
Planning Statement

Unit D Prologis Park, Hillingdon

On behalf of Virtus London 14 Limited

December 2024

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1. Introduction

- 1.1 This Planning Statement has been prepared in support of an application made pursuant to Section 73 of the Town and Country Planning Act (1990) (as amended), submitted to the London Borough of Hillingdon on behalf of Virtus London 14 Limited ('the applicant') in respect of Unit D Prologis Park, Hillingdon ('the site').
- 1.2 The site is located within the administrative area of the London Borough of Hillingdon (LBH). The site measures c.2ha in size and is located in the northeastern corner of Prologis Park Industrial Estate, approximately 2km south east of Yiewsley. The site currently comprises a single warehouse building with ancillary office accommodation.
- 1.3 Planning Permission Ref. 18399/APP/2022/411 was granted at the site on 3rd May 2023 for the following:

"Installation of plant and equipment to unit DC6 including external plant equipment, external louvres and associated security fencing and landscaping, to facilitate use of the building as a data centre".

Overview of Proposals

- 1.4 Conditions 10 and 11 attached to the abovementioned permission require the submission of final noise attenuation details relating to the chiller plant and standby generators to be installed, respectively. The full condition wording for these two conditions is replicated below for completeness.

Condition 10: *"Prior to the first use of the site as a data centre, full and final details shall be submitted to, and approved in writing by, the Local Planning Authority relating to the chiller plant and any associated noise control.*

The plant shall be selected and installed, together with any associated screening, so as to minimise sound externally to a practicable minimum, such that the daytime (07:00-23:00) and night-time (23:00-07:00) cumulative rating levels, determined in accordance with BS 4142 at 1 m from any residential premises, are at least 10 dB below the relevant background sound levels. The relevant background sound levels shall be determined in accordance with BS 4142 and, as a minimum, from measurements over at least a 72-hour period, to include a weekend, at two locations in the vicinity of the nearest dwellings. The cumulative specific sound level(s) shall not exceed 55 dB (L_{Aeq,1h}) 1 m from any office space window belonging to a neighbouring commercial premises".

Condition 11: *"Prior to the first use of the site as a data centre, full and final details shall be submitted to, and approved in writing by, the Local Planning Authority relating to the standby generator plant and any associated noise control.*

The plant shall be selected and installed, together with any associated screening, so as to minimise sound externally to a practicable minimum, such that the daytime (07:00-23:00) and night-time (23:00-07:00) cumulative rating levels, determined in accordance with BS 4142 at 1 m from any residential premises, are at least 5 dB below the relevant background sound levels to within a tolerance of 2 dB.

The relevant background sound levels shall be determined in accordance with BS 4142 and, as a minimum, from measurements over at least a 72-hour period, to include a weekend, at two locations in the vicinity of the nearest dwellings".

- 1.5 During the detailed design process, discussions with the equipment manufacturer for the chiller plant and generators has confirmed the sound power levels arising from this plant equipment. In order to ensure suitable, compliant external noise levels at the nearby residential and commercial façades in accordance with Conditions 10 and 11 respectively, acoustic attenuation is proposed as part of this application.
- 1.6 The primary acoustic mitigation measures proposed, in addition to those previously approved as part of the above permission, include the installation of a profiled acoustic 'lid' above the gantry-top chillers, with a three-sided acoustic screen comprising Caice composite acoustic panels proposed to the northern, eastern and southern sides atop the consented gantry structure and shrouding to the chiller plant. Additional attenuation is proposed to the standby generators at ground level. Full details in respect of the acoustic attenuation proposed can be found in the Acoustics Summary Note prepared by Hoare Lea, submitted in support of this application.
- 1.7 As a result of the proposed acoustic mitigation measures now proposed, the previously-consented 15-metre acoustic screen (along the southern site boundary) can be reduced to c6.6 metres in height, whilst still ensuring that the noise limits for the standby generators (in respect of Condition 11) can be complied with in full.
- 1.8 Alongside these changes, the applicant is proposing a number of other revisions at the site to support the effective operation of the site as a data centre whilst increasing site security and safety for employees and visitors.
- 1.9 This application follows pre-application engagement with officers the Council held in recent months, and the applicant has sought to positively respond to any comments from the local planning authority wherever possible.

Description of Development

- 1.10 The proposed description of development is provided below:

"Variation of Condition 2 and Condition 3 pursuant to Planning Permission 18399/APP/2022/411 (Installation of plant and equipment to unit DC6 including external plant equipment, external louvres and associated security fencing and landscaping, to facilitate use of the building as a data centre)".

Application Documentation

1.11 This Planning Statement summarises the application proposals and provides an assessment of the proposed development in the context of the relevant national and local policy guidance and other material considerations. It should be read in conjunction with the wider supporting information submitted as part of this Section 73 Application:

- Cover Letter, prepared by Savills;
- Community Infrastructure Levy Form 1: Additional Information;
- Amended Planning Drawings, prepared by Stephen George + Partners;
- Design and Access Statement Addendum, prepared by Stephen George + Partners; and
- Acoustics Summary Note, prepared by Hoare Lea.

Structure of Statement

1.12 The structure of this Statement is as follows:

- **Section 2** provides the background to the site and its context within the surrounding area;
- **Section 3** provides a summary of the proposed development and the proposed alterations to Conditions 2 and 3 of Planning Permission 18399/APP/2022/411;
- **Section 4** sets out the relevant planning policy framework for the site and the proposed development;
- **Section 5** sets out the consideration in respect of the material planning considerations for the application; and
- **Section 6** provides a summary and conclusion in respect to the proposed development.

2. Site and Surroundings

2.1 The site measures c.2ha in size and is located in the northeastern corner of Prologis Park Industrial Estate, approximately 2km south east of Yiewsley. The site currently comprises a single warehouse building with ancillary office accommodation, measuring c.14.45 metres in height (to parapet level). An excerpt of the Site Location Plan is provided below.

