

# Planning Statement

**DC5 and DC6, Prologis Park West, Iron Bridge  
Road North, West Drayton, UB11 1BT**

Updated July 2026

Prepared by:

**Savills**

Prepared for:

**Prologis UK Ltd**



# Contents

|    |                                                                         |           |
|----|-------------------------------------------------------------------------|-----------|
| 1. | <b>Introduction</b>                                                     | <b>3</b>  |
| 2. | <b>Site Overview</b>                                                    | <b>6</b>  |
| 3. | <b>Pre-Application Engagement, Public Consultation and EIA Approach</b> | <b>9</b>  |
| 4. | <b>Proposed Development</b>                                             | <b>12</b> |
| 5. | <b>Planning Assessment</b>                                              | <b>15</b> |
| 6. | <b>Conclusion</b>                                                       | <b>29</b> |

## Executive Summary

Prologis is bringing forward an application for planning permission which will enable the conversion of two completed but vacant logistics buildings to data centres.

Data centres have specific requirements, primarily around location, power availability, and fibre connectivity. The application site is a site which satisfies these criteria and its redevelopment will make a significant contribution to the delivery of additional data capacity in an Availability Zone where there is forecast need.

Repositioning of these buildings as data centres aligns with local, regional, and national planning policy (and decisions taken in this context) relating to the principle of development, both by making most efficient use of previously developed land and ensuring that the planning system responds to the needs of the modern economy by bringing back two vacant buildings into active use.

Aligned to this, the site's redevelopment will deliver a package of socio-economic benefits. At a national and international level, data centres underpin the digital economy and modern life, whilst, at a local and regional level, the site's redevelopment will deliver operational jobs, jobs whilst the construction work is ongoing, and support additional Government revenues.

It can do so in a way which is technical and environmentally sound with the planning submission demonstrating that the proposed development complies with all regional and local policy managing the impacts of development.

# 1. Introduction

## 1.1. Overview of Applicant

- 1.1.1. This Planning Statement has been prepared by Savills on behalf of Prologis UK Ltd ('Prologis').

### About Prologis

- 1.1.2. Prologis is the world's largest Real Estate Investment Trust (REIT), operating in more than 20 countries and managing \$215 billion in real estate assets. Through its global network, Prologis creates the infrastructure that powers commerce — connecting the digital and physical worlds to help 6,500 customers move faster, operate smarter, and grow sustainably.

### A Trusted, Long-Term Investor Driving UK Economic Growth

- 1.1.3. Prologis has been active in the UK market since 1998 and is recognised as a major inward investor, playing a critical role in supporting sustainable growth, jobs, and infrastructure.
- 1.1.4. Prologis has over \$10 billion of assets under management in the UK across 28 Prologis Parks where the equivalent of 2.5% of the UK's GDP flows through their facilities annually. Over 100,000 people are employed by the businesses operating from Prologis facilities, helping to drive productivity and economic resilience.
- 1.1.5. In September 2025, Prologis announced further UK investment intentions totalling \$3.9 billion, supporting critical drivers of growth identified in the Modern Industrial Strategy.

### Driving the Future of Digital Infrastructure

- 1.1.6. With more than 25 years' experience in data centre development, Prologis is uniquely positioned to meet the evolving needs of the digital economy. Combining global expertise, development capability and financial strength, the company is currently delivering data centres across some 20 sites worldwide — representing \$7–8 billion of additional investment by 2028.
- 1.1.7. Since 2016, Prologis has developed seven data centres in the UK and continues to explore further opportunities to help deliver the nation's ambition to build "cutting-edge, secure and sustainable AI infrastructure." At Prologis Park West London, the planned conversion of DC5/6 represents a projected \$1 billion investment — one that will play a vital role in strengthening the UK's digital backbone.

### A Global Leader in Sustainability and Innovation

- 1.1.8. Prologis is committed to achieving net-zero greenhouse gas emissions across its entire value chain by 2040. As a leader in real estate development, the company delivers sustainable, resilient facilities that support local communities and enable decarbonisation at scale. Prologis is also one of the world's largest providers of on-site solar energy, with UK facilities generating renewable power sufficient to supply thousands of homes.

## **1.2. Overview of Planning Application**

- 1.2.1. The application site consists of two warehouse buildings – known as DC5 and DC6 – which Prologis secured planning permission for and have completed (ref. 39207/APP/2020/2188). The two existing buildings are vacant. In the same way that Prologis has successfully developed the existing data centre buildings to the west of the site (operated by Virtus and known as LONDON 5, 6, 7, 8 and 14), Prologis is seeking to convert these two buildings into data centres.
- 1.2.2. This Planning Statement supports the planning application required to facilitate occupation of the buildings as data centres.
- 1.2.3. The application seeks full planning permission for the partial deconstruction and adaptation of the existing buildings including the installation of mezzanines in both buildings, the installation of a new sub-station and plant equipment to facilitate the conversion of the buildings to data centres. The description of development for this application is as follows:

*‘Partial deconstruction and adaptation of existing buildings; installation of mezzanines and new gantry decks housing MEP, a sub-station and fire suppression infrastructure; and associated physical works including alterations to the layout of the site.’*

## **1.3. Need for Additional Data Centre Floorspace and Benefits of Data Centres**

- 1.3.1. Data is central to nearly everything we do as a society. Its recent growth has been phenomenal: even reasonably historic figures suggest that on average Google processes more than 40,000 searches every second and that each minute 41,666,667 WhatsApp messages are sent, 52,083 users connect on Microsoft Teams, and 3.7m Mastercard and Visa transactions are made. The growth in data being created is also expected to double every two years.
- 1.3.2. Whilst these statistics may seem somewhat abstract, they are highly relevant as they highlight the ever-growing level of data that is being created globally which requires storing and processing. Data centres provide these essential services and are the places where the latest technology is deployed to host and accelerate data processing and data management.
- 1.3.3. In this way, data centres are critical national infrastructure (and were designated by Central Government as such in September 2024) that bring data transmission, storage and management – together with the supporting networks - into general or conventional definitions of infrastructure.
- 1.3.4. Data centres have specific requirements and cannot be located anywhere. Instead, they need to be close to the fibre network, have access to a sufficient amount of power, and, at the scale and type proposed by this application, be within an Availability Zone (a group of data centres connected over a redundant, high speed, low latency network).
- 1.3.5. The application site meets these specific requirements in that:
- Key fibre routes run along the Paddington to Swansea Railway Line, the site’s proximity to which and ability to use Stockley Road, means that connecting to this fibre network is possible;
  - Prologis has secured sufficient power from UK Power Networks as the Independent Distribution Network Operator for the conversion of the two buildings to data centres;
  - It is within the London Availability Region and, within this, the Hayes Availability Zone where the need for additional data centre capacity in the short term is not expected to be met with forecast supply.

- 1.3.6. Aligned with this, it is good spatial planning to redevelop this site as a data centre campus. This is, not only because it satisfies the locational requirements for data centres, but because it will make the most efficient use of two logistics units that are vacant and, by virtue of their design, floor to ceiling heights, and available external space, are well-suited to being converted to data centres.
- 1.3.7. This application is therefore highly significant in that it provides an opportunity to make a substantial contribution to meeting the unmet need for additional data centre capacity by making efficient use of two vacant logistics units.

#### **1.4. Statement Structure and Submission Documents**

- 1.4.1. The remainder of this Statement is therefore structured as follows:
- Section 2 describes the site, its context and summarises its planning history;
  - Section 3 summarises the pre-application discussions that have taken place and the approach taken to Environmental Impact Assessment;
  - Section 4 describes the final development proposal subject to this planning application
  - Section 5 assess the proposed development against the relevant planning policies and any material considerations; and
  - Section 6 provides a summary and conclusions.

