

4 Consultation, Alternatives and Design Evolution

4.1 Consultation

EIA Consultation

- 4.1.1 Informal scoping discussions were undertaken with the Council between September and November 2025 to agree on the scope of the technical assessments to be included within the EIA. A Scoping Report was issued to the Council in October 2025 (see Appendix 4.1), identifying the environmental topics considered likely to be relevant to the Proposed Development.
- 4.1.2 As part of the pre-application meetings with LBH, discussions were held in relation to which topics would need to be considered as part of the Environmental Statement (ES). A Scoping Opinion was received on the 12th November 2025 (see Appendix 4.2). Further meetings were held with LBH and the project team to discuss the likely effects of the Proposed Development. In particular, discussions were focused on the potential impacts on air quality and climate change.
- 4.1.3 In addition to this, further technical consultation has also been undertaken as part of the ongoing EIA process with regard to the assessment scope and methodology for each of the scoped in topics. Further details of this are provided within Chapters 6 and 7.

Consultation with the LPA

- 4.1.4 As part of a Planning Performance Agreement (PPA), various pre-application discussions with statutory and non-statutory consultees and the local community all have an influence over the evolution of the design of the Proposed Development and the scope of the EIA. This section summarises the consultation process undertaken with key stakeholders and includes the key issues raised during these discussions. These pre-application enquiries are as follows:

Table 4.1 – Summary table of Consultation with LPA

Date	Points of discussion
6 August 2025	Pre-application meeting no.1 – A discussion with LBH over the planning strategy and the decision to submit two applications concurrently. Key agreements and comments include: LBH officers confirmed that the flexible use class supports B8 data centre use; Officers' concerns over the chiller decks and gantry extensions, which were deemed to be overly bulky and visually dominant; Façade alterations must be well integrated; for the applicant team to provide further design, landscape and transport swept path information.
12 August 2025	Air Quality Workshop – session to allow the applicant team to test assumptions, explore alternative designs and respond to LBH feedback.
28 August 2025	Site visit with LBH Officers
15 September 2025	Climate Change Workshop– session to allow the applicant team to test assumptions, explore alternative designs and respond to officer feedback.

Date	Points of discussion
15 October 2025	Pre-application design meeting no.2 – A discussion over the evolving design for the project Site, including updates on massing, gantry height, an externalised substation within the envelope, reduced parking and an updated view study. Key agreements and comments include: gantry height reduced by 1.67m; full floorplans/elevations and material details requested; substation proposed to be externalised with a new louvred façade, LBH requested clarity on banding, louvre density and visibility of the removed roof from multiple viewpoints; provide drawings showing the fence, hedge and tree relationships and BNG to be measured against true existing baseline, including green walls, with the expectations that the scheme can demonstrate a minimum 10% BNG uplift.
28 November 2025	Pre-application design meeting no. 3 – presented the latest gantry designs with pattern studies, elevations and key view renders. Updated substation information, including revised sections, louvres, bay spacing and Site visualisations. Key agreements and comments include: DC01 pebble pattern was considered visually repetitive and lacked clear subdivisions; the ‘tree and sticks’ pattern was viewed more favourably, offering greater potential due to increased variation, visual richness and stronger conceptual alignment; DC02 materials and green fins help break up the massing, further refinement is expected, with horizontal trim suggested over vertical fins; and improvements to substation was positive but further clarity is needed on louvre transparency.
9 December 2025	In-person design workshop – Applicant team presented multiple view studies for DC01 and DC02 gantries, including Wave and Fin cladding options for the DC01 façade. Key agreements and comments include: DC01 is in a sensitive location within the registered park and garden and requires refined, contextually sensitive design; DC02 gantry must remain visually subordinate to the existing building; develop a shared DC01 design language with geometric, refined patterns and colours that harmonise with existing buildings; DC02 is mainly seen from fast-moving, less sensitive views, so the gantry should blend with the building and remain visually recessive.
13 March 2026	Consultation Submission & design note – Applicant team submitted a revised DC01 gantry design with fins, reflecting feedback from the in-person design workshop. Documents include TVIA AVR views for the summer and autumn scenario, enlarged elevations with colour and material finishes, and detailed bay studies with key dimensions. Key agreements and comments for the full planning application include: the shift towards a consistent, standardised architectural approach is welcomed and represents a more robust redesign; a full Townscape and Visual Impact Assessment is required for the planning application submission; ensure ancillary elements (e.g. tanks and infrastructure) are integrated into the design or appropriately screened to minimise visual impact and, to provide a comprehensive landscaping strategy, including clear plans, sections and tree schedules.

