

PLANNING REF : 262274
PROPERTY ADDRESS : Charvil House Road
:
: RG10 9RD
SUBMITTED BY : James Goodband
DATE SUBMITTED : 08/10/2026

COMMENTS:

I object to this application. I live in Charvil and regularly cycle the National cycle route 4 through Thames Valley Park. I have reviewed the application documents and rely principally on the applicant's own assessments and figures.

I recognise that current national policy supports data centres and gives substantial weight to the economic benefits of commercial development. My objection is therefore not to data centres in principle. It concerns this particular site, the scale and environmental envelope of the outline proposal, and especially the high-carbon operating case that would be permitted if consent were granted as submitted.

The application should be refused because the adverse effects and development-plan conflicts are not overcome by the benefits claimed. At the very least, it should not be determined until the Environmental Statement and supporting material provide a clear, internally consistent assessment of the lawful worst-case development and the public has been reconsulted on any substantial further information.

Summary of grounds

- The only energy case presently secured retains gas-fired fuel cells for the assessed 60-year life. The lower-carbon grid scenario and removal of the fuel cells are not secured.
- The applicant reports net operational emissions of 154,315 tCO₂e a year and classifies operational energy and in-use embodied carbon as Major Adverse (Significant), while proposing no additional operational mitigation.
- The greenhouse-gas significance assessment appears to compare one year of project emissions with a five-year national carbon budget and contains further internal inconsistencies.
- The air-quality material does not transparently present the consequences of routine generator testing and the 72-hour outage sensitivity case, identify all relevant receptors, or commit to the emissions controls on which acceptability may depend.
- The applicant accepts lasting Moderate Adverse, "important" visual effects for users of the Thames Path, the river and the Nature Reserve, while the requested worst-case winter evidence is incomplete.
- Protected-species evidence and the biodiversity calculations require a single, clear pre-determination account; the operational noise envelope has not been adequately demonstrated; and the claimed heat-reuse benefit remains notional.
- The economic benefits merit weight but are modest in local operational-employment terms and do not remove the need to assess and secure an acceptable environmental scheme.

1. Decision-making framework

The application should be determined in accordance with the development plan unless material considerations indicate otherwise. The current national support for data centres is an important material consideration, but it is not an exemption from policies on climate change, environmental protection, landscape, amenity and good design. National climate policy also expects development to conserve energy and resources and to exploit realistic opportunities for low-carbon energy and the use of surplus heat.

This is an outline application. The Council therefore needs to be satisfied now that the maximum development parameters and the energy, emissions, noise and landscape envelope are acceptable.

Matters

essential to understanding likely significant effects should not be left wholly to reserved matters or to a condition without evidence that an acceptable scheme is achievable.

2. Energy strategy and greenhouse-gas emissions

2.1 Scale of the assessed emissions

ES Volume 2, Chapter 8, Table 8-21 reports net operational emissions of 154,315 tCO₂e per year. The same chapter uses a Wokingham baseline of 688,076 tCO₂e. The project figure is equivalent to approximately 22.4% of that baseline. I use this as an illustration of scale, not as an assertion that every project emission would fall within the same territorial inventory boundary. The applicant should explain the respective accounting boundaries so that the comparison is not misunderstood.

The existing offices are reported to emit approximately 2,961 tCO₂e a year, making the proposed annual figure about 52 times higher. On a simple constant-rate calculation, 60 years of operation plus 109,667 tCO₂e of construction emissions is approximately 9.37 million tCO₂e. The Energy Strategy separately gives 8.38 million tCO₂e for Option 1. If these figures use different boundaries, grid trajectories or operating profiles, the difference should be reconciled in one transparent table.

The ES classifies operational energy and in-use embodied carbon as Major Adverse (Significant), but section 8.7.3.1 states that no additional mitigation measures are proposed during operation. The scale and admitted significance of the effect require more than a general assertion that the proposal is consistent with climate objectives.

2.2 The lower-carbon future is not secured

The Non-Technical Summary states that the fuel cells would provide the principal energy source until approximately 2037. The assessed and consented position appears materially different. ES section 8.8.1

assesses the approved 60 MW connection with gas supply, described as Option 1, under which the gas fuel cells remain for the full 60-year assessment period alongside the grid.

Energy Strategy Table 5 describes the 110 MW connection that would allow removal of the fuel cells as "Not secured". The Strategy says retention of the fuel cells locks in a high, non-improving emissions profile, while removing them would reduce the stated lifecycle total from 8.38 to 2.10 million tCO₂e. Biomethane is described as not iably deliverable. These are not minor implementation details: they are the difference between the high- and lower-carbon cases.