## 2. Site Overview

### 2.1. Introduction

2.1.1. This section of the Statement describes the application site, its location, and wider context.

### 2.2. Site Description

2.2.1. The application site comprises Units DC5 and DC6 at Prologis Park West, Iron Bridge Road North in West Drayton alongside associated access, car parking and hard and soft landscaping (**'the Site'**). The Site measures approximately 6.3ha and is shown outlined in red in the Site Location Plan below:



2.2.2. The Site currently accommodates two warehouse buildings which were completed in 2023:

- DC5 - Distribution Centre 5; and
- DC6 - Distribution Centre 6.

2.2.3. DC5 and DC 6 are single-storey warehouse units measuring: 18,063 sqm (194,428 sq ft) and 13,290 sqm (143,052 sq ft) respectively. Each building has a clear haunch height of 15m and an overall building height of 18m. The development has been constructed so that both buildings can be occupied together by a single tenant or independently from one another.

2.2.4. DC5 is the southern of the two buildings and runs in parallel to the site's southern boundary though its southern façade is circa 50m north of the application's site southern boundary. Between the southern façade of DC5 is the service yard and loading bays (which are located in the eastern portion of this part of the site and served by an access onto Iron Bridge Road) and staff car parking closer to Iron Bridge Road. The design approach sought to push the office element (which is glazed) along DC5's western façade and overlooking the car parking area.

- 2.2.5. DC6 is the northern of the two buildings and is perpendicular to DC5 and parallel to Iron Bridge Road. The car parking for DC6 is located to the north of DC6 with the service yard and loading bays are positioned to its east. The design approach sought to push the office element (which is glazed) along DC6's northern façade overlooking the car parking area.
- 2.2.6. Architecturally, both buildings incorporate the same design approach and match the design and colour palette of other buildings across the wider Prologis estate nationally. The buildings are predominantly constructed of a mix of cladding types. Different tones of grey and textures are used to add visual interest to the cladding and break up the sense of massing. Both buildings have barrel roofs (with each building having three barrels across the extent of its roof). Green datum lines separate the roof from the building's facades as well as a consistent green datum line running circa 2m below the building's roofline.
- 2.2.7. The existing buildings at the Site were erected pursuant to planning permission granted on 24 June 2021 for:

*'Redevelopment of the site to provide two industrial units providing industrial floorspace (Use Class B1c/B2/B8) and ancillary offices together with associated parking, access arrangements, landscaping and infrastructure (Ref: 39207/APP/2020/2188)' ('2020 Permission').*

- 2.2.8. The 2021 Permission was granted subject to 26 conditions.
- 2.2.9. The existing buildings are currently vacant but benefit from the flexible use included within the following use classes: Classes B2, B8 and E(g)(iii).

## **2.3. Site Context**

- 2.3.1. The Site is bounded to the east by Stockley Road (A408) and beyond that; Stockley Park which accommodates a series of large office buildings rising two to three storeys high.
- 2.3.2. To the north is Horton Road and beyond that significant mature landscaping, including Stockley Country Park and Stockley Park Golf Course.
- 2.3.3. To the south, between the Grand Union Canal and a mainline railway, lies a cluster of industrial yards that include carparking and storage facilities. Beyond that is the closest area of residential land use.
- 2.3.4. To the west is Iron Bridge Road North, the remainder of the Prologis Park West Estate and further commercial uses. Prologis Park West includes four further industrial buildings located directly to the west of the Site. Those buildings have also been adapted in recent years and are now occupied by data centre operators.

## **2.4. Planning Policy**

- 2.4.1. The development plan for LBH comprises the following plans which this application will be assessed against:
- The London Plan (March 2021);
  - The Local Plan: Part 1 Strategic Policies (November 2012) ('LPP1');
  - The Local Plan: Part 2 Development Management Policies and Site Allocations and Designations (January 2020) ('LPP2'); and
  - The West London Waste Plan (July 2015).

- 2.4.2. In planning policy terms, the Site is located within a designated Locally Significant Employment Location . The LPP1 states that Locally Significant Employment Location s have primarily a light industrial, office and research role.
- 2.4.3. Parts of the site also overlap with areas of Green Belt as shown in the extract below:



- 2.4.4. The extent of Green Belt within the site boundary is clearly very modest and limited to the site's peripheries. These areas are predominantly landscaped in accordance with the requirements of the 2021 Permission.

## **2.5. Existing Highways and Accessibility**

- 2.5.1. As set out above, the Site is accessed via four vehicular and pedestrian access points directly from Iron Bridge Road North.
- 2.5.2. Two of the access points serve areas of car and cycle parking and two of the access points provide dedicated access into yard areas for service vehicles including HGVs.
- 2.5.3. The Public Transport Accessibility Level (PTAL) is a measurement tool grading accessibility to the surrounding public transport network, taking into account walk access time and service availability and so measures the density of the public transport network at a chosen point. The Site has a PTAL level of 1b.

### 3. Pre-Application Engagement, Public Consultation and EIA Approach

#### 3.1. Pre-Application Engagement

- 3.1.1. The pre-application engagement with the professional officers of the Local Planning Authority ('LPA') has helped to shape and inform the final development concept the subject of this application.
- 3.1.2. The pre-application phase of the project has been progressed under the terms of a Planning Performance Agreement ('PPA') which included the following:
- 6 August 2025 - Pre-Application Meeting 1;
  - 12 August 2025 - Air Quality Workshop;
  - 28 August 2025 - Site Visit;
  - 15 September 2025 - Climate Change Workshop;
  - 22 October 2025 - Pre-Application Meeting 2;
  - 28 November 2025 – Pre-Application Meeting 3; and
  - 9 December 2025 - Design Workshop.
- 3.1.3. Broadly speaking, these pre-application meetings have been structured around three core strands.
- 3.1.4. Firstly, these have related to the town planning matters.
- 3.1.5. During these meetings, the potential planning application strategy was discussed, including the potential to make an application for full planning permission and a separate Section 73 application to remove Condition 22 to allow for the installation of internal mezzanines.
- 3.1.6. Discussions included the potential for the application(s) to be referable to the Greater London Authority relating to the creation of floorspace and deconstruction and adaption of the existing building as well as a package of physical works to allow for the creation and installation of plant equipment.
- 3.1.7. The second strand of these pre-application discussions has been around specific technical matters with standalone meetings relating to Air Quality and Climate Change. These meetings focussed on the need for and scope of supporting planning documentation.
- 3.1.8. The third strand of pre-application discussions focussed on the design of the proposals and has resulted in:
- A reduction in the height of the proposed gantry decks;
  - Revisions to the treatment to the retained structure around the sub-station;
  - A more comprehensive landscaping scheme to deliver benefits within the street scene outside the application site; and

- Extensive testing and development of the approach to the treatment, design, materiality, and colour of the DC1 and (in particular) DC2 gantry.

### **3.2. Public Consultation**

- 3.2.1. A proportionate approach has been taken to public engagement which responds to the level of interest in the original application for full planning permission for Units DC5 and DC6, as well as the fact that the proposal is for the conversion of two existing buildings to data centres rather than being for new build development.
- 3.2.2. For the original application for full planning permission for Units DC5 and DC6, Prologis sought to arrange meetings with Cabinet Members and local Ward Members, made contact with various community groups, and held a virtual public consultation event following the sending of 3,964 letters of invitation.
- 3.2.3. Ultimately, no feedback forms were provided as part of this process and no elected members requested a meeting. A virtual session did however take place with the Hillingdon Canal Partnership.
- 3.2.4. The approach taken to engagement takes into account the very limited level of feedback in the original application for full planning permission for Units DC5 and DC6. In this particular case Savills has consulted by letter residential addresses at Emden Close and Eastwood Road, together with the adjacent Busy Bees nursery.
- 3.2.5. At the time of submission, no responses or enquiries have been received.