- 4.1.5 Further details of this are provided within the Design and Access Statement (DAS) and Statement of Community Involvement (SCI) submitted as part of the suite of planning application documents.

- 4.1.6 The Proposed Development has evolved since conception, and work has been undertaken by the design team to address the comments made by officers, where possible. A detailed explanation of how the scheme has evolved to take account of the consultation process is provided in the DAS. Details of how this evolution has been informed by environmental considerations are set out below.

Public Consultation

- 4.1.7 As part of the original outline application (ref. 39207/APP/2020/2188), Prologis engaged extensively with elected representatives, community representatives and businesses as well as distributing letters to 3,964 residents and businesses inviting them to the public consultation event which ran from 2 June 2020 until 12 June 2020.

4.2 Alternatives and design iteration

- 4.2.1 Schedule 4, paragraph 2 of the EIA Regulations requires Environmental Statements to include:

‘A description of the reasonable alternatives (for example, in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.’

- 4.2.2 An assessment of the reasonable alternatives are included below.

Alternative Sites

- 4.2.3 The EIA Regulations do not require the full assessment of all potential alternatives, only a reasonable account of those actually considered by a developer prior to the submission of the planning application.

- 4.2.4 There are a number of Sites that could potentially be available for a data centre within a 5km radius of the Site. Most sites were either under construction, expired or pending a decision.

- 75111/APP/2020/1955 – As this Site is under construction, it is an existing commitment and cannot be included as an alternative provision.
- 78343/APP/2025/719 – Site has received a committee resolution to grant however, the quantum of development on site cannot meet the quantum of the Proposed Development in its entirety.
- PL/24/0754/OA – Has capacity for up to 72,000 sqm of data centre floorspace however, the Site is not within the applicant’s ownership and therefore, does not represent a sufficient alternative Site.

- 4.2.5 On the basis that there are no suitable alternative sites within the Applicants’ control within the area which aren’t already being developed or cannot provide the full quantum of development either in isolation or combined. Therefore, there are no available alternative sites considered by the Applicant or assessed in the EIA which would be deliverable.

Alternative development scenarios and design iterations

- 4.2.6 Given the nature and purpose of the Proposed Development, the assessment of reasonable alternatives to the development presented in the ES considers options within the following categories. Therefore assessment of alternatives has considered options within the following two categories:

- **Do Nothing:** Under this scenario no development is implemented at the Site and baseline conditions continue in their current trends. This option would not result in the delivery of a key piece of infrastructure on a site where two storage and distribution units have been constructed and lay vacant despite extensive marketing. The Site would remain in its current condition as a vacant industrial and logistics building. As such, under a 'do nothing' scenario, the substantial economic and supporting infrastructure benefits of the Proposed Development would not be realised. Furthermore, it is considered that the existing uses on the Site would continue to be underutilised.
- **A Different Design:** Under this scenario the Proposed Development is realised with alternative scales and layouts in the context of developmental constraints present at the Site. This option is discussed further below.

Design Evolution

- 4.2.7 The design of the Proposed Development has been developed to minimise the environmental impact and, where possible, deliver environmental enhancements.

Option 1: Retention of existing layout

- 4.2.8 Retaining the existing layout would involve not demolishing part of DC02 and would not involve installing the two gantries to the south of DC01 and east of DC02. This would involve retaining the existing layout inside the buildings.
- 4.2.9 Although this would limit the scale of visual change on the Site whilst also conserving embodied carbon through the lack of deconstruction on Site, this would significantly limit the capacity of the building and would not allow a Data Centre to operate efficiently, if at all, on the Site. The two units would likely continue to lay vacant.
- 4.2.10 As such, Option 1 was not considered appropriate for the proposals.

