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Mr Jack Bell

Savills Mountbatten House

1 Grosvenor Square

Southampton

SO15 2BZ

Officer: Emilie Bateman

Email: planning@hillingdon.gov.uk

Ref: 67666/APP/2026/2056

12th October 2026

Dear Mr Bell,

Town and Country Planning Act 1990 (as amended) & Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2017 (as amended) (herein 'EIA Regs 2017')

Scoping Opinion – Former Sipson Garden Centre, Sipson Road

I refer you to the above matter with respect to the request for a Scoping Opinion from the Hillingdon Council Local Planning Authority. The following documentation was submitted with the request:

- EIA Scoping Request Document

The proposed development

The applicant, Virtus Data Centres, proposes to submit a planning application for a development described as follows:

Redevelopment of the former Sipson Garden Centre site to provide a data centre facility including associated energy infrastructure, security measures and access arrangements.

Aspects of the environment likely to be significantly affected (the Scoping Opinion)

The letter sets out the Scoping Opinion in relation to the 'Scoping Report', taking into account the observations of the various statutory and non-statutory consultees.

Please be advised that the scope of the EIA will need to be kept under review and modified, for example, if there is a material change in the project or baseline conditions, if new information comes to light and/or new environmental impacts are identified that have the potential to be significant.

Scoped Out:

The topics which are agreed to be 'scoped out' are listed as follows:

- Major accidents and disasters (provided potential risks/effects related to UXO, terrorist attacks and cyber attacks can be suitably mitigated);
- Odour;

- Lighting;
- Wind Microclimate;
- Ecology and Biodiversity (subject to submission of the supporting ecological information identified within this opinion);
- Ground Conditions and Contamination (subject to supporting investigations and mitigation being secured);
- Daylight and Sunlight (subject to the findings of the accompanying technical assessment); and
- Transport and Access (subject to supporting Transport Assessment evidence confirming no significant residual effects).

Based on the information currently available and the comments contained within this Scoping Opinion, it is considered that the above topics can be scoped out of the Environmental Statement, subject to the recommendations and qualifications set out within Appendix A.

Scoped In:

The topics which are agreed to be scoped in are listed as follows:

- Air Quality;
- Archaeology;
- Landscape and Visual Impact;
- Noise and Vibration;
- Climate Change and Greenhouse Gas Emissions;
- Cumulative / in-combination effects;
- Utilities and Energy Infrastructure.

In addition, further justification is required in relation to:

- Agricultural Land Quality and Soils;
- Waste and Resources;
- Hydrology, Flood Risk and Drainage;
- Socio-economics and Human Health;
- Aviation; and
- Built Heritage.

Should subsequent assessment demonstrate the potential for significant effects in relation to these matters, they should also be scoped into the Environmental Statement.

Based on the information provided, it is considered that there are likely to be significant effects associated with the scoped-in topics identified above and these should be assessed within the Environmental Statement.

The justification for scoping in these topics is contained within the Scoping Report and the Council's independent technical review. Relevant additions, amendments and further assessment requirements are set out in detail within **Appendix A**.

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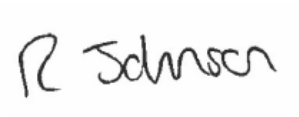
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The applicant is encouraged to read and consider comments received from all consultees, which are reproduced in **Appendix A**.

I trust the above clearly sets out the Scoping Opinion of the London Borough of Hillingdon. However, should there be any matters arising, please do not hesitate to contact us.

Yours sincerely,



Roz Johnson

Head of Development Management and Building Control

On behalf of the Council

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Appendix A: Buro Happold's Environmental Impact Assessment Scoping Opinion

Please see document appended separately.

BURO HAPPOLD

Former Sipson Garden Centre

Independent Review of EIA Scoping Opinion Request (Savills, August 2026)

072251-001

072251

7 October 2026

Revision P01

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Revision	Description	Issued by	Date	Checked
P01	Independent Review of EIA Scoping Opinion Request (Savills, August 2026)	PL	07/10/2026	HL

https://burohappold.sharepoint.com/sites/072251/Shared Documents/Environment/EIA Scoping Review/FSGC - EIA Scoping Report Review-001.docx

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author	**Patrick Little**
date	**07/10/26**
approved	**07/10/26**
signature	
date	**07/10/26**

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Appendix A Consultee Comments

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1 Introduction

1.1 Background

Buro Happold has been commissioned by the London Borough of Hillingdon ('LB Hillingdon) to provide independent Environmental Impact Assessment (EIA) and environmental planning advice and peer review services in relation to a proposed datacentre campus development on the site of the Former Sipson Garden Centre and land to the south, Sipson Road, Sipson, in the London Borough of Hillingdon.

In due course, Virtus Data Centres Limited (hereafter referred to as 'the Applicant') will be submitting an outline planning application to LB Hillingdon, as the determining authority. The proposals comprise the demolition of existing structures on site and construction of a new datacentre building (54MW Capacity), of approximately up to 25,000sqm (GFA), as well as ancillary office accommodation (approximately 5,250sqm), external plant (approximately 6,500sqm) and substation (approximately 3,250sqm), and car parking provision of 100 spaces.

The Applicant recognises there is the potential for significant environmental effects to arise. As such, in line with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended in 2018), the proposed development will be subject to EIA. This will culminate in the preparation of an Environmental Statement (ES), which will be submitted alongside the planning application in due course. The Applicant has commissioned Savills as Lead EIA Consultant for the scheme.

The purpose of this document is to report the outcome of Buro Happold's independent review of the EIA Scoping Opinion Request, prepared by Savills (dated August 2026) (hereafter referred to as the 'EIA Scoping Report'). It provides commentary suitable for inclusion in LB Hillingdon's EIA Scoping Opinion.

Buro Happold's review comprises a review of the overall process and proposed approach to the EIA, as set out in the EIA Scoping Report, as well as technical reviews of relevant sections of the EIA Scoping Report provided by Buro Happold's air quality, climate change, energy, water resources, and ecology technical specialists. These technical specialists have been instructed by LB Hillingdon, as the Council does not currently have the capacity to provide this expertise internally to support the project. Consultee comments that have been received have also been considered in the review. These are provided in full in **Appendix A**.

1.2 Buro Happold Review Team

The review of the overall process and proposed approach to the EIA, as set out in the EIA Scoping Report, has been undertaken by an experienced EIA coordinator in Buro Happold's Environmental Consulting team.

Buro Happold's Environmental Consulting team is experienced in managing and coordinating EIAs and lead authoring EIA documents for projects in London and across the UK. The team is also experienced in supporting local planning authorities in an independent EIA advisory and peer review role. Buro Happold is ISEP EIA Quality Mark accredited, demonstrating our commitment to upholding the highest standards of EIA practice.

The technical reviews have been undertaken by Buro Happold's experienced technical specialists.

Buro Happold's review team is set out in Table 1.1.

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Table 1.1 Buro Happold's review team

Consultant	Role	Qualifications, experience and memberships
Patrick Little Buro Happold	EIA process review of the entire EIA Scoping Report, including compliance with the Town and Country Planning EIA Regulations (2017) (as amended) Technical review of Climate Change and Greenhouse Gases section	BSc, MSc, PISEP Technical Director and EIA and Environmental Planning Lead, London & the South East. Patrick is a specialist in EIA, environmental planning and climate change EIA consultancy. He has over 15 years of environmental consultancy experience and has co-ordinated EIAs and prepared EIA documents, including Environmental Statements (ES) and Climate Change and Greenhouse Gas Emissions ES chapters, for numerous urban development projects in London and across the UK. Patrick is also experienced in supporting local planning authorities in an independent EIA advisory and peer review role.
Kathryn Woolley	Technical review of Section 6: Air Quality	BSc (Hons), MIAQM Associate Director Kathryn Woolley has over ten years of experience in carrying out air quality assessments for planning and is a Member of the Institute of Air Quality Management (MIAQM). She has worked on numerous data centre air quality assessments, including Pure Data Centres' LON1 facility in London and the Republic data centre at East India Dock, and has peer-reviewed air quality work on multiple projects.
Fernando Scherner	Technical Review of Section 10 Ecology (specifically in regard to impacts on statutory designated ecological sites)	BSc MSc PhD MCIEEM CEcol Associate Director Fernando has over 19 years' experience delivering complex ecological and environmental consultancy projects across the UK and internationally. Fernando has technical expertise in ecology, biodiversity and ecosystem assessment.
Luke Boustead	Technical Review of Section 12: Hydrology, Flood Risk and Drainage (specifically in regard to impacts from use of water resources)	MEng (Hons), CEng MICE, CEnv C.WEM MCIWEM Associate Director As Global Lead for Water Resource Management, Luke advises on water neutrality, catchment water balance, supply-demand assessment, nutrient neutrality and environmental constraints, helping develop resilient, evidence-based solutions. He is also an ICE Professional Reviewer, Trustee of an environmental charity, and member of a public-sector design review panel.
Chris Glover	Technical review of Utilities (Energy Infrastructure) sections	BEng (Hons), CEng, MBA, MIGEM, MIET Director With over 30 years of experience, Chris has extensive experience in utility and power connection strategy for complex, power-intensive developments, with a strong track record in advising on electrical infrastructure for major projects including data centres.

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1.3 The structure of this document

The remaining parts of this report are structured as follows:

- An assessment of regulatory compliance;
- Review of proposed EIA approach; and
- Summary and conclusions.

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2 Regulatory Compliance

2.1 EIA regulatory context

The procedures for carrying out EIA for a proposed development under the English town and country planning regime are set out within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended in 2018[1]) - herein referred to as the 'EIA Regulations 2017'.

The proposed development is not Schedule 1 development, for which EIA would be mandatory. It is however of a type listed within the descriptions of development contained within Schedule 2. The Applicant has considered that it falls under Category 10(a) Industrial Estate development projects. It could also be considered to fall under Category 10(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas.

A development is considered to be Schedule 2 development if any part of it lies within a 'sensitive area' or if it meets or exceeds the relevant thresholds and criteria for that category of development, set out in the EIA Regulations 2017.

For Category 10(a) projects, the thresholds and criteria are:

- The area of the development exceeds 5 hectares.

For Category 10(b) projects, the thresholds and criteria are:

- The development includes more than 1 hectare of urban development which is not dwellinghouse development
- The development includes more than 150 dwellings
- The overall area of the development exceeds 5 hectares.

The proposed development does not lie within a sensitive area; however, on the basis that it would exceed the 1 hectare of non-residential development threshold under Category 10(b) and the 5 hectare site area threshold under both categories, it is considered to be Schedule 2 development and would therefore fall within the scope of the regulations. Schedule 2 developments are considered to be 'EIA development' if they are likely to result in significant effects on the environment by virtue of factors such as their nature, size and location.