### **3.3. EIA Approach**

- 3.3.1. Submitted as part of this application is an Environmental Statement prepared by Savills which should be read alongside this Planning Statement.
- 3.3.2. The selection criteria for screening Schedule 2 development are provided in Schedule 3 of the EIA Regulations. Schedule 2 projects require EIA if they are likely to have significant effects on the environment by virtue of their nature, size or location. The potential for likely significant effects on 'sensitive areas', as defined in Regulation 2(1) of the EIA Regulations, is a particularly important consideration.
- 3.3.3. The Proposed Development falls within Schedule 2 Part 10 (a) "Industrial estate development projects". 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."
- 3.3.4. Given the nature and scale of the Proposed Development, and as the Site extends to approximately 6.3 hectares, the Applicant considered that the scheme could give rise to significant environmental effects. As such, no formal request for a Screening Opinion was sought from LBH, and the Applicant elected to undertake a voluntary EIA.
- 3.3.5. Informal scoping discussions were undertaken with the Council between September and November 2025 to agree the scope of the technical assessments to be included within the EIA. A Scoping Report was issued to LBH in October 2025. Following consultation with relevant stakeholders, LBH provided scoping comments in November 2025. Although not a formal EIA Scoping Opinion, the EIA has been informed by the comprehensive scoping consultation undertaken as part of the pre-application process. The topics scoped into the Environmental Statement are:
  - Air Quality; and
  - Climate Change and Greenhouse Gases.

- 3.3.6. The Environmental Statement has therefore been prepared in accordance with the agreed scope of assessment and addresses the environmental topics identified through the scoping process, providing a proportionate assessment of the likely significant effects of the proposed development.
- 3.3.7. Whilst not repeated in this Planning Statement, Section 5.2 of the Environmental Statement provides an explanation as to why the scope of the EIA is limited to the above two topics and why other topics were scoped out. Table 5.6 of the Environmental Statement explains the approach taken to the consideration of cumulative effects with four other data centres considered cumulatively with the proposed development.
- 3.3.8. The conclusion reached in the Environmental Statement is that the residual effects relating to the two chapters scoped into the EIA are Not Significant in EIA terms.

## 4. Proposed Development

### 4.1. Overview of Proposals

4.1.1. This Planning Statement supports a planning application needed to facilitate the conversion of DC5 and DC6 into two data centres. The new data centre buildings will be referred to as Data Centre 01 (DC01) and Data Centre 02 (DC02). Using their existing names, DC5 is to become Data Centre 01 and DC6 is to become Data Centre 02.

4.1.2. The application seeks full planning permission for a package of physical works to both DC01 and DC02. The description of development is as follows:

*'Partial deconstruction and adaptation of existing buildings; installation of mezzanines and new gantry decks housing MEP, a sub-station and fire suppression infrastructure; and associated physical works including alterations to the layout of the site.'*

4.1.3. The application is required to facilitate the operation of both buildings as data centres and a data centre could not operate efficiently in either building unless the application is progressed. The proposals are needed to facilitate the external physical works and the installation of mezzanines and mechanical and electrical plant required to convert the existing warehouse buildings into data centres. The mezzanines will provide the space for the necessary IT equipment to be installed efficiently within the buildings.

4.1.4. The principal works that comprise the physical development the application seeks full planning permission for are summarised below:

- Partial deconstruction of existing DC6. The parts of DC6 to be removed are limited to its eastern portion closest to its existing service yard. This is required to allow for the creation of the plant gantry required to allow for conversion of the building to a data centre;
- Installation of new, three tier gantry decks serving each building (comprising generator units, buffer tanks and chiller units). These are to be located in the existing service yards for both buildings – i.e. to the south of DC01 and to the east of DC02. The architectural approach to both gantries has sought to use fins, different colour tones, and datum lines so that the newly introduced mass will read alongside the existing buildings whilst also appearing to be subordinate. Each gantry will be served by two staircases. Two new loading docks will be relocated adjacent to the office area, where a new ramp is to be constructed;
- Installation of 32 back-up generators. The generators will only operate in the event of a power outage or planned testing or maintenance events. They are not designed for continuous operation and will only be subject to periodic functional testing (which is staggered daily and monthly to limit simultaneous generator operation, managing emissions and operational impact) in line with best practice and manufacturer recommendations. The flues serving the generators will measure approximately 18m at max height which is also within the established ridge height of the existing buildings;
- Alteration to elevations of DC5 and removal of roof panels to accommodate an external sub-station within the original footprint of the building;
- As a data centre use is not as employee intensive as other traditional storage and distribution logistics sites, as intended, the proposals involves the loss of car parking spaces. The total parking provision on Site is set out in the table below:

| Parking Spaces           | Approved | Proposed |
|--------------------------|----------|----------|
| Car Parking (Accessible) | 239 (24) | 73 (16)  |
| Bicycle                  | 94       | 80       |
| Motorbike                | 13       | 11       |

- Installation of new water tanks in a dedicated enclosure;
- The enhancement of existing landscaping features. Existing areas of landscaping between the two units are proposed to be enhanced as well as a new area of landscaping to the north of the new substation and additional areas to the south. Ornamental hedgerow planting will also be located to the west of the proposals to replace car parking areas not required for operation of the buildings as data centres and further soften the building and other hard landscaped areas on the most prominent boundary of the Site; and
- To meet security requirements, upgrades will be required to the perimeter fencing lines around each building. This will likely include a low-security fence at (1.2 metres height) with gates and a high security fence (2.4 - 3 metres height) with turnstiles, positioned adjacent to the buildings. Acoustic timber fencing to the canal on the south side is to be retained.

4.1.5. No changes are proposed to either the vehicular or pedestrian access or egress points into the sits.

4.1.6. The proposed development is illustrated on the existing, deconstruction, and proposed drawings and described in more detail within the Design and Access Statement.

4.1.7. The application is also seeking planning permission for the installation of mezzanines in DC01 and DC02. The mezzanines have been included in the application in the context of condition 22 of planning permission 39207/APP/2020/2188. Condition 22 of that planning permission prevents the installation of any internal mezzanines. The condition is worded as follows:

*‘Notwithstanding the provisions of Section 55 of the Town and Country Planning Act 1990 (or any others revoking and re-enacting this provision with or without modification), no additional internal floorspace shall be created in excess of that area expressly authorised by this permission.’*

4.1.8. The reason for the imposition of the condition is per the below:

*‘To enable the Local Planning Authority to assess all the implications of the development and to ensure that adequate parking and loading facilities can be provided on the site, in accordance with Policy DMT 1 and DMT 2 of the Local Plan: Part Two Development Management Policies (2020).’*

4.1.9. The application seeks planning permission to install the mezzanines and supporting information for the planning application assesses the impacts of this additional floorspace including from a transport perspective.

