

Colt Hayes Digital Park

EIA Screening Opinion Request

August 2024

Prepared on behalf of Colt Data Centre Services



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Project:	Colt Hayes Digital Park
Client:	Colt Data Centre Services
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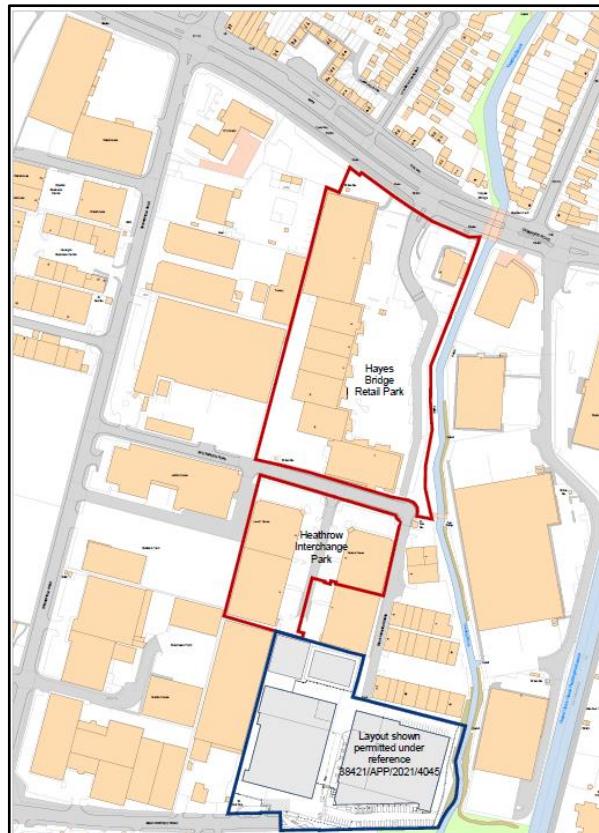
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EIA Screening Opinion Request

1. Introduction

- 1.1 On behalf of Colt Data Centre Services (the 'Applicant'), Savills is writing to request a formal Environmental Impact Assessment ('EIA') screening opinion from London Borough of Hillingdon Council ('LBH / the Council') in connection with proposed data centre development on land at Hayes Bridge Retail Park and Heathrow Interchange Park ('the Site / the Proposed Development').
- 1.2 The description of development for the purpose of this EIA Screening Opinion Request is "*the Redevelopment of site to deliver data centre campus and technology centre*".
- 1.3 This request for a screening opinion is made under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'). In accordance with Regulation 6(2) of the EIA Regulations, this report contains:
 - A site plan.
 - A description of the development and demolition works required.
 - A description of the aspects of the environment likely to be significantly affected by the development.
 - Where information is available, a description of any likely significant effects of the proposed developments on the environment.

Figure 1 Site location plan



2. The Site

2.1 The Site is comprised of two land parcels which, together, have a site area of approximately 4.5 hectares ('ha') but are separated from each other by Bullsbrook Road, an adopted highways which serves other premises within the wider commercial area.

2.2 The northern parcel (to the north of Bullsbrook Road) is roughly rectangular in shape and includes several units currently utilised as part of the Hayes Bridge Retail Park. Hayes Bridge Retail Park consists of a terrace of seven retail units and a standalone commercial bank (Metro Bank) set around a central surface car park which is accessed from the Uxbridge Road. The retail terrace is equivalent to two storeys in height whilst the bank is single storey and has been constructed more recently than the retail terrace. The retail park is in an increasingly derelict site as more units have become vacant. It is bound to the north by Uxbridge Road, to the east by the Yeading Brook, to the south by Bullsbrook Road, and to the west by an undeveloped parcel of land which benefits from planning permission for a hotel (ref. 69827/APP/2021/1565) and the Hyatt Hotel beyond.

2.3 The southern parcel (to the south of Bullsbrook Road) is known as Heathrow Interchange Park. Heathrow Interchange Park consists of a series of industrial units arranged into two parallel terraces which are orientated north-south and separated from each other by an open yard with parking and vehicle turning which is served by Bullsbrook Road. Each terrace is split into two units resulting in a total of four units within Heathrow Interchange Park. The Heathrow Interchange Park Site is bound by Bullsbrook Road to the north, Brook Industrial estate to the east (the site that the Applicant is redeveloping to deliver two data centres to the south (ref. 38421/APP/2021/4045)) and a business park to the west.

2.4 The Site is located on the urban fringes of Hayes and Southall circa 1.1km West of Southall town centre, circa 1.6km East of Hayes Town centre and, circa 4.3km North East of Heathrow Airport.

2.5 The northern parcel of the Site has an application approved subject to the agreement of a S106 (ref. 1911/APP/2022/1853) for "*Demolition of existing buildings and erection of a single commercial building for employment purposes Class E(g)iii, B2 and B8, along with ancillary offices, gatehouse, associated infrastructure including; service yard, car parking, drainage and hard and soft landscaping*". This application was recommended approval at committee and was not considered EIA development.

2.6 Existing site levels are generally flat. The Site is predominately within Flood Zone 2, with a medium risk of flooding according to EA flood risk mapping. The Yeading Brook located adjacent to the Site is a statutory main river. The majority of the Site is of low risk of surface water flooding, with some areas of the Site classified as low and medium risk (up to 3.3% annual chance of localised flooding).

2.7 Geological mapping and environmental data records indicate that the site is underlain by superficial deposits comprising Langley Silt Member (clay and silt) in the western part of the site and the Lynch Hill Gravel Member (sand and gravel) in the southern part of the site. No superficial deposits are mapped in the eastern part of the site. The superficial deposits are underlain by the London Clay Formation.

Local context

2.8 The Site is within an Urban location with the immediate surroundings primarily characterised by other commercial, retail and industrial units. The Site is bound by such uses to the east, west and south. To the north, the character of the area is predominately residential, with the nearest residential receptors to the Site located 38m north off Uxbridge Road.