As set out in the EIA Scoping Report, the Applicant has determined that because "*some significant effects are likely to arise*", the proposed development will constitute EIA development and therefore proposes to submit an ES in due course, in conjunction with the planning application. The Applicant is therefore forgoing the option to attempt to 'screen out' the need for EIA via the EIA screening process.

2.2 EIA scoping compliance

Regulation 15(2)(a) of the EIA Regulations 2017, sets out what must be included in a Request for a Scoping Opinion. Table 2.1 below sets out the EIA Scoping Report's compliance with the requirement of this Regulation.

[1] *The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018*

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Table 2.1 Review of EIA Scoping Report compliance

EIA Regulation Requirement	Requirement met in the EIA Scoping Report?
A plan sufficient to identify the land	Yes - a site location plan is provided in Figure 2.1 in the Site and Local Context section of the EIA Scoping Report, as well as in Appendix 2.1 at the rear of the document.
A brief description of the nature and purpose of the development, including its location and technical capacity	Yes – descriptions of the application site's location and the proposed development are provided in the Site and Local Context and the Proposed Development sections of the EIA Scoping Report respectively. The description of the site itself provided in this section is lacking in detail in certain areas, e.g. a comprehensive summary of the buildings present on site has not been provided. A comprehensive description of the site should be provided in the ES in due course.
An explanation of the likely significant effects of the development on the environment	Yes – the topics considered in the EIA Scoping Report are discussed in Sections 5 to 15 of the EIA Scoping Report. Where topics are proposed to be scoped in on the basis that significant effects are considered likely to arise, this has been stated. The topics proposed to be scoped in and out of the ES are also set out in Table 1.1 in the Introduction section of the document.
Such other information or representations as the person making the request may wish to provide or make	Yes – additional information on the proposed EIA methodology has been included throughout the EIA Scoping Report.

As set out in the table above, the EIA Scoping Report is considered to meet the necessary regulatory requirements.

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3 Review of Proposed EIA Approach

The outcome of Buro Happold's review of Savills' proposed approach to undertaking the EIA is set out in this chapter. Each section of the EIA Scoping Report has been reviewed in chronological order, with the structure of this chapter following the same general structure as the EIA Scoping Report. All sections of the EIA Scoping Report have been subject to an EIA process review, while specific sections have also been subject to technical review by Buro Happold's air quality, climate change, energy, water resources, and ecology specialists. The review also takes into account comments provided by the consultees. Where additional assessment work has been recommended, this is clearly set out under each relevant technical topic heading.

In undertaking this review, Buro Happold has had regard to:

- any information provided by the Applicant about the proposed development
- the specific characteristics of the particular development
- the specific characteristics of development of the type concerned
- the environmental features likely to be significantly affected by the development (Regulation 15(6), of the EIA Regulations 2017).

Responses from the following consultees have been taken into account in undertaking this review:

- LB Hillingdon - Urban Design Officer
- LB Hillingdon - Conservation Officer
- LB Hillingdon – Highways
- LB Hillingdon – Lead Local Flood Authority (LLFA)
- LB Hillingdon - Contaminated Land
- LB Hillingdon - Noise Planning Specialist Team
- Natural England
- Heathrow Airport Limited
- The Environment Agency (EA).
- Historic England - Greater London Archaeological Advisory Service
- Historic England (Built Heritage)
- Environment Agency

The consultation responses are provided in full in **Appendix A**.

3.1 Section 1: Introduction

Consultee Responses

No responses have been received from the consultees in relation to this section of the EIA Scoping Report. Buro Happold's review of this section is set out in the sections below.

Buro Happold EIA Process Review

It is stated in this section of the EIA Scoping Report that the EIA will be undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations 2017'). The regulations were amended in 2018 by The Town and Country Planning and Infrastructure Planning (Environmental Impact

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Assessment) (Amendment) Regulations 2018. The EIA should be undertaken in accordance with the amended regulations and they should be referenced in the ES in due course.

3.2 Section 2: The Site and Local Context

Consultee Responses

No responses have been received from the consultees in relation to this section of the EIA Scoping Report. Buro Happold's review of this section is set out in the section below.

Buro Happold EIA Process Review

The description of the site provided in this section of the EIA Scoping Report is lacking in detail in certain areas, e.g. a comprehensive summary of the buildings present on site has not been provided. A comprehensive description of the site should be provided in the ES in due course. All aspects of the site relevant to the assessments scoped into the EIA should be clearly described.

The orientation of the site location plan in Figure 2.1 is ambiguous. The figure is not presented with north at the top of the page and does not include a north arrow. Figure orientation should be clearly indicated for all relevant figures in the ES.

The EIA Scoping Report states that a new electricity connection will be established with Laleham Substation and that this new cable route will comprise 'associated development'. This should therefore be assessed in combination with the proposed development in the ES. Known information and assumptions regarding the cable route, including its location and the associated area boundary being considered, should be included in the ES.

3.3 Section 3: The Proposed Development

Consultee Responses

No responses have been received from the consultees in relation to this section of the EIA Scoping Report. Buro Happold's review of this section is set out in the sections below.

Buro Happold EIA Process Review

It is stated in this section of the EIA Scoping Report that the datacentre will have a capacity of 54 MW. It is unclear whether this refers to the IT load capacity, gross facility demand, firm import capacity, or an aspirational campus capacity. A 54 MW IT load could require materially higher grid import once cooling and electrical losses are included. This should be clarified in the ES in due course.

It is stated that the assessments will be based on a set of maximum parameter plans. Paragraph 3.1.9 sets out what the parameter plans are proposed to cover. This should also include maximum building footprints/envelopes.

To ensure the Rochdale Envelope approach is followed, the assessments should also be based on numerical maximum parameters where necessary. For example, maximum parameters regarding floorspace quanta, car parking spaces and datacentre power capacity.

It is stated that in some instances, the illustrative masterplan may also be referred to within the impact assessments to provide additional context to the proposed development. This is acceptable; however, any effect significance judgements should be based on the maximum parameters rather than the illustrative masterplan.

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The construction phase assessments should assess the worst-case demolition and construction phase effects on each relevant receptor across the programme.

Paragraph 3.1.12 states that "*Throughout the construction impact assessments, the assumption will be made that the standard environmental controls required under legislation and best practice guidance are met as a matter of course*." This is acceptable, provided that these 'standard environmental controls' and how they will be secured are clearly set out in the ES.

Paragraph 3.2.6 states that "*the assessment of effects prior to the adoption of additional mitigation measures will assume that construction will proceed in accordance with industry standard best practice techniques and that all legislative requirements will be met. Standard measures can be secured through planning conditions and will therefore not be repeated as mitigation in the ES. These include: site waste management; construction and environment management; construction traffic management.*" Whether secured by condition or not, all mitigation measures that inform the effect significance judgements in the ES must be provided in full in the ES for full transparency.

3.4 Section 4: Consultation, Site Selection and Alternatives

Consultee Responses

No responses have been received from the consultees in relation to this section of the EIA Scoping Report. Buro Happold's review of this section is set out in the sections below.

Buro Happold EIA Process Review

Section 4.2 discusses pre-application consultations with LB Hillingdon and how a summary of the consultations and their outcomes will be presented in the ES. The ES should also provide a summary of the public consultation exercises undertaken, including those contacted/attending, feedback, and how this has been considered and responded to in the EIA.

3.5 Section 5: Approach to Assessment

Consultee Responses

Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- Heathrow Airport Limited (HAL)
- Historic England Greater London Archaeology Advisory Service (GLAAS)

In its consultation response, HAL states that it considers that the proposed development could conflict with and prejudice the delivery of the Heathrow Expansion project. Under the expansion proposals, the land within the current application site is proposed for a realignment of the A4, public open space and provision of European Protected Species enhancements. It requests that "*The Environmental Statement should therefore include a robust assessment of these interactions and demonstrate how such conflicts would be avoided, reduced or mitigated. and requests a consideration of the interactions between the two schemes in the EIA.*"

In its consultation response, GLAAS has also referenced the need to assess the cumulative archaeological impact of the proposed development in combination with the Heathrow Expansion proposals.

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Buro Happold EIA Process Review

The proposed generic receptor sensitivity and impact magnitude criteria to be used across the ES are provided in Tables 5.1 and 5.2 in the EIA Scoping Report. Topic specific sensitivity and magnitude criteria should be provided in each of the technical ES chapters in due course that should form the basis of the assessments. There is an incorrect use of the term 'effects' in the criteria description for a high impact magnitude. The ES should clearly differentiate between impacts and effects. i.e. an impact is the change caused by the proposed development, whereas an effect is the consequence of that change for a particular environmental receptor, taking into account the sensitivity of that receptor.

Paragraph 5.4.4 states that "*Having identified the sensitivity of the receptor and the magnitude of the impact, the standard matrix set out below will be used to indicate the predicted level of effect, ranging from neutral to substantial.*" The matrix indicates a scale ranging from negligible to substantial, rather than neutral to substantial. The methodology should be clearly and consistently defined and applied within and across the ES.

The likely effects of the proposed development will be described as adverse / beneficial; direct / indirect; temporary / permanent; and reversible / irreversible. In addition to these descriptors, whether effects are short / medium / long - term should also be described for each and every effect reported in the ES.

Both embedded and additional mitigation measures should be clearly described in each relevant ES chapter. For all additional mitigation measures, it should be clearly stated how the measure would be secured, e.g. by planning condition.

Paragraph 5.4.8 states that "*In the preparation of the ES, it is assumed that all legislative requirements will be met and the proposed development will be constructed in accordance with industry standard techniques and best practice methods implemented on-site. It is therefore not necessary to re-consider this as mitigation that will be evaluated in the assessment of residual effects.*" Alignment with legislative requirements cannot necessarily be assumed and any and all measures considered as embedded mitigation must be clearly stated within the ES, in line with typical good EIA practice.

The inter-development cumulative assessment is proposed to include schemes with planning permission in place that are yet to commence or complete construction, in addition to allocated schemes that are likely to proceed within three years. Planning applications that have been submitted but are not yet approved should also be included, as there is a reasonable likelihood that they could be consented before the proposed Former Sipson Garden Centre development.

The proposed list of cumulative schemes for assessment is provided in Table 5.4. It appears that only forthcoming datacentre schemes have been considered. Other development types could also potentially result in cumulative effects in combination with the proposed development, for example through cumulative landscape/townscape and visual effects or cumulative construction transport effects. The cumulative context should be reviewed and updated to include local non-datacentre development projects, taking into account planning applications that have been submitted but not yet approved. It is recommended that appropriate criteria are established to scope cumulative schemes into or out of the EIA. For example, the Schedule 2 screening criteria within the EIA Regulations 2017 could be considered for this purpose.