4.1.10. The planning application will enable Prologis to introduce a mezzanine floor in each building to host part of the data halls. The existing and proposed floorspace areas following the installation of the internal mezzanines are illustrated in the table below.

| Existing Floorspace (sqm) (GIA) | Proposed Floorspace (sqm) (GIA) | Uplift (sqm) (GIA) |
|---------------------------------|---------------------------------|--------------------|
| Unit 1 – 17,673                 | DC01 – 31,490                   | 13,817             |

|                 |               |       |
|-----------------|---------------|-------|
| Unit 2 – 12,954 | DC02 – 17,524 | 4,570 |
|-----------------|---------------|-------|

## 4.2. Planning Obligations

4.2.1. Prologis recognise that the granting of planning permission will be subject to planning obligations.

4.2.2. It is anticipated that a Section 106 agreement will be required between Prologis and LBH with the Heads of Terms relating to:

- A financial contribution towards air quality damages;
- A financial contribution towards carbon offsetting;
- A financial contribution towards offsite canalside landscape enhancements;
- A financial contribution towards offsite active travel enhancements;
- Commitments to an employment / construction training scheme; and
- Agreement and monitoring of a Travel Plan

## 5. Planning Assessment

### 5.1. Introduction

5.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications is made in accordance with the development plan unless material considerations indicate otherwise. This section of the Planning Statement assesses the development against the relevant strategic objectives, planning policies and any other material consideration.

5.1.2. The key considerations in respect of this planning application are considered to be:

- Principle of development and delivering economic growth;
- Green Belt;
- Design;
- Heritage and Townscape Impact;
- Sustainability and energy use;
- Transportation
- Air Quality
- Landscaping and Ecology
- Noise; and
- Flood risk and Drainage.

### 5.2. Principle of Development and Delivering Economic Growth

5.2.1. The Site is located within a designated Locally Significant Employment Location. The LPP1 states that Locally Significant Employment Locations have primarily a light industrial, office and research role.

5.2.2. As set out in Section 2, the existing buildings at the Site benefit from a flexible employment use including for operations within Classes B2, B8 and E(g)(iii).

5.2.3. Planning policy at a local, regional, and national level recognises the importance of data centres to the economy and decisions undertaken by LBH and the Greater London Authority accept data centres as falling within Class B8. This use classification has also been corroborated by the latest decisions of the Secretary of State in respect of data centre floorspace.

5.2.4. Secure and efficient data storage is essential to store, process, and manage the ever-growing amount of data that is fundamental to our daily life, whether that be the increasingly digital nature of the economy or our individual day to day usage. The growing national and global need for additional data storage capacity is fully understood.

- 5.2.5. Data centres were designated as Critical National Infrastructure in September 2024 alongside energy and water infrastructure. This designation demonstrates the importance of data centre capacity to the economy and wider society. In planning terms, this is recognised by the NPPF which now requires local planning authorities to actively plan for data centre development and recognise that data centres are a form of infrastructure with specific locational requirements.
- 5.2.6. The Secretary of State has highlighted the importance of delivering new data centre floorspace within the UK.
- 5.2.7. In the Woodlands Park appeal decision, the Secretary of State concluded that:
- “the provision of data centres would make a significant contribution to the UK economy, and that significant weight should be given to the need for additional data centre capacity within the UK”* (emphasis added).
- 5.2.8. The Secretary of State has also allowed recovered appeals for data centres in both Iver, Buckinghamshire (December 2024) and Abbots Langley, Hertfordshire (May 2025). In both of those decisions, the Secretary of State applied significant weight to the evidence that there is a ‘very significant’ level of need for additional data centre capacity. In Paragraph 24 of the decision for Abbots Langley the Secretary of State concludes that:
- “...a failure to provide enough sites to meet the need for new data centres could result in investment being lost to other well-established markets outside the UK. Overall, the Secretary of State agrees [...] that there is a clear and pressing need for new data centre capacity in the London Availability Region”.*
- 5.2.9. In the Abbots Langley decision the ‘need’ for additional data centre capacity to serve the London Region was updated and projected between 2024 and 2029. The Secretary of State endorsed a net additional requirement for data centre capacity of 3,824MW.
- 5.2.10. The proposed development benefits from secured power of 84MW and would contribute directly towards meeting some of the significant need within the London Region.
- 5.2.11. The Site is also within an established Availability Zone (Hayes).
- 5.2.12. An Availability Zone is a distinct geographical area where a public cloud company (such as AWS or Microsoft) will have multiple data centres, either through self-building or leasing from third parties, which are interconnected. Connections are through dedicated low latency networks (low-latency is milliseconds) or existing fibre infrastructure.
- 5.2.13. A single Availability Zone must not generally exceed a fibre cable radius from the initial data centre deployment, often referred to as the “parent data centre site”. This is critical to efficient operation of data centres within a single Availability Zone which, in turn, is critical to achieving resilience within the Availability Zone.
- 5.2.14. The ability to help meet some of the significant need that exists for additional data centre capacity within the London Region and potentially form part of an established Availability Zone drives a locationally specific requirement for the proposed development.
- 5.2.15. The proposed operation accords with the established use of the floorspace at the Site and its designation for employment uses within the development plan. The proposed development accords with SO15 and Policy E1 of LPP1 which seek to protect and enhance land for employment uses to meet the needs of different sectors of the economy.

- 5.2.16. Not only is the proposed land use acceptable in planning policy terms, there are significant material considerations associated with the proposed development that further weight in support of the acceptability of the proposed land use.
- 5.2.17. Since the Labour Government took office in July 2024, the Secretary of State for Housing, Communities and Local Government has recovered three appeals for data centres within the London Green Belt – one at Court Lane Industrial Estate in Iver (ref. APP/P1940/W/24/3346061), a second at Bedmond Road in Abbots Langley (ref. APP/N0410/W/24/3337981), and a third at the Woodlands Park Landfill site (ref. APP/N0410/W/24/3347353).
- 5.2.18. Given that all three of these sites were in the Green Belt, their submissions put forward, and the Secretary of State and Planning Inspector assessed, benefits of the proposals that were put forward as Very Special Circumstances.
- 5.2.19. Whilst the application site does not propose substantive development in the Green Belt (and therefore there is no requirement to demonstrate Very Special Circumstances), the matters put forward as Very Special Circumstances represent a good framework of what could constitute material considerations / scheme benefits.
- 5.2.20. The below table provides an overview of how weight was afforded to these key considerations by the Secretary of State or by the Inspector.

| <b>Very Special Circumstances</b>                                     | <b>Court Lane</b> | <b>Abbots Langley</b> | <b>Woodlands Park</b> |
|-----------------------------------------------------------------------|-------------------|-----------------------|-----------------------|
| Need for Additional Data Centre Capacity within the Availability Zone | Significant       | Significant           | Substantial           |
| Economic Benefits Associated with Level of Investment                 | Significant       | Significant           | Substantial           |
| Social Benefits Associated with Data Centres                          | N/A               | N/A                   | Significant           |
| Lack of Alternative Sites within Availability Zone                    | Significant       | Significant           | Substantial           |
| Lack of Plan-Led Solution to Deliver Required Capacity                | N/A               | No Weight             | Significant           |
| Damage for UK Digital Economy if Appeal Dismissed                     | N/A               | N/A                   | Significant           |
| Site is Previously Developed Land                                     | Significant       | N/A                   | N/A                   |

- 5.2.21. The quantum of data centre floorspace proposed as part of this planning application is comparable to that of the three above referenced appeal decisions, and, as with those proposals, could provide data centre floorspace used for a co-location, hyperscale, or artificial intelligence format facility. It therefore follows that the above matters put forward as Very Special Circumstances for the three allowed appeals represent material considerations in support of the proposed development (save for there being no alternative sites within the Availability Zone as the policy support for the proposals does not mean that this needs to be demonstrated).
- 5.2.22. All levels of planning policy contain a recognition that planning policy should support economic growth and productivity. Support for economic development on a general basis is set out throughout Chapter 6 of the NPPF, Policies E2, E4, E5 and E7 of the London Plan, and Policies E1 and E2 of the LPP1. As above, there is explicit specific support for knowledge and data-driven, creative or high technology industries (including data centres) in Paragraph 87 of the NPPF.