- 2.9 The east the Site is immediately bound by the Matrix Tiles and Bada Business Limited units with an SSE and Cash and Carry unit further west. There are several other commercial units located further west off Springfield Road. The Minet Country Park is located circa 280m west and the River Crane located circa 490m west. The A312 'The Parkway' lies past the river with an area of housing and another retail park lying beyond this.
- 2.10 To the south lies Beaconsfield Road and Nanaksar Primary school (circa 200m south) and the Hayes and Yeading Football Club Stadium (circa 205m south). The mixed-use redevelopment of the Former Southall Gas Works lies beyond this, with the site currently under construction with permission for up to 6,250 dwellings.
- 2.11 Immediately east lies the Yeading Brook, with the Veetec motor group premises, Sky Furniture and Lighting Store and BMI Redland Depot lying across the brook. The Gran Union canal lies beyond this circa 180m east. Further to the east lies an area of housing off the Bankside.
- 2.12 The Site is located within the LBH Air Quality Management Area (AQMA), which runs from the south boundary of the Borough up to the railway line north of the A40, comprising approximately two thirds of the borough.
- 2.13 There are no nationally environmentally designated sites on the Site or within 2km of the Site. The nearest ecologically designated Site is the Yeading Brook, Minet Country Park and Hither Brook Park SINC, which is located adjacent to the Site. There are a number of heritage assets within 2km of the Site, the nearest of which being the Grade II listed Church of St George building approximately 570m North East. Also of note is the South West Canalside Conservation area located circa 180m East.
- 2.14 There is a Public Right of Way (PRoW) near to the Site. The Hayes Towpath: 'Bulls Bridge to Yeading Lane' runs alongside the Grand Union canal to the East of the Site.
- 2.15 The Site does not lie in a Local Authority Archaeological Priority Zone and does not contain any nationally designated (protected) sites such as Scheduled Monuments or Registered Parks and Gardens.
- 2.16 There are no active potable groundwater abstractions within a 1km radius and the site is not located within a groundwater Source Protection Zone (SPZ).

3. The Proposed Development

- 3.1 The Proposed Development comprises the demolition of the majority of existing buildings on the Site to provide three main data centres along with associated office space. The maximum proposed building heights are up to 56m. The massing of the Proposed Development will be designed as a cluster with the north of LON 7 being the highest point and buildings stepping down progressively to the north and south.
- 3.2 The primary access for the Site will be from the north via the existing junction on Uxbridge Road. The data centres will require a number of below-ground services which will be provided under the internal access road.
- 3.3 In the north of the Site, a technology start-up centre is proposed fronting onto Uxbridge Road. The intention is that the scale and massing of this building seeks to mirror the podium of the permitted adjoining hotel (ref. 69827/APP/2021/1565), stepping upwards from Uxbridge Road.
- 3.4 A landmark data centre building (marked LON 6 on Figure 2) is proposed to the south of the technology start-up centre. It is currently proposed that office space will be provided as a central core within the overall massing of the building. A further data centre building (LON 7) will be located to the south in the southern portion of the Hayes Bridge Retail Park site. The location of this portion of the Site sits centrally within the wider commercial area and its comparative

distance from sensitivities outside of the Site means that this is likely to accommodate the tallest of the buildings proposed (up to 56m).

- 3.5 The third data centre building (LON 8) will be located on the western part of the Heathrow Interchange Park to the south of Bullsbrook Road. This is proposed to be a single data centre building with adjoining offices in the front. This steps down in height from the data centre buildings to the north and is proposed to be 38m in height.
- 3.6 A substation is proposed in southeast of the site where Unit 1 of the Heathrow Interchange Park is currently located. This substation is to serve the permitted scheme at Beacosnfield on a temporary basis and then go on to support the data centres proposed for the Proposed Development at Heathrow Interchange and Hayes Bridge Retail parks.
- 3.7 In addition to the office and databank structures, there will be a gated entrance, fencing and a security point to help keep the Site secure and offer passive supervision. The design of the scheme aims to utilise screening from landscaping and other proposed building to minimise the impact of these measures.
- 3.8 The Proposed Development will be bordered by landscaping on the southern, eastern and northern sides. A wildlife corridor and buffer area is proposed around the Yeadng Brook, and tree and hedgerow planting around the proposed buildings. Structural landscaping and the provision of an enhanced public realm along the Site's northern boundary with Uxbridge Road is also proposed. Each data centre is expected to have a dedicated car parking area on the eastern side with an additional area of parking located north of the sub-station. The areas below the carparks and service yards will be used for water attenuation and fuel storage.
- 3.9 An illustrative layout showing a potential option for developing the Site based on emerging designs can be seen in Figure 2 below.

Figure 2 Illustrative Layout



- 3.10 As part of the Proposed Development several features of the Site are proposed to be retained. The existing Metro Bank at the north eastern corner of Hayes Bridge Retail Park will be retained but with the extent of its car parking likely reduced and strategic landscaping enhanced along its boundary with Uxbridge Road and the Yeading Brook. Whilst currently subject to a lease with a long unexpired lease, the proposals can enhance the relationship that it has with its context.
- 3.11 Bullsbrook Road will be retained in its current location as well as Unit 2 of Heathrow Interchange (which sits outside the Site boundary).

4. EIA Screening

Introduction

- 4.1 In determining whether the Proposed Development constitutes EIA development, consideration should be given to the following:
 - If the proposed development is of a type listed in Schedule 1 of the EIA Regulations.
 - If not, whether it is listed in Schedule 2 of the EIA Regulations.

- Is it located within or partly within a sensitive area.
- Does it meet any of the relevant thresholds and criteria set out in Schedule 2 of the EIA Regulations.
- Would it lead to likely significant effects on the environment?

4.2 These points are explored further in this section with reference to the EIA Regulations and supporting Planning Practice Guidance ('PPG').

Schedule 1 Projects

4.3 The Proposed Development is not of a type listed in Schedule 1.

Schedule 2 Projects

4.4 Schedule 2 identifies development types where, if the relevant threshold criteria are exceeded, further consideration is required (with reference to Schedule 3) in order to determine whether significant effects are likely, in which case, EIA is required. We consider that the Proposed Development falls within Part 10 (a) of Schedule 2:

"(a) Industrial estate development projects."

4.5 The criterion to be considered for Part 10 (a) Industrial Estate Development Projects is given in column 2 as:

"the area of the development exceeds 5 hectares."

4.6 The Proposed Development may also be considered to fall under Part 13(b) of Schedule 2 (changes and extensions to Schedule 2 developments) if the LPA considers this project to be an extension of the already consented data centre development, however the criteria for Part 13(b) would be the same as Part 10(a).