The Council should determine the application on the development that would actually be authorised and can reasonably be delivered. No material weight should be given to removal of the fuel cells or transition to a 110 MW grid supply unless a lawful, precise and deliverable phasing mechanism secures it. Otherwise the assessment and planning balance must proceed on the 60-year gas-led case.

2.3 The national carbon-budget comparison requires correction

The ES compares annual project emissions with the Seventh Carbon Budget figure of 535 MtCO₂e. That figure is the total budget for the five years 2038-2042, not an annual budget. The periods should be aligned. At 154,315 tCO₂e a year, five project years would be 771,575 tCO₂e, equivalent to approximately 0.144% of 535 MtCO₂e. The same result is obtained by comparing one project year with the budget's annual average of approximately 107 MtCO₂e.

On the face of Table 8-8, 0.144% is above the ES's 0.1% threshold for the Moderate band. The applicant should therefore explain why the national effect is reported as Negligible rather than Moderate Adverse and, if the ES methodology treats Moderate effects as significant, correct the significance conclusion. The revised calculation should use the actual annual emissions profile if it is not constant.

There are additional internal issues requiring clarification. Operational energy at regional level is described as Moderate Adverse (Not Significant) in section 8.7.1.2 but as Moderate Adverse (Significant) in Table 8-25, while section 8.5.1.5 appears to treat Moderate effects as significant. Total operational emissions of 0.028% appear to fall within the ES's Minor band but are reported as Negligible. A revised chapter should also identify clearly where upstream fuel emissions, any methane releases and refrigerant leakage are included, rather than leaving the reader to infer the boundary.

2.4 Policy conflict and required response

The secured high-carbon case sits uneasily with Core Strategy Policy CP1 and MDD Policies CC04 and CC05, with the Council's 2030 carbon-neutral ambition and Climate and Nature Strategy providing important local context. Emerging Policy CE2 is not adopted policy, but its energy-performance requirements reinforce the direction of travel and should be addressed accurately and with the weight appropriate to its examination stage.

I ask the Council to require, under regulation 25 of the EIA Regulations if it considers the statutory test met, a corrected greenhouse-gas chapter; a reconciliation of all scenario totals and boundaries; a realistic year-by-year energy and emissions profile; and an enforceable account of what energy transition is relied on. Any substantial further environmental information should be published and consulted upon before determination.

3. Air quality and generator operation

The scheme includes 36 diesel backup generators and provision for 72 hours of fuel. Selective catalytic reduction and particulate filtration are referred to, but the application should state unambiguously which controls form part of the development, their guaranteed performance and how they would be secured.

Chapter 6 says the sensitivity-test results are not presented, while Appendix 6-8 contains maximum hourly nitrogen-dioxide process contributions for the 72-hour outage case. The reported values include E12: 1,277; E11: 748; E13: 731; E10: 660; E15: 553; and E6:327 g/m .

These are process contributions rather than total predicted environmental concentrations, and a maximum hourly value does not by itself prove breach of the hourly objective. The objective of 200 g/m permits up to 18 exceedances in a year. Nevertheless, every reported maximum exceeds 200 g/m , in some cases by several times. For a modeled 72-hour event the Council needs the full hourly sequence, the 19th-highest total concentration, background concentrations, receptor identities and uses, meteorological assumptions, outage probability and the effect of any committed abatement. A headline conclusion without those results is not a transparent worst-case assessment.

The ES also records routine monthly testing contributions above 10% of the hourly standard at six receptors. The testing schedule, whether units are tested simultaneously, maximum annual testing hours and records should be fixed. Any reliance on the environmental-permitting regime should be explained; the existence of another regime does not remove the need to assess land-use consequences.

The air-quality chapter states that there are no ecologically sensitive sites in the vicinity, yet other application material identifies the adjoining Local Wildlife Site, woodland and Nature serve. The applicant should screen the relevant habitats and, where

necessary, assess nitrogen oxides and deposition against appropriate critical levels or loads. This should be decided on ecological evidence, not by an unsupported exclusion.

The Planning Statement also says the fuel cells produce no nitrogen oxides, while the ES models a NO_x emission rate of 0.0013 g/s for the fuel-cell installation. The Council's air-quality officer should confirm the correct emission basis and whether the rate is representative of the full 49.9 MW plant. Table 6-17's absence of site-specific local monitoring should be justified by showing that the background data used are representative.

Before determination, I ask for a revised air-quality assessment presenting thenormal testing and outage cases clearly, including ecological receptors, and for the Council's air-quality officer to advise whether the controls and operating limits are sufficient and enforceable.