### **5.3. Green Belt**

- 5.3.1. As set out in Section 2.4 of this Planning Statement, small portions of land inside the red line boundary but at the site's peripheries, are within the Green Belt. Prologis' proposals include very modest works (many of which do not constitute development) within the Green Belt.
- 5.3.2. The proposed landscaping scheme includes enhancements to the green infrastructure along the pedestrianised side of Ironbridge Road, additional native shrub planting on the northern side of the northern access, tree planting at the southwestern quadrant of Horton Road and Stockley Road, and the replacement of hardstanding with new green infrastructure north of fire suppression compound. These works are considered to provide enhancements to the environment around the Green Belt, and they do not constitute development.
- 5.3.3. Providing sufficient onsite physical security is essential for the successful operation of a data centre campus and the proposed approach seeks to minimise security fencing where this is possible.
- 5.3.4. There is however a requirement for the installation of small stretch of 1.2m fence line inbound of existing picket fence at northwestern corner of site. This portion of the site is within the Green Belt. Whilst this would constitute development, the installation of a fence up to a height of a 2m (when not located next to a highway) benefits from permitted development rights under Schedule 2, Part 2, Class of the Town and Country Planning (General Permitted Development) (England) Order 2015. On that basis, this element can be installed without the need for planning permission but is included in the submission for completeness.
- 5.3.5. Aligned with this, there is a requirement for the installation of new 2.6m security fence adjacent to existing security fence on hardstanding along southern boundary within the Green Belt. Given that the location of the fence is previously developed land, sits inbound of the existing fence, and is visually well contained from views by existing landscaping it is considered that this constitutes limited infilling on previously developed land as defined as not being 'Inappropriate' under Paragraph 154(g) of the NPPF as there would be no harm to the openness of the Green Belt.
- 5.3.6. To facilitate access of the plant gantries, staircases are required and the proposal is for the installation of an emergency staircase on the northern part of the eastern elevation of the DC01 gantry. This portion of the site is within the Green Belt but is on the far eastern part of the footprint of the former multi-storey car park. On that basis, it constitutes limited infilling or partial redevelopment on previously developed land as defined as not being 'Inappropriate' under Paragraph 154(g) of the NPPF on the basis that there would not be substantial harm to the openness of the Green Belt.

### **5.4. Design**

- 5.4.1. Planning policy, and most explicitly the London Plan, indicates change is to be considered as a fundamental characteristic of London, and respecting character and accommodating change should not be seen as mutually exclusive. This is particularly the case in land designated for employment uses where the various documents of the development plan strongly encourage the intensification of land to best meet the economic and employment needs of the Borough.
- 5.4.2. In planning policy terms, the most relevant policies are Policy D3 (Optimising Site Capacity Through the Design-Led Approach) of the London Plan and Policy DMHB 11 of LPP2 (Design of New Development). Together, these policies provide expectations of what good quality design should be and can broadly be distilled to the following:
- Ensuring that design responds to a site's local context and distinctiveness;

- Promoting an approach where development makes the most efficient use of land and optimises site capacity;
- Promoting the use of high quality materials, finishes, and architectural treatments;
- Designing buildings in a way which their amenity impact and impact on landscape and heritage assets is minimised;
- Avoiding design prejudicing the development of adjoining land parcels;
- Encouraging sustainable travel and facilitate appropriate servicing;
- Designing for safety; and
- Aiming for high sustainability standards.

5.4.3. To a significant extent, the function of the data centre defines the adaptation works and proposed new build elements – data design is largely a case of form following function. This does not mean that data centres cannot be well designed or of high quality but that the operational requirements of a data centre must be fully realised and drive the design process. The fact that this application is for the conversion of two existing industrial buildings to data centres rather than the development of a purpose built data centre drives the approach to site layout and the design approach taken. In this case, the key drivers of design are as follows:

- Given that the proposal is to make use of the existing two buildings, the form and scale and mass of the data centre buildings (accommodating the data halls) is largely fixed;
- The conversion of the two existing data centre buildings triggers the requirement for back-up generators. The existing site layout and the technical requirements for the back-up generators mean that the generator gantries can only be positioned in certain locations;
- The generators have various sizes, offsets, and requirements to ensure efficient operation;
- There is a clear design context, materiality, colour, and approach to architectural treatment is driven by the two existing buildings; and
- The transition from two conventional logistics units to two data centre buildings drives additional onsite security requirements and the need for the installation of further buried services triggers updated requirements for fencing and impacts the ability to landscape certain parts of the site.

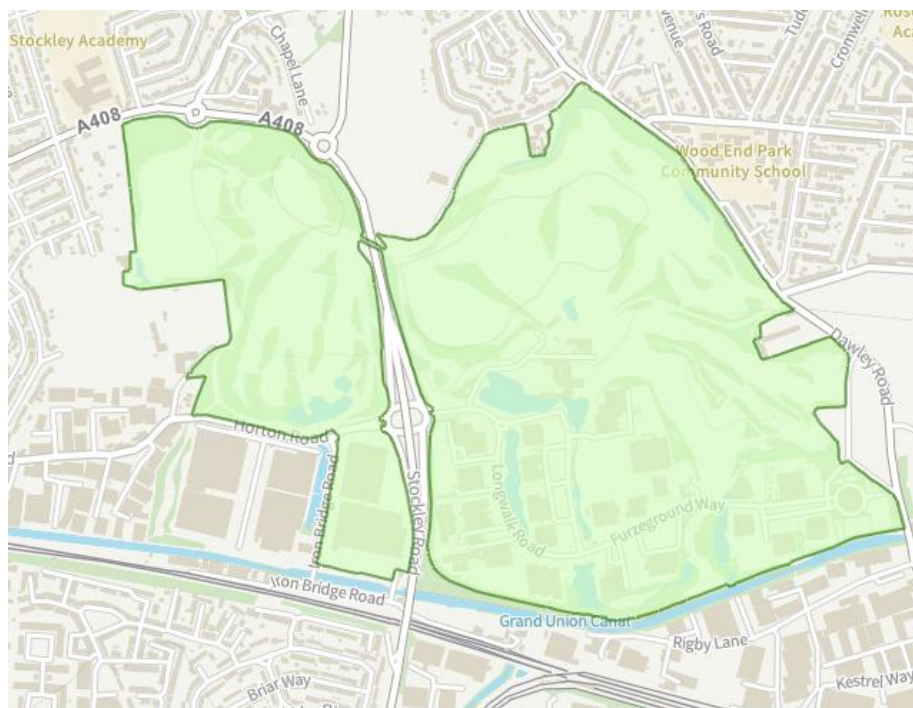
5.4.4. The design approach has evolved following extensive pre-application engagement with LBH.

5.4.5. To facilitate the conversion of the buildings to data centres, an element of disassembly is required and this has been minimised where possible. Whilst the size, scale, and mass of the data centres are largely fixed by virtue of them already having been constructed, the scale and massing of the proposed works have evolved to respond positively to pre-application feedback and guidance on townscape and visual matters. This has included a reduction in the overall height of the gantry decks on both buildings so that they read as being subordinate and integrated with DC01 and DC02.