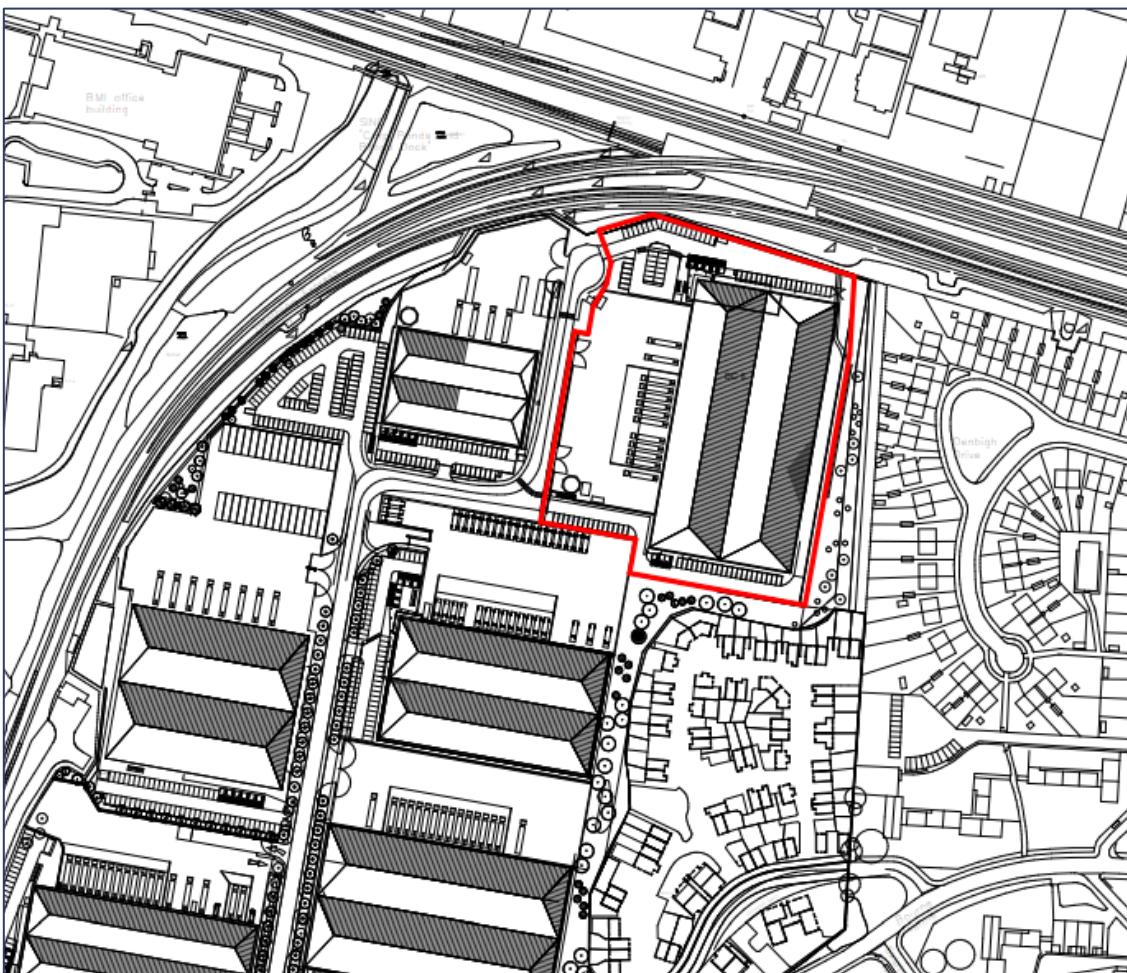


Figure 2.1: Site Location Plan (Source: Stephen George + Partners)

2.2 Vehicular and pedestrian access to the site is provided from the internal Park estate road, which links further south with a security-controlled east/west access road. The access road links to Stockley Road in the west, and Nine Acres Close in the east.

2.3 Planning Permission Ref. 18399/APP/2022/411, (approved 3rd May 2023), granted full planning permission for the installation of plant and equipment to Unit D including external plant equipment, external louvres and associated security fencing and landscaping, to facilitate the use of the building as a data centre. As part of the application, a gantry structure measuring c.14.45 metres in height (at its tallest point) was approved, to be attached to the existing warehouse's western elevation. The gantry structure was designed to house various equipment including rooftop chiller plant. At ground level, generators measuring c.4 metres in height were approved in the existing service yard for the warehouse, to be screened from the south via the provision of a 15 metre high acoustic timber screen.

2.4 The wider Prologis Park Industrial Estate is an established logistics and industrial park which comprises 6no. large-scale industrial units, each with associated parking and servicing yards located immediately southwest and west of the application site. The surrounding industrial units have been designed and constructed in an identical manner. The wider Estate measures approximately 12ha in size.

2.5 Railway lines border the site to the immediate north. The site is immediately bound by mature vegetation along its eastern and southern boundaries, beyond which sits low-density residential development primarily comprising two-storey semi-detached and terrace properties along Denbigh Drive (to the east) and Nine Acres Close (to the south). Land to the wider north, southwest and west of the site is heavily characterised by employment land uses, primarily comprising industrial-type warehousing and storage activities.

2.6 The site is located in Flood Zone 1, indicating a low probability of flooding. The site is not located within a Conservation Area, and no buildings within or adjacent are listed. The site, along with the wider Prologis Park, is identified as a Strategic Industrial Location in the adopted Development Plan.

3. The Proposed Development

- 3.1 This section of the Planning Statement provides a summary of the amendments proposed as part of this application.
- 3.2 For a comprehensive review of the proposals sought, please refer to the Planning Drawings and Design and Access Statement Addendum, prepared by Stephen George + Partners, and the Acoustics Summary Note prepared by Hoare Lea.

Noise Attenuation

- 3.3 A number of acoustic attenuation measures are proposed as part of this amendment application.
- 3.4 In respect of the chiller plant, it is proposed to introduce an acoustic 'lid' to enclose the approved chiller plant atop the (consented) gantry structure. 1100mm acoustic shrouds are proposed to be fitted to all chiller units.
- 3.5 In addition to the acoustic lid atop the consented gantry, it is proposed to introduce a three-sided acoustic screen, comprising Caice acoustic panels that extends only 2.557m above the existing, consented height of the gantry structure. The gantry screen would surround the chillers and acoustic lid on the northern, eastern and southern facades of the gantry.
- 3.6 In addition to the attenuation proposed atop the consented gantry structure, attenuation technology is proposed to the ground-level generators to deliver further acoustic attenuation, alongside other attenuation measures.
- 3.7 As a result of the acoustic attenuation features proposed for the generators, and the acoustic enhancements achieved, the previously-consented 15m acoustic fence on the southern site boundary can now be reduced in height to 6.6m.
- 3.8 Full details of all acoustic attenuation proposed is set out in technical means within the Acoustics Summary Note prepared by Hoare Lea.

Security and Access

- 3.9 A number of site security enhancements are sought as part of the proposals, primarily relating to the introduction of new or revised fencing arrangements across the site. Noting the Government's recent acknowledgement of data centres as 'critical infrastructure', it is imperative for data centre operators to ensure the highest level of security and control in respect of access into these sites.

3.10 Firstly, an entrance gate and turnstile arrangement fronting onto the internal industrial estate access road is proposed, in the northeastern corner of the site, to provide a greater level of security and control in respect of site access.

3.11 Similarly, to enhance site security and to restrict unauthorised control, a minor uplift in the height of the previously-consented security fences on the northern, eastern and southern site boundaries is proposed. The proposed 4m fence on the southern boundary will be screened entirely by the existing wooden acoustic barrier (5m in height), with no sensitive views existing to the immediate north of the site. Existing vegetation is likely to screen views of the minor uplift in height of the current-approved security fence on the eastern boundary.

3.12 Within the site itself, 2.4m high security fencing is proposed to surround the entrances to the warehouse on the north and south facades, again to provide a further measure of security, to restrict unauthorised access to the building entrances. Again, this fencing will not be visible from the north, east or south of the site given the consented fencing heights surrounding the site at present sit at a greater height.