4.7 The area of this development proposal is on a site of around 4.5ha which is below the 5ha threshold. However, when considered in combination with the adjacent site to the south, the total area of both developments exceeds this. Whilst the development to the south does not form part of the Proposed Development and benefits from planning consent data centres under application 38421/APP/2021/4045, given the Applicant is the same and the potential for cumulative impacts, it was agreed with the LPA to screen the Proposed Development in this context. The proposal is has therefore been considered as Schedule 2 development for which screening the need for EIA should be conducted. The EIA Regulations provide that development listed in Schedule 2 is EIA development if it is likely to have a significant effect on the environment by virtue of certain factors such as its nature, size or location.

4.8 The PPG sets out further guidance and criteria against which Schedule 2 developments should be considered and provides that EIA is unlikely to be required for industrial estate development projects unless the site area for the new development is more than 20ha. Finally, it provides that key issues to consider in any determination would include the potential increase in traffic, emissions and noise.

4.9 This screening assessment has been prepared to indicate whether the Proposed Development would be likely to result in significant environmental effects. In order to achieve this, Schedule 3 of the EIA Regulations and the PPG need to be taken into account. Information on these is set out below.

4.10 Sensitive areas are defined in the EIA regulations as:

- Sites of Special Scientific Interest and European Sites.

- National Parks, the Broads, and Areas of Outstanding Natural Beauty.
- World Heritage Sites and Scheduled Monuments.

4.11 In certain cases, local designations which are not included in the definition of sensitive areas, but which are nonetheless environmentally sensitive, may also be relevant in determining whether an assessment is required. Furthermore, in considering the sensitivity of a particular location, regard should also be had to whether any national or internationally agreed environmental standards (e.g., air quality) are already being approached or exceeded.

Schedule 3 Criteria

4.12 Regulation 5 of the EIA Regulations states that when determining whether a Schedule 2 is EIA development, the relevant LPA must take into account in making that decision:

- (a) *any information provided by the applicant;*
- (b) *the results of any relevant EU environmental assessment which are reasonably available to the relevant planning authority; and*
- (c) *such of the selection criteria set out in Schedule 3 of the EIA Regulations as are relevant to the development. The three broad selection criteria included at Schedule 3 that should be considered are: 1. Characteristics of the development; 2. Location of the development; 3. Types and characteristics of the potential impact.”*

4.13 We have considered the Proposed Development against these below, having regard to the characteristics of the potential impacts.

4.14 Characteristics:

- The size of the development.
- The cumulation with other existing and/or approved development.
- The use of natural resources.
- The production of waste.
- Pollution and nuisances.
- The risk of major accidents.
- Risks to human health.

4.15 Location:

- The existing land use.
- The relative abundance, quality and regenerative capacity of natural resources in the area.
- The absorption capacity of the natural environment.

4.16 Potential Impact:

- The extent of the impact (geographical area and size of the affected population)..
- The nature of the impact
- The transboundary nature of the impact.
- The intensity and complexity of the impact.

- The probability of the impact.
- The duration, frequency and reversibility of the impact.
- The cumulation of the impact with the impact of other existing and/or approved development.
- The possibility of reducing the impact.

Consideration of Cumulative Effects

4.17 PPG (Environmental Impact Assessment: Paragraph: 024 ref: 4-024-20170728) states:

"Each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."

4.18 In addition, the PPG (Paragraph: 025 Reference ID: 4-025-20170728) states:

"An application should not be considered in isolation if, in reality, it is an integral part of a more substantial development (Judgment in the case of R v Swale BC ex parte RSPB [1991] 1PLR 6). In such cases, the need for Environmental Impact Assessment must be considered in the context of the whole development. In other cases, it is appropriate to establish whether each of the proposed developments could proceed independently (R (Candlish) v Hastings Borough Council [2005] All ER (D) 178 (Jul); Baker v Bath & North East Somerset Council [2009] All ER (D) 169 (Jul))."

4.19 The following Environmental Impact Assessment screening checklist is to aid the Council and ensure that the relevant issues are considered and to provide a clear audit trail, as suggested by the PPG.

5. Consideration of the Proposed Development

Application Thresholds	
i. Does the Proposed development fall within Schedule 1 (Y/N)?	No
ii. If yes, what is the applicable description?	-
iii. Does the Proposed development fall within Schedule 2 (Y/N)?	Yes
iv. If yes, what is the applicable description?	10(a) Industrial estate development projects
v. Is any part of the Proposed development to be carried out in a defined Sensitive Area (see Regulation 2(1))	No
vi. What is the applicable threshold/criteria in Schedule 2?	The proposed development Site does not exceed the 5ha threshold, however, if considered in the context of the consented scheme to the South, the threshold is exceeded.*
vii. Does the Proposed development meet/exceed the applicable threshold (Y/N)?	Yes
If yes to (iii) and then (v) or (vii) the proposed development will require EIA if it is likely to have significant effects on the environment.	

*Given the site area and its context with the consented data centre scheme adjacent to the south of the Site (Ref:38421/APP/2021/4045) it was agreed with LBH to screen the Proposed Development.

Possible effects on the environment
<p>The following information has been prepared with reference to the selection criteria for screening Schedule 2 development, provided in Schedule 3 of the EIA Regulations:</p> <ol style="list-style-type: none">1. Characteristics of development (a) – (g)2. Location of development (a) – (c)3. Characteristics of the potential impact (a) – (h) <p>Features of the proposed development and any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment have been identified as per the PPG guidance at Paragraph 023 of the Environmental Impact Assessment chapter (ID 4-023-20170728).</p> <p>The Applicant has a good understanding of the possible environmental effects of the Proposed Development and, as such, the illustrative layout of the Proposed Development includes inherent environmental mitigation to respond to the constraints and potential impacts on and off site.</p>

Possible effects on the environment

In the absence of inherent and additional mitigation and in advance of any judgments of the significance of individual effects, the possible environmental effects of the proposals are considered to be:

- Air quality – from emissions and dust generated during the construction phase and emissions resulting from the operation of the Proposed Development.
- Noise and vibration – from the construction and operational phases of the Proposed Development.
- Landscape and visual effects – local impacts on surrounding human receptors through the development of the Site; near and far-field views of the buildings from the road network, public rights of way, and residential properties.
- Social and environmental effects – including the creation of new employment during construction and operation.
- Transport – the traffic movements associated with the construction phase of the Proposed Development on the local road network.
- Biodiversity and ecology – the effects on existing biodiversity and ecology from the development of the Site and introduction of new landscaping.
- Risks to human health – the risk of accidents or disasters resulting from the construction phase of the Proposed Development.
- Climate change – the effects on climate through GHG emissions during the construction and operation phase.
- Ground conditions – the effects on ground conditions through the mobilisation of potential contaminants during the construction phase.

