheme when it is fully operational is around **370 FTE jobs**, although the actual number will depend on the precise configuration of the activities.

#### Contribution to the local wages

7.81. The jobs in data centres are skilled and experience from other data centres suggests that the average annual wage paid for a full-time job at the data centre will be £48,000 to £55,000 (and higher for specialist skills), giving an annual wages bill for a total of 370 FTE staff of **£18 million to £20 million** (in 2023 prices). The wages paid would be considerably above the average of North Lincolnshire or North East Lincolnshire – around 50% higher than the mean and 75% higher than the median annual wage for the local area.

#### Other indirect and induced economic effects

7.82. All forms of economic activity produce wider benefits via so-called multiplier effects. These stem from: supply chain effects (“indirect impacts”); and from the jobs and economic activity supported by the wages of those employed directly and indirectly (“induced impacts”).

7.83. Nicol Economics have constructed an initial estimate of **£237m** in GVA generated, 850 associated jobs and **£36m** wages bill in the supply chain in Greater Lincolnshire arising from the wages bill and local spend by the data centre operator at Humber Tech Park.

#### Contribution to skills

7.84. The new jobs in the data centre would provide an opportunity to support **upskilling** locally and the development of training and other programmes. Currently the ICT sector in North Lincolnshire and North East Lincolnshire is small and there are few job opportunities.



#### Non-domestic rates impacts

- 7.85. Under current arrangements North Lincolnshire Council stands to retain some of the additional business rates from any new development to help support local services and investment in the local area. Nicol Economics have assessed the likely total rateable value for the completed development to be around **£23.5 million** for the buildings including an amount for the plant and machinery. This is based on other large data centres in England and Wales.

#### Economic impacts from the proposed Glasshouse

- 7.86. Work for Humber Tech Park Ltd by Collison and Associates Limited as assessed the potential of a series of greenhouses covering 2.8 hectares (7 acres). The agricultural output would be around **£3.5 million** and the activity would support an estimated **28 FTE** on-site jobs (with up to 10 additional off-site jobs in the supply chain).

#### Contribution to the Levelling-Up Agenda

- 7.87. The Government has made a commitment to ending the geographical inequality across the UK. The significant economic boost to the local economy as highlighted above would also present a significant private investment in an area which has seen contraction in the traditional industrial base. It could also potentially act as a catalyst to further private investment in the locality. It also important to recognise whilst the proposed scheme has specific locational requirements these exist elsewhere in the UK and the scheme is not constrained to clusters of data centres as found in 'cloud-based' hyperscale schemes.

#### Social benefits

- 7.88. In addition to the economic benefits, data centres also provide vitally important social benefits that underpin modern day living in the UK. The use of data and connected devices is so embedded into our day to day lives that it is easy to overlook the social benefits. Sectors and activities that are reliant on the use of data. The proposals would therefore reinforce the critical infrastructure upon which modern day society increasingly depends.

#### Addressing Climate Change

- 7.89. Data centres require large amounts of electricity to operate the servers and processors and to keep the machines cool. A key objective of the industry is to reduce energy consumption, increase efficiencies and reduce carbon emissions. Large scale modern data centres operate with very high utilization rates, with much more sophisticated cooling equipment and they are highly energy efficient. This helps to explain how energy usage has remained stable despite the boom in data usage and the importance of new, highly efficient data centres. Data centre operators and trade associations are committed to the European Green Deal, achieving ambitious greenhouse gas reductions (using technology and digitalisation to achieve the goal of making Europe climate neutral by 2050).



7.90. The aim of the development proposals is to provide a high-quality development that is adaptable and resilient to future climate change, with all buildings built to an overall certification BREEAM 'very good' rating, including for water efficiency.

Heat capture from a district heating system

7.91. The operation of a data centre generates large amounts of heat from the servers. Normally this is regarded as a waste product, and it is released into the atmosphere. The development proposals could be designed in a way to capture and harness the heated air so that it could be used as part of a district heating network. This would be an additional but separate benefit for climate change and would assist in reducing carbon emissions in other ways.

7.92. The proposals also include a horticultural glass house which would through use of the excess heat capture have significant environmental benefits. The opportunity will also exist for other potential developers to tap into this in the future in the local area.