- 5.4.6. There has been a particular focus on the design approach taken to the southern façade of DC01. This reflects that this gantry is the longer of the two and, by virtue of it running parallel to the Grand Union Canal Towpath and being visible from the elevated Stockley Road, is more visible. The design approach to this gantry uses fins, different colour tones, and datum lines so that the newly introduced mass will read alongside the existing buildings whilst also appearing to be subordinate to it.
- 5.4.7. A simpler approach is taken to the design approach for the DC02 gantry, reflecting that it has a reduced prominence compared to DC02 though it continues to remain subservient with the host building, incorporating similar materiality and colours.
- 5.4.8. Through pre-application discussions, Prologis have re-positioned the substation from being free-standing to being integrated within the data centre building, representing a neater and more holistic design approach.
- 5.4.9. The effect of the above is a contextually sensitive design that responds appropriately to the functional requirements required for the successful operation of a data centre whilst introducing an appropriate and high quality architectural approach that is read together with the existing DCO01 and DC02 buildings. The conclusion can therefore be reached that the design approach accord with the requirements of Policy DMHB 11 of LPP2 and Policy D3 of the London Plan.

## **5.5. Heritage and Townscape Impacts**

- 5.5.1. The Site is designated as part of the Stockley Park Business Park Registered Park and Garden (Grade II). The Stockley Park Business Park Registered Park and Garden was added to the list in 2020 (List Entry 1466074).
- 5.5.2. As shown in the map extract below, the extent of the Stockley Park Business Park Registered Park and Garden covers the application site, Stockley Park Golf Club and Stockley Country Park to the north of the application site, and the main Stockley Park Campus on the eastern side of Stockley Road. The application site sits at the periphery of the Park, and it has undergone extensive redevelopment since the designation was made.



- 5.5.3. There are no other heritage designations and the Site does not fall within a conservation area.

- 5.5.4. The local planning authority (as decision-maker) is required to take account of the statutory requirements set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, Sections 66 and 72 when considering development relating to listed buildings and conservation areas.
- 5.5.5. National policy on designated heritage assets is derived from the Planning (Listed Buildings and Conservation Areas) Act 1990, and is set out in detail in the National Planning Policy Framework (NPPF), 2024. Paragraphs 207 to 221 of the NPPF set out the policies for assessing proposals that affect designated and non-designated heritage assets. These policies require the assessor to establish whether the significance of heritage assets is better revealed/enhanced or harmed as a result of new development.
- 5.5.6. In paragraph 215, the NPPF states: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use". As stated in NPPG paragraph 18a-018-20190723, within each category of harm i.e., substantial or less than substantial harm, the extent of harm may vary and should be clearly articulated.
- 5.5.7. The relevant development plan policies relating to assessing proposals which could have an impact on designated heritage assets are Policy HC1 (Heritage Conservation and Growth) of the London Plan and Policy DMHB1 (Heritage Assets) of the LLP2. Together, these policies reflect the requirements of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 5.5.8. A Heritage, Townscape and Visual Impact Assessment has been prepared by Savills, which provides an assessment of the anticipated heritage, townscape and visual impact of the proposed development.
- 5.5.9. The Assessment identifies and appraises the setting and significance of the relevant heritage assets. Of particular relevance is the designation of the Site as forming part of a Registered Park and Garden (Grade II) and the existing built form which includes two substantial warehouse buildings (approved and built following the designation of the Registered Park and Garden ).
- 5.5.10. The townscape analysis and initial view studies have informed the design development, ensuring the proposed scale and massing of the new build elements (primarily the gantry decks) is appropriate for its setting. It has driven the approach of ensuring that the proposed gantries remain subordinate to the existing DC5 and DC6 building, whilst also informing the approach to the materiality, colours, and design of the DC01 gantry.
- 5.5.11. The potential townscape impacts of the proposed development have been assessed in detail including a total of 19 views from 18 viewpoints agreed with the LBH as part of the pre-application stage. Most of the 18 viewpoints tested are found to be of 'low sensitivity'.
- 5.5.12. As set out above, the scale and massing of the proposed works have evolved to respond to pre-application feedback and guidance on townscape and visual matters. This has included a reduction in the overall height of the gantry decks and a bespoke approach to design and materiality helping to ensure they complement the existing buildings and present successfully within the wider, local views and context.
- 5.5.13. Overall, the townscape and visual effects of the proposed development are predominantly localised and read within the setting of the existing buildings and viewed from the wider, designated employment area. In this context, the level of changes is consistent with the on-going regeneration process of a modern employment area.
- 5.5.14. Some of the proposed development will be visible from the wider Registered Park and Garden to the east of Stockley Road. These are typically glimpsed views looking west. Although these views are considered to be more sensitive, the level of visibility and change is 'low'.

- 5.5.15. Given the established character of the built form on the Site and the design approach that has been adopted, which successfully minimises the visual impact of the new build elements, the Heritage, Townscape and Visual Impact Assessment does not find any material level of harm to the Registered Park and Garden .
- 5.5.16. Applying the requirements of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990, the conclusion is reached that there is no heritage harm. On that basis, the conclusion can be reached that the proposed development accords with Policy DMHB 8 of the LPP2 and Policy HC1 of the London Plan.

## **5.6. Sustainability and Energy**

- 5.6.1. The proposed development has been designed with sustainability at its heart and seeks to adapt and re-use existing, vacant buildings which makes the best and most efficient use of existing floorspace and previously developed land.
- 5.6.2. Whilst the LPP1 and LPP2 contain specific policy relating to sustainability and energy matters, the recency of the London Plan, combined with its greater detail, mean that the policy framework that it sets is of greater relevance. The relevant policy is Policy SI2 (Minimising Greenhouse Gas Emissions). This requires developments to be net zero and commit to following the Greater London Authority's 'Be Lean, Be Clean, Be Green, Be Seen' energy hierarchy. It also sets requirements to report regulated and unregulated energy, requiring that a 35% improvement beyond building regulations is achieved, with any shortfall between this and net zero either compensated through offsite provision or an offsite carbon offsetting financial contribution. Nowhere in either local or London Plan policy is a specific target for BREEAM set.
- 5.6.3. The existing buildings are of modern design and already operate efficiently. However a number of additional measures have been adopted to deliver improvements in accordance with the energy hierarchy. These include:
- A very high level of air tightness within the building;
  - High efficiency VRF for space heating with no gas used at the Site;
  - Mechanical ventilation with heat recovery;
  - High Efficacy LED Luminaires;
  - Lighting control including presence detection; and
  - 100% electric domestic hot water.
- 5.6.4. A number of design decisions and responses have been informed by the aspiration to minimise the amount of carbon dioxide emissions from the development, and to follow, as far as feasible (given the proposed use of the building), the energy hierarchy which is established in Policy SI2 of the London Plan.
- 5.6.5. An Energy and Sustainability Assessment is provided as part of the submission which sets out the performance of the development and the reductions in carbon achieved on site. This demonstrates that the Greater London Authority's 'Be Lean, Be Green, Be Clean, Be Seen' agenda has been (and will be followed). In line with Policy SI2 of the London Plan. The Energy and Sustainability Assessment reports on regulated and unregulated energy, as well as savings required.

5.6.6. The Assessment also includes a BREEAM Pre-Assessment which demonstrates that the proposed development will deliver a BREEAM rating of 'Very Good' with an aspiration to achieve 'Excellent'. This needs to be seen in the context of the existing DC5 and DC6 buildings having achieved BREEAM 'Excellent'. Aligned to this, it demonstrates that the WAT01 water credit will be achieved. Prologis can commit to post-occupation reporting of the BREEAM target that has been achieved.

5.6.7. The proposed development accords with the aspirations and relevant requirements of Policy SI2 of the London Plan, Policy EM1 of LPP1 and Policy DME1 2 of LPP2 (in so far as they are relevant).