Wider Operational Amendments

3.13 Aside from the acoustic attenuation features and the revised security and site access measures proposed, a number of other, minor operational changes are sought to assist with the wider operation of the consented data centre. These are summarised briefly below:

- A second loading bay door is to be added to the building's western elevation, accessible via the existing service yard.
- An adiabatic cooling plant water tank is proposed in the southern part of the site, to support adiabatic cooling systems for the data centre operations.
- The introduction of the adiabatic cooling tank is proposed, which will result in the minor loss of 6no. parking spaces.
- Other alterations to parking arrangements include the relocation of 3no. blue badge spaces to the northern part of the site, along with the relocation of existing electric vehicle charging facilities and the provision of additional charging infrastructure.
- It is proposed to reposition windows consented on the northern façade, to align with the internal office layout/arrangements. No windows will be removed as part of this revision, this solely relates to a slight repositioning of windows on the northern facade.
- A roof access hatch is proposed for maintenance purposes, alongside the addition of utility stairs to access generators.
- Minor alterations to the consented security fence alignment in the northeastern part of the site are proposed to allow sufficient standoff distances from the consented HV housing.

3.14 Again, please refer to the Planning Drawings and Design and Access Statement Addendum, prepared by Stephen George + Partners, and the Acoustics Summary Note prepared by Hoare Lea for further details.

Required Amendments to Planning Conditions – Application 18399/APP/2022/411

3.15 This application seeks variations to Conditions 2 and 3 of Planning Permission 18399/APP/2022/411 in respect of the proposed amendments sought to the permission. Namely, the following revisions are proposed:

Condition 2 – Approved Drawings

3.16 It is proposed to amend Condition 2 to reflect the suite of updated planning drawings supporting the amendments proposed as part of this Section 73 application, along with the introduction of a new planning drawing as requested by LBH Officers within written pre-application feedback.

3.17 Condition two is proposed to read as follows (with red text indicating updated drawing revisions to be added to the condition and strikethrough text showing deleted text where required):

The development hereby approved shall not be carried out except in complete accordance with the details shown on the following plans, numbers:

- 21-079-SGP-SIT-ZZ-DR-A-130000;
- 21-079-SGP-SIT-ZZ-DR-A-130001;
- 21-079-SGP-SIT-ZZ-DR-A-130002;
- 21-079-SGP-SIT-ZZ-DR-A-130100;
- 21-079-SGP-SIT-ZZ-DR-A-130101;
- 21-079-SGP-SIT-ZZ-DR-A-130103;
- 21-079-SGP-SIT-ZZ-DR-A-130200;
- 21-079-SGP-SIT-ZZ-DR-A-130300;
- 21-079-SGP-SIT-ZZ-DR-A-131000 *Rev. P5*;
- 21-079-SGP-SIT-ZZ-DR-A-131001 *Rev. P6*;
- 21-079-SGP-SIT-ZZ-DR-A-131002 *(Rev. P1) Rev. P3*;
- 21-079-SGP-SIT-ZZ-DR-A-131100 *Rev. P2*;
- 21-079-SGP-SIT-ZZ-DR-A-131101 *Rev. P2*;
- 21-079-SGP-SIT-ZZ-DR-A-131103 *Rev. P3*;
- 21-079-SGP-SIT-ZZ-DR-A-131200 *Rev. P2*;
- 21-079-SGP-SIT-ZZ-DR-A-131201 *(Rev. P1) Rev. P2*;
- **21-079-SGP-SIT-ZZ-DR-A-131202 Rev. P4**
- 21-079-SGP-SIT-ZZ-DR-A-131300 *Rev. P2*;
- 21-079-SGP-SIT-ZZ-DR-A-131301 *Rev. P4*;

- 21-079-SGP-SIT-ZZ-DR-A-132100 *Rev. P3*;
- 21-079-SGP-SIT-ZZ-DR-A-132101 *Rev. P2*;
- 21-079-SGP-SIT-ZZ-DR-A-132102 *Rev. P2*;
- 21-079-SGP-SIT-ZZ-DR-A-132300 *Rev. P2*;

Thereafter the development shall be retained as such for as long as the development remains in existence".

Condition 3 – Supporting Documents

3.18 It is proposed to insert reference to the Design and Access Statement Addendum and Acoustics Summary Note within Condition 3, with no alterations to other approved documents required as part of this application. Condition 3 is proposed to now read as follows (with red text showing the proposed additions):

"The development hereby approved shall be implemented in accordance with the following supporting documents:

- *Air Quality Assessment Report (January 2022);*
- *Virtus DC6 - Air Quality Assessment Report - Addendum (16-05-22);*
- *Virtus DC6 - Air Quality Assessment Report - Addendum #2 (29-11-22);*
- *Performance Data (26-02-20);*
- *Design and Access Statement (January 2022);*
- *Design and Access Statement Addendum (December 2024);*
- *External Plant Assessment (Ref: 07194/3/1/4) (01 February 2022);*
- *Acoustics Summary Note (December 2024);*
- *'As designed Be Green BRUKL Output Document' (May 2022);*
- *'As designed Be Lean BRUKL Output Document' (May 2022); and*
- *Flood Risk Assessment (10-04-2013).*

Thereafter the development shall be maintained in accordance with these details for as long as the development remains in existence".

4. Planning Policy Context

- 4.1 In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), the planning application should be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 4.2 The proposed development has taken account of the Development Plan covering the site as well as other material considerations. This section of the Planning Statement sets out a summary of the relevant planning policy and guidance documents, whilst the following section demonstrates compliance with the policies contained within.
- 4.3 The adopted Development Plan for LBH consists of the following:
 - The London Plan (March 2021)
 - The Hillingdon Local Plan: Part 1- Strategic Policies (November 2012);
 - The Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020); and
 - The Hillingdon Local Plan: Part 2 - Site Allocations and Designations (January 2020).
- 4.4 Other material considerations include (but are not limited to):
 - National Planning Policy Framework (NPPF) (December 2024);
 - National Planning Practice Guidance; and
 - GLA Supplementary Planning Documents and Supplementary Guidance.
- 4.5 The Government consulted on updates to the NPPF in July 2024, with the revised NPPF formally published in December 2024. The NPPF makes explicitly reference to meeting the needs of a 'modern economy', with policy guidance stating the need for planning decisions to make provision for new, expanded or upgraded facilities to support the growth of industries including data centres.
- 4.6 Similarly, the Secretary of State's Written Ministerial Statement (dated 30th July 2024) outlined the Government's support for "*those sectors which will be the engine of the UK's economy in the years ahead*" including growth-supporting infrastructure such as data centres. Similarly, in summer 2024 the Government also sought views as to whether data centres should be classified within the Nationally Significant Infrastructure Projects regime, demonstrating the significant emphasis placed upon supporting such uses within the knowledge-based economy.
- 4.7 Whilst not directly related to planning policy, it is also important to recognise the Government's identification of data centres as 'Critical National Infrastructure' in September 2024 further exemplifies the recognition of the role data centres will play within the UK's economy and growth in the coming years.

4.8 At a local level, LBH also undertook the first stage of a new Local Plan Review, with the 'Call for Views' consultation concluding in June 2024. Consultation on the 'Proposed Submission' Regulation 19 Draft Local Plan is anticipated to be held in early 2025.

5. Material Planning Considerations

5.1 This section of the Planning Statement sets out the main planning considerations arising from the proposed development with reference to the planning policy framework set out in the previous section.