Biodiversity Enhancements

7.93. There would be substantial net gains for biodiversity of 52.38% in habitat units, 41.84% in hedgerow units and 15.77% in watercourse units. It is important to recognise that BNG is normally expressed in percentage terms but 45% BNG on a small site is not equal to 45% on a large site in absolute terms. This is a very large site and so 52% is a very considerable uplift.

Landscape Enhancements

7.94. There would be meaningful enhancements to the landscape and visual amenity through new planting and long-term management. The strategic planting of woodland, specimen trees and the restoration of hedges and planting of new hedgerows will provide the fundamental elements that mitigate effects arising from the development proposals. These form one element of the overall landscape strategy which includes the creation of extensive areas of new meadow grassland, native scrub, damp land habitats associated with new swales and attenuation basins and the long term management of the existing drainage ditches. Together these features create extensive new potential habitat to encourage biodiversity as well as creating a single landscape that is intended to assimilate into the wider agricultural landscape. These landscape and biodiversity enhancements would be in accordance with saved Policy LC20 of the North Lincolnshire Local Plan.

Building Beautiful

7.95. The NPPF at paragraph 131 talks about the creation of high quality, beautiful and sustainable buildings and places, and how this is fundamental to what the planning and development process should achieve. An appropriate and innovative design approach has been considered which has started with a landscape led approach to the site. This has informed the illustrative layout.

### Education and Employment Fund

7.96. A long-term fund is to be established that will pay for education, apprenticeships, and employment initiatives to be managed by North Lincolnshire Council. This fund can be secured through a planning obligation and would be consistent with the provisions of Core Strategy Policy CS 13. This would involve long term funding that would be directed to:-

- a. Safeguarding apprenticeships,
- b. Training programmes, and
- c. Community engagement

7.97. These initiatives aim to upskill the local population to be able to take up the newly created jobs. This would support and reinforce the growing high-tech cluster in the area.

### **Summary**

7.98. Taken together there would be very considerable social, economic and environmental benefits associated with this development that weigh very heavily in favour of a grant of planning permission. The varying weights to be attached to these benefits in the planning balance are described in Section 8 below.

## **Issue 3 Other technical matters**

### **Landscape and Visual Effects**

7.99. Although the site is open to views, the site itself makes a limited contribution to the quality of local and middle distance views due to limited landscape features and abundance of highway detractors which are also seen in these views.

7.100. The introduction of new built form to the site is likely to be seen in local and middle-distance views due to the openness of the landscape. The site does have capacity to mitigate potential effects on both landscape character and views through extensive restoration of field hedgerows and new large scale tree planting.

7.101. Overall, the development proposals, although large in scale, are not assessed to result in unacceptable harm to either landscape character or visual amenity. The proposals will create a high magnitude of change to the landscape of the site, but this change is not identified to have a significant detrimental effect when considered in the context of published guidance and requirements of local landscape policy.

7.102. The strategy for landscape mitigation is an important element of the development proposals which is confirmed in the landscape and visual assessment of effects of development. These landscape mitigation measures would be in accordance with the aim of saved Policy LC20



of the North Lincolnshire Local Plan and provide positive effects on the appearance of the wider industrial area.

7.103. Beyond the site itself, the character of the rural landscape will be conserved and there is potential to improve local views through the proposed woodland planting.

7.104. In summary, with the proposed mitigation there are no landscape constraints to the development proposals.

### **Traffic and Transportation**

7.105. DTA has been commissioned to prepare a Transport Assessment in support of the application. Overall, the assessment demonstrates that the proposed development would not have a material impact on the safety or operation of the adjacent highway network even accounting for other development in the area.

7.106. It is proposed to serve the proposed development via a new priority T-junction arrangement with a dedicated right-turn lane onto Habrough Road. Traffic management signage will be in place to ensure the safety of the site as well as keep traffic flowing as freely as possible during the construction period.

7.107. It is proposed to provide a 3.0m wide shared footway/ cycleway on the Harborough Road linking into the existing shared footway/ cycleway across the A160 Humber Road into South Killingholme. Opportunities for enhancing connectivity by bus to/from the site will be explored as part of post-submission discussions with the Local Authority and relevant operators. A Framework Travel Plan accompanies the application.