In its consultation response, HAL states that it considers that the proposed development could conflict with and prejudice the delivery of Heathrow Expansion and requests a consideration of the interactions between the two schemes in the EIA. Whilst EIA is not an appropriate mechanism for protecting the deliverability of another scheme, the inter-development cumulative environmental effects of the proposed development in combination with the Heathrow expansion proposals are potentially a matter for consideration in the EIA. In its consultation response,

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GLAAS has referenced the need to assess the cumulative archaeological impact of the proposed development in combination with the Heathrow Expansion proposals; whilst Buro Happold's technical review of the air quality section of the EIA Scoping Report, reported in Section 3.7 of this document, also references the need to assess the cumulative air quality effects of the two proposals. It is therefore recommended that the Heathrow expansion proposals are included as a cumulative scheme in the EIA/ES.

Climate change resilience and in-combination climate change impact assessment are discussed in Section 5.6. A qualitative in-combination climate change assessment is proposed. It is recommended that a dedicated section is included in each technical topic ES chapter. Thorough qualitative consideration should be given to the potential for the in-combination effects in each chapter. The EIA Scoping Report proposes to use the UKCP18 climate change projections to inform the assessment, based on a medium emissions scenario. In line with advice provided in the ISEP (formerly IEMA) EIA Guide to Climate Change Resilience and Adaptation (2020) (the 'ISEP 2020 Guidance'), the RCP8.5, high-emissions scenario should be used instead, using the 50th percentile, based on a timescale appropriate to the lifetime of the proposed development. The potential effects of climate change on the proposed development in terms of resilience and adaptation has not been discussed. Should such effects not be considered likely to be significant, this should be clearly explained and justified, taking into account mitigation as necessary, in the ES. Under this scenario, as a minimum, all proposed climate change resilience measures should be clearly set out in the ES, for example within the Proposed Development Description ES chapter. Alternatively, should significant effects be considered likely, a climate change resilience impact assessment/risk assessment should be undertaken in accordance with the ISEP 2020 Guidance and reported in the ES.

3.6 Section 5: Proposed Scoped out Topics

3.6.1 Major accidents and disasters

Consultee Responses

No responses have been received from the consultees in relation to this section of the EIA Scoping Report. Buro Happold's review of this section is set out in the sections below.

Buro Happold EIA Process Review

Section 5.3.7 references an "*absence of recognised guidance on this subject in the context of EIA*". Buro Happold would direct the authors to the ISEP (formerly IEMA) *Major Accidents and Disasters in EIA: A Primer* (2020), which applies specifically to EIA.

Given the generally low risk of occurrence of major environmental hazards in the UK, such as major volcanic eruptions and earthquakes, these hazards have been screened out from further consideration. Flood risks have been considered in a separate section.

Other potential risks have been screened out on the basis that design measures will be embedded and statutory design guidelines will be complied with. No further explanation/justification is given in the EIA Scoping Report.

The proposals would be required to meet building regulations, which, for example, would cover fire safety; should ensure appropriate internal thermal comfort conditions are achieved during periods of extreme temperature highs and lows; and should ensure the proposed buildings would be capable of withstanding storms.

Other relevant existing mitigation is already in place. For example the Met Office operates a national severe weather warning service to inform the public and emergency responders of forthcoming severe or hazardous weather which

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would have the potential to cause loss of life or widespread disruption. Cold Weather Alerts and a Heat Health Watch Service are currently provided by Public Health England. The purpose of these services is to provide health advice for the public and healthcare workers in England, according to levels of heat forecast/measured by the Met Office. The 999 emergency response procedure is also in place to allow any site users whose health may be affected by accidents or hazards that may occur to request an ambulance or other emergency assistance.

It is stated in the Ground Conditions and Contamination section of the EIA Scoping Report that a Preliminary UXO Risk Assessment by Igne has identified WWII military activities on or affecting the site. Igne has recommended that a Stage 2 Detailed UXO Risk Assessment is commissioned to clarify the UXO risk to the proposed development. It is recommended that this assessment is undertaken and the outcomes reviewed and potential mitigation agreed, if necessary, before a decision is made regarding scoping this topic in or out of the EIA. There has also been no consideration of terrorist attacks or cyber attacks in the EIA Scoping Report. This should be considered by the Applicant and justification for why significant effects are not anticipated should be provided in the ES. Provided potential risks/effects related to UXO, terrorist attacks and cyber attacks can be suitably mitigated, scoping this topic out of the ES would be acceptable.

3.6.2 Agricultural Land Quality and Soil Resource

Consultee Responses

No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

Buro Happold EIA Process Review

This section of the EIA Scoping Report does not provide sufficient assurance that significant effects on agricultural land and soils can be avoided.

The green areas on site are shown on the Predictive Agricultural Land Classification Map as being Grade 1 agricultural land, the highest grade of agricultural land quality. If accurate, this would likely be considered of high sensitivity in EIA. A site-specific Agricultural Land Classification (ALC) assessment is proposed to be prepared and submitted alongside the planning application, which would accurately ascertain the agricultural land quality of the site.

Dependent on the ALC results, the total area of agricultural land that would be lost under the proposals, and the proposed mitigation measures, at this stage, Buro Happold considers that there may be the potential for significant effects on agricultural land and soils to arise. It is recommended that the potential for significant effects is reviewed when the ALC results are available and mitigation measures are confirmed. Should significant residual effects not be anticipated, comprehensive justification should be provided in the ES, supported by the results of the ALC, and the proposed mitigation measures. Alternatively, should significant effects be considered likely to arise, Agricultural Land and Soils should be scoped into the EIA and a dedicated chapter should be included in the ES.

3.6.3 Waste & Resources

Consultee Responses

No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

Buro Happold EIA Process Review

This section of the EIA Scoping Report does not provide sufficient assurance that significant effects related to waste and resources can be avoided.

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Local baseline landfill capacity data and the likely effects upon this capacity have not been specifically considered. In line with the guidance provided in the ISEP (Formerly IEMA) Guide to: Materials and Waste in Environmental Impact Assessment (2020), baseline landfill capacity data and a preliminary assessment of effect significance of waste generated by the proposed development during the construction and operational phases on anticipated landfill capacity in the future should be provided based on industry benchmarks. This information should be provided in the planning submission documents. Provided this exercise indicates that significant waste effects are unlikely to arise, the Applicant's proposal to scope out this topic from the ES is considered acceptable. Alternatively, should the results indicate that significant effects are likely to arise then a stand-alone waste ES chapter should be scoped into the ES. The chapter should be prepared in accordance with the IEMA Guide to: Materials and Waste in Environmental Impact Assessment (2020).

3.6.4 Lighting

Consultee Responses

No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

Buro Happold EIA Process Review

The Applicant's proposal to scope out this topic from the ES is considered an acceptable judgement.

3.6.5 Utilities

Consultee Comments

No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

Buro Happold Technical Review

It is unclear if the reference to 54 MW is the IT load, the gross facility demand, the firm import capacity, or an aspirational campus capacity. A 54 MW IT load could require materially higher grid import once cooling and electrical losses are included. This should be clarified in the ES in due course.

The following connection evidence will need to be provided alongside the planning application: accepted grid offer, single-line diagram, connection voltage, import/export capacity, required upstream works, delivery milestones and conditions precedent.

The proposed construction/occupation period overlaps with the stated earliest permanent connection availability, with first occupation anticipated in 2029-2030 and the proposed permanent grid connection not available until 2030. This means that the site is planned to be operational before the grid connection is available, which can only be achieved if temporary power is provided from another source. The project needs a clear energisation and phasing plan, including whether building completion, partial commissioning and tenant occupation are driven by the grid connection date, or whether temporary generation or another power source will be used to bridge the gap. It is recommended that this information is provided to LB Hillingdon for review and comment during the pre-application stage.

The approximate 8 km cable corridor remains undefined. The proposed Utilities Assessment that will be prepared and appended to the ES should address route options, highway/third-party land rights, utility congestion, environmental constraints, crossings, construction impacts, diversion requirements, consenting and programme risk.

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The EIA Scoping Report mentions demand-side management and load shifting, but does not say the scale or impact this would have. The Applicant should determine whether the operator will offer flexible workload scheduling, curtailment capability, battery/UPS flexibility, or participation in DNO/ESO flexibility arrangements.

The following should be provided by the Applicant in the planning application: PUE/WUE targets, annual MWh demand, hourly load profile, energy-procurement strategy, evidence of renewable additionality, and a quantification of operational emissions against London/UK carbon budgets.

The EIA Scoping Report recognises the opportunity for heat reuse but does not demonstrate delivery. A credible appraisal would identify viable customers, heat quantity/temperature, seasonal mismatch, route/land rights, commercial structure, interface responsibility and whether a future-ready heat-export connection will be installed.

Buro Happold EIA Process Review

The power proposed for the data centre is relatively large and given the exact size, 54MW, suggests that this is the available power locally rather than a specific size of data centre development. If this is the headroom at the substation then any future developments will face delays and increased costs as significant reinforcement works will be required to create more capacity, as this project will have acquired all the freely available power. On this basis, and taking into account the potential for inadequate provision of power for the development at the commencement of the operational phase, there is considered to be the potential for significant adverse effects to arise. Buro Happold therefore recommends that a stand-alone Utilities (Energy Infrastructure) technical chapter is scoped into the ES. The chapter should report an assessment of effect significance in regard to each of the potential impacts/receptors.

As stated in the technical review above, it is recommended that a clear energisation and phasing plan is provided to LB Hillingdon for review and comment during the pre-application stage.

3.6.6 Wind Microclimate

Consultee Comments

No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

Buro Happold EIA Process Review

The Applicant's proposal to scope out this topic from the ES is considered an acceptable judgement.

3.7 Section 6: Air Quality

Consultee Responses

Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- LB Hillingdon - Urban Design Officer

The Council's Urban Design Officer has recommended that air quality is considered as part of the EIA scoping process.

Buro Happold Technical Review

Buro Happold agrees with the aspects of the air quality assessment proposed to be scoped into the ES; however there is a general lack of detail within the EIA Scoping Report preventing the reader from being able to ascertain if the proposed methodology is sufficient. The main areas of missing information regarding the assessment methodology

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have been identified below. It is recommended that the Applicant submits further detail on its proposed assessment methodology to LB Hillingdon prior to submission of the planning application and ES to allow the Council to review and comment.

Baseline Assessment

The proposed scope provides insufficient technical detail regarding the baseline air quality assessment. The ES chapter should clearly identify the datasets that will be used to characterise existing air quality conditions, including local authority monitoring data, Defra background concentrations, any site-specific monitoring, and other significant local emission sources. Particular consideration should be given to emissions associated with Heathrow Airport, including aircraft operations, airside activities and airport-related road traffic, as these are likely to represent a key influence on baseline air quality in the vicinity of the proposed development.