Principle of Development

5.2 The principle of data centre uses has already been accepted at the site through the approval of Planning Application 18399/APP/2022/411 in May 2023. However, the principle of the key amendments to the permission sought as part of this application, to support the consented data centre operations at the site, are considered in further detail below for completeness.

Acoustic Attenuation

5.3 NPPF Paragraph 198 states that proposals should seek to mitigate and reduce to a minimum potential adverse impacts resulting from noise, to avoid noise giving rise to any adverse impacts on health and quality of life. London Plan D14 further states that development proposals should manage noise by avoiding significant adverse noise impacts on health and quality of life (in line with NPPF requirements) and sets out further efforts seeking to mitigate any noise-generating or noise sensitive proposals.

5.4 Policy EM8 of Local Plan Part 1 also sets out that LBH will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

5.5 As set out above, Planning Permission Ref. 18399/APP/2022/411 was granted at the site on 3rd May 2023. The application sought the installation of plant and equipment (including external plant equipment) with associated security fencing and landscaping, to allow use of the existing building as a data centre.

5.6 Noting the introduction of external plant equipment at the site through the above permission, a number of planning conditions were attached to the relevant permission requiring the submission of noise control measures and resulting noise levels. The conditions are set out in full below for completeness.

Condition 10: *"Prior to the first use of the site as a data centre, full and final details shall be submitted to, and approved in writing by, the Local Planning Authority relating to the chiller plant and any associated noise control.*

The plant shall be selected and installed, together with any associated screening, so as to minimise sound externally to a practicable minimum, such that the daytime (07:00-23:00) and night-time (23:00-07:00) cumulative rating levels, determined in accordance with BS 4142 at 1 m from any residential premises, are at least 10 dB below the relevant background sound levels. The relevant background sound levels shall be

determined in accordance with BS 4142 and, as a minimum, from measurements over at least a 72-hour period, to include a weekend, at two locations in the vicinity of the nearest dwellings. The cumulative specific sound level(s) shall not exceed 55 dB (L_{Aeq,1h}) 1 m from any office space window belonging to a neighbouring commercial premises".

Condition 11: *"Prior to the first use of the site as a data centre, full and final details shall be submitted to, and approved in writing by, the Local Planning Authority relating to the standby generator plant and any associated noise control.*

The plant shall be selected and installed, together with any associated screening, so as to minimise sound externally to a practicable minimum, such that the daytime (07:00-23:00) and night-time (23:00-07:00) cumulative rating levels, determined in accordance with BS 4142 at 1 m from any residential premises, are at least 5 dB below the relevant background sound levels to within a tolerance of 2 dB.

The relevant background sound levels shall be determined in accordance with BS 4142 and, as a minimum, from measurements over at least a 72-hour period, to include a weekend, at two locations in the vicinity of the nearest dwellings".

5.7 Discussions were held with the equipment manufacturer for the chiller plant and generators following the granting of planning permission in May 2023, during which the sound power levels arising from the consented plant equipment were confirmed to the applicant. Following these discussions, in order to enhance acoustic attenuation capabilities for the proposed data centre operation and to ensure compliant external noise levels at the nearby residential and commercial façades in accordance with Conditions 10 and 11 respectively, additional acoustic attenuation features are proposed as part of this application.

5.8 As set out in Section 3 of this report, the fundamental acoustic attenuation measures proposed can be summarised as follows:

- An acoustic lid will be installed atop the consented gantry structure, which will sit over the approved chillers in order to mitigate sound levels. The previous chiller-top attenuation features are retained.
- A three-sided acoustic screen will be installed along the northern, eastern and southern facades of the gantry structure. The screens comprise Caice acoustic panels which will extend only 2.557m above the previously-consented gantry height.
- Acoustic attenuation devices will be fitted to the ground-level generators.

5.9 Again, full details of all technical attenuation features proposed can be found within the Acoustics Summary Note prepared by Hoare Lea.

5.10 To inform the proposals, pre-application discussions in respect of the acoustic attenuation (along with the wider operational amendments proposed) were held with LBH on 3rd July 2024. As part of these discussions,

Anderson Acoustics, a third-party noise consultancy, were appointed by LBH to review the acoustic attenuation proposals and their compliance with Conditions 10 and 11 of Planning Permission 18399/APP/2022/411. Technical information provided at pre-application stage for review by Anderson Acoustics helped to inform the discussions. Following review of all supporting information, Anderson Acoustics confirmed via formal written feedback that the requirements of Conditions 10 and 11 would be met through the attenuation measures proposed as part of this application, and thus the proposals were acceptable in respect of discharging these two conditions (under separate cover at a later date, subject to approval of this Section 73 application).

- 5.11 From an acoustic perspective, the feedback from Anderson Acoustics demonstrates that the proposals in-principle are entirely appropriate and acceptable in respect of enhancing acoustic mitigation properties of the data centre operations, and ensuring compliance with the relevant conditions aforementioned.
- 5.12 To provide further technical justification in respect of the acoustic attenuation proposed, an Acoustics Summary Note has been prepared by Hoare Lea in support of the proposals. The Note provides a detailed account in respect of the acoustic attenuation specifications for completeness.
- 5.13 Following additional modelling tests with the acoustic attenuation measures incorporated, Hoare Lea identify that the attenuation proposed in respect of the gantry-top chillers (namely the acoustic lid, Caice acoustic screens and 1100mm acoustic shroud to each chiller) would in combination lead to a c.16 dB(A) reduction in sound level at the worst-affected nearby receptor.
- 5.14 The performance of each of these elements has been optimised such that the proposed technical specifications (i.e. in respect of acoustic screen height, length of chiller-top attenuators etc.) ensure that the acoustic attenuation properties of the data centre are maximised, subsequently ensuring compliance with Condition 10 (as outlined in Hoare Lea's Summary Note and the previous. The principle of these features is therefore entirely acceptable in planning terms.
- 5.15 In respect of the attenuation to the generators, the features proposed help to enhance the acoustic mitigation afforded to the generator plant to such an extent that the previously-consented 15m acoustic fence can be sufficiently reduced in height to 6.6m, whilst still providing sufficient acoustic attenuation properties to achieve compliance with the noise limits for the generators as set out in Condition 11. Therefore, the enhanced acoustic attenuation strategy for the generators, allowing the reduction in height of the approved 15m fence (with the associated design benefits of reducing the scale of the fence also to consider) without leading to adverse noise impacts, should be strongly welcomed by the local authority.
- 5.16 It is also worth reiterating that as per NPPF Paragraph 87(a), planning decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven high-technology industries such as data centres. In this regard, the upgraded attenuation features for the extant data centre permission in question would help to support the effective function and operation of the site for

data centre purposes, contributing to the strengthening of the wider knowledge-based, modern in terms of efficiency, productivity and growth. In this respect, the attenuation features are entirely appropriate and acceptable in planning policy terms, in respect of supporting a strong, competitive economy.

5.17 In summary, the attenuation features proposed will provide acoustic enhancements to ensure compliance with the respective requirements of Conditions 10 and 11 attached to Planning Permission 18399/APP/2022/411. This will support the everyday function and wider operation of the data centre uses at the site to contribute to the strong, competitive 'modern economy', whilst maintaining amenity for local stakeholders, and therefore the principle of the attenuation proposed is acceptable and appropriate.