### **Ecology**

7.108. The Site itself is not subject to any nature conservation designation, nor are there any such designations in the immediate vicinity of the Site. The Humber Estuary is located approximately 4km to the east of the Site, and is subject to overlapping international / European-level designations (namely the 'Humber Estuary' Special Protection Area, Special Area of Conservation, Ramsar site, and the underpinning Site of Special Scientific Interest). These designations relate primarily to the coastal and estuarine habitats of the Humber Estuary and the wintering birds that they support. The closest non-statutory Local Wildlife Site designations is nearly 1km distant from the Site.

7.109. The Site is dominated by intensively managed arable habitats. Trees and scrub are scattered at the western, north-eastern and south-eastern margins of the Site; whereas the southern boundary supports near-continuous shrub cover alongside a (dry) ditch channel that is aligned with the North Lincolnshire authority boundary.

- 7.110. The Site supports a relatively low baseline Biodiversity Metric value at present, due to the dominance of arable habitats.
- 7.111. Detailed species surveys are presented in the Ecological Impact Assessment accompanying the application. In summary, on the basis of current data there are not considered to be any overriding ecological constraints to development; and the proposal development presents the opportunity to deliver on-site habitat enhancement which have been designed to support a range of species.

### **Noise**

- 7.112. An acoustic assessment has been undertaken to assess the likely impact of noise from the proposed development on nearby sensitive receptors.
- 7.113. With mitigation in the form of a 2.5m high acoustic screening on the gantries, limiting emergency generator testing to daylight hours, and taking into account further contextual factors of the development, it has been demonstrated that the proposed data centre will unlikely yield an impact from an acoustics perspective on the nearest receptors.

### **Air Quality**

- 7.114. An assessment of the emissions from the generator plant has demonstrated that the off-site impacts of these emissions, on both human health and ecological receptors, will be negligible.
- 7.115. The combined impacts from the development's generator and road traffic emissions are also deemed to be insignificant. Overall, the operational air quality effects of the proposals are judged to be 'not significant'.

### **Built Heritage**

- 7.116. Following appropriate assessment, including through site visits, no impact to the heritage significance of built heritage assets in the vicinity of the site is anticipated.

### **Archaeology**

- 7.117. There is potential for Iron Age and Romano-British archaeological remains to be present within the Site with evidence for six areas of settlement from these periods indicated by the geophysical survey, however, any remains are likely to be non-designated heritage assets. Evidence of medieval ridge and furrow has been identified across the whole of the Site although this has now been ploughed out. The evidence for ploughing indicates a low potential for evidence of settlement to be present within the Site. Any medieval remains identified are also unlikely to be considered to be heritage assets. Similarly there is low potential for significant archaeological remains of post-medieval or modern date to be identified within the Site. Any post-medieval or modern remains identified are also unlikely to be considered to be heritage assets.

## Flood Risk

- 7.118. The site is located within Flood Zone 1 on the Environment Agency (EA) 'Flood Map for Planning (Rivers and Sea)' – an area considered to have the lowest probability of fluvial and tidal flooding. Utilising available data, the risk of flooding from all sources has been assessed and the flood risk to the site is considered to be **Low and Acceptable**.

## Drainage Strategy

- 7.119. The proposed development will introduce impermeable drainage area in the form of buildings and access. This will result in an increase in surface water runoff. In order to ensure the increase in surface water runoff will not increase flood risk elsewhere, flow control will be used, and attenuation provided on site to accommodate storm events up to and including the 1 in 100 year plus 25% climate change event.
- 7.120. All methods of surface water discharge have been assessed. Where soakaways are not possible, discharge of surface water to the land drain leading to Habrough Marsh Drain Branch 4 appears to be the most practical option.
- 7.121. Adequate arrangements can be made to accommodate foul water discharge to the existing public Anglian Water foul sewer.

