

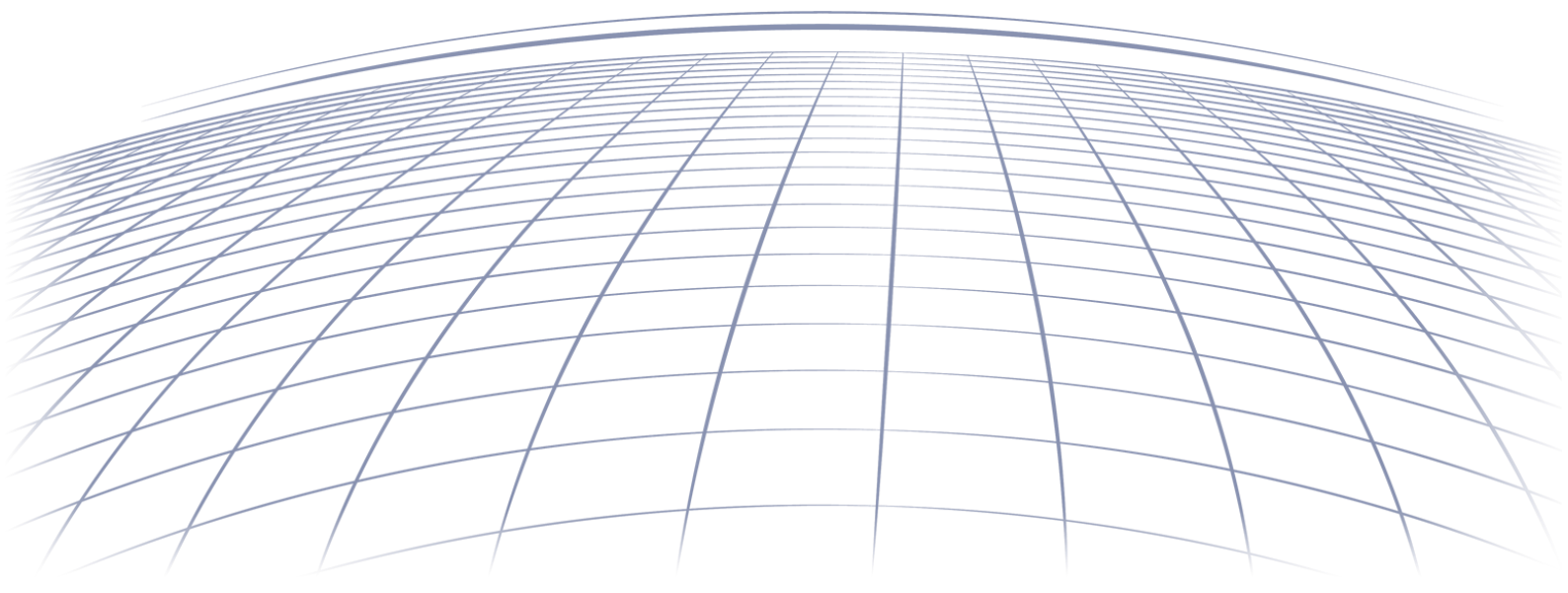
# Southampton to London Pipeline Project

Planning Inspectorate Reference: EN070005

Ark Data Centres Limited – Written Statement

Interested Party Registration 20022637

**14<sup>th</sup> November 2019**



## Contents

<b>Introduction</b> .....	2
<b>Pipeline Location</b> .....	2
<b>Final Route Order Limits</b> .....	3

## VERSION HISTORY

<b>Document Reference:</b>	Uncontrolled Document		
<b>Filename:</b>	191114 ADCL Written Statement v1		
<b>D2 Reference</b>			
<b>Date</b>	<b>Version</b>	<b>Author</b>	<b>Comment</b>
13 November 2019	0.0	NH	Draft
14 November 2019	0.1	SCB/PS	Comments
14 November 2019	1.0	PS	Final for Issue

Copyright © 2019 Ark Data Centres Limited. All rights reserved.

The information contained in this document: represents the view of Ark Data Centres as at the date of publication only; is provided on an 'as is' basis without warranty as to its accuracy; may be subject to revision without notice; and does not constitute an offer to provide goods or services or accept any duty of care to the recipient or any third party.

Ark Data Centres and third parties may have patents, patent applications, trademark, copyright or other intellectual property rights covering or relating to the information contained in this document. The issue of this document does not give the recipient or any third party any licence to these patents, trademarks, copyrights or other intellectual property.

Ark, Ark Data Centres, The Arks, ArkNet, Cody Park and Spring Park are trading styles of Ark Data Centres Limited, registered in England and Wales number 05656968.