Site Security Improvements and Wider Operational Requirements

5.18 As set out previously, greater emphasis has placed upon the critical importance of data centres within the wider 'modern, knowledge-based economy'. As set out in previous paragraphs, within the latest iteration of the NPPF, published in December 2024, in plan-making (and by association, decision-taking), particular regard should be had in respect of facilitating development to meet the needs of a modern economy, including in relation to data centre operations, as per NPPF Paragraph 86(c).

5.19 Again, NPPF Paragraph 87(a) also states that planning decisions should make provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of data-driven high-technology industries such as data centres.

5.20 Further recognition should also be given to the designation of data centres as 'critical infrastructure' by the new Labour government, a sign of the strategic importance of such facilities in contributing to the modern, knowledge-based economy across the country.

5.21 In this regard, ensuring the upmost level of security and control in respect of access to such infrastructure is clearly a critical priority in this respect. To this end, revisions to the previous access and fencing arrangements at the site are proposed. This includes the introduction of a revised vehicular and pedestrian access point from the internal industrial estate access road in the northeastern corner of the site, which will assist in ensuring greater access control and subsequent site security for staff and site visitors. Similarly, it is proposed to increase the height of the consented 3m security fencing along the northern, eastern and southern site boundaries by 1m, to a total height of 4m. This will act as a further deterrent in regard to unauthorised site access, providing greater protection to the operations undertaken at the site, better reflecting the site's role as 'critical infrastructure'.

5.22 Additional security fencing, measuring 2.4m in height, is also proposed within the site itself to surround the entrances to the warehouse on the north and south facades. This is proposed to add a further element of site security and access control to the data centre's primary access points.

5.23 Noting the current rhetoric in respect of the essential role that data centres now play in the country's modern economy, it is clear that an increased level of security and access control is entirely appropriate to protect such critical infrastructure. As such, the principle of the proposed security measures set out above is considered to be entirely justified and acceptable in planning policy terms, particularly noting the policy objectives outlined within the latest NPPF.

5.24 Similarly, a number of additional minor amendments are sought to the previous data centre permission, in order to enhance the functionality and subsequent efficiency of the consented data centre operations at the site, in line with national policy guidance. These amendments include, but are not limited to, the introduction of access stairs for the consented generators and roof access hatch, both to allow easier access for maintenance purposes as required to support the effective running of the data centre. Adiabatic cooling tanks are proposed to support adiabatic cooling systems for the data centre operations, with an additional loading bay door also proposed on the building's western façade.

5.25 These minor amendments, as set out above, assist with an enhanced functionality and efficiency for data centre operations at the site, the principle of which noting national guidance on supporting data centre operations should be strongly welcomed.

Design and Amenity

5.26 The NPPF attaches notable weight to the design of the built environment. High quality design is considered to be a fundamental aspect of sustainable development as defined within Paragraph 131 of the NPPF. Paragraph 135 also encourages planning decisions to, through scrutiny of the subject proposals, ensure that development proposed is sympathetic to local character, including the surrounding built environment, while not preventing or discouraging appropriate innovation or change, including increased built form. Paragraph 135(e) also requires planning decisions to ensure that development optimises the potential of a given site.

5.27 At a regional level, London Plan Policy D3 encourages development proposals to consider local context through the delivery of built form which responds to considerations of layout, scale, shape and general appearance, having due regard to existing and emerging building types, forms and proportions. Policy D6 and Table 3.2 also identify that the built form, massing and height of development should be appropriate for the surrounding context.

5.28 In regard to wider amenity considerations, Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

Alterations to Fencing Arrangements

5.29 In respect of the proposed amendments to fencing arrangements at the site, either relating to the alteration in heights of previously-consented fencing or the introduction of new fencing, detailed consideration has been given to the potential design and amenity effects from these proposed amendments.

5.30 In respect of the 2.4m internal security fences proposed to provide secure access control to the main data centre building entrances, it should be noted that the existing landscape buffers running along the site's northern and eastern boundaries will restrict most, if not all, views of the internal fencing from views into the site from the north and east, and similarly existing close-board timber fencing along the site's southern boundary (reaching 5m in height) with adjacent landscaping beyond will entirely restrict views of the 2.4m fencing from the south. Views of the proposed security fencing are likely to only be taken from the west, i.e. within the setting of the wider industrial park, where views are not considered to be sensitive in nature. As such, the inclusion of fencing just 2.4m tall in height, with a CLD wire design to allow views through the fencing to the building beyond, is not considered to adversely harm the character and wider appearance of the site.

5.31 In a similar vein, the 4m high security fence proposed along the southern site boundary will be entirely screened from views taken from the south by the existing 5m tall close-board acoustic fence, thus no adverse design and amenity impacts will be caused through its introduction. Again, the landscaped buffers running along the northern and eastern boundaries are likely to screen the majority of the perimeter fencing in any instance.

5.32 Even if oblique, partly-interrupted views through to the fencing can be taken from the north and east of the site, the minor increase in height of just 1m above the consented fencing height along the northern and eastern boundaries, for security purposes, will not be discernible when taken in the context of the site's immediate setting i.e. being sited immediately adjacent to a c.14.5m warehouse building. As such, the minor increase in perimeter fencing heights of 1m above the currently approved fencing heights along these boundaries are not considered to cause adverse harm in respect of design and amenity considerations.

5.33 The reduction in height of the 15m acoustic timber fence in the southern part of the site, previously required for noise attenuation purposes, now taken to 6.6m given acoustic attenuation enhancements proposed for the ground-level generators, is considered to be a demonstrable design enhancement, by reducing the visual impact of the consented arrangement in this location. This point was explicitly acknowledged by LBH Officers during pre-application discussions, and this revision (noting the acoustic justification set out earlier in Section 5 of this report) should be welcomed.

5.34 On balance, it is clear that the revisions to the fencing arrangements within the site and around its perimeter will not have an adverse visual impact upon surrounding land uses, thus retaining existing amenity for surrounding residential and commercial properties. Therefore, in regard to design policy guidance identified

above, the fencing proposals are entirely appropriate and acceptable, in addition to the aforementioned security benefits provided by the revised fencing arrangements which should be afforded great weight.

Wider Operational Alterations

5.35 Noting the site's existing industrial character and form at present, the introduction of operational features including access stairs for the generators, a second loading door on the building's western façade, a roof access hatch and the introduction of an adiabatic water storage tank in the southern part of the site are not considered to be incompatible with the site's prevailing materiality and appearance. The scale, form and design of these features will be subservient in nature to the wider existing, and consented, built form at the site. The majority of these changes will only be visible from within the site itself, or from views from the west (i.e. within the industrial park itself) and given the prevailing industrial character of the site and the wider park, it is not considered that these operational features will cause any adverse impacts upon the appearance, character and overall design of the site and the proposed development.

5.36 To reiterate the points raised above, excerpts of amended drawings and model views prepared by Stephen George + Partners are provided below with summarising commentary in respect of the design considerations associated with the relevant operational features proposed.