## Agricultural Land Assessment

- 7.122. The land at the Humber Tech Park is grade 3a and thus falls within the policy parameters of BMV land, but grade 3a is not as versatile or productive as grades 1 and 2. Grade 3a is defined as:
- Subgrade 3a – good quality agricultural land – Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of crops including cereals, grass, oilseed rape, potatoes, sugar beet, land less demanding horticultural crops.
- 7.123. Whereas grade 1 land supports intensive crops such as fruit, salads and ornamentals which can have output values 3–10 times (or more) the average for all crops, grade 3a land in North Lincolnshire is typically used for a mixed arable rotation of cereals, oilseeds with occasional lower value field vegetables crops (e.g. some brassicas) or potatoes. This means that the average value of output on the Humber Tech Park site is that typically associated with 'broad acre' arable crop rotations, which are dominated by cereals, pulses and oilseeds.
- 7.124. The Collinson and Associates Ltd report that accompanies the application demonstrates there would be a negligible loss in food production equivalent to only circa 0.04% of the total wheat crop grown in Greater Lincolnshire/UK Food Valley in a typical year<sup>6</sup>, grown on 0.01%



of the farmed area of Greater Lincolnshire which is 572,000 hectares (DEFRA 2023 data<sup>4</sup>) should the site ceased to be used for agricultural production.

- 7.125. The greenhouse (or vertical farm) linked to the data centre could grow a wide range of intensive crops using (low carbon) waste heat, but to simplify the analysis and to give an overview of what might be possible one crop, tomatoes, has been used to illustrate the parameters for this crop. Tomatoes have been chosen as they are the largest UK greenhouse crop, have high levels of imports (table 4) and high value (table 5). This allows expansion in UK production without displacing economic activity elsewhere in the UK. Based on a 7 acre (2.8 hectare) unit growing tomatoes, will produce a food yield 2.5 times the weight of wheat displaced. If even more intensive, total controlled environment agriculture systems were used, the multiples of production could be increased further. This yield of tomatoes would generate a sales value of close to £3.5m, or over 27 times as much as wheat and across the supply chain support an estimated 38 FTEs, or over 58 times as many jobs as displaced.
- 7.126. Furthermore, the greenhouse production will allow a large area of the development site to be dedicated to trees, hedges, wildflower meadows and open water or wetland areas. This will create new habitats and enhanced bio-diversity benefits when compared to the baseline arable production.
- 7.127. Increasing the production of UK intensive greenhouse crops will also bring benefits through developing increased supplies of UK grown fresh produce in a sector which is currently very dependent on imports and associated carbon costs of transporting them. The greenhouse will also utilise 'waste heat' from the data centre, offsetting the carbon emissions from greenhouse crops grown in the Netherlands primarily using natural gas.

### **Unexploded Ordnance**

- 7.128. Information obtained from online unexploded ordnance (UXO) risk mapping indicates the Site is in an of low risk for UXO.

### **Other Considerations**

- 7.129. There are no other harms to weigh in the planning balance that cannot be addressed by conditions or planning obligations.

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<sup>4</sup> DEFRA (2023), Crop areas in England sourced from the Basic Payment Scheme

## 8. The Overall Planning Balance

- 8.1. In this Section the Applicant will identify the wide range of benefits and other considerations that weigh in favour of the scheme and it will attribute weight to each of them. The same will be done for any potential adverse effects. This allows for a balanced assessment of the proposals in accordance with the NPPF and the Development Plan and it enables the decision maker to assess whether they constitute sustainable development.
- 8.2. Given the unique nature of the proposals relating to emerging technologies it is unsurprising that the proposed development would not be in accordance with the Development Plan.
- 8.3. In any event there are important other considerations, many of which are specific to this particular development proposal and the site itself. When taken together, it is considered that they clearly outweigh any potential harm. As such there are significant material considerations, including national policy and guidance which justify the proposed development in this case.
- 8.4. The overall conclusion is that the proposals represent sustainable development and that it is critical to meeting the needs of the UK economy with very considerable benefits to the local area.

### **Considerations weighing in favour of the proposals.**

- 8.5. The Applicant considers that the proposals would secure important benefits that would respond to all three of the Government's overarching objectives for sustainable development (social, economic and environmental).
- 8.6. The Applicant has already outlined the main benefits and other considerations that weigh in favour of the proposals in Section 7. It is unnecessary to rehearse these again in full, but the Applicant will identify some of the headline points that affect the weight that should apply to each of them.<sup>5</sup>

### **The need for the development including national considerations and the contribution that the application scheme will make to meeting that need**

- 8.7. The evidence shows that there is a national and local need for data centre development. It is critical infrastructure and the need is overwhelming in scale. The fact that 90% of all data globally has been produced in the last 2 years and that the total amount of data created, captured, and stored by industry doubles every 1.2 years puts this into some perspective.