A Screening Criteria Question	B Response to the Screening Criteria question and explanation of reasons (Yes/No or N/A)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons) If the answer in Column B is 'No', Column C is not applicable.
Natural resources		
<p>Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area?</p>	<p>No</p> <p>Existing site levels are generally flat. The Site has been previously developed so it is not considered that any significant topographical changes would be required to facilitate the development. As such, significant amounts of natural resources are not expected to be necessary in order to create a suitable development platform.</p>	<p>N/A</p>
<p>Will construction or operation of the project use natural resources above or below ground such as land, soil, water, materials/minerals or energy which are non-renewable or in short supply?</p>	<p>Yes</p> <p>The vast majority of the materials required for the construction of the Proposed Development are common natural and manufactured materials generic to the construction of industrial estate developments. The fit-out of the data centre will require the procurement of servers and other</p>	<p>No</p> <p>Taking into account the scale and nature of the Proposed Development, significant effects related to consumption of natural resources during construction are not considered likely and would be suitably controlled through the implementation of</p>

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	<p>related equipment such as microchips and electronic boards which contain critical raw materials and rare earth elements, such as gold and palladium.</p> <p>During the construction phase, certain activities require water, including some common mitigation measures used to control potential demolition and construction impacts, such as dust dampening.</p> <p>During the operational phase, water consumption associated with the commercial and office uses will occur. Due to the heat output from the data centres, cooling systems will be required which may also involve water usage.</p>	<p>standard best practice construction techniques (to be set out in a Construction Environmental Management Plan ('CEMP') and secured via planning condition).</p> <p>The Proposed Development is not considered to be of a magnitude which would lead to any significant strain on the local or regional water resource or other natural resources. Furthermore, the Proposed Development will include measures to promote sustainable water use through design where possible.</p>
<p>Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g., forestry, agriculture, water/coastal, fisheries, minerals?</p>	<p>No</p> <p>The Site is previously developed brownfield land within an urban environment. As such there are not considered to be any areas of particular high quality or scarce resources on or within the vicinity of the Site.</p> <p>The Site is not safeguarded for minerals as part of the local development plan. If any minerals were found to be present on the Site, extraction would not likely be viable, due to the nature of the size and surroundings of the Site. Therefore, the Proposed Development will not sterilise this</p>	<p>N/A</p>

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	<p>resource or have a significant impact on the region's mineral provisions.</p> <p>The Site is within an urban environment and, with reference to MAGIC.gov.uk, is not designated as Best and Most Versatile Agricultural Land. Therefore, the Proposed Development will not have any impacts related to soils or the availability of agricultural land.</p>	
Waste		
Will the project produce solid wastes during construction or operation or decommissioning?	<p>Yes</p> <p>During the demolition and construction phase, waste will be generated on-site with the highest quantities of waste typically generated during demolition and earthwork.</p> <p>Given the proposed usage, during the operational phase there will likely be a negligible amount of solid waste production associated with the data centres. Some commercial waste will be produced associated with office space and the technology start up centre.</p>	<p>No</p> <p>During demolition and construction, the approach to sustainable ways of working will seek to optimise construction methods and material use, and implement best practice waste management, retaining as much as possible of any excavated material within the development area. The nature and scale of the Proposed Development is such that solid waste produced during construction and the management of that waste, including from removal of the structures already built on Site. Is considered unlikely to result in significant effects.</p>

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		<p>Furthermore, demolition waste will be reused wherever possible and materials that cannot be used will be disposed using a licensed waste operator. A Construction and Operational Waste Management Plan will be submitted alongside the planning application, as will a Circular Economy Statement.</p> <p>The nature of the Proposed Development is such that excessive or abnormal waste generation is unlikely to occur during operation. Whilst there will be some waste production associated with the office and ancillary uses, this is unlikely to increase above the current baseline levels given the existing use as a retail park. Therefore, it is considered that there is sufficient waste capacity within the borough to accommodate the Proposed Development without causing any significant effects in relation to waste generation and disposal.</p>
Pollution and Nuisances		
Will the project release pollutants or any hazardous, toxic or noxious substances to air?	Yes	The primary influence on air quality will take place during demolition and construction, with emissions
	No	Whilst there is likely to be some dust creation during demolition and construction, this would be controlled by appropriate planning

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	<p>and dust generated from demolition activity and construction traffic being the primary source.</p> <p>During the operational phase, the Proposed Development will likely reduce the number of vehicle trips on the surrounding road network from the current baseline as the data centres are likely to generate fewer vehicle journeys than the current retail and industrial uses.</p> <p>During operation, hydrotreated vegetable oil (HVO) fuelled generators are required for emergency backup power generation. Grid failures are incredibly rare and, historically, have been for less than an hour per year. These are expected to require routine maintenance startups which will be a temporary localised source of air pollution. Compared to diesel, HVO is a cleaner fuel type with a lower level of associated particulates.</p>	<p>conditions. Through the adoption of standard best practice measures, the likely residual impact of the Proposed Development is not considered to be significant in accordance with Institute of Air Quality Management (IAQM) guidance. Mitigation measures such as implementing a dust management plan, ensuring screens are placed around dust producing activities and using dampening techniques would further reduce the potential dust impacts. Overall, it is considered unlikely that the Proposed Development will result in significant air quality effects during the construction phase.</p> <p>During operation, given there is likely to be a reduction in vehicle trips, it is considered unlikely that significant effects on air quality will occur due to transport related impacts through emissions. Furthermore, air quality impacts from construction vehicle emissions can be reduced through best practice construction techniques, such as ensuring that vehicles are not left idling.</p> <p>The use of HVO fuelled generators for emergency power generation may result in temporary localised effects on air quality.</p>