Cumulative impact

Given the proximity of the site to Heathrow Airport, the assessment should set out how future changes in airport activity, committed airport infrastructure, forecast air traffic movements, and changes to the surrounding highway network will be considered in the assessment. This should include an assessment of the inter-development cumulative effects of the proposed development in combination with the proposed Heathrow Airport Expansion. The interaction between these sources and emissions associated with the proposed development should be clearly defined to ensure cumulative air quality effects are adequately assessed.

Assessment Scenarios

No assessment scenarios are currently identified. The scenarios proposed for assessment should be defined, including the baseline year, future assessment years, construction phase scenarios, operational opening year and any future design year scenarios. How cumulative developments and Heathrow Airport-related growth assumptions will be incorporated within the assessment framework should also be clarified.

Operational Scenarios

The EIA Scoping Report does not provide details of the diesel generator operation and testing scenarios that will be assessed. The assessment should clearly define the scenarios and any operating conditions for the proposed diesel generators.

Buro Happold EIA Process Review

Buro Happold has no additional observations to make in regard to the proposed methodology set out in the EIA Scoping Report beyond those set out in the technical review reported above. It is recommended that the further methodology information that has been requested is submitted by the Applicant to LB Hillingdon prior to submission of the planning application and ES to allow the Council to review and comment.

3.8 Section 7: Archaeology and Built heritage

Consultee Responses

Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- Historic England Greater London Archaeology Advisory Service (GLAAS)
- Historic England (Built Heritage)

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- LB Hillingdon - Conservation Officer
- LB Hillingdon - Urban Design Officer

The Council's Urban Design Officer has recommended that built heritage and archaeology is considered as part of the EIA scoping process.

In its consultation response, GLAAS has advised that it agrees that archaeology should be scoped into the ES and recommends further pre-application engagement. Its response is as follows:

"This is a large-scale development proposal in an area of known high archaeological potential for all periods from the Neolithic through to the medieval in the Heathrow Archaeological Priority Zone. Large parts of the site's surroundings have been subject to archaeological investigation prior to mineral extraction revealing extensive remains of early prehistoric ceremonial and burial monuments and later prehistoric, Roman and early medieval settlement and field systems.

The site lies next to the medieval village of Sipson. Archaeological evaluation trenches were dug in 2001 and should be reviewed along with published and unpublished information from the surrounding area. MOLA should be consulted for unpublished information on the West London Gravels Project. Once existing information has been reviewed it may be necessary to supplement this with additional fieldwork such as geophysical survey and/or trial trenching.

The nature of the development is such that there appears to be little scope for preservation of archaeological remains within the scheme implying a high risk of total loss of any heritage assets present. In assessing the impact the cumulative harm with previous development and the proposals for Heathrow Expansion should be considered. Mitigation for cumulative harm might include engaging with Heathrow Airports over integrating analysis and publication of this site with theirs and contributing to wider public benefit initiatives for which a Section 106 Agreement might be appropriate."

The Council's Conservation Officer has noted the potential for impacts on the setting of locally and statutory listed buildings and has requested assessment of the visual impacts, potentially supported by photographs/visualisations. The response is as follows:

"There would be a limited impact on the setting of the grade II listed King William IV public house located at the junction of Sipson Road and Harmondsworth lane. Similarly there would be an impact on the grade II listed Lanz Farm house on Harmondsworth Lane. There would be more of an impact on the setting of the locally listed Sipson Former Baptist Church 228 Sipson Lane. The biggest impact would be on the setting of the Plough Public house another locally listed building to the north of the village at 239 Sipson Road.

Adjacent to the Former Baptist Church is presumably a 19th century dwelling of a similar date which may or may not be connected to the Baptist church use. It is now the Lady Nafisa School.

We would recommend that this visual impact is assessed and perhaps some street views are produced to show the visual impact so that the harm to the setting of the designated and non designated heritage assets can be fully assessed. It would be useful to contemplate heritage gain that could help to balance any harm."

In its consultee response Historic England has not raised any concerns with the proposed approach to scoping out built heritage from the ES. The response is as follows:

"I note that that heritage is proposed to be scoped out of the ES, and taking account of the proposed scale of development (20m) and heritage in the area (several Grade II listed building in the wider area), we don't wish to raise any issues with this approach. We don't have a statutory remit to comment on settings implications for Grade II listed

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buildings, but it will be for the Council to determine whether Historic England should be consulted on the future planning application."

Buro Happold EIA Process Review

Archaeology

The proposed approach to clearly differentiate between heritage significance and effect significance in the ES chapter, set out in Paragraph 7.3.18 in the EIA Scoping Report, is supported by Buro Happold.

The Applicant is advised to align with advice from GLAAS in its consultation response when preparing the ES chapter.

Built Heritage

The EIA Scoping Report states that there is minimal intervisibility between the application site and the King William IV Public House, Sipson House, the Plough Public House, No. 228 Sipson Lane, and the Sant Nirankari Bhawan (former Cottage Hospital). Some of these receptors are extremely close to the site (e.g. the King William IV Public House and the Plough Public House are located within 70 m and 10 m of the site, respectively).

Whilst Historic England has not raised any concerns with the proposed approach to scoping out built heritage from the ES, the Council's Conservation Officer has noted the potential for impacts on the setting of locally and statutory listed buildings and has requested assessment of the visual impacts, potentially supported by photographs/visualisations.

A Historic Environment Desk-Based Assessment is proposed to be submitted alongside the planning application which will assess the impacts of the proposed development on the relevant built heritage assets. In line with the Conservation Officer's comments, the assessment should be supported by photographs/visualisations to support the impact assessment judgements. It is recommended that the full scope of the photographs/visualisations, including locations and the mix of photographs and rendered visualisations, is agreed with LB Hillingdon prior to submission of the planning application. Should the desk assessment results indicate that significant effects are likely to arise on any of the assets, built heritage should be scoped into the ES and should be subject to a stand-alone built heritage ES chapter or a combined archaeology and built heritage ES chapter.

3.9 Section 8: Climate Change and Greenhouse Gas Emissions

Consultee Responses

Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- LB Hillingdon - Urban Design Officer

The Council's Urban Design Officer has recommended that climate change and carbon are considered as part of the EIA scoping process.

Buro Happold Technical and EIA Process Review

Greenhouse Gas (GHG) Emissions

The August 2026 update to the NPPF is not specifically referenced in the Relevant Legislation and Policies section of the EIA Scoping Report, nor are other key national, regional and local policies related to net zero. All existing and

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emerging national, regional and local net zero policy should be clearly referenced and considered in the ES chapter in due course.

A quantitative lifecycle GHG assessment is proposed, which would be informed by, for example, estimated construction material quantities and predicted operational energy use. This is supported. However, Paragraph 8.2.8 states that "*Should uncertainty remain at the stage of ES regarding specific GHG activity data for parts of the Proposed Development, the assessment may be qualitative*". Buro Happold does not support this approach. In instances of uncertainty, conservative industry benchmarks should be sourced and used in place of scheme specific activity data to ensure a comprehensive quantitative and conservative approach is applied.

The Applicant should ensure that all key emissions specific to the datacentre use are captured in the quantitative assessment (e.g. embodied emissions associated with water use for cooling; and emissions associated with the testing and emergency use of backup generators). Where there is uncertainty (e.g. regarding the frequency of backup generator testing or how much emergency use could be required annually), conservative assumptions should be applied.

It is proposed that the proposed development's GHG emissions will be contextualised against both the GLA and national carbon budgets, as well as the Climate Change Committee's (CCC's) Balanced Net Zero Pathway post-2037 (although this should be post-2042, rather than post-2037, as the seventh national carbon budget (2038 to 2042) is now set in law). It is stated that the GHG emissions will also be contextualised against available sectoral budgets where possible. The Applicant should also contextualise the GHG emissions against local carbon budgets. The recommended local budgets from the Logika Local Authority Carbon Budget Tool could be used in the absence of formal local carbon budgets. At national, regional, local and sectoral scales, all budget periods in which the proposed development would be under construction or in operation should be included in the comparison exercise, and the outcomes should be considered in the assessment of effect significance, in line with the methodology advocated in the ISEP (2026) *Assessing greenhouse gas emissions and evaluating their significance with supplementary guidance* (Edition 2.1) (the 'ISEP 2026 GHG Guidance').

Thorough consideration should be given to the potential requirement for assessment of additional upstream and downstream indirect emissions in the context of the 2024 Supreme Court judgement on R (on the application of Finch on behalf of the Weald Action Group) v Surrey County Council and others. Some consideration has been given to this in Table 8.9 in the EIA Scoping Report; however a more comprehensive consideration should be provided in the ES chapter. Thorough justification should be provided for any upstream and downstream indirect emissions that could arise that the authors choose to scope out of the assessment.

In line with the ISEP 2026 GHG Guidance, the significance of Module A, B and C effects should be assessed individually, as well as cumulatively (the whole lifecycle stage (Modules A, B and C combined) in the ES chapter. The ISEP 2026 GHG Guidance also recommends a higher evidentiary bar for 'not significant' conclusions, requiring clear, evidence-based mitigation that goes beyond minimum regulatory compliance where necessary (when current policy lags behind the actions necessary to achieve levels of GHG emission reductions compatible with the UK's science-based 1.5°C compatible trajectory towards net zero). The Applicant should ensure that all mitigation measures are sufficiently clear and detailed and are secured via an appropriate mechanism.

<u>Climate Change Resilience and Adaptation</u>

A climate change resilience assessment is proposed to be scoped into the ES chapter. Buro Happold has no specific observations to make in regard to the proposed methodology set out in the EIA Scoping Report.

<u>In-combination Climate Change</u>

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A standalone In-combination Climate Change Impact (ICCI) assessment is proposed to be scoped out of the EIA, on the basis that significant in-combination effects are not anticipated. Detailed justification for this judgement has not been provided in the EIA Scoping Report. What is stated in this section appears to differ to what is stated in Section 5.6 of the EIA Scoping Report. In line with typical good EIA practice, Buro Happold recommends that a qualitative ICCI assessment is reported in the ES. In line with advice provided in the IEMA/ISEP EIA Guide to Climate Change Resilience and Adaptation (IEMA, 2020), it is recommended that effects are considered and reported on a topic-by-topic basis in each of the technical chapters in the ES.

3.10 Section 9: Daylight and Sunlight

Consultee Responses

No responses have been received from the consultees in relation to this section of the EIA Scoping Report. Buro Happold's review of this section is set out in the section below.