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<sup>5</sup> For the avoidance of doubt, the weightings that will be applied are as follows:- Very Limited, Limited, Moderate, Significant, Substantial and Very Substantial





- 8.8. National policy and relevant strategies emphasis the importance of digital infrastructure to growth of the UK economy.
- 8.9. Not providing for the need does not just return us to the present day baseline without the benefits. In some respects the failure to realise the scheme will in itself generate harm such as:-
- A reduction in the service level offered to UK businesses especially in data hungry sectors, as result of capacity not growing in line with need
  - The UK becoming less attractive to foreign investment
  - Restricting growth of our increasingly data driven economy and reducing the ability to compete.

8.10. The proposals would make a significant contribution to meeting needs at the right time and in the right location. The Applicant would afford this very substantial weight.

**The Locational Requirements of this Data Centre and lack of more suitable alternatives**

- 8.11. The Applicant has identified the specific locational requirements of the proposed development and how it responds to the particular needs.
- 8.12. There is no evidence that the identified need can be met or exceeded on an alternative site(s). The Applicant would afford substantial weight to the absence of alternatives to meet the need.

**Economic impact/support for local businesses**

- 8.13. Direct inward investment of between **£2.2billion and £3 billion** is of itself an extremely important consideration. The evidence of Nicol Economics further emphasise the importance of that investment and the implications for the wider economy that is data dependent.
- 8.14. The economic benefits are both local and national in character and align with the Government's aims to generate growth and prosperity for all. They also align strongly with vision and objectives of North Lincolnshire to diversify its economy and attract major inward investment. These economic benefits should be afforded very substantial weight.

**Temporary employment during the construction phase**

- 8.15. The construction industry is an important sector in the UK economy. Nicol Economics present evidence to show that the application proposals would generate significant amounts of employment (direct and indirect) during the construction phase.
- 8.16. The Applicant recognises that construction jobs are only temporary, but the industry relies upon a constant stream of sites and this will be a major construction project. The Applicant would afford this moderate weight.



### **Direct and indirect employment generation**

- 8.17. The proposals would generate in the region of **370 FTE permanent jobs**. They would be high skilled jobs with above average wage levels for the North Lincolnshire economy.
- 8.18. The economic benefits will also be spread and will benefit other areas outside of the District. The Applicant would afford significant weight to the new employment opportunities.

### **Social benefits**

- 8.19. The proposals reinforce the critical infrastructure upon which modern day society increasingly depends.
- 8.20. It is difficult to quantify the extent of the benefit because it is so entwined into our day to day lives. However, its importance to government, administration, healthcare, education as well as communications and entertainment means that this warrants significant weight.

### **Addressing Climate Change**

- 8.21. Climate change is a key issue for the achievement of sustainable development and new data centres have an important direct and indirect role to play.
- 8.22. The operation of data centres also means that people can make more sustainable choices about where they work and communicate which can reduce the need to travel. This also has an indirect effect on climate change.
- 8.23. The development proposals will also meet at least the BREEAM very good standard.
- 8.24. The Applicant would afford this significant weight.

### **Biodiversity enhancements**

- 8.25. This provides opportunities for biodiversity enhancements and an overall significant net gain in habitat units. This should be afforded significant weight.

### **Landscape enhancements**

- 8.26. The strategic planting of woodland, specimen trees and the restoration of hedges and planting of new hedgerows, together with the creation of extensive areas of new meadow grassland, native scrub, and damp land habitats associated with new swales and attenuation basins, will provide considerable enhancements to the local landscape. They will also accord with aims of saved policy LC20. This should be afforded significant weight.

### **Building beautiful**

- 8.27. Whilst this is an outline application (and that tempers the weight that can be afforded to this) the LPA can require the high quality and innovative design approach detailed in the original application to be carried through into the final scheme. The application proposals represent

an opportunity to show what can be done even with large utilitarian buildings to advance the high quality design agenda. The Applicant would afford this limited/moderate weight.