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		<p>However, given the temporary nature and the relatively infrequent use of the generators, it is unlikely this would result in a significant impact.</p> <p>An Air Quality Assessment will be submitted alongside the planning application and financial obligations under a Section 106 agreement may be provided towards implementing the borough's Air Quality Action Plan measures.</p>
<p>Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?</p>	<p>Yes</p> <p>During the demolition and construction phase, construction traffic and machinery will generate new sources of noise and vibration. The closest noise sensitive receptors to the Site are the residential properties to the North off Uxbridge Road (approximately 38m at the closest point).</p> <p>Noise during operation is restricted to the emergency backup generators which will require temporary startups for maintenance purposes, and any external plant associated with the proposed use.</p> <p>During the operational phase, the data centres will produce heat through the operation of servers and plant. Cooling systems will be used to maintain the</p>	<p>No</p> <p>Noise and vibration associated with the construction of the Proposed Development has the potential to impact upon the nearby residential receptors which are considered to be of high sensitivity. However, given the existing noise baseline is characterised by industrial, road and commercial noise, as well as from air traffic at Heathrow Airport, it is considered that noise generated by the Proposed Development would be consistent with the noise landscape and could be accommodated without resulting in significant effects.</p> <p>Impacts during the demolition and construction phases will be temporary in</p>

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	internal temperatures and residual heat will be removed and dissipated into the atmosphere.	nature and will be limited to daytime hours via commitments in the anticipated CEMP. Although the construction works will be carried out during the daytime, some equipment, such as power generation plant for security or lighting, may be required to run at night. All plant will be selected, maintained and positioned to minimise potential noise impacts. It is therefore considered that demolition and construction impacts can be appropriately mitigated through the use of appropriate equipment and standard best practice methods. During operation, noise generated by the backup generators is restricted to temporary maintenance / testing or emergency situations. Given the distance to the nearest sensitive receptors, it is considered unlikely that any significant effects will occur. Testing can be scheduled to take place to avoid periods in the day where the background noise level is low. An important contextual consideration is that the proposed site itself has historically operated as a commercial / industrial / retail premises. Likewise, planning permission was

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		<p>granted for the redevelopment of Hayes Bridge Retail Park to deliver an industrial unit. The presence of industrial and commercial sound sources is therefore not new to the existing receptors and the introduction of the new items of plant is not considered to alter the character of the existing acoustic environment. A Noise Impact Assessment report will be submitted alongside the planning application.</p> <p>The potential residual heat generated from the data centres may have localised impacts (at a site level) around the cooling plant, however, given the scale of the Proposed Development this is not considered to result in any significant effects in terms of heat and microclimate.</p>
<p>Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?</p>	<p>Yes</p> <p>The Site is previously developed land so there is a potential that the land has been previously contaminated through these uses. It is understood that historical uses on the site include sheet metal works, bakery, trye factory in the northern parcel and public houses off Uxbridge road. As such, there is the potential for Made Ground to be present as a result of the redevelopment at the site.</p>	<p>No</p> <p>If contamination is found on site during the construction phase, best practice procedure will be followed to ensure the risk to receptors is minimised. Standard best practice construction processes will ensure the risk of contamination to watercourses and land is minimised. These measures will be implemented via the CEMP. Likewise, it is</p>

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	<p>There is the potential for contaminants and ground gas to be present within the underlying soils. These sources could impact receptors including construction workers, future site users, offsite residents/users of the adjacent properties and the proposed buildings.</p> <p>The risk of contamination to land or surface water is considered to be limited to the demolition and construction stages. During the construction phase, there will be a requirement to build new foundations to ensure structural integrity. This activity could mobilise any contaminants present, exposing them to potential pathways (e.g. disruption of the water table) from which controlled waters (groundwater / surface water bodies) could be affected by contaminated soils and groundwater.</p> <p>The nearest surface water receptor sensitive to water pollution is Yeading Brook. Whilst the Yeading Brook is adjacent to the eastern boundary, the underlying geology for the majority of the site is considered to have a low permeability. Measures to restrict and prevent run-off from reaching the brook could be achieved through good site practices and agreeing certain mitigation through a CEMP.</p>	anticipated that planning conditions relating to ground contamination would be attached to any permission, including those requiring a submission prior to the commencement of development. A ground investigation and quantitative risk assessment will be undertaken to assess potential risks to receptors.

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<p>Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g., where existing legal environmental standards are exceeded, which could be affected by the project?</p>	<p>Yes</p> <p>Obligations under the Environment Act 1995 require local authorities to declare an AQMA at sensitive receptor locations where National Air Quality Strategy ('AQS') Objectives have been or are predicted to be exceeded. The Site is within the LBH AQMA, which was declared in 2003 due to exceedances in nitrogen dioxide emissions criteria. The AQMA covers the entirety of the southern part of LBH.</p>	<p>No</p> <p>Whilst there is likely to be a temporary increase in vehicles and plant activities on the Site during the demolition and construction phases, it is not considered that this will be of a scale that would lead to significant effects on the AQMA. Furthermore these would be temporary in nature. As noted above, air quality impacts will be controlled through best practice construction techniques and the production of a CEMP.</p> <p>During operation, it is currently anticipated that the Proposed Development may lead to reductions in overall vehicle movements. Therefore, air quality impacts associated with vehicle movements are unlikely to increase above the current baseline and are not considered to be significant.</p> <p>It is also noted that the previously consented use on the northern parcel of the Site for an industrial unit (1911/APP/2022/1853) was deemed acceptable without having adverse impacts on the highways network and would have resulted in a higher number of HGV movements than the Proposed Development.</p>

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Population and Human Health		
<p>Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?</p>	<p>No</p> <p>The Site's location within the UK is such that natural disasters, including those caused by climate change, are not considered to represent a likely risk to the Proposed Development.</p> <p>The Proposed Development will be designed in accordance with recognised and accepted best practice in terms of highway design, specification of drainage and current building regulations. It is considered that, whilst there is always a potential risk of an accident, this risk is managed through design measures and through compliance with statutory design guidelines, such that a significant environmental impact is unlikely.</p>	<p>N/A</p>
<p>Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example, due to water contamination or air pollution)</p>	<p>No</p> <p>During the construction phase, a temporary increase in HGV movements could present an increased accident risk on the local road network. However, given the scale of the development, the current uses (associated with HGV movements) and the implementation of temporary construction traffic controls, it is not considered that a significant risk will arise. Therefore, this consideration can be</p>	<p>N/A</p>