## **5.7. Transportation**

5.7.1. A Transport Statement and Framework Travel Plan have been prepared by TPA and form part of the application.

5.7.2. The Transport Statement includes an analysis of the maximum number of trips associated with the existing floorspace and compares that to the projected number of trips to the proposed development. The proposed use of the buildings as data centres combined with adaptations proposed to the building will result in a material reduction in movements to the Site.

5.7.3. The Transport Statement projects a reduction of 3,265 total trips in a 24 hour period. That will include a reduction of 921 HGV movements and 1,114 LGV movements across each 24 hour period with material reductions during the AM and PM peaks.

5.7.4. It follows that the proposed development will have no adverse impacts on the safe or convenient use of the local highway network.

5.7.5. A Framework Travel Plan has also been prepared and sets out the objectives of the development to provide viable sustainable travel options for accessing the Site through the promotion of the use of walking, cycling and public transport. The Framework Travel Plan has been informed by an Active Travel Zone assessment and the facilities to be provided on site to serve the development.

5.7.6. The amount of car parking on Site is proposed to be reduced from 239 spaces to 73. The number of spaces is below the maximum level of parking that would be permitted by the adopted ratios within the LPP2 (i.e. 1 space per 500 sq. m). A material reduction in parking reflects the number of trips projected to the Site and a desire to reduce reliance on private modes in favour of sustainable travel.

5.7.7. A total of 80 cycle parking spaces are proposed to be provided. Cycle parking will be conveniently located adjacent to each building in dedicated areas and visible to cyclists.

5.7.8. Servicing and delivery arrangements will continue similar to that of the existing arrangements. The proposed site layout will ensure safe and efficient access for vehicles, ensuring they enter and leave the Site in a forward gear. The delivery and servicing strategy is set out in the Framework Delivery and Servicing Management Plan prepared by RED.

5.7.9. The Transport Statement demonstrates that the proposed development will have no adverse impact on the safe and convenient use of the local highway network and thus complies with the requirements of Policy DMT 2 of the LPP2. The proposed development also promotes the use of sustainable modes of transport as part of a dedicated FTP.

## **5.8. Air Quality**

- 5.8.1. The site lies within Hillingdon's Air Quality Management Area but not in a Focus Area. The Air Quality Management Area covers approximately the southern two-thirds of the Borough and was designated on 1 September 2003. Local monitoring data shows NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> annual mean concentrations below the Air Quality Objectives, and indicate no exceedances of short-term limits. The London Atmospheric Emissions Inventory (LAEI) projections for 2025 and 2030 predict further reductions in NO<sub>2</sub> and stable PM levels.
- 5.8.2. Submitted as part of this application is an Air Quality Assessment. Air quality is a matter that has been scoped into the EIA and for which the Environmental Statement includes a specific chapter (and for which the Air Quality Assessment sits at Appendix 6).
- 5.8.3. As with all data centres, there is a requirement for a back-up power source and, for this development, the proposal is for the use of back-up generators. These are used only in the case of a power outage scenario, but they are required to be subject to regular but infrequent testing.
- 5.8.4. Generators will be fuelled by Hydrotreated Vegetable Oil which is not a fossil fuel and burns cleaner diesel. Generators are fitted with selective catalytic reducers and their flue heights have been optimised.
- 5.8.5. To reflect this, the methodology taken in the Air Quality Assessment considers two scenarios – the routine testing of the back-up generators and the running of the back-up generators in the case of a 24 hour power outage.
- 5.8.6. Due to the significantly lower level of vehicle movements to and from the site associated with the proposed data centre when compared with the permitted use of the two buildings for logistics purposes as well as the implementation of a Travel Plan, projected vehicle trips have been scoped out.
- 5.8.7. The Air Quality Assessment concludes that, for both scenarios modelled, there would be negligible impacts on regulatory standards for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> annual mean concentrations and no significant risk of exceeding short-term standards. It also considers the temporary air quality impact during the construction phase, concluding acceptability subject to the adherence to a Construction Environmental Management Plan controlled via planning condition.
- 5.8.8. In planning policy terms, this allows for the conclusion to be reached that the proposals are compliant with Policy SI2 (Improving Air Quality) of the London Plan, Policy EM8 (Land, Water, Air and Noise) of LPP1, and Policy DMEI14 (Air Quality) of LPP2 because it has been demonstrated that the proposed development will not result in an unacceptable air quality impact.
- 5.8.9. In EIA terms, this is considered to be 'Not Significant'.

## **5.9. Landscape and Ecology**

- 5.9.1. Paragraph 135 of the NPPF states that planning policies and decisions should seek to ensure that developments will function well and add to the overall quality of an area, being visually attractive as a result of several factors including landscaping. NPPF Paragraph 136 furthers this statement, noting that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change.
- 5.9.2. Policy G5 of the London Plan states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

- 5.9.3. Policy DMHB 14 of LPP2 states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- 5.9.4. A Preliminary Ecological Appraisal has been produced by FPCR as part of the planning application.
- 5.9.5. This confirms that there are no statutory designations relating to ecological habitats or nature conservation within the Site.
- 5.9.6. Eleven Sites of Importance for Nature Conservation (SINCs) lie within 1 km of the Site. The closest of these is the Grand Union Canal SINC, which forms part of London's Canal SINC and adjoins the Site's southern boundary.
- 5.9.7. There are two designations of Nature Conservation of Metropolitan or Borough Grade 1 and Grade II or Local Importance directly to the south of the Site around the Grand Union Canal. The Site itself is of limited ecological value, comprising predominantly hardstanding. Landscaping features include ornamental trees, hedgerows and shrubs around the car park and site perimeter which were planted as part of the development of the site in accordance with the 2021 permission.
- 5.9.8. A survey of existing habitats and species on Site was undertaken. The existing habitats on Site consisted of the green roofs and green walls on the exteriors of the warehouse buildings as well as areas of newly planted trees, hedgerows and ornamental shrubs. There were also two bird and bat boxes in the northeast and southeast corners of the Site.
- 5.9.9. In terms of habitats on Site, the buildings revealed limited potential access points for bat species and, considering the limited gaps in the building construction, there is also limited potential for roosting bats. The Grand Union Canal may provide a corridor for commuting bats and other wildlife. Additionally, no evidence of current or past nesting birds were noted although trees and hedgerows on Site, as well as the bird boxes, provide nesting opportunities for nesting birds.
- 5.9.10. The objective of the proposed development was to limit any changes to the existing landscaping and habitats at the Site.
- 5.9.11. The proposed development is primarily focused on areas of existing built form or hard standing. The only impacts in terms of existing landscaping is to relocate 20 existing, immature tree specimens and the removal of 10 'green wall' panels. The trees to be relocated were only planted in 2023 when the existing buildings on site were completed.
- 5.9.12. The landscape concept protects all mature landscaping located around the perimeter of the Site including the avenue trees along the western boundary (Iron Bridge Road North). The wider landscape scheme will include:
- Planting 32 additional trees;
  - Additional planting of native species, native shrubs and ornamental species;
  - Enhancements of existing rain gardens and SuDS features; and
  - Additional hedgerow and wildflower planting along Iron Bridge Road North.
- 5.9.13. The effect of the proposed development is an Urban Greening Factor (UGF) of 0.215. Whilst Policy G5 of the London Plan explicitly excludes Class B8 uses from achieving a specific UGF score, it sets a requirement that the onsite UGF is maximised as much as possible.