#### **The absence of a plan-led solution**

- 8.28. The planning operates in a plan led system yet there is no plan led solution that is available that can address the growing need for Data Centres in this area. The plan is out of date and there is also no imminent solution in the form of an emerging plan which will provide any plan-led solution in the foreseeable future. This consideration should be given significant weight.

#### **Education and employment fund**

- 8.29. The proposals presents a significant opportunity to upskill local people so they can take up the employment opportunities that the proposals presents. The proposed training fund would provide a significant boost to local training opportunities. The Applicant would afford this significant weight.

#### **Heat capture for a district heating system and horticultural glass house**

- 8.30. LPA's should be looking to capture and harness energy from what is a waste product of other industrial processes. Heat capture from a data centre is no different.
- 8.31. The opportunity will exist for future developers to tap into this in the future as well as the heating of the proposed on-site horticultural glass house. The Applicant would afford this moderate weight.

#### **Summary of benefits**

- 8.32. Overall, it can be seen that there are multiple benefits and other considerations which individually and collectively weigh very considerably in favour of this application being granted.

### **The adverse effects to be weighed in the balance.**

#### **Conflict with the Development Plan**

- 8.33. The applicant acknowledges that there is conflict with the Development Plan by virtue of it not being located in a settlement boundary or an allocated site.
- 8.34. However as detailed in Section 7, the Development Plan is out of date in that it does not respond to up to date development needs specifically those of the digital infrastructure market. Given the policy support for the development proposals in the NPPF and other government documents, and the close alignment between the proposals and the spatial vision and objectives of the Development Plan the applicant would afford the conflict with limited weight.

### **Landscape and Visual Harm**

- 8.35. As previously explained, the LVIA has identified that the introduction of new built form to the site is likely to be seen in local and middle distance views due to the openness of the landscape. This is an unavoidable harm that would arise from any development on this scale on a greenfield site.
- 8.36. However, through extensive restoration of field hedgerows and new large scale tree planting, this impact will be mitigated.
- 8.37. There will also be other landscape and visual enhancements which are considered separately in the benefits section that result in a net enhancement overall.
- 8.38. The adverse effects should be afforded limited weight in the planning balance.

### **Other considerations**

- 8.39. There are no other grounds to resist development on this site which cannot be avoided, mitigated, or controlled through Reserved Matter applications, planning conditions and/or planning obligations.

### **The Overall Planning Balance**

1. The proposals do not accord with the Development Plan insofar as the site is not allocated for development or located within a settlement boundary. However, this is a form of development not anticipated by the plan and there is nonetheless close alignment with its vision and objectives.
2. There are also a number of benefits and other considerations that weigh variously in favour of the proposals. They include:-
  - a. Need for the development and contribution to meeting that need - Very Substantial
  - b. Locational Requirements and the Lack of Alternative Sites - Substantial
  - c. Economic Impact/support for local businesses - Very Substantial
  - d. Temporary employment during the construction phase. - Moderate
  - e. Direct and indirect employment generation - Significant
  - f. Social benefits - Significant
  - g. Addressing Climate Change - Significant
  - h. Biodiversity Enhancements - Significant
  - i. Landscape Enhancements - Significant
  - j. Building Beautiful - Limited/Moderate
  - k. The absence of a plan-led solution - Significant



- l. Education and Employment Fund – Significant
      - m. Heat capture for a district heating system and horticultural glass house – Moderate
- 3. The potential adverse impacts have been identified and these should also be afforded varying degrees of weight as follows:
  - a. Conflict with Development Plan – Limited
  - b. Landscape and visual impact – Limited
- 4. All other identified impacts can be avoided, mitigated or addressed through RM applications, planning conditions and/or obligations.
- 5. Overall, the considerable benefits would very clearly outweigh the limited harms including the conflict with the Development Plan.
- 6. As such there are other material considerations that justify a departure from the Development Plan. It follows that the proposals represent sustainable development and planning permission should be granted.