4. Landscape, the Thames Path and the Local Gap

Theapplicant's Landscape and Visual Appraisal, Table 9, identifies Moderate Adverse, "important" effects remaining at Year 15 for people using the Thames Path National Trail (receptor group 4), river users (group 6) and visitors to Thames Valley Park NatureReserve (group 9). The upper parts of buildings up to 30.5 metres high would remain above the tree line. These are admitted, long-term effects on highly valued public routes and spaces, not merely short-term construction impacts.

The Council's landscapeadviser requested worst-case winter photography. The submitted photographs were taken in April 2026, and the additional requested viewpoint appears to lack equivalent winter evidence. April conditions do not necessarily demonstrate the true leaf-off worst case. Because this is an outline application, the Council should not assume that later design refinement or planting will remove an effect that the applicant says remains at Year 15.

The Planning Statement acknowledges the Sonning Neighbourhood Plan Local Gap under Policy SNP/ENV1 but does not appear to carry that effect through the stated planning balance. The relationship with Core Strategy Policy CP3, MDD Policy TB21 and emerging Policy NE6 should be addressed expressly, with the appropriate weight given to each policy.

I regularly cycle this stretch of the Thames Path. The affected views are part of the everyday experience of the river corridor and Nature Reserve. The maximum heights, plant zones and development envelope should be fixed now, supported by genuine winter photomontages. If the identified residual effects cannot be acceptably reduced, they weigh materially in favour of refusal.

5. Ecology, trees and biodiversity net gain

The scheme would remove a substantial proportion of the site's trees

and vegetation. The Landscape and Visual Appraisal refers to removal of 75 of 131 trees, 10 tree groups and 18 hedgerows. That loss increases the importance of establishing protected-species use, maintaining dark and connected corridors, and demonstrating that proposed replacement habitats are achievable alongside the operational development.

The Preliminary Ecological Appraisal identifies potential bat-roost features in perimeter woodland and records 1,221 bat records within 2 km, including barbastelle. It recommends a ground-level tree assessment and a night-time bat walkover and says findings will be reported separately. The officer report should identify the corresponding reports on the register and explain whether their scope, timing and results answer those recommendations. If adequate surveys are not before the Council, determination should be deferred; the presence and extent of protected species should not be left to a condition where the information is needed to decide whether the scheme is acceptable.

The biodiversity figures also require reconciliation. The application material gives baseline figures of 22.65, 14.39 and 14.45 units and net-gain percentages of 11.21% and 17.12%. These may relate to different versions or assumptions, but the public and decision-maker need one dated metric, a change log and a clear statement of the habitat baseline, condition assessments, trading rules, on-site delivery, any off-site units and the long-term management mechanism. The statutory biodiversity-gain condition is not a reason to leave an unclear baseline unresolved.

The ecology review should also address the generator air-quality pathway, lighting, noise and the consequences of vegetation removal in combination. The fact that ecology was scoped out of the EIA is not, by itself, a reason for refusal, but that scoping conclusion should be revisited if the outstanding information identifies a likely significant effect.

6. Operational noise

A data centre of this scale would operate continuously and contain numerous fans, chillers, transformers, generators and other plant. The submitted material does not demonstrate through a complete worst-case operational model and BS 4142 assessment that the maximum outline envelope can meet an acceptable limit at all relevant human receptors. The ES records proposed limits but indicates that formal confirmation from Environmental Health had not then been received.

The assessment should include cumulative operation of all phases and plant, nighttime conditions, tonality, intermittency, impulsivity where relevant, low-frequency characteristics, testing and credible emergency operation. A condition can secure a demonstrated design; it should not be used to postpone the basic question of whether the consented envelope can be made acceptable.

Effects on wildlife should be considered separately with the ecologist rather than treated as a BS 4142 issue. I ask Environmental Health to confirm the appropriate rating-level limits

and for the applicant to provide sufficient modeling to show that those limits are achievable before permission is granted.

7. Energy efficiency and use of surplus heat

The applicant identifies approximately 219,000 MWh a year of recoverable heat. The notional off-site network is said to use approximately 45,306 MWh a year, around 20.7% of that figure, and is 1.5-2.65 km away in Reading. It depends on third parties and another local authority. The application should distinguish technical recoverability from useful heat at a suitable temperature and time, and should explain what infrastructure lies within the applicant's control.

No weight should be given to the network as mitigation or benefit unless a deliverable mechanism is secured. At minimum the development should be designed and conditioned to be connection-ready, with a heat-reuse strategy, safeguarded routes, metering and review points. Any claimed off-site connection should be supported by an appropriate obligation or agreement, not described only as "notional". The design and discharge of the remaining heat should also be explained so that local thermal and amenity effects can be considered proportionately.