Buro Happold EIA Process Review

Justification for scoping out an assessment of daylight and sunlight effects from the ES is provided in the EIA Scoping Report. A daylight and sunlight assessment technical report is proposed to be submitted alongside the planning application in due course to illustrate that the proposed development does not cause unacceptable loss of amenity to adjacent occupiers by reducing the amount of daylight or sunlight they receive. On the basis that this technical report evidences that significant effects on local sensitive receptors are not anticipated, Buro Happold considers it acceptable to scope this topic out of the ES. However, should the technical report indicate that significant effects could arise, the topic should be scoped into the EIA and a dedicated technical chapter should be included in the ES.

3.11 Section 10: Ecology

Consultee Responses

Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- Natural England
- LB Hillingdon - Urban Design Officer

Natural England has provided advice in its consultation response regarding Colne Valley Regional Park: "*Natural England encourages development proposals within or adjacent to the Colne Valley to actively support the principles of the Colne Valley Regional Park by safeguarding and enhancing its interconnected green and blue infrastructure.*" It advises that "*Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again".* Natural England's generic advice is also provided in Annex A to their consultation response.

The Council's Urban Design Officer has recommended that ecology and biodiversity are considered as part of the EIA scoping process.

Buro Happold Technical Review

The ecology section of the EIA Scoping Report has been reviewed with a focus on the potential for effects on statutory designated ecological sites and the appropriateness of scoping ecology out of the EIA.

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The EIA Scoping Report identifies the nearest internationally designated site as the South West London Waterbodies Special Protection Area (SPA) and associated Ramsar site, located approximately 4.7 to 4.8 km southwest of the site. Two nationally designated sites are also identified within 5 km; namely Staines Moor Site of Special Scientific Interest (SSSI) and Wraysbury Reservoir SSSI. No statutory designated sites are located within or adjacent to the site boundary.

The Applicant concludes that significant effects on designated sites are unlikely and proposes to scope ecology out of the EIA, relying on a Preliminary Ecological Appraisal (PEA), Ecological Impact Assessment (EcIA) and associated supporting documents to accompany the planning application.

In principle, Buro Happold agrees that significant ecological effects on statutory designated sites are unlikely given the absence of direct habitat loss to designated sites and the considerable separation distances between the site and the nearest European and national designations, as well as the nature and scale of the proposed development. The site is located within an established urban and transport corridor environment adjacent to the M4 Spur Road and approximately 1 km north of Heathrow Airport, with no obvious potential pathways for direct habitat loss, fragmentation or recreational disturbance affecting the designated sites identified.

However, the justification provided for scoping out ecology relies heavily on assumptions regarding the absence of impact pathways and on the distance between the proposed development and designated sites. While the conclusion may ultimately be justified, further evidence should be provided within the planning application documentation to demonstrate this robustly.

In relation to the South West London Waterbodies SPA and Ramsar site, the EIA Scoping Report states that a Habitats Regulations Assessment (HRA) screening is not proposed because no impact pathways have been identified and because the qualifying bird species are not considered sensitive to atmospheric pollution. While this may be reasonable, sufficient information should be provided alongside the planning application to enable a Habitats Regulations Screening Assessment to be undertaken by the competent authority. This should explicitly consider all potential pathways, including air quality, hydrology, disturbance and any effects associated with backup generator emissions, traffic emissions and construction activities, even where effects are ultimately screened out.

The Applicant's conclusion that air-quality effects on European designated sites are unlikely is also dependent upon assumptions regarding the scale, location and frequency of operational emissions sources. At the EIA scoping stage, details regarding backup generators and associated emissions remain limited. The Applicant should therefore ensure that the air quality assessment and any HRA screening exercise clearly demonstrate that there would be no likely significant effects on the South West London Waterbodies SPA/Ramsar site, either alone or in-combination with other plans and projects. Given the concentration of existing and proposed data centre developments within the wider Heathrow and Hillingdon area, as well as the presence of Heathrow Airport, particular attention should be given to in-combination effects where relevant.

The proximity of Staines Moor SSSI and Wraysbury Reservoir SSSI also warrants specific consideration within the supporting ecological documentation. Although significant effects are not anticipated given the distance from the site and absence of direct pathways, the EcIA should clearly document the rationale for screening out impacts on these nationally designated sites.

Subject to the above recommendations, Buro Happold considers that significant effects on statutory designated ecological sites are unlikely and that a standalone Ecology chapter within the ES is unlikely to be required. The Applicant's proposal to scope ecology out of the ES is therefore considered acceptable, provided that the planning application is supported by a robust EcIA, PEA, BNG assessment, bat survey information and sufficient information to

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enable the competent authority to undertake a Habitats Regulations screening. Any conclusion of no likely significant effect on European designated sites should be fully evidenced within the application documentation.

Buro Happold EIA Process Review

The proposed approach to ecology is generally proportionate to the nature of the site and the findings of the ecological surveys undertaken to date. The Applicant has identified that the site is dominated by modified grassland, developed land and boundary tree planting, with statutory designated sites located several kilometres from the site. Good practice mitigation, biodiversity enhancements and a commitment to achieving at least 10% Biodiversity Net Gain are proposed.

Subject to receipt of the outstanding survey and impact assessment results and implementation of the recommendations set out above regarding designated sites and HRA screening, the Applicant's proposal to scope ecology out of the ES is considered acceptable. The EcIA and supporting ecological documents submitted with the planning application should provide the detailed evidence necessary to confirm the absence of significant effects and inform the Council's assessment. However, should the outstanding survey results indicate the potential for likely significant effects, ecology should be scoped into the EIA and a stand-alone ES chapter should be provided in the ES.

3.12 Section 11: Ground Conditions and Contamination

Consultee Responses

Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- LB Hillingdon - Contaminated Land
- LB Hillingdon - Urban Design Officer

The Council's Urban Design Officer has recommended that ground conditions and contamination are considered as part of the EIA scoping process.

The Council's Contaminated Land team has not raised any objection to the Applicant's proposal to scope out ground conditions and contamination from the ES; on the basis that suitably worded conditions are attached to any future planning consent, ensuring that the necessary surveys/investigations and remediation and mitigation measures related to this topic are secured. The proposed planning conditions are set out in the consultation response.

Buro Happold EIA Process Review

Justification for scoping out an assessment of ground conditions and contamination effects from the ES is provided in the EIA Scoping Report. Up to date Preliminary Risk Assessment (PRA) and Ground Investigation (GI) reports will be submitted alongside the planning application in due course. The mitigation measures proposed to be implemented in the Construction Environmental Management Plan (CEMP) are set out in Table 11.1 in the EIA Scoping Report. It is noted that the Council's Contaminated Land team has not raised any objection to the proposed approach.

On the basis that the PRA and GI reports clearly evidence that significant residual effects are not anticipated, Buro Happold considers it acceptable to scope this topic out of the ES. However, should the reports indicate that significant residual effects could arise, the topic should be scoped into the EIA and a dedicated technical chapter should be included in the ES. The proposed mitigation set out in Table 11.1 of the EIA Scoping Report should be secured through an appropriate mechanism.

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3.13 Section 12: Hydrology, Flood Risk & Drainage

Consultee Responses

Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- The Environment Agency (EA)
- LB Hillingdon – Lead Local Flood Authority (LLFA)
- LB Hillingdon - Urban Design Officer.

The Council's Urban Design Officer has recommended that hydrology, drainage and flood risk are considered as part of the EIA scoping process.

The EA has not made any specific comments in its consultation response.

The Council's Flood Officer has advised that, subject to advice in their consultation response being followed, they agree that hydrology, flood risk and drainage can be scoped out of the ES. Their consultation response is as follows:

The LLFA has no objection to hydrology, flood risk and drainage being scoped out of the Environmental Statement. The site is located within Flood Zone 1 and, based on the information currently available, there is no indication that flood risk or drainage matters are likely to give rise to significant environmental effects.

The proposed drainage strategy remains at an early stage of development and a number of assumptions have been made regarding the drainage approach, including the feasibility of infiltration. A site-specific Flood Risk Assessment and detailed drainage strategy should therefore accompany the planning application and demonstrate how surface water runoff will be managed, that the drainage hierarchy has been followed, and that flood risk will not be increased on or off site.

Subject to this information being provided at application stage, the LLFA agrees that flood risk, hydrology and drainage can be scoped out of the Environmental Statement."

Buro Happold Technical Review

The Hydrology, Flood Risk and Drainage section of the EIA Scoping Report has been reviewed by Buro Happold specifically in relation to the proposed development's water use and potential effects on water resources.

The EIA Scoping Report provides limited information on the operational water requirements of the proposed development. While foul flows associated with an approximate population of 102 are considered, the overall water demand of the data centre has not been quantified. In particular, the proposed cooling strategy and associated water requirements are not identified. This information is necessary to understand the potential implications for water resources.

The Applicant should confirm the proposed cooling strategy and quantify anticipated annual and peak water demand, including potable and non-potable requirements associated with cooling, process uses and staff. The assessment should identify the proposed source of water and demonstrate how demand has been minimised through water-efficient design and, where appropriate, alternative non-potable water sources.

The planning application should also provide evidence that sufficient public water supply capacity is available to accommodate the proposed development, including consultation with the relevant water company. Where

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reinforcement or other infrastructure is required to provide the necessary supply, this should be identified, together with any implications for delivery of the proposed development.

On the basis of the information currently provided, there is insufficient evidence to confirm that significant effects on water resources can be avoided. The justification for scoping out Hydrology, Flood Risk and Drainage principally considers flood risk and drainage and does not adequately address the potential scale or effect of operational water consumption.

Subject to the Applicant demonstrating that water demand can be appropriately minimised and that a sustainable and deliverable water supply is available without significant effects on water resources, Buro Happold considers that a standalone water resources chapter within the ES would not be required.

Buro Happold EIA Process Review

Buro Happold has no additional observations to make beyond those set out in the technical review reported above. It is recommended that the further information that has been requested is submitted by the Applicant to LB Hillingdon prior to submission of the planning application and ES to allow the Council to review and comment.

3.14 Section 13: Landscape and Visual Impact

Consultee Responses

Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- LB Hillingdon - Urban Design Officer

The Council's Urban Design Officer has recommended that landscape, townscape and visual are considered as part of the EIA scoping process.

Buro Happold EIA Process Review

There is an incorrect use of the term ‘effects’ in the impact magnitude criteria and accompanying text (Paragraphs 13.2.8 to 13.2.10 and Table 13.4). The ES chapter should clearly differentiate between impacts and effects, i.e. an impact is the change caused by the proposed development, whereas an effect is the consequence of that change for a particular environmental receptor, taking into account the sensitivity of that receptor. Buro Happold presumes that the reference to Table 11.9 in Paragraph 13.2.13 is incorrect and should instead refer to Table 13.9. It is noted that the proposed views and the mix of visualisations are proposed to be agreed with LB Hillingdon’s officers in due course.