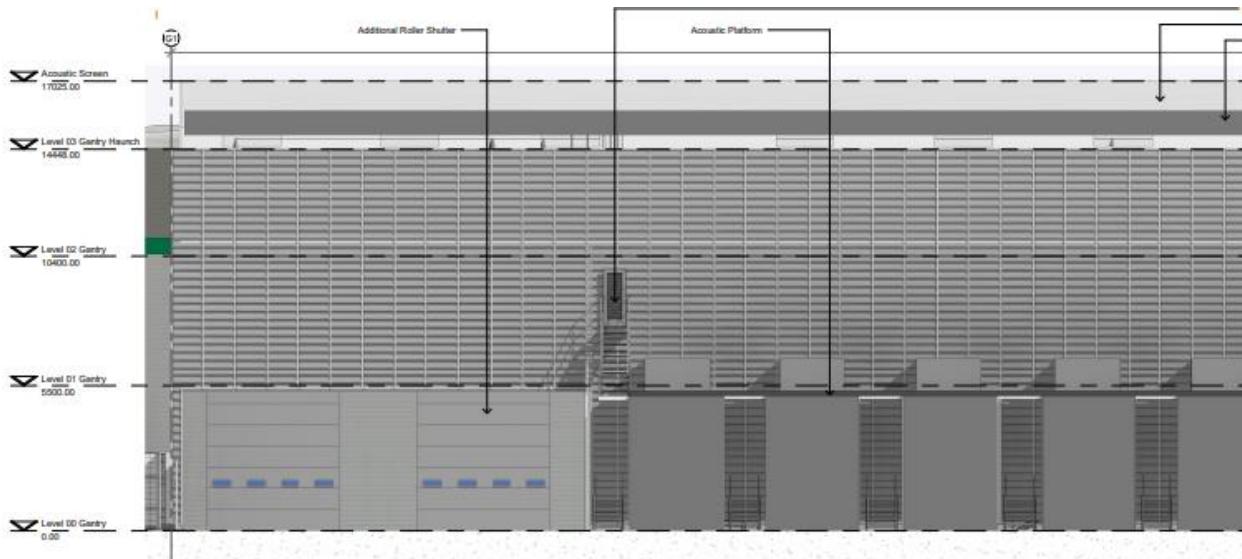


Figure 5.1 - Excerpt of Proposed Western Gantry Elevation Drawing – the additional loading door proposed appears entirely congruent and in keeping with the wider composition, structure and materiality of the consented western façade profile. The additional roller door integrates successfully within the façade design.

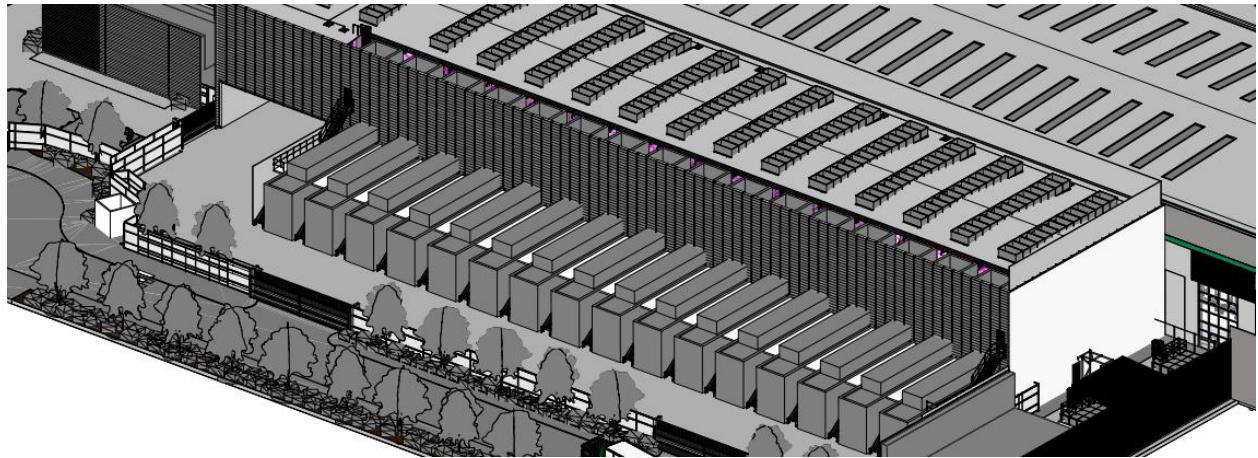


Figure 5.2 – excerpt of 3D Model (included within Proposed Gantry Elevation Drawing) – the two sets of access stairs proposed at either end of the consented gantry structure are clearly subordinate and sympathetic in scale, form and character to the wider gantry structure and surrounding plant equipment. When considered against the adjacent built form, the stairs do not appear incongruous or overbearing. Taking the wider scale, form and overall context of the site's appearance into considerations, particularly the gantry structure and associated plant in the service yard area, the stairs are considered to effectively integrate within the wider materiality and prevailing character of the site.

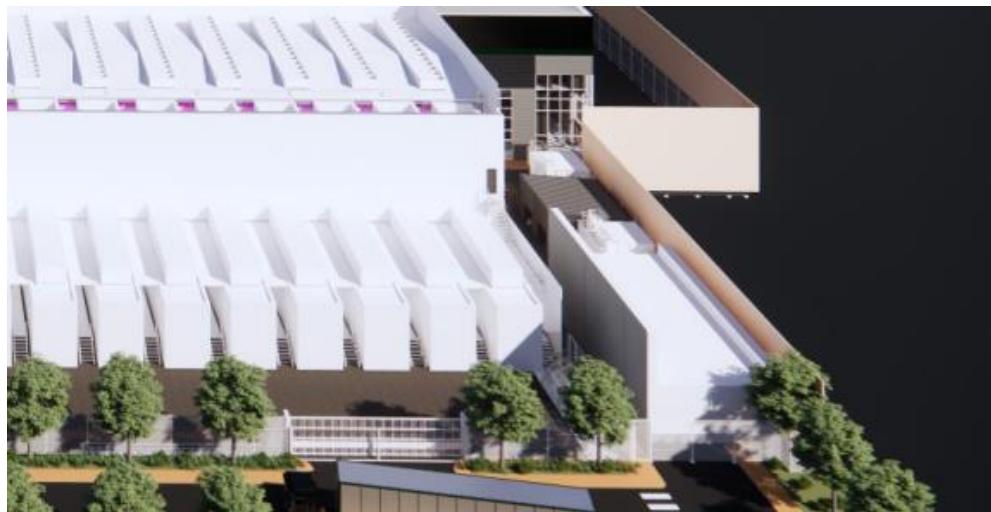


Figure 5.3 – Excerpt of Coloured Model View (from Design and Access Statement Addendum) – the adiabatic cooling tanks (located immediately behind the consented substation in the above model view) are screened on all sides by built form, namely the consented gantry to the north, the existing warehouse building to the east, the proposed 6.6m acoustic fence to the south, and the consented substation to the west. Noting the site's prevailing industrial character, and acceptance of wider plant equipment consented under the previous

planning permission on-site, the materiality and form of the tanks is considered entirely appropriate and acceptable, with the surrounding built form screening the proposals ensuring no adverse design impacts result from the proposed inclusion of the tanks.