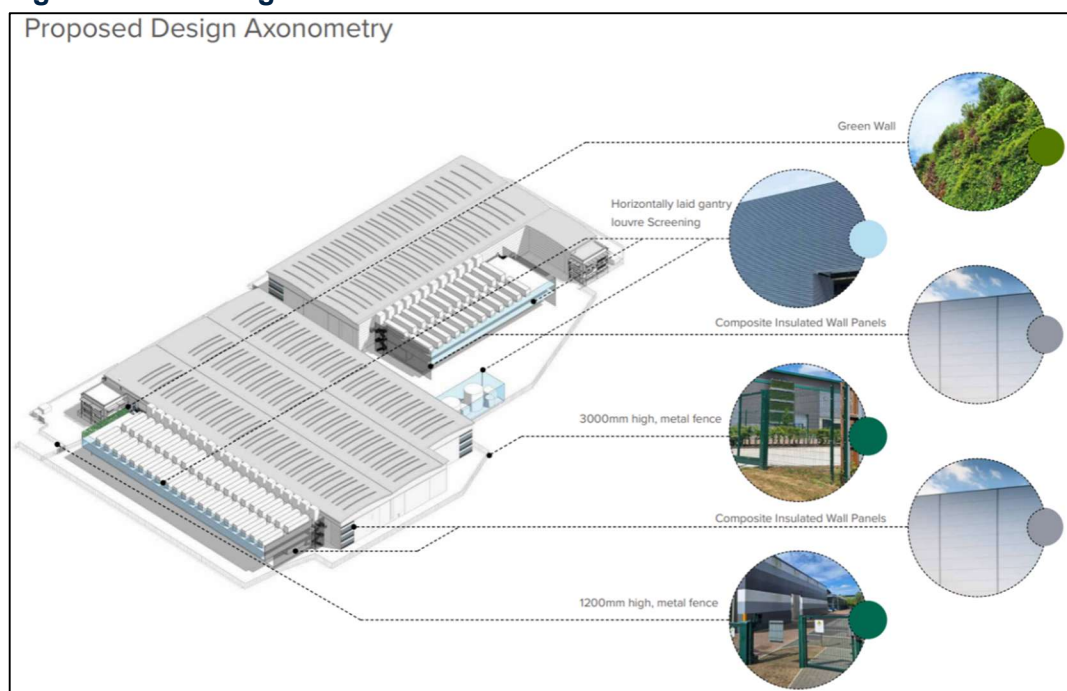
Option 2: Extension of DC02 and DC01 without deconstruction

- 4.2.11 The retention of most of the building and then expansion of DC02 to the east and the expansion of DC01 as shown without any deconstruction was also considered.
- 4.2.12 Although this option would also not involve any deconstruction, it would also result in slightly higher visual impacts, particularly from Stockley Road to the east and would not allow sufficient space for the proposals to be installed without significant tree loss on the eastern boundary of the Site.
- 4.2.13 As such, Option 2 was not considered appropriate for the proposals.

Option 3: The Proposed Site Layout

- 4.2.14 Following significant consultation by the design team with the LBH in a series of regular pre-application meetings, progress was made in line with the design objectives, key principles and layout. This included inputs from the technical project team to ensure, where possible, embedded environmental mitigation was factored into the designs.
- 4.2.15 Following an analysis of the Sites opportunities and constraints initial concept designs were produced. Figure 4.1 shows the initial massing sketches.

Figure 4.1 Massing sketches



4.2.16 Table 4.1 outlines further how environmental constraints and consideration of potential impacts have influenced the design of the Proposed Development.

Table 4.2 Key Design Changes and Influences

Environmental Topic	Change	Change and Influence on Environmental Impacts / Effects
Air Quality	A flue height review was incorporated into the design process to ensure that AQALs would not be exceeded and dispersion optimised within landscape and visual design constraints. The Site's back-up generator flues are provided with an unimpeded vertical discharge at 12.5m above ground with no structures above them.	By increasing flue height and optimising discharge characteristics, the design change improves the initial dispersion of exhaust pollutants, enabling emissions to mix more effectively with ambient air before reaching ground level. This has resulted in lower predicted concentrations of key pollutants, including NO₂ and particulate matter, at nearby receptors. The improved dispersion reduces the likelihood of exceeding AQALs and decreases the magnitude of potential effects on human health, residential properties, and sensitive ecological receptors located along the Grand Union Canal and within the wider area. In addition, the design adjustment helps to ensure compliance with relevant local, regional and national policy expectations, including London Plan requirements for developments to demonstrate an "Air Quality Positive" approach. Balancing the flue height with landscape and visual design constraints ensures that the optimisation of air quality outcomes does not give rise to unacceptable impacts in other environmental disciplines, thereby supporting a