3.15 Section 14: Transport and Access

Consultee Responses

Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- LB Hillingdon – Highways.
- LB Hillingdon - Urban Design Officer

The Council's Urban Design Officer has recommended that transport and movement are considered as part of the EIA scoping process. The Council’s Highways team has agreed that transport and access can be scoped out of the ES on the basis that vehicle movements from the proposed development during the operational phase would be low.

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Buro Happold EIA Process Review

Justification for scoping out an assessment of transport and access effects from the ES is provided in the EIA Scoping Report. A Transport Assessment (TA) and Travel Plan (TP) will be submitted alongside the planning application in due course.

The TA will assess the potential impacts of the proposed development during the operational phase on the local highway network and is proposed to include mitigation where necessary to avoid any significant effects. The TP is proposed to include measures to encourage staff and visitors associated with the proposed development to travel by sustainable transport modes, to minimise additional vehicle trips on the surrounding highway network. Construction phase mitigation measures are also proposed to be recorded in the CEMP.

On the basis that the TA clearly evidences that significant residual effects on the local transport network during the operational phase are not anticipated, Buro Happold considers it acceptable to scope an assessment of operational phase transport effects out of the ES. Given the TA will focus only on the operational phase, further justification for scoping out an assessment of construction phase transport effects should be reported in the ES (for example, within the Proposed Development Description chapter). This should include the anticipated peak construction vehicle movement figures, as well as any mitigation to be secured in the CEMP. Any proposed mitigation should be secured by an appropriate mechanism. However, should the documents indicate that significant residual effects could arise, the topic should be scoped into the EIA and a dedicated technical chapter should be included in the ES.

3.16 Section 15: Noise and Vibration

Consultee Responses

Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- LB Hillingdon - Noise Planning Specialist Team
- LB Hillingdon - Urban Design Officer

The Council's Urban Design Officer has recommended that noise and vibration are considered as part of the EIA scoping process.

The Council's Noise Planning Specialist Team has agreed that noise and vibration should be scoped into the EIA.

Buro Happold EIA Process Review

Paragraph 15.2.3 in the EIA Scoping Report states that the key receptors sensitive to changes in noise and vibration levels that could potentially be affected by the proposed development are existing residential properties. However, Paragraph 13.3.1 also references the adjacent hotel and school as sensitive receptors. The ES chapter should assess effects on all of these local sensitive receptors.

The receptor sensitivity, impact magnitude and effect significance criteria have not been provided. The criteria used in the ES chapter should be transparent and repeatable.

The technical methodology information is light in detail, for example in regard to construction vibration. The technical methodology should be set out in detail in the ES chapter in due course. The assessment should consider all relevant aspects of the proposed development that could create noise, including testing and potential use of backup generators, and the cooling infrastructure.

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3.17 Additional Topics Not Considered in EIA Scoping Report

3.17.1 Socio-economics and Human Health & Wellbeing

Consultee Responses

Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- LB Hillingdon - Urban Design Officer

The Council's Urban Design Officer has recommended that socio-economics and human health are considered as part of the EIA scoping process.

Buro Happold EIA Process Review

The EIA Scoping Report does not identify or consider potential socio-economic or human health and wellbeing effects.

This omission should be addressed. Although "socio-economics" is not a separately named EIA topic in the EIA Regulations 2017, there is a clear statutory basis for considering it through the requirement to assess likely significant effects on population and human health. The Applicant should justify why significant socio-economic and human health and wellbeing effects are not expected to arise. This should be provided in the ES in due course. If it cannot be suitably justified, these topics should be scoped into the EIA, with stand-alone technical chapter(s) provided in the ES.

3.17.2 Aviation

Consultee Responses

Responses have been received from the following consultees in relation to this topic:

- Heathrow Airport Limited (HAL)

In its consultation response, HAL has provided the following advice:

"Obstacle Limitation Surfaces

The site is located beneath multiple Obstacle Limitation Surface (OLS) for Heathrow Airport Ltd. The following surfaces are the most onerous.

- *Inner Horizontal Surface/Transitional Surface - At the point of the site, the surface has a height limitation or 67.95m Above Ordnance Datum (AOD) on the Northen boundary and 54m AOD respectively on the southern boundary of the site. These heights represent the level above which consideration needs to be given to the control of new obstacles to facilitate practicable and efficient operation of Heathrow's runways.*

All OLSs restrict the height of buildings, plant, and roof structures such as aerials and flagpoles.

Although the above surface sets the height restrictions for the site it does not necessarily mean we would accept them. National Air Traffic Services (NATS) would still have to carry out an operational assessment at the full planning stage.

Instrument Flight Procedures

Heathrow's Instrument Flight Procedures (IFPs) would also need to be protected. An initial assessment shows that the proposed heights of the development would not have an impact on the IFP's associated to Heathrow Airport. However, once the design has sufficiently matured, Heathrow's advice would be to undertake a pre-planning assessment so that

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any IFP concerns can be formally assessed at the cost of the applicant. A request for Pre-Planning assessments should be sent to Heathrow via Safeguarding@heathrow.com.

Furthermore, an assessment of any proposed crane operations would also require an IFP assessment ensuring no impact to Heathrow's IFP routes.

Building/Roof Design:

It is important that the building/roof structures are designed so that they are unattractive to birds. Buildings may be used by birds depending upon the design and use of the buildings and the availability of food in the nearby environment. Pigeons, starlings and gulls are the most common birds hazardous to aviation to be found in and around buildings. Pigeons make use of ledges of buildings to roost whilst starlings may roost both on and in buildings in vast numbers. Gantries and other complex structures offer potential perches and gulls are increasingly nesting on flat and shallow pitched roofs. 'Green' roofs can also be very attractive to birds.

Note: If the overall size of the flat/shallow pitched roof/s exceeds 500Sq.M then we would apply a condition to ensure the roof space was monitored for bird activity throughout the year and for the life of the building. To avoid any such condition then we would advise the roofs to be pitched greater than 15 degrees.

Landscaping Scheme:

This consultation relates to a scoping opinion for consists of new habitats by including tree and shrub planting, introducing Sustainable Drainage Systems (SuDs), enhancing resources for wildlife and three drainage basins.

The details of the proposed attenuation basins will be key in managing the risk to Heathrow's operations and making the proposals acceptable. In order to ensure that the basins do not result in an unacceptable risk open permanent water should be kept to an absolute minimum, with small basins/swales or features designed to be generally dry except during and immediately after extreme rainfall. Areas that will hold water on a more regular basis should be well vegetated, ideally with wetland vegetation across the base to obscure any water present. If deeper pools are necessary for water management, they should be as small as possible, with a dense continuous barrier of emergent vegetation to reduce the open aspect of the water and to prevent easy access between land and water, both for waterbirds such as ducks and geese, and also for members of the public who may try to feed the birds.

The landscaping scheme should consider trees predominantly of smaller species such as Birches, Hazel, Willows and Field Maple and with none or very limited Oak, Scots Pine and Poplar then this should not be above background levels of attraction in the area.

Therefore, to help minimise the potential bird strike risk to Heathrow Airport, a Bird Hazard Management Plan should incorporate the above measures, with particular consideration given to the design and management of the attenuation basins and the selection of appropriate planting species.

Cranes and Construction

Given the nature of the proposed development, it is possible that crane/s or other tall construction equipment may be required during the extraction and restoration phases. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane near an aerodrome.

For notification, please follow the link via CAA website:

Crane notification | Civil Aviation Authority (caa.co.uk)

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Once crane notification has been received from the CAA, Heathrow Works Approval Team will assess and issue the necessary crane permit. No cranes should operate on site until a crane permit has been issued.

Specific CAA guidance for crane lighting/marking is given in CAP1096: Guidance to crane users on the crane notification process and obstacle lighting and marking (caa.co.uk)

Renewable Energy

Wind turbine developments of any kind, have the potential to impact aviation safety. If located within 15km of an aerodrome, turbines could infringe the OLSs. They could also interfere with the aerodrome radar and other aids to air navigation. Therefore, full details of any turbine proposals, no matter the size should be provided to Heathrow, to allow a full impact assessment to be completed.

If solar panels are proposed at a later stage, then Heathrow airport would require a Glint & Glare study to be completed prior to installation to ensure no impact on Pilots or Air Traffic Control."

Buro Happold EIA Process Review

The EIA Scoping Report does not identify or consider potential effects related to aviation.

Aviation-related consequences can fall within EIA when they constitute likely significant operational, direct or indirect effects of the proposed development on the Regulation 4 environmental factors. Given the proximity of the site to Heathrow Airport and the advice provided by HAL in its consultation response, potential aviation effects should be considered. If significant effects are not considered likely to arise, this should be justified by the Applicant and included in the ES in due course. If it cannot be suitably justified, this topic may need to be scoped into the ES. HAL's advice in its consultation response should be considered by the Applicant.

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4 Summary & Conclusions

Buro Happold has been commissioned by LB Hillingdon to provide independent Environmental Impact Assessment (EIA) and environmental planning advice and peer review services in relation to a proposed datacentre campus development on the site of the Former Sipson Garden Centre and land to the south, Sipson Road, Sipson, in the London Borough of Hillingdon.

In due course, the Applicant will be submitting an outline planning application to LB Hillingdon, as the determining authority. The proposals comprise the demolition of existing structures on site and construction of a new datacentre building (54MW Capacity), of approximately up to 25,000sqm (GFA), as well as ancillary office accommodation (approximately 5,250sqm), external plant (approximately 6,500sqm) and substation (approximately 3,250sqm), and car parking provision of 100 spaces.

The purpose of this document is to report the outcome of Buro Happold's independent review of the EIA Scoping Report, prepared by Savills (dated August 2026). It provides commentary suitable for inclusion in LB Hillingdon's EIA Scoping Opinion.

The outcome of Buro Happold's review of the proposed EIA approach is set out in Chapters 2 and 3 of this report. The review takes into account comments provided by the statutory consultees. The EIA Scoping Report is considered to meet the necessary regulatory requirements. Where additional assessment work has been recommended, this is clearly set out under each technical topic heading.