Registered and Head office: Spring Park, Westwells Road, Hawthorn, Corsham, Wiltshire, SN13 9GB

## Written Statement

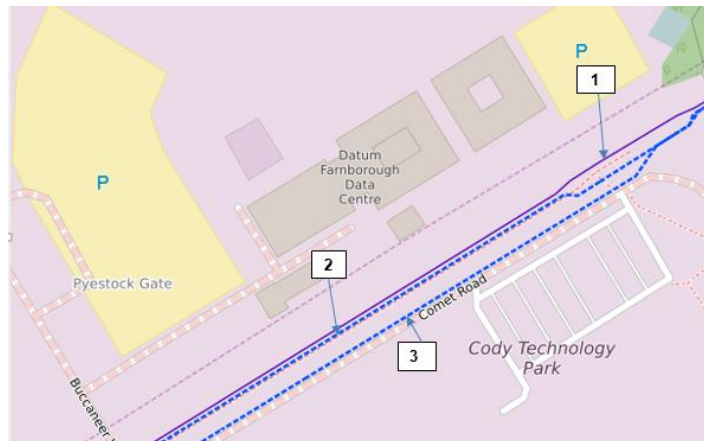
---

### **Introduction**

1. This Statement is prepared by Ark Data Centres Ltd (Ark). Ark is registered as an interested party (ref. 20022637) in connection with the Southampton to London Pipeline Project Development Control Order (DCO).
2. The Inspector will be aware of Ark and its interest in the pipeline project from previous consultation responses. As part of the consultations run by Esso Petroleum Company, Ark provided comments as part of the corridor (April 2018) and route (October 2018) consultations and, since acceptance of the development consent order application by the Planning Inspectorate, registered as an interested party (June 2019) and requested to appear at a Compulsory Acquisition Hearing and/or an Open Forum Session (October 2019).
3. Ark and its group companies are the owner, developer and operator of the Cody Park Data Centre campus which sits to the north of the Cody Technology Park on the edge of Farnborough. The existing pipeline passes to the south of Cody Technology Park and the proposal is for the new pipeline to continue to be located to the south of the Park.
4. The project raises two main concerns. The first is the alignment of the proposed pipeline which has been the focus of our comments on the project so far. The second is the way in which the pipeline might be delivered or managed – with specific reference to issues of land control or acquisition (and the CPO powers sought).
5. Neither of Ark's concerns have been considered. This is not a criticism of either the Esso Petroleum Company or the Planning Inspectorate but is a quite understandable reflection of the vast range of considerations and the fact that Ark's concerns relate to a very limited stretch of the route and it is expected that once these issues are considered they will be addressed to Ark's satisfaction.

### **Pipeline Location**

6. For obvious reasons, and up to this stage, Ark's principal concern was the precise route of the new pipeline. Once a corridor was identified that was centred broadly on the current alignment, Ark's objective has been to ensure that the Preferred Order Limit (and associated Preferred Limits of Deviation) were drawn as tightly as possible and that the Possible Pipeline Location was located at the southern part of the Limits of Deviation. This would ensure that it is south of the Existing Pipeline and as far as it could be from the Cody Park Data Centre complex.
7. Fortunately, the project's sponsors have been able to respond positively and the proposed location or alignment of the pipeline, is now in the best location it can be. The map below shows the various pipeline locations:



8. This is an extract from the Interactive Map on the Pipeline Project's website and it shows The Final Route Possible Pipeline Location (number 3) as far south within the Preferred Limits of Deviation as possible. This means that it is south of the Existing Pipeline (no.1) and the Preferred Possible Pipeline Location (no. 2) that was subject to consultation in Autumn 2018.
9. If Ark were to appear at examination, it would be to reiterate the importance of the alignment of the route as proposed (no.3) and to re-emphasise the concerns associated with an alignment closer to the Technology Park.

#### **Final Route Order Limits**

10. The way the pipeline is delivered and operated (and the land rights that are secured in association with the project) are also of concern to Ark. This is a straightforward point and comes from the need to ensure that Ark's Data Centre campus operates reliably and securely. This is especially important for modern data centres where reliability and security are paramount to successful operation.
11. Arks' concerns in this respect come from the CPO plans and documents which describe the area shown in blue below as land that will be affected by the CPO:



12. It is not clear how the extent of the CPO area has been defined but from the approach taken elsewhere along the route it is likely that it is based on a fixed distance either side of the proposed pipeline rather than site specific analysis of operators that adjoin the pipeline.
13. Whilst Ark is sure that there is no intention to this, work in the blue area could have the potential to disturb operations at the Data Centre Campus, because it includes about 25% of

## Written Statement

---

the communications cables serving the Data Centre campus, Victor Way which provides road access to Ark's campus, and the northern perimeter fence of Cody Technology Park.

14. Furthermore, the DCO powers sought in this area include the ability to acquire and discharge easements. Ark would request that access or the provision of services to the Data Centre Campus are not at any time materially adversely affected by the exercise of the DCO powers and that appropriate qualifications are imposed in any development consent order in so far as it affects the Data Centre Campus:
  - a. Preventing the extinction of any existing rights of access (via private land or public highway) that benefit the Data Centre Campus
  - b. Preventing of the creation of any rights of way or other new easement over the Data Centre Campus in favour of any third party other than the pipeline operator.
  - c. Ensuring that any new easement created (i) does not materially adversely affect the security of Data Centre Campus and (ii) is subject to Ark's site access protocols
  - d. Ensuring that no easement may be extinguished or diverted without there first being provided at the cost of pipeline operator a suitable alternative easement with associated new conduits cables etc.
  - e. Ensuring that no less than six months' prior notice is given prior to the diversion or extinguishment of any easement.
15. We also note that there is an area shaded yellow immediately outside the Ark security fence and the Data Centre Campus entrance date that may be used as a construction compound. In connection with this Ark would request that:
  - a. The compound is kept tidy and properly fenced and managed.
  - b. An appropriate stand-off between the compound and the Ark security fence is maintained; ideally the compound itself would be located at least 3.5m from the security fence.
16. It may be the case that the Order Limits can be easily changed (which appears to have happened to the West of Cody Park already).