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	<p>suitably addressed through the planning application process.</p> <p>The level of risk during construction will be managed through a combination of mitigation, design and good working practice measures set out in a CEMP. This will control potential effects to human health via dermal absorption, ingestion or the inhalation of particles, in particular for those working on-site who are in closest proximity to the operations.</p> <p>Other potential impacts that may pose a risk to human health, such as air or noise pollution, are not considered likely to occur due to the nature of the Proposed Development.</p>	
Water Resources		
<p>Are there any water resources including surface waters, e.g., rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?</p>	<p>No</p>	<p>A review of the EA indicative Flood Maps shows that the majority of the site is located within Flood Zone 2, i.e. land defined as having less than 1 in 100 but greater than a 1 in 1,000 annual probability of flooding from river or sea in any year. However, it was noted within the Flood Risk Assessment for the previous application on the Site that a review of the EA Product 4 detailed flood model levels for the</p>

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	<p>adjacent Yeading Brook identified the majority of the Site located in low-risk Flood Zone 1, except for a small area in the south east corner.</p> <p>As the Site area is greater than 0.5ha, a Flood Risk Assessment is required to be submitted with the planning application. This will consider the flood risk on Site and the impact upon the flood risk of the local area.</p> <p>As the Site is currently developed, the Proposed Development would not result in any material change in non-permeable surfaces on site.</p> <p>The Yeading Brook is located adjacent to the East of the Site. A drainage strategy will be submitted with the planning application which will ensure that surface water is suitably managed to minimise the risk of impacts. The drainage strategy will look to incorporate suitable forms of Sustainable Drainage Systems (SuDS) which help to reduce the risk of flooding and reduce the level of pollutants in runoff.</p>	
Biodiversity (species and habitats)		
Are there any protected areas which are designated or classified for their terrestrial,	Yes	The Site does not contain any designated ecological assets and the surrounding area has

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<p>avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g., wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local)).</p>	<p>very few designated and non-designated ecological sites due to the urban location. The nearest statutory designated site is Yeadings Meadows Local Nature Reserve (LNR), approximately 1.5km northwest of the Site. Given the distance between the Site and other sites of ecological importance, it is not considered that significant environmental effects will arise as no ecological links currently exist.</p> <p>There is a locally designated SINC located adjacent to the Site at its nearest point (Yeadings Brook (which runs along the eastern boundary), Minet Country Park and Hitherbroom Park). This SINC covers approximately 67.86ha, and comprises areas of recently created rough grassland, areas of older natural meadow and damp and aquatic habitats. The brook and country park support a wide range of flora, including Pale Persicaria Persicaria lapathifolia, Squirrel-tail Fescue Vulpia bromoides, Musk Mallow Malva moschata, Lesser Reedmace Typha angustifolia, Arrowhead Sagittaria sagittifolia, and Pepper Saxifrage Silaum silaus.</p>	<p>implemented during the proposed construction works to prevent potential pollution (e.g. dust, noise, lighting and surface run-off) entering the brook and surrounding areas. This would be secured and implemented through a CEMP.</p> <p>The Proposed Development will include measures such as a buffer between the SINC as well as landscaping which will help minimise any potential impact. Therefore, significant environmental effects on designated sites are considered unlikely to occur.</p> <p>With regards to Yeadings meadows LNR, given the small size of the development and the intervening distance, it is considered unlikely that the redevelopment of the Site will have any direct or indirect adverse effects upon this designated site.</p> <p>Appropriate ecological survey work and Biodiversity Net Gain plans and management information will be submitted during the course of the application which will help to avoid the risk of harm to ecological assets,</p>

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		designated sites and biodiversity both on Site and at nearby ecological sites
<p>Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g., for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?</p>	<p>Yes</p> <p>The Site is primarily comprised of retail and industrial units. The areas around the buildings are dominated by hardstanding associated with car parking and site access. Small areas of landscaping are present on the Site in the north of the Site on the boundary of Uxbridge Road, as well as within the existing car park and along the boundaries of Bullsbrook Road. However, overall, the Site is considered to be of low ecological value. The habitats present on the Site are likely to consist of common and widespread species.</p> <p>The Yeading Brook River Corridor adjacent to the Site contains dense vegetation along the boundaries which likely has some limited ecological value.</p> <p>Aside from the area adjacent to the water course, the Site has a relatively small number of green infrastructure assets which would offer opportunities for wildlife. The proposed landscaping scheme would likely improve the number of such assets.</p>	<p>No</p> <p>The Site itself is previously developed so likely has negligible ecological value and therefore the Proposed Development would be unlikely to detrimentally impact the ecological value of the Site.</p> <p>With regards to the Yeading Brook River Corridor, the emerging design will incorporate embedded mitigation through the provision of landscaping and new planting which will reduce the impact on biodiversity to ensure that significant adverse effects are avoided. Moreover, there is scope for Biodiversity Net Gains to be delivered compared to the existing situation.</p> <p>Overall, the Proposed Development, including the demolition of the existing buildings, is not considered to cause the loss of any significant or important habitats in the area, or adversely impact any protected or sensitive species.</p>

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Landscape and Visual		
<p>Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project?¹ Where designated indicate level of designation (international, national, regional or local).</p>	<p>No</p> <p>The Site is not within or nearby to a National Landscape (previously AONB). The nearest National Landscape is approximately 16km north west of the Site.</p> <p>There are no other landscape designations on or nearby to the Site and therefore significant effects on designated landscape sites are not anticipated.</p>	<p>N/A</p>
<p>Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)</p>	<p>Yes</p> <p>The Site is visible from various viewpoints including from Uxbridge road adjacent to the Site's northern boundary and from other commercial and retail estates in the vicinity of the Site. The Site is also visible from residential properties off Uxbridge road.</p> <p>The Proposed Development will result in an increase in built form and heights, therefore views of the Site will change through the demolition,</p>	<p>No</p> <p>The Site currently has an urban character. At a site level, the townscape will change as a result of the new built form. However, within the context of the wider environment, given the existing urban character of the Site and surrounds, it is not considered that the Proposed Development would result in significant urbanising effects. It is also a context that is evolving with a number of</p>

¹ See question 8.1 for consideration of impacts on heritage designations and receptors, including on views to, within and from designated areas.