5.37 Noting the above, the scale, form, composition and overall prevailing design of these operational features proposed at the site is considered to be entirely appropriate when taking the site's existing industrial character and appearance into account. These alterations would not detrimentally alter the site's character and would not adversely harm the amenity of surrounding stakeholders, commercial or residential, and as such the proposals are considered to be acceptable in planning policy terms in respect of design and amenity matters.

Alterations to Window Arrangements (Northern Façade)

5.38 Minor alterations are proposed to the location of windows serving first floor office space on the northern façade of the building. It is proposed to reposition these windows at a greater height within the façade, with no windows to be lost as a result of this minor alteration.

5.39 Noting the overall scale, composition and materiality of the northern building façade as consented, the relocation of the windows introduces no new elements to this elevation, instead only relocating consented window arrangements slightly higher within the building façade. There are no sensitive land uses located immediately north of the site, from which alterations to the design and composition of the northern façade could impact in design/outlook terms. As such, the northern façade is considered to be less sensitive to design alterations, and given this proposed revisions in question seek only to partially relocate a small number of windows to a greater height in the same façade, with no alteration to their scale, composition or appearance, the revisions are considered to be acceptable in design terms, when viewed against prevailing policy directives.

Acoustic Attenuation Features

5.40 The design of the proposed acoustic attenuation features has been considered in respect of the potential visual effects, and any subsequent amenity impacts, that such features could bring about through their introduction.

5.41 In the first instance, it is important to recognise that the acoustic attenuation proposed for the ground-level generators will only be discernible from short-range views from the west of the site, from within the industrial park itself. Given the scale and form of the consented generators, the minor addition of acoustic attenuation features to the plant in this location (particularly when viewed against the backdrop of the consented gantry structure and its associated scale, form and materiality) will appear subservient and congruent with the wider character and profile of the development. Views to the generator attenuation will not be possible from the east and south, from residential properties, given screening afforded by existing built form, and thus no subsequent impacts on visual amenity or outlook will arise from these features.

5.42 In respect of the gantry-top attenuation features proposed, it should be noted that given the depth of the existing warehouse building on-site and subsequent distance between the gantry structure and residential properties east of the site, views taken from said residential properties will not identify the acoustic lid, nor the acoustic screen beyond the profile of the warehouse building. As such, views from the east of the site in respect of the proposed gantry-top attenuation will be unaffected by the introduction of attenuation features proposed within this application.

5.43 From the north and south of the site, despite the introduction of the acoustic lid and acoustic shrouds atop the chiller plant, views to these features will be screened through the introduction of the acoustic Caice panels along the northern and southern boundaries (as well as the eastern boundary) of the gantry structure. Therefore, the acoustic lid and shrouding attenuation will not cause adverse visual impacts in these directions. It should also be noted that no immediate concerns regarding the acoustic lid, in respect of any perceived visual impacts, were raised during pre-application discussions with LBH.

5.44 Given there are no adjacent, sensitive land uses to the north of the site (with the site bound by vegetation and railway lines due north, with wider industrial land uses further northward), the visibility through to the proposed acoustic screen, when taking the consented profile of the gantry structure and existing warehouse building into account, is not considered to lead to detrimental impacts upon visual amenity in this direction.

5.45 Views from residential properties to the south/southeast of the site through to the site and the proposed acoustic screen have been considered in further detail, in respect of the potential visual effect and subsequent amenity implications. The screen would sit only 2.557m above the consented gantry structure, which in itself measures 14.448m at its highest point; a height deemed acceptable in-principle by LBH given the approval of the prior data centre application at the site in May 2023. As such, it is important to consider the visual effects upon views from residential properties southeast of the site in relation to the gantry structure as approved by LBH, and then accounting for the marginal increase in height through the introduction of the gantry screen above that height already considered acceptable by LBH.

5.46 Within the Design and Access Statement Addendum, a comparative study of perspective views, taken from ground and first floor level from a residential property south of the site on Nine Acres Close, has been provided. The comparative study demonstrates firstly that existing views immediately north/northwest from those residential properties closest to the site on Nine Acres Close are already characterised by industrial built form noting the existing warehouse building on-site, and similar industrial built form located immediately west (off-site, but within the same industrial park). Therefore, the surrounding areas north and west of residential properties on Nine Acres Close are already exposed to views of industrial built form and associated scale, form and materiality even before the introduction of the acoustic screen.

5.47 The comparative, perspective views also identify that the gantry structure approved by LBH in May 2023 will be partially visible from the selected residential property in question to the south of the site at first floor level;

however, when viewed against the existing warehouse building profile, the gantry appears subservient and therefore minimal in respect of its scale, discernibility and subsequent visual impact.

5.48 By assessing the perspective views prepared (excerpts included below for completeness), it is clear that any minor extent of the acoustic screen visible from ground and first floor levels of the sample residential property south of the site would, like the consented gantry structure, also appear subservient to the existing scale of the warehouse building on-site at present. The limited extent of the screen visible from the nearest residential properties south of the site, when taking the existing, and consented, built context of the site into account, demonstrates that the acoustic screen would have extremely limited discernibility against the building profile as existing, and also as 'consented' under the May 2023 permission, and thus no adverse visual impact nor impact upon residential amenity (through loss of daylight, sunlight or overlooking) would occur.



Figure 5.4 – 'Consented' Perspective View – Ground Floor Level – Sample Nine Acres Close Property



Figure 5.5 – 'Proposed' Perspective View – Ground Floor Level – Sample Nine Acres Close Property



Figure 5.6 – ‘Consented’ Perspective View – First Flood Level – Sample Nine Acres Close Property



Figure 5.7 – ‘Proposed’ Perspective View – First Flood Level – Sample Nine Acres Close Property

5.49 The perspective view comparisons shown above demonstrate that despite a marginal increase in built form through the introduction of the acoustic screen, aside from the technical, acoustic justification for this feature, the additional built form visible would appear subservient and sympathetic in context to both the scale and form of the existing, industrial uses already in-place at the site, and also to the additional consented gantry structure profile. As such, it is clear that the screen would not be so significantly discernible from views taken from the south so far as to lead to adverse visual and wider amenity impacts for local residents.

5.50 To further reduce the discernibility and perceived scale of the gantry screen, the proposed materiality of the acoustic screen, formed of Caice acoustic panels, has been designed so as to integrate the screen effectively

within the wider materiality, form and composition of the consented gantry structure, thus reducing the prominence and overall discernibility of the screen further.

5.51 The acoustic screening is not continued along the western side of the gantry structure. Given that views from the west of the site will be taken from within the existing industrial park, these views are already characterised by industrial structures and associated forms, scales and materialities. As such, despite views through to the acoustic lid and shrouding, and surrounding acoustic screen, will be visible from the west within the industrial park, these features are not considered to adversely impact the existing industrial character of the site itself and the surrounding industrial park, and as such visual impacts from western views will be extremely limited, if not non-existent, when taken in this context.