## 9. Summary & Conclusions

9.1. This Planning Statement has been prepared by Pegasus Group to accompany a planning application that is submitted on behalf of Humber Tech Park Ltd (the Applicant). The application relates to the following:

**“Construction of a data centre of up to 309,000 sqm (GEA) delivered across up to 3no. buildings, including ancillary offices, internal plant and equipment and emergency back-up generators and associated fuel storage. Other works include internal roads and footpaths, cycle and car parking, hard and soft landscaping, security perimeter fence, lighting, drainage, an electricity substation, a district heating unit, horticultural glass house, and other associated works and infrastructure”.**

9.2. This statement identifies the main planning policy issues as follows:-

- |                |  |
|----------------|--|
| <b>Issue 1</b> | <b>The principle of development</b>                                |
| <b>Issue 2</b> | <b>Other considerations which weigh in favour of the proposals</b> |
| <b>Issue 3</b> | <b>Other technical matters</b>                                     |

The main findings can be summarised as follows:-

### **Issue 1 The principle of development**

1. It is acknowledged that the development proposals are not in accordance with the development plan in that the site is not allocated for development and it is not located within a settlement boundary.
2. However, the adopted and emerging Development Plans do not plan for the rapidly growing need to deliver critical digital infrastructure of this scale and form.
3. This is no ordinary development proposal and nor is it one that meets a generic need that could be met anywhere. The application proposals are about meeting the need for critical digital infrastructure where and when it is required. It would provide for an AI data centre in a broad location where the adopted and emerging development plan seeks to secure new employment opportunities and major inward investment.
4. There is a rapidly growing need for data storage being driven by the rapid growth of the use data in almost every aspect of human activity – social, economic and governmental. This growing need is set to accelerate even further with the forecast growth in AI activity. The timely delivery of the development proposals is a matter of national importance to support economic growth and society more generally.
5. The proposals attract considerable support from national policy. NPPF paragraph 85 states that significant weight should be placed on the need to support economic growth and productivity. Areas should build on their strengths and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation.

6. The NPPF requires policies to address potential barriers to investment, such as inadequate infrastructure and to enable a rapid response to changes in economic circumstances. Those types of policies are absent from the Development Plan here [NPPF paragraph 86].
7. NPPF paragraph 87 is supportive of this type of proposal. It says decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations in suitably accessible locations.
8. The NPPF requires the planning system to meet development needs and to align growth and infrastructure. Paragraph 118 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.
9. Nicol Economics explain that the Government recognises the importance of the digital economy to UK prosperity and effective functioning of our public services, government and society and this role is becoming ever more important, presenting great opportunities and also challenges.
10. It also recognises the importance of a secure and reliable digital infrastructure to ensure the smooth functioning and to maximise the growth prospects of the economy to the extent that data centres are referred to as a critically important part of that digital infrastructure.
11. The Development Plan is out of date in that it pre-dates the NPPF and it does not respond to up to date development needs including the challenges that we now face with regards digital infrastructure.
12. The Development Proposals are in broad agreement with the vision and spatial objectives of the adopted and emerging Development Plan for North Lincolnshire and compliment the development of the South Humber Bank.
13. The Development Proposal are in accordance with, and make a substantial contribution to, the South Humber Bank Initiative.
14. There are no other more suitable, available and deliverable sites.

## **Issue 2 Other considerations which weigh in favour of the proposals**

15. The application proposals would support 2,500 to 3,000 jobs a year on and off site over the anticipated 3 year build out.
16. The proposed development would represent a “very substantial capital investment of a minimum of £2.2 billion to well over £3 billion, and an initial direct GVA boost of some £850 to £1,100 million to the local economy. The likely number of jobs at the proposed scheme when it is fully operational is around 370 FTE jobs, although the actual number will depend on the precise configuration of the activities.
17. The estimated annual wages bill for a total of 370 FTE staff is £18 million to £20 million (in 2023 prices).