- 5.9.14. The package of documentation submitted as part of this application demonstrates that the UGF score that the proposed development achieves has been maximised as much as possible given the inherent constraints (around security requirements and offsets and buried services) resultant from operation as a data centre.
- 5.9.15. The Preliminary Ecological Appraisal also provides commentary around which portions of the site are sensitive to external lighting and the site's ecological sensitivities have informed the external lighting strategy which seeks to avoid light spill to site boundaries.
- 5.9.16. Full details of the landscape proposals for the Site are included in the Landscape Statement prepared by Macfarlane and Associates.
- 5.9.17. Policy DMEI 7 of the LPP2 requires development to retain and enhance features of biodiversity value.
- 5.9.18. Paragraph 8 of the NPPF seeks to secure net gains within the three underpinning objectives of sustainable development, including improvements to biodiversity and the quality of the natural environment. Paragraph 186 also explicitly states that opportunities to incorporate biodiversity improvements within development proposals should be strongly encouraged, especially where this can secure measurable net gains for biodiversity.
- 5.9.19. The Environment Act 2021 requires developments to deliver a mandatory 10% net gain in biodiversity.
- 5.9.20. A Biodiversity Net Gain Report and Metric Calculation has been prepared by FPCR. The Report demonstrates that the proposed development will deliver a net gain of 16.5% in total habitat units and a 54.2% net gain in total hedgerow units. It also confirms that all trading rules are satisfied by the proposed development. The proposed biodiversity enhancements will be subject to detailed design and a 30 year management plan which can be secured via a planning condition.
- 5.9.21. The proposed development accords with the requirements of Policy EM7 of LPP1 and Policy DMEI 7 of LLP2.

## **5.10. Noise impacts**

- 5.10.1. Together, Policy EM8 (Land, Water, Air and Noise) of LPP1 Policy D14 (Noise) of the London Plan set a framework for considering matters relating to noise. Applied to this application, these policies require that the introduction of new development does not have an adverse noise impact on existing land uses and, conversely.
- 5.10.2. Submitted as part of this application is a Planning Noise Assessment prepared by Sharps Redmore. The Plant Noise Assessment models three scenarios – normal operation in the day time, normal operation in the night time, and emergency operation in the night time. Given the higher background noise levels during the day time, there is no value in modelling either emergency operation in the day time or generator testing in the day time (as, if emergency operation in the night time is acceptable then, by virtue of the higher background noise levels, so would both of these events).
- 5.10.3. The Plant Noise Assessment demonstrates that, modelled noise levels will be at least 5dB below background during normal operations, as well as being below the absolute noise level of 35dB at the nearest residential receptors at Emden Place. These are the requirements placed by condition on the planning permission allowing the Virtus data centres adjacent to the application site.

- 5.10.4. Likewise, the Plant Noise Assessment demonstrates that, whilst background noise levels will be exceeded in the emergency operation in the night time scenario at Emden Place, this is modelled to be within tolerance and align with the requirements placed by condition on the planning permission allowing the Virtus data centres adjacent to the application site.
- 5.10.5. With regards to the Busy Bees Nursery, the Plant Noise Assessment models that noise levels will be below recommended in relevant guidance.
- 5.10.6. Taking the above together, the Plant Noise Assessment demonstrates that the proposed development is expected to result in noise levels that comply with the levels that LBH have controlled via planning conditions at other data centre sites. On this basis, the conclusion can be reached that the proposals comply with Policy EM8 (Land, Water, Air and Noise) of LPP1 Policy D14 (Noise) of the London Plan.

## **5.11. Flood Risk and Drainage**

- 5.11.1. At a national level, the NPPF encourages the direction of new development away from areas identified to be at high risk of flooding sources, instead situating development in those areas of lowest risk in the first instance. London Plan Policy SI12 states development proposals should ensure flood risk is minimised and mitigated through sufficient measures integrated within the development.
- 5.11.2. The Environment Agency's flood maps show the Site is located entirely within Flood Zone 1 which has the 'lowest' risk of fluvial / tidal flooding. Flood Zone 1 is deemed to have between a 1 in 1000 (0.1%) chance of river or tidal flooding in any one year. The Yeading Brook and its banks are in Flood Zone 3.
- 5.11.3. There are pockets of surface water flood risk on the Site, which does not follow the patterns of the existing built form. These pockets of surface water flood areas are located where the existing buildings are and in the parking areas proposed.
- 5.11.4. As above, the closest water feature to the Site is the Grand Union Canal which runs directly to the south of the Site.
- 5.11.5. An assessment of geological ground conditions was undertaken as part of the Flood Risk Assessment and Drainage Strategy, focusing on the potential movement of groundwater through Made Ground, Drift Geology and Solid Geology. The Site is considered to present a medium-high risk of groundwater vulnerability.
- 5.11.6. The underlying bedrock comprises the London Clay Formation (clay, silt and sand), deposited between approximately 56 and 47.8 million years ago. Overlying this are superficial deposits of the Lynch Hill Gravel Member (sand and gravel), formed between approximately 362,000 and Much of the Site consists of Artificial / Made Ground associated with previous development.
- 5.11.7. A Flood Risk Assessment and Drainage Strategy Report prepared by Pinnacle sits as part of this submission. Given the nature of data centres, developers and occupiers require sites to be flood free and therefore their operational requirements with regards to flood risk are considered more stringent than set out in planning policy.
- 5.11.8. The Flood Risk Assessment and Drainage Strategy Report confirms that the flood risk to the proposed development from all sources is assessed as low and therefore that the proposed development and its users will be safe from all sources of flooding over the development's lifetime.

- 5.11.9. With regards to drainage, the proposed strategy of making use of SuDS to control water onsite before discharging into the Grand Union Canal follows the surface water disposal hierarchy given that there is no demand for re-use of water onsite and that the site's geology prevents infiltration. Details of pollution management and maintenance measures are included within the Drainage strategy.
- 5.11.10. The proposed development is therefore considered to accord with and London Plan Policy SI12 and LLP2 Policy EM6.

## 6. Conclusion

- 6.1.1. This Planning Statement has been prepared by Savills on behalf of Prologis.
- 6.1.2. It supports a planning application for full planning permission for a package of physical works including the installation of internal mezzanines within both buildings to facilitate the conversion of two completed but vacant logistics buildings to two data centres.
- 6.1.3. Data centres have specific locational requirements (primarily around location, power availability, and fibre connectivity) which the subject site satisfies. Its redevelopment to deliver two data centres provides an opportunity to deliver much needed additional data centre capacity on a previously developed site that is within an Availability Zone with a need that is forecast to grow significantly and not be met by committed supply. The conversion of the buildings also aligns with local, regional, and national planning policy (and decisions taken in this context) relating to the principle of development, both by making most efficient use of previously developed land and ensuring that the planning system responds to the needs of the modern economy by bringing two vacant buildings into active use.
- 6.1.4. The application is supported by a package of supporting technical documentation, including an Environmental Statement. Together, these documents demonstrate the environmental and technical acceptability and performance of the proposals, allowing for the conclusion to be reached that the proposals comply with development management style planning policies contained within LPP1, LPP2, and the London Plan.
- 6.1.5. Even if the Council were to identify limited areas of tension with development management policy, those matters would attract no more than limited weight against the proposals. Any such harm would be localised and modest in nature, arising principally from the visual presence of new plant and security infrastructure. Against that, the proposals would deliver substantial public benefits, including the provision of critical national infrastructure, a meaningful contribution to the pressing need for additional data centre capacity within the London Availability Region and Hayes Availability Zone, the productive re-use of completed existing employment buildings on previously developed land, significant reductions in traffic and servicing movements compared with the extant lawful use, biodiversity net gain, and economic and employment benefits. Taken together, those benefits clearly and decisively outweigh any limited harm.
- 6.1.6. Taking the above together, the conclusion can be reached that planning permission should be granted.