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Appendix A Consultee Comments

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EXTERNAL CONSULTEE	DATE	COMMENT
Greater London Archaeology Advisory Service	15-09-26	The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice in accordance with the National Planning Policy Framework and GLAAS Charter. This is a large-scale development proposal in an area of known high archaeological potential for all periods from the Neolithic through to the medieval in the Heathrow Archaeological Priority Zone. Large parts of the site's surroundings have been subject to archaeological investigation prior to mineral extraction revealing extensive remains of early prehistoric ceremonial and burial monuments and later prehistoric, Roman and early medieval settlement and field systems. The site lies next to the medieval village of Sipson. Archaeological evaluation trenches were dug in 2001 and should be reviewed along with published and unpublished information from the surrounding area. MOLA should be consulted for unpublished information on the West London Gravels Project. Once existing information has been reviewed it may be necessary to supplement this with additional fieldwork such as geophysical survey and/or trial trenching. The nature of the development is such that there appears to be little scope for preservation of archaeological remains within the scheme implying a high risk of total loss of any heritage assets present. In assessing the impact the cumulative harm with previous development and the proposals for Heathrow Expansion should be considered. Mitigation for cumulative harm might include engaging with Heathrow Airports over integrating analysis and publication of this site with theirs and contributing to wider public benefit initiatives for which a Section 106 Agreement might be appropriate. I therefore agree with the ES Scoping proposal to scope in archaeology and recommend further pre-application engagement.
Environment Agency	15-09-26	Based on a review of the submitted information, we have no comments to make on the EIA Scoping Opinion. However, we would like to draw your attention to the following advice.
Heathrow Aerodrome Safeguarding		
Natural England (London Region)		
INTERNAL CONSULTEE	**DATE**	**COMMENT**

Flood Officer	28-08-26	The LLFA has no objection to hydrology, flood risk and drainage being scoped out of the Environmental Statement. The site is located within Flood Zone 1 and, based on the information currently available, there is no indication that flood risk or drainage matters are likely to give rise to significant environmental effects. The proposed drainage strategy remains at an early stage of development and a number of assumptions have been made regarding the drainage approach, including the feasibility of infiltration. A site-specific Flood Risk Assessment and detailed drainage strategy should therefore accompany the planning application and demonstrate how surface water runoff will be managed, that the drainage hierarchy has been followed, and that flood risk will not be increased on or off site. Subject to this information being provided at application stage, the LLFA agrees that flood risk, hydrology and drainage can be scoped out of the Environmental Statement.
Urban Design Officer	11-09-26	In our understanding a Scoping Opinion sets out what topics and environmental information should be included in an Environmental Impact Assessment (EIA) and Environmental Statement (ES). We recommend for this case that the following is considered: Landscape, Townscape and Visual Arboriculture Ecology and Biodiversity Urban Greening and Green Infrastructure Topography and Landform Hydrology, Drainage and Flood Risk Ground Conditions and Contamination Air Quality Noise and Vibration Transport and Movement Socio-Economics and Human Health Built Heritage and Archaeology Climate Change, Carbon and Resilience Cumulative Effects
Highways		
Contaminated Land	15-09-26	Having consider the nature of the proposed development, location and the submitted Environmental Impact Assessment (EIA) Scoping Opinion Request with job number 709799 dated

		August 2026 taken note of section 11 (Ground Conditions and Contamination), please be advise that we have no objection in relation to the application on land contamination. Whilst considering the applicant submission in sub-section 11.4 (Rationale for Scoping Out) of the report, land contamination assessment must be one of the issues that will need to be address in the proposed development as stated by the applicant in sub-section 11.5 (Scoping Summary) of the submitted Environmental Impact Assessment Scoping report in response to the existing (Baseline Assessment) sub-section 11.3 of the report. Therefore, relevant planning conditions relating to ground contamination would need to be attached to any permission, including those requiring a submission prior to the commencement of development a ground investigation and quantitative risk assessment to be undertaken to assess potential risks as stated below. Land Contamination Condition (i) The development hereby permitted (excluding demolition, site clearance and initial ground investigation works) shall not commence until a scheme to deal with unacceptable contamination, (including asbestos materials detected within the soil), has been submitted to and approved by the Local Planning Authority (LPA). All works which form part of any required remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include the following measures unless the LPA dispenses with any such requirement specifically and in writing: a) A desk-top study carried out by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land

		and water and all other identified receptors relevant to the site: (b) A site investigation, including where relevant soil, soil gas, surface water, and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations, and recommendations for remedial measures to make the site suitable for the proposed use; and (c) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation. (ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and (iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works have been carried out in full and in accordance with the approved methodology. (iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping and/or engineering purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the factual results and

		interpretive reports of this testing shall be submitted to and approved in writing by the Local Planning Authority.. REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.
Environmental Specialist Team		
Noise Planning Specialist Team	04-09-26	I would not disagree with the recommendation that noise is scoped into the EIA for the potential development
Rights of Way Officer		

Heathrow Airport Limited
Airside Operations Facility
Hounslow, Middlesex TW6 2GW
Tel: +44(0) 208 757 0887
Email: Safeguarding@baa.com

Emilie Bateman
London Borough of Hillingdon Planning Services
By email

18/09/26

Dear Emilie Bateman,

Re: Planning Application No. 67666/APP/2026/2056
Request for Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the erection of a Data centre campus on the Site of the Former Sipson Garden Centre and land to the south, Sipson Road, Sipson.
Location: FORMER SIPSON GARDEN CENTRE SIPSON ROAD SIPSON.

Our Ref: LHR6666

I refer to your email, received 28 August 2026. Below, I have listed the areas which are of interest to Heathrow Airport Ltd and should be considered when considering the final design, prior to submission at full planning.

The local planning authority is also reminded that this site is located in proximity to the proposed scheme for a third runway to the northwest of Heathrow. There is renewed Government support for the scheme, and it remains the intention of Heathrow to pursue a third runway.

1.0 Obstacle Limitation Surfaces
The site is located beneath multiple Obstacle Limitation Surface (OLS) for Heathrow Airport Ltd. The following surfaces are the most onerous.

- Inner Horizontal Surface/Transitional Surface - At the point of the site, the surface has a height limitation or 67.95m Above Ordnance Datum (AOD) on the Northen boundary and 54m AOD respectively on the southern boundary of the site. These heights represent the level above which consideration needs to be given to the control of new obstacles to facilitate practicable and efficient operation of Heathrow's runways.

All OLSs restrict the height of buildings, plant, and roof structures such as aerials and flagpoles.

Although the above surface sets the height restrictions for the site it does not necessarily mean we would accept them. National Air Traffic Services (NATS) would still have to carry out an operational assessment at the full planning stage.

2.0 Instrument Flight Procedures
Heathrow's Instrument Flight Procedures (IFPs) would also need to be protected. An initial assessment shows that the proposed heights of the development would not have an impact on the IFP's associated to Heathrow Airport. However, once the design has sufficiently matured, Heathrow's advice would be to undertake a pre-planning assessment so that any IFP concerns can be formally assessed at the cost of

the applicant. A request for Pre-Planning assessments should be sent to Heathrow via Safeguarding@heathrow.com.

Furthermore, an assessment of any proposed crane operations would also require an IFP assessment ensuring no impact to Heathrow's IFP routes.

3.0 Building/Roof Design:
It is important that the building/roof structures are designed so that they are unattractive to birds. Buildings may be used by birds depending upon the design and use of the buildings and the availability of food in the nearby environment. Pigeons, starlings and gulls are the most common birds hazardous to aviation to be found in and around buildings. Pigeons make use of ledges of buildings to roost whilst starlings may roost both on and in buildings in vast numbers. Gantries and other complex structures offer potential perches and gulls are increasingly nesting on flat and shallow pitched roofs. 'Green' roofs can also be very attractive to birds.

Note: If the overall size of the flat/shallow pitched roof/s exceeds 500Sq.M then we would apply a condition to ensure the roof space was monitored for bird activity throughout the year and for the life of the building. To avoid any such condition then we would advise the roofs to be pitched greater than 15 degrees.

4.0 Landscaping Scheme:
This consultation relates to a scoping opinion for consists of new habitats by including tree and shrub planting, introducing Sustainable Drainage Systems (SuDs), enhancing resources for wildlife and three drainage basins.

The details of the proposed attenuation basins will be key in managing the risk to Heathrow's operations and making the proposals acceptable. In order to ensure that the basins do not result in an unacceptable risk open permanent water should be kept to an absolute minimum, with small basins/swales or features designed to be generally dry except during and immediately after extreme rainfall. Areas that will hold water on a more regular basis should be well vegetated, ideally with wetland vegetation across the base to obscure any water present. If deeper pools are necessary for water management, they should be as small as possible, with a dense continuous barrier of emergent vegetation to reduce the open aspect of the water and to prevent easy access between land and water, both for waterbirds such as ducks and geese, and also for members of the public who may try to feed the birds.

The landscaping scheme should consider trees predominantly of smaller species such as Birches, Hazel, Willows and Field Maple and with none or very limited Oak, Scots Pine and Poplar then this should not be above background levels of attraction in the area.

Therefore, to help minimise the potential bird strike risk to Heathrow Airport, a Bird Hazard Management Plan should incorporate the above measures, with particular consideration given to the design and management of the attenuation basins and the selection of appropriate planting species.

5.0 Cranes and Construction
Given the nature of the proposed development, it is possible that crane/s or other tall construction equipment may be required during the extraction and restoration phases. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane near an aerodrome.

For notification, please follow the link via CAA website:

Crane notification | Civil Aviation Authority (caa.co.uk)

Once crane notification has been received from the CAA, Heathrow Works Approval Team will assess and issue the necessary crane permit. No cranes should operate on site until a crane permit has been issued.

Specific CAA guidance for crane lighting/marking is given in CAP1096: Guidance to crane users on the crane notification process and obstacle lighting and marking (caa.co.uk)

6.0 Renewable Energy

Wind turbine developments of any kind, have the potential to impact aviation safety. If located within 15km of an aerodrome, turbines could infringe the OLSs. They could also interfere with the aerodrome radar and other aids to air navigation. Therefore, full details of any turbine proposals, no matter the size should be provided to Heathrow, to allow a full impact assessment to be completed.

If solar panels are proposed at a later stage, then Heathrow airport would require a Glint & Glare study to be completed prior to installation to ensure no impact on Pilots or Air Traffic Control.

I hope you find this information helpful. Feel free to contact me if you require further clarification.

Yours sincerely

Simon Vince
For and on behalf of Heathrow Airport Limited

Heathrow

Planning Service (Development Management)
London Borough of Hillingdon
Residents Services
Civic Centre
High Street
Uxbridge
UB8 1UW

By email: PlanningEConsult@Hillingdon.Gov.UK
FAO: Emilie Bateman

18th September 2026

Dear Ms Bateman,

Re: Consultation for application Ref: 67666/APP/2026/2056

Request for Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the erection of a Data centre campus on the Site of the Former Sipson Garden Centre and land to the south, Sipson Road, Sipson.

Location: Former Sipson Garden Centre, Sipson Road, Sipson

Heathrow Airport Limited (HAL) was consulted on an EIA Scoping Opinion Request on the 28th August 2026, in its capacity as a Statutory Consultee for aerodrome safeguarding. HAL has responded to this consultation request separately in that capacity. This written representation is submitted by the HAL Town Planning team and addresses wider considerations for HAL. The proposal falls within the Draft Order Limit boundary to expand the airport with a third runway to the north west of the airport. The Draft Order Limit was subject to a scoping opinion by the Planning Inspectorate dated 10 October 2025. The proposal would overlap with the expansion programme.