5.52 In summary, the proposed acoustic attenuation will clearly not lead to adverse visual nor amenity impacts upon surrounding land uses. Residents to the east will have no direct view to the proposed attenuation measures proposed. It has also been demonstrated that any views through to the acoustic screen from residential properties from the south, when accounting for the scale, form and overall profile of the consented gantry structure against the existing warehouse building, will not lead to adverse visual impacts, nor will the acoustic screen lead to any subsequent impacts upon outlook, privacy or daylight and sunlight. In this regard, the acoustic attenuation measures proposed, taking into account the abovementioned planning policy directives in respect of design and amenity, are entirely appropriate and acceptable.

Highways Considerations

5.53 NPPF Paragraph 116 states clearly that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

5.54 At a local level, Policy DMT 1 of the LBH Local Plan Part 2 notes that in order for development proposals to be acceptable, they are required to have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.

Parking Quantum

5.55 Due to the inclusion of an adiabatic cooling plant water storage tank at ground floor level to support adiabatic cooling systems for the consented data centre, a reduction of 6no. parking spaces is proposed. In the first instance, it should be clarified that no blue badge parking spaces are included within the 6no. spaces to be removed.

5.56 The principle of parking reduction at the site has already been established previously through the consented loss of 23no. parking spaces under Planning Permission Ref. 18399/APP/2022/411. The Delegated Report for the previous application, states in regard to parking requirements that:

“Unlike a more traditional B8 use of the building (e.g. as a logistics and industrial distribution warehouse), data centres tend to have much lower occupancy rates, with significantly fewer people employed on-site, and as such, the intended use would be unlikely to require high levels of parking. Additionally, there would be fewer daily traffic movements and deliveries by large articulated and maintenance vehicles, although these would still occur periodically”.

5.57 A similar justification in regard to the acceptability of parking reduction, to support data centre functions in LBH, was also provided within Planning Permission 77241/APP/2022/1407 at Prologis Park West, to the northwest of the site. A reduction of 40no. spaces in that instance was justified within the respective Delegated Report, where it was stated that data centre uses do not require as much parking on a site as industrial uses do, and thus the loss of 40no. spaces was appropriate in that instance.

5.58 Noting the precedence set by the two aforementioned permissions, one of which relating to the application site itself, a reduction of only 6no. parking spaces in this instance is considered to be entirely appropriate and acceptable in context. In this regard, pre-application feedback received from LBH Planning Officers in respect of the proposals directly acknowledged that data centres generate less vehicle movements which would therefore require less car parking. The proposal to reduce the number of parking spaces from 75no. to 69no. was considered therefore to *“be unlikely to impact on highway safety, parking stress or the capacity of the local highway network”*.

5.59 The inclusion of the adiabatic water storage tank to assist with cooling systems for the data centre, in support of its wider functionality and operation, should be strongly welcomed in-principle i.e. through *“facilitating development to meet the needs of the modern economy”* including data centre operations, as set out in NPPF Paragraph 86(c). On balance, the reduction of only 6no. parking spaces to accommodate this plant to support the functionality and operation of the data centre is considered entirely appropriate and acceptable therefore.

5.60 The previous permission granted at the site, to allow the existing warehouse to operate as a data centre via the installation of plant and equipment, included no condition to restrict the use of the development for data centre purposes, noting that the previous description of development directly cited the use of the site for data centre operations. It is important to recognise that the previous permission at the site resulted in the reduction of nearly four times more parking spaces than the proposed additional 6no. spaces currently sought to be reduced as part of this application, yet no such condition to restrict the use of the site for data centre purposes was considered necessary or reasonable at the time of granting permission.

5.61 In this context, any imposition of a planning condition upon the approval of this Section 73 application, to restrict the use of the site for data centre purposes, would not be considered necessary or reasonable in the context of the scale of the parking reduction sought, and thus any such condition would not pass the relevant tests set out in Paragraph 57 of the NPPF. The investment being made in respect of converting the site for data centre operations is considered to provide sufficient comfort in respect of the planned long-term

operations of the site for data centre uses to the local authority, avoiding the need for a condition which as set out above would not be considered reasonable or necessary, and thus unjustified.

5.62 In summary, the minor reduction in parking proposed, to facilitate the delivery of supporting plant equipment for the wider function and operation of the consented data centre (to which significant weight should be afforded) is considered to be entirely acceptable in planning policy terms, noting the previous precedence set for greater parking reductions seen for data centre permissions at the site and elsewhere in the borough. The proposals are therefore compliant in this respect with prevailing planning policy directives and should be supported.

Blue Badge Parking Layout

5.63 The current data centre permission at the site comprises 8no. blue badge parking spaces, with 5no. spaces located in the northern part of the site and the remaining 3no. spaces located in the southern part of the site.

5.64 The proposals seek to relocate the 3no. spaces to the northern part of the site, which previous pre-application feedback from LBH acknowledged to be acceptable in-principle. The retention of 8no. blue badge spaces would continue to assist with providing appropriate, well-located disabled persons parking in line with London Plan Policy T6, is therefore acceptable in planning policy terms.

Electric Vehicle Charging

5.65 The proposals would also result in the relocation of 5no. electric vehicle charging points, with the introduction of an additional 5no. electric vehicle charging points. The enhanced electric vehicle charging provision should be welcomed in order to support more 'green' modes of travel in line with national, regional and local sustainable travel objectives.

6. Conclusion

- 6.1. This Planning Statement has been prepared in support of an application made pursuant to Section 73 of the Town and Country Planning Act (1990) (as amended), submitted to the London Borough of Hillingdon on behalf of Virtus London 14 Limited in respect of Unit D Prologis Park, Hillingdon.
- 6.2. Planning Permission Ref. 18399/APP/2022/411 was granted at the site on 3rd May 2023 for the following:
"Installation of plant and equipment to unit DC6 including external plant equipment, external louvres and associated security fencing and landscaping, to facilitate use of the building as a data centre".
- 6.3. During the detailed design process, discussions with the equipment manufacturer for the chiller plant and generators has confirmed the sound power levels arising from this plant equipment. In order to ensure suitable, compliant external noise levels at the nearby residential and commercial façades in accordance with Conditions 10 and 11 respectively attached to Permission Ref. 18399/APP/2022/411, additional acoustic mitigation is now proposed as part of this Section 73 application.
- 6.4. The additional mitigation measures proposed include the installation of a profiled acoustic 'lid' above the gantry-top chillers, with a three-sided acoustic screen comprising Caice composite acoustic panels proposed to the northern, eastern and southern sides atop the consented gantry structure along with acoustic shrouding for the chillers. Additional attenuation is proposed to the standby generators at ground level.
- 6.5. As a result of the proposed acoustic mitigation measures now proposed, the previously-consented 15-metre acoustic screen (along the southern site boundary) is proposed to be reduced to c6.6 metres in height, whilst still ensuring that the noise limits for the standby generators (in respect of Condition 11) can be complied with in full.
- 6.6. Alongside these changes, the applicant is proposing a number of other revisions at the site to support the effective operation of the site as a data centre whilst increasing site security and safety for employees and visitors.
- 6.7. This Statement has assessed the proposed development against the Development Plan and has demonstrated that the proposals broadly comply with said Development Plan taking into account material considerations. It is therefore respectfully requested that the proposed development is recommended for approval at the earliest opportunity.