Environmental Topic	Change	Change and Influence on Environmental Impacts / Effects
		more integrated and environmentally robust design.
Climate Change and Greenhouse Gases	Lean CO₂ emissions' reductions are achieved by the energy efficient design of the building and by implementing passive and active energy-saving measures where feasible. The key energy efficiency measures incorporated within the building are as follows: - Very high level of air tightness - High efficiency VRF for space heating with no gas on Site - Mechanical ventilation with heat recovery - High Efficacy LED Luminaires - Lighting control including presence detection.	The implementation of energy-efficient design measures reduces potential environmental impacts by lowering operational CO₂ emissions and improving overall building performance. These passive and active strategies not only contribute to meeting sustainability objectives but also reduce indirect impacts on air quality and climate change by optimising energy use throughout the building's lifecycle.
Other topics		
Ecology	A key element of the design evolution has been the retention and enhancement of green infrastructure across the Site. Where practicable, existing trees have been retained, particularly along the Site boundaries, to minimise the loss of habitat associated with the Proposed Development. Green infrastructure forms a key element of the Proposed Development. Landscaping proposals including enhancement of the existing landscape with the planting of new trees.	Retaining established trees reduces the scale of direct ecological impacts by preserving existing nesting, foraging and commuting opportunities for local wildlife. Mature trees also contribute to the Site's green structure from the outset, avoiding the temporary loss of canopy cover that would otherwise occur while new planting establishes. Boundary tree retention also provides immediate visual screening, helping to reduce both short- and long-term landscape and visual effects. This supports a more sensitive integration of the Proposed Development into its surroundings. The proposed green infrastructure measures will increase the diversity and extent of habitats on the Site compared with the existing baseline, offering improved opportunities for birds, invertebrates, and other urban wildlife. Over time, the establishment of new planting will create a more connected and resilient landscape structure, enhancing ecological functionality across the Site. Collectively, these measures contribute to achieving measurable Biodiversity Net Gain (BNG) by increasing habitat units and improving habitat condition and connectivity. The enhanced green infrastructure reduces the magnitude of adverse ecological impacts during both construction and operation, while delivering long-term ecological benefits that extend beyond the immediate Site boundary.

Environmental Topic	Change	Change and Influence on Environmental Impacts / Effects
Transport	Availability and promotion of sustainable transport options, including the provision of cycle parking. No change in Site access.	By improving facilities for cyclists and promoting sustainable travel behaviour, the development is expected to reduce reliance on private car use and minimise the number of vehicle trips generated during operation. Fewer car journeys will in turn help to reduce traffic-related emissions, including NO _x , PM ₁₀ and PM _{2.5} , resulting in lower contributions to local air quality impacts. Reduced vehicle movements also reduce noise generation, congestion, and energy use associated with transport, thereby helping to mitigate wider climate-related and environmental effects.
Hydrology	Design iterations undertaken as part of the Drainage Strategy have directly influenced the layout and configuration of the Proposed Development by ensuring that areas sensitive to surface water flooding and attenuation requirements are fully accounted for. By integrating surface water flood risk mapping and drainage constraints into the evolving site layout, the design has been refined to avoid high-risk areas, incorporate appropriate attenuation features, and optimise the management of runoff across the development.	These design considerations reduce the potential for adverse hydrological impacts by managing surface water at source, ensuring adequate storage capacity, and maintaining controlled discharge rates to the receiving network. As a result, the Proposed Development is expected to lower the risk of on-site and off-site flooding, minimise the likelihood of localised surface water accumulation, and prevent increased flood risk to neighbouring land. Incorporating these drainage-led refinements into the layout also supports compliance with sustainable drainage (SuDS) principles, improves the resilience of the development to future climate change scenarios, and contributes to the protection of water quality by reducing uncontrolled runoff.