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	<p>construction and occupation phases. The increased height will result in a greater zone of visibility around the Site.</p>	<p>nearby approvals permitting increases in height.</p> <p>The design of the Proposed Development seeks to improve the visual quality of the current development within the Site so would be unlikely to have a significantly detrimental impact on the visual amenity of the area. The initial designs have also sought to incorporate landscaping features to help reduce the visibility of some elements of the scheme and to improve the overall aesthetic quality.</p> <p>An initial visual assessment has been undertaken by iceni as part of the Pre-app and it is considered that the Proposed Development is sympathetic to the setting of the surrounding heritage assets and would enhance the existing townscape of Uxbridge Road. The maximum height of the proposal is of a similar scale to the emerging heights seen across Hillingdon and Ealing, and more specifically responds to the cumulative schemes on Uxbridge Road. The Site would create a new 'cluster' of taller development, which would be consistent with its role within the urban hierarchy of Uxbridge Road. It also aligns with policy expectations for the</p>

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		<p>intensification of industrial uses within this location.</p> <p>Overall, the proposal would introduce height to the Site, but from short and long range views the Proposed Development would be understood in a wider context of taller buildings. Any visible parts of the proposed buildings will be seen within the existing urban context and will become familiar over time following any initial change. Therefore, whilst there will be a visual change at some receptors, it is not considered these will be significant in EIA terms.</p>
Cultural Heritage/Archaeology		
<p>Are there any areas or features which are protected for their cultural heritage or archaeological value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation</p>	<p>No</p>	<p>There are no designated heritage assets on the Site but there are a number of listed buildings in the vicinity, the closest of which are within a 1km radius of the Site (see site description). The Site benefits from a degree of containment by existing settlement pattern and landform. As such, it is considered the Site has the capacity to accommodate the Proposed Development without significantly impacting the setting of nearby</p>

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(international, national, regional or local).	<p>heritage assets.</p> <p>The Site is not located within an archaeological priority area and contains no designated buried heritage assets (such as scheduled monuments). There are no overriding archaeological constraints to the Proposed Development. During construction, standard best practice working methods will be followed to ensure that, should any below ground non-designated heritage assets be discovered, appropriate mitigation fieldwork will ensure adverse impacts are avoided.</p>	
Transport and Access		
Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	Yes	The Hayes Towpath: 'Bulls Bridge to Yeading Lane' runs alongside the Grand Union canal to the East of the Site circa 180m which could be impacted by the Proposed Development.
Are there any transport routes on or around the location which are susceptible to congestion, or which cause environmental problems, which	Yes	Given the urban location of the Site, the surrounding road network could be susceptible to congestion and

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could be affected by the project?	<p>therefore the associated environmental impacts (such as driver delay).</p> <p>During the construction phase, HGVs and construction related vehicles will be required to access the Site and use the surrounding road network to remove and import materials. This may exceed the current baseline, although the Site is currently used for industrial activity and therefore the baseline will account for some HGVs using the local road network currently.</p> <p>During operation, it is likely that traffic flows from the Site will reduce.</p> <p>The Site is in an area with poor public transport accessibility. It is, however, still accessible by bus routes and is located within a 30-minute walk to two train stations. Cycle paths and pavements are located throughout the wider area, including routes to the Site.</p>	<p>the business park are a prominent feature of the existing environmental baseline.</p> <p>Vehicle movements can be controlled through appropriate traffic management and routing agreement with restrictions imposed over timings as appropriate. A temporary impact could arise during construction on local traffic which could affect people who live and work in the area. However, the Site is within an area with well-established road and travel infrastructure. Therefore, with the implementation of standard control methods, significant environmental effects are not considered likely during construction phase.</p> <p>Once operational, the Proposed Development would likely reduce the number of vehicle trips on the surrounding road network. Given the proposed use, the composition of vehicles accessing the Site would predominantly be cars, although some HGV trips may be required. Given the surrounding industrial land uses to the west of the Site, commercial vehicle movements are an existing feature on the surrounding road network. Therefore, the Proposed Development is not considered to introduce a</p>

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		significant negative change in vehicle composition on the network. The overall scale and nature of the Proposed Development is not considered likely to result in significant adverse effects on traffic or transport. Consequently, it is not considered that the scheme warrants an EIA on transport grounds.
Land Use		
<p>Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g., housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.</p>	<p>Yes</p> <p>The Site is located within the Hayes Bridge Retail Park and the Heathrow Interchange Industrial Park. Elements of these parks are proposed for demolition, which are currently used for retail, industrial and commercial purposes.</p>	<p>No</p> <p>The current retail park is largely vacant and low density in an out of centre retail park. It is not considered that the loss of the existing retail units would be significant due to the number of remaining units. Furthermore, the Site is located a short distance from the Hayes Town centre (circa 600m west of the Site) which could offer alter sequentially preferable retail premises.</p> <p>There are likely to be some short term employment benefits during the construction period. However, given the scale of the Proposed Development, significant effects are not likely to occur.</p>

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<p>Are there any plans for future land uses on or around the location which could be affected by the project?</p>	<p>Yes</p> <p>The land to the south of the Site has planning consent for a new data centre under application reference 38421/APP/2021/4045 and the land to the north west has extant permission for refurbishment and extension of a hotel, reference 2385/APP/2022/2952.</p>	<p>No</p> <p>Whilst these proposals are adjacent to the Site, it is not considered that the Proposed Development would lead to significant effects on these future projects.</p> <p>The consented data centre application to the south of the Site is consistent with the land use of the Proposed Development, as such would not introduce any sensitive receptors to the site (for example occupiers of residential dwellings).</p> <p>Once operational, the Proposed Development is expected to generate limited traffic (below the current baseline levels), therefore would not adversely impact the operation of the data centre development to the south.</p> <p>The future visitors and workers of the hotel development to the north would be more sensitive to disturbance impacts from the constitution of the Proposed Development (depending on construction phasing), however, as noted above given the scale of the Proposed Development and likely duration of construction impacts it is not</p>