18. Indirect benefits consist constructed an initial estimate of £237m in GVA generated, 850 associated jobs and £36m wages bill in the supply chain in Greater Lincolnshire arising from the wages bill and local spend by the data centre operator at Humber Tech Park.
19. The new jobs in the data centre would provide an opportunity to support upskilling locally and the development of training and other programmes.
20. The likely total rateable value for the completed development to be around £23.5 million for the buildings including an amount for the plant and machinery.
21. The agricultural output of the new glass houses would be around £3.5 million and the activity would support an estimated 28 FTE on-site jobs (with up to 10 additional off-site jobs in the supply chain).
22. The significant economic boost to the local economy would also present a significant private investment in an area which has seen contraction in the traditional industrial base and potentially act as a catalyst to further private investment in the locality.
23. The proposals would reinforce the critical infrastructure upon which modern day society increasingly depends.
24. The aim of the development proposal is to provide a high-quality development that is adaptable and resilient to future climate change, with all buildings built to an overall certification BREEAM 'very good' rating, including for water efficiency.
25. The proposal includes a horticultural glass house which would through use of the excess heat capture have significant environmental benefits. It will also offset the carbon cost of the import of food produce from abroad. The opportunity will also exist for potential developers to tap into this in the future in the local area.
26. There would be significant net gains for biodiversity of 45.01% in habitat units, 41.84% in hedgerow units and 15.77% in watercourse units.
27. There would be meaningful enhancements to the landscape and visual amenity through new planting and long-term management, which would be in accordance with saved Policy LC20 of the North Lincolnshire Local Plan.
28. An appropriate and innovative design approach has been considered which has started with a landscape led approach to the site.
29. There will be long term funding of education, apprenticeships, and employment initiatives to be managed by North Lincolnshire Council.

### **Issue 3 Other technical matters**

30. The development proposals would introduce a new built form to the site that is likely to be seen in local and middle distance views due to the openness of the landscape . This will be mitigated overt time through extensive restoration of field hedgerows and new large scale tree planting.
31. The proposed development would not have a material impact on the safety or operation of the adjacent highway network during both the construction and operational phases.



32. The proposed data centres will unlikely yield an impact from an acoustics perspective on the nearest receptors given the recommended mitigation and contextual environment.
33. The operational air quality effects are judged to be 'not significant'.
34. The flood risk to the site is considered to be low and acceptable.
35. It is anticipated that there will be no impact to the heritage significance of built heritage assets in the vicinity of the site.
36. Any archaeological remains identified are unlikely to be considered to be heritage assets.
37. The output from the proposed glass house would more than compensate for any loss of agricultural land in both tonnage, value and jobs.
38. There would be no other harms to weigh in the planning balance that cannot be addressed by conditions or planning obligations.

### **The Overall Planning Balance**

39. The proposals do not accord with the Development Plan insofar as the site is not allocated for development or located within a settlement boundary. However, this is a form of development not anticipated by the plan and there is nonetheless close alignment with its vision and objectives.
40. There are also a number of benefits and other considerations that weigh variously in favour of the proposals. They include:-
  - a. Need for the development and contribution to meeting that need - Very Substantial
  - b. Locational Requirements and the Lack of Alternative Sites - Substantial
  - c. Economic Impact/support for local businesses - Very Substantial
  - d. Temporary employment during the construction phase. - Moderate
  - e. Direct and indirect employment generation - Significant
  - f. Social benefits - Significant
  - g. Addressing Climate Change - Significant
  - h. Landscape and Biodiversity Enhancements - Significant
  - i. Landscape Enhancements - Significant
  - j. Building Beautiful - Limited/Moderate
  - k. The absence of a plan-led solution - Significant
  - l. Education and Employment Fund - Significant
  - m. Heat capture for a district heating system and horticultural glass house - Moderate
41. The potential adverse impacts have been identified and these should also be afforded varying degrees of weight as follows:



- a. Conflict with Development Plan – Limited
  - b. Landscape and visual impact – Limited
42. All other identified impacts can be avoided, mitigated or addressed through RM applications, planning conditions and/or obligations.
43. Overall, the considerable benefits would very clearly outweigh the limited harms including the conflict with the Development Plan.
44. As such there are other material considerations that justify a departure from the Development Plan. It follows that the proposals represent sustainable development and planning permission should be granted.

### **Concluding Comments**

- 9.3. Having undertaken a planning balance in the way that has been outlined, the Applicant reaches the conclusion that the proposals represent a suitable and sustainable form of development in this location and that there are compelling reasons that justify the grant of planning permission.
- 9.4. In view of the foregoing, the LPA is respectfully requested to grant outline planning permission, subject to any necessary conditions and planning obligations.

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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