8. Economic benefits and the planning balance

I recognise the strategic and economic case for data. The Economic Benefits Statement forecasts up to 30 net additional operational jobs in Wokingham and up to 7.4 million of annual operational value added, alongside temporary construction benefits. Those matters deserve weight. The weight should, however, reflect the evidence for additionality, local capture and delivery, and should not be inflated by benefits that are aspirational or not secured.

I do not rely on the previous office traffic figures as a proxy for a precise job count, and I do not suggest that low employment density alone makes a B8 use unacceptable. Equally, the designation of an employment area and national support for data centres do not predetermine the balance. The Council must compare the actual benefits with the project's admitted significant carbon effect, the unsecured energy transition, air-quality uncertainty, lasting landscape harm and the other environmental matters above.

I have also not relied on a monetised "climate damage" calculation, a tonnes-per-job ratio, speculative competition for grid capacity, the absence of CIL or unquantified business rates. Those points are not necessary. On the applicant's own evidence, the environmental consequences are substantial and the lower-carbon case has not been secured.

9. Safety, consultation and document consistency

The Planning Statement identifies a Major Accident Hazard Pipeline

and a consultation zone associated with a major nuclear site. The site would also contain a substantial diesel inventory together with fuel cells, batteries and UPS equipment. I do not suggest that these facts prove the scheme unsafe. I ask the Council to confirm the maximum diesel volume and any hazardous-substances consent implications, and to obtain advice from the Health and Safety Executive and Royal Berkshire Fire and Rescue Service before determination. Any planning controls should follow that specialist advice and avoid unnecessary duplication of other regimes.

Several inconsistencies reduce confidence in the current assessment: the 2037 narrative compared with the 60-year gas case; the carbon-budget period and significance conclusions; "no NOx" compared with a modeled emission rate; and the differing biodiversity figures. Placeholders and references to apartments or residents are control concerns, but are not relied on as standalone reasons for refusal. The important point is that material assumptions and conclusions must be corrected consistently across the Environmental Statement, Non-Technical Summary, Planning Statement and Energy Strategy.

The alternatives section should also explain why the selected gas-led configuration and phasing were preferred over reasonable lower-carbon energy and heat-reuse options identified by the applicant's own work. I do not contend that the EIA Regulations automatically require a search of every alternative site; the deficiency is the absence of a clear comparison of alternatives relevant to the project's defining environmental effects.

10. What I ask the Council to do

I ask the Council to refuse the application. At a minimum, it should not determine the application until the following steps have been completed:

- Request further environmental information under regulation 25, if the Council considers the statutory test met, comprising a corrected greenhouse-gas assessment and reconciled energy scenarios; a transparent generator testing/outage air-quality assessment including ecological receptors; operational-noise feasibility modeling; adequate protected-species evidence and a reconciled biodiversity metric; and the outstanding worst-case landscape material.
- Require the applicant to explain and, where relied upon, secure the energy transition, fuel-cell cessation, emissions controls, heat-reuse measures and phase-by-phase environmental envelope.
- Publish and reconsult on any substantial further information before determination.
- Obtain advice from Environmental Health, the Council's landscape and ecology specialists, the Health and Safety Executive, Royal Berkshire Fire and Rescue Service and Reading Borough Council where cross-boundary heat-network or air-quality matters arise.
- Determine the application in public at Planning Committee. The Statement of Community Involvement records 399 objections among 455 pre-application respondents; while the number of objections is not itself a planning reason, it supports transparent committee

consideration.

If the Council is nevertheless minded to approve, the permission and any planning obligation should, following specialist and legal advice, address at least:

- approved parameter plans fixing maximum building and plant heights, development zones and landscape buffers;
 - a precise energy and phasing mechanism preventing later phases operating indefinitely on the gas-led case, with enforceable fuel-cell cessation/decommissioning provisions where relied upon;
 - committed generator-abatement specifications, testing-hour and simultaneous-operation limits, an outage protocol, records and reporting;
 - operational-noise limits at identified human receptors, based on a worst-case cumulative assessment, with pre-opening validation and complaint investigation;
 - heat-reuse and connection-ready infrastructure for matters within the applicant's control, with no planning credit for an off-site network unless it is secured;
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- protected-species safeguards, a single approved biodiversity-gain plan and metric, dark corridors, tree protection and long-term habitat management;
 - construction logistics protecting National Cycle Route 4, the Thames Path and nearby ecological receptors.

For the reasons above, the application as submitted does not provide a sufficiently certain or acceptable basis for granting outline permission.