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		<p>considered that this would give rise to any significant impacts on occupiers of the hotel.</p> <p>Illustrative emerging designs for the Proposed Development respond to the surrounding development proposals in terms of height and massing and would not alter the Site existing urban character.</p> <p>Further considerations of cumulative effects are set out below.</p>
Land Stability and Climate		
<p>Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g., temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?</p>	<p>No</p>	<p>The Site's location within the UK is such that natural disasters, including those caused by climate change, are not considered to represent a likely risk to the Proposed Development. For example, it is considered that the likelihood of an earthquake with a magnitude sufficient to cause damage to buildings and/or loss of life occurring and impacting the Site is extremely low.</p>
Cumulative Effects		

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<p>Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?</p>	<p>Yes</p> <p>In respect of potential cumulative effects with other development, PPG advises that <i>“each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development”</i> (ID 4-024-201740728).</p> <p>Consideration has been given as to whether there is potential for likely significant effects to occur through the combination of the Proposed Development with other existing or approved developments. A GIS search of the Glenigan planning application database has been conducted, which looked to identify planning applications within 3km of 80 dwellings or more or 1,000sqm commercial space or more. The search returned 26 sites which have received planning consent.</p> <p>Following a further sifting process the key sites identified which have the potential to give rise to cumulative effects are listed below.</p>	<p>No</p> <p>A qualitative review of the cumulative schemes has been undertaken. The Site is separated from surrounding areas by a number of linear constraints, including the Grand Union Canal to the north, the mainline railway to the south and the M25 to the east. These linear constraints separate the Site from the majority of the cumulative schemes reviewed, which is considered to limit the possibility of significant cumulative effects with those schemes.</p> <p>The key consideration of cumulative effects has been given to the proposed data centre under application 38421/APP/2021/4045 due to its location adjacent to the Site to the south, and the proposed hotel development (69827/APP/2021/1565) adjacent to the north. As part of the cumulative effects assessment, a review has been undertaken of the technical assessments provided to support those applications.</p> <p>The technical assessment supporting these applications concluded that the potential environmental impacts would not be significant. Transport impacts were considered negligible and other</p>

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	<ul style="list-style-type: none"> • Land North of Beaconsfield Road (38421/APP/2021/4045). • 15-17 Uxbridge Road (69827/APP/2021/1565) and Hyatt Place (2385/APP/2022/2952). • Hambrough Tavern (223545FUL). • Avondale Drive Estates (765511/APP/2021/4502). • Southall Waterside Masterplan and the Green Quarter Phases 1, 2 & 3 (171562VAR; 160115REM; 216077REM; and, 205101REM). • The Green Southall (215058FULR3) 7. Kings House (164285FUL) and 13-15 the Green (216215FUL). • Project Union at Bulls Bridge (751111/APP/2020/1955). 	<p>environmental impacts related to AQ, Noise, Hydrology and Ecology were also considered to be minimal with the implementation of suitable mitigation. With regards to townscape and visual effects, overall the visual impacts from the proposals were considered to be predominantly localised, to within very close proximity of the application sites. Residents and visitors familiar with the area would consider the proposals as an expect element in the context of the industrial location.</p> <p>The cumulative context of the Site demonstrates the emerging context of the Site which includes increasing heights of 7-15 storeys and show the growth and intensification along Broadway, with an evolving sense of a potential 'cluster' marking the border of Hillingdon and Ealing. As such, it is considered that the Proposed Development will be absorbed within the wider context in cumulation with other approved schemes the effects of would not increase to a significant degree.</p> <p>Upon review of the wider sites listed in column B, it is noted that, through the</p>

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		<p>adoption of appropriate mitigation, limited significant environmental effects from these developments have been identified (in isolation or cumulatively with surroundings proposals).</p> <p>Furthermore, with regards to drainage, each development manages its respective impact through suitable drainage design to ensure no adverse effects on the water network. As such, cumulatively, the Proposed Development is not considered to cause any greater or significant effects. Given the similar nature of the Proposed Development and the urban context of the area, it is not considered that significant cumulative effects will occur.</p> <p>The potential for significant cumulative effects caused by the combination of a number of impacts on a particular receptor (taking into consideration impacts at both the construction and operational phases), which, acting together, may cause a greater significant impact collectively than individually, has also been considered.</p> <p>Based upon the considerations presented within this table and with the implementation</p>

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		of standard mitigation measures, significant cumulative effects related to the overall combined impacts are considered to be unlikely.
Transboundary effects		
Is the project likely to lead to transboundary effects? ²	No	Impacts are unlikely to be transboundary, given the scale and nature of the development proposed and its location within the UK.

² The Regulations require consideration of the transboundary nature of the impact. Due to the England's geographical location the vast majority of TCPA cases are unlikely to result in transboundary impacts.

6. Conclusion

- 6.1 The Proposed Development does not qualify as a Schedule 1 development. If considered as a standalone development, the proposal also fails to meet the 5ha threshold, however, if considered in the context of the previously approved scheme to the south, then this could exceed the applicable threshold criteria set out in Schedule 2 of the EIA Regulations. It therefore requires screening in order to determine whether significant environmental effects might be associated with its development, such that it is considered to be EIA development.
- 6.2 To determine whether the Proposed Development comprises EIA development, it is necessary for the LPA to consider whether it is likely to have significant effects on the environment, taking account of the selection criteria in Schedule 3 of the Regulations.
- 6.3 The Site is not within or partly within a sensitive area as defined in Regulation 2(1). The Site and adjacent land uses are not considered to be sensitive to the development of the Site. The consideration has included the assessment of cumulative impacts with other existing and/or approved developments in the vicinity.
- 6.4 Our assessment concludes that the characteristics and location of the development are unlikely to give rise to significant environmental effects, alone, or in accumulation with other developments.
- 6.5 The planning application in respect of the Proposed Development will be accompanied by the full suite of technical reports in order to address adopted policy and the Council's validation requirements.
- 6.6 Regulation 6(6) of the EIA Regulations advises that a LPA shall adopt a screening opinion within three weeks of the date of receipt of a request, and Regulation 5(5)(a) requires the main reasons for its conclusion to be identified, with reference to the relevant criteria listed in Schedule 3.
- 6.7 We trust the information provided above by the Applicant will assist the Council when adopting its opinion as to whether or not the Proposed Development constitutes EIA development.

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