Heathrow Northwest Runway Scheme Development Consent Order (DCO)

Consent is to be sought for an outline planning application for a data centre campus on the former Sipson Garden Centre site and land to the south. The proposal would comprise erection of a data centre up to approximately 25,000sqm, ancillary office accommodation (approximately 5,250sqm), external plant (approximately 6,5000sqm) and substation (approximately 3,250sqm), car parking provision of 100 spaces with maximum building height of up to 20m.

The 2019 Masterplan which was consulted on during the Airport Expansion Consultation (AEC) back in the summer of 2019 proposed under this zone (Zone Q) whilst not an exhaustive list, components of relevance are the rediverted A4, active travel cycle route, European Protected Species mitigation areas and dual function of reprovided public open space. At present, this scheme would conflict with the proposed land uses as denoted below in the 2019 Masterplan, shown in both image 1 and 2. HAL is pursuing this masterplan as its foundation re-mobilising Expansion and subsequent preparation of an application for development consent.

Green Infrastructure

The proposed land use is reprovided public open space (RPOS) and requirement for European Protected Species (EPS). The location of the proposed data centre provides an important area for the delivery of the European Protected Species proposals due to its proximity in relation to the Sipson Lane road bridge which is the be ‘greened’ to enable bats to cross the M4 spur and access habitat provision to the east. The site already has some mature habitat making it suitable for rapid early enhancement and its proximity to existing habitat that will be retained for bats, primarily as corridor for movement.

Heathrow
Making every journey better

Surface Access

As shown by way of image 2 below, the realigned A4 is proposed to run through the site subject to this scoping consultation. In order to deliver the expansion scheme, this site would be subject to clearance, construction activity and earthworks to run through the new A4 in the early 2030s, with all road diversions required to be in place ahead of the runway construction and opening.



Figure 6.16.4: Parameter Plan - Zone Q

Image 1 (above): Extract from Masterplan 2019 Zone Q – Sipson and Harlington Area

Image 2 (below): Heathrow Masterplan (2019)



Planning Policy

The Airport National Policy Statement (ANPS) was designated by the Secretary of the State for Transport in June 2018 and sets the national policy framework for airport expansion in the south-east of England. Specifically, the ANPS sets out the need for additional airport capacity in the south-east of England, why it is best met by a North-West runway at Heathrow Airport and specific requirements to gain development consent for the scheme. ANPS Annex A and B provide a boundary and masterplan for the Heathrow Northwest Runway Scheme.

In June 2026, the Government published a draft Heathrow Expansion National Policy Statement (HENPS) for consultation. Whilst not yet designated policy, the draft HENPS reaffirms the Government's support for Heathrow expansion and the Heathrow Northwest Runway scheme and establishes the proposed framework for the assessment of a future development consent application. The draft HENPS therefore represents an important material consideration and indication of the Government's current policy direction.

Heathrow Airport Limited is progressing proposals for Heathrow expansion, which comprise not only a new runway but also associated infrastructure, environmental mitigation and compensation measures, surface access improvements, replacement open space and other supporting development. Accordingly, where development proposals have the potential to interact with, constrain or otherwise influence the delivery of Heathrow expansion, it is important that such interactions are appropriately identified and assessed within the Environmental Impact Assessment process.

Conclusion

Whilst HAL recognises that the purpose of this consultation is to establish the scope of the Environmental Impact Assessment, HAL has significant concerns regarding the proposed development.

HAL considers that the proposal may conflict with and prejudice the delivery of Heathrow Expansion. The Environmental Statement should therefore include a robust assessment of these interactions and demonstrate how such conflicts would be avoided, reduced or mitigated.

HAL will continue to monitor the progress of this application throughout the determination process. We remain committed to ongoing engagement with the London Borough of Hillingdon and the Applicant as the respective projects progress. Please do not hesitate to contact us should you wish to discuss our response and the issues raised within it further.

Yours sincerely,



Emily Fitzpatrick MRTPI

Senior Town Planning Manager

Date: 23 September 2026
Our ref: 557854
Your ref: 67666/APP/2026/2056

Hillingdon London Borough Council

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Emilie Bateman,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): for the erection of a Data centre campus
Location: Site of the Former Sipson Garden Centre and land to the south, Sipson Road, Sipson.

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated and received on 26 August 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Colne Valley Regional Park

The Colne Valley Regional Park is a 43-square-mile network of countryside, lakes, rivers and green spaces west of London, providing an important natural buffer, wildlife habitat and recreational landscape for local communities.

Natural England encourages development proposals within or adjacent to the Colne Valley to actively support the principles of the Colne Valley Regional Park by safeguarding and enhancing its interconnected green and blue infrastructure. The Colne Valley's landscape-scale approach emphasises habitat connectivity, multifunctional green spaces, and improved linkages for both people and wildlife. These principles should be reflected through Local Nature Recovery Strategy (LNRS) delivery, ensuring that development contributes positively to the wider ecological network and long-term landscape resilience.

The Colne and Crane Valleys Green Infrastructure Strategy (September 2019) sets out key landscape-scale guidelines, and we encourage applicants to use these to inform and influence green infrastructure design on site.

Further guidance is set out in Planning Practice Guidance on environmental assessment, natural environment and climate change.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

Kimberley McDowell
Consultations Team

Annex A – Natural England Advice on EIA Scoping

General Principles

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on environmental assessment and natural environment.

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The National Planning Policy Framework (paragraphs 192-196) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the natural environment.

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a duty to conserve and enhance biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available here.

Designated nature conservation sites

The proposal is unlikely to adversely impact any European or internationally designated nature conservation sites (including 'habitats sites' under the NPPF) or nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Marine Conservation Zones).

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 192 and 193). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the

Conservation of Habitats and Species Regulations 2017
is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System.*

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A DLL scheme for GCN may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures

- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland.

The ancient tree inventory provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

Biodiversity net gain

Paragraph 193 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including draft Planning Practice Guidance, can be found here

The statutory biodiversity metric, together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.
The metric should be used to:
• assess or audit the biodiversity unit value of land within the application area
• calculate the losses and gains in biodiversity unit value resulting from proposed development
• demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape and visual impacts

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound

basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013 (*(3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure.
It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil

resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 187 and 188 of the NPPF. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

As set out in paragraph 223 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and

The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1].A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

2030 and to reduce emissions of NOx and SO_2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - http://www.scail.ceh.ac.uk/
- Ammonia assessment for agricultural development https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit
- Environment Agency Screening Tool for industrial emissions https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England http://www.airqualityengland.co.uk/laqm

Natural England has produced *'Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site'.* This standing advice is to help planning authorities understand the impact on statutory protected sites from particular developments that emit specific air pollutants. The advice covers emissions of ammonia (NH3), nitrogen oxides (NO, NO2 or NO*x*), nitrogen deposition, acid deposition and sulphur dioxide (SO2).

The standing advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts.

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. If your planning application is affected by Nutrient Neutrality, the ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. These solutions or plans should be relevant to the specific planning consultation site.
Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat

creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the Committee on Climate Change's (CCC) Independent Assessment of UK Climate Risk, the National Adaptation Programme (NAP), the Climate Change Impacts Report Cards (biodiversity, infrastructure, water etc.) and the UKCP18 climate projections.

The Natural England and RSPB Climate Change Adaptation Manual (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's Nature Networks Evidence Handbook (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's Carbon Storage and Sequestration by Habitat report (2021) and the British Ecological Society's nature-based solutions report (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

Transport/Highways Appraisal

Reference	67666/APP/2026/2056
Location	FORMER SIPSON GARDEN CENTRE SIPSON ROAD
Proposal	Request for Scoping Opinion (SO) under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the erection of a Data centre campus on the Site of the Former Sipson Garden Centre and land to the south, Sipson Road, Sipson.
Case Officer	Emilie Bateman
Recommendation **'Scoping Out' of EIA**	**AGREED**

Background Precis

Virtus Data Centres Limited intend to submit an outline planning application seeking planning consent for a data centre campus on the site of the former Sipson Garden Centre and land to the south, Sipson Road, Sipson.

Prior to submission, the applicant has committed to undertake an EIA for the proposed development. The EIA will be in accord with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'). Regulation 15 enables the applicant to request confirmation in writing from the relevant planning authority seeking their opinion as to the scope, and the level of detail, of the information that should be provided in the Environmental Statement (ES).

Appraisal – Transport/Highway Scoping Opinion (SO)

When considering the typical 'low key' vehicular/pedestrian activity linked to daily 'Data Centre' activities, the Highway Authority (HA) accept that in terms of transport/highway related consequences, the predicted vehicular impacts of the proposal would be expected to fall well below the threshold of a 10% uplift on overall local baseline traffic flows that would otherwise trigger the need for an EIA in the first instance.

On that premise, the HA accept the applicant's recommendation for the proposal to be 'scoped out' of the EIA. There are no further observations.

END

Richard Michalski - Highway Authority (30/09/2026)

From: Emilie Bateman <EBateman@hillingdon.gov.uk>
To: Patrick Little <Patrick.Little@BuroHappold.com>
Subject: RE: Former Sipson Garden Centre - EIA Specialist (Buro Happold)

External Email. This email originated from outside Buro Happold.

Hi Patrick,

Thank you for your email and comments.

We are still awaiting a response from Historic England, although it appears the proposal may fall outside their formal consultation remit. In the meantime, we have sought comments internally from our Conservation Officer, who considers that built heritage should be scoped into the assessment. Their comments are set out below:

There would be a limited impact on the setting of the grade II listed King William IV public house located at the junction of Sipson Road and Harmondsworth Lane. Similarly there would be an impact on the grade II listed Lanz Farm house on Harmondsworth Lane. There would be more of an impact on the setting of the locally listed Sipson Former Baptist Church, 228 Sipson Lane. The biggest impact would be on the setting of the Plough Public House, another locally listed building to the north of the village at 239 Sipson Road.

Adjacent to the Former Baptist Church is presumably a 19th century dwelling of a similar date which may or may not be connected to the Baptist church use. It is now the Lady Nafisa School.

- The King William IV Public House - Historic England list entry 1080164
- Lanz Farmhouse - Historic England list entry 1080219
- Former Baptist Church, 228 Sipson Lane
- The Plough, 239 Sipson Road

We would recommend that this visual impact is assessed and perhaps some street views are produced to show the visual impact so that the harm to the setting of the designated and non-designated heritage assets can be fully assessed. It would be useful to contemplate heritage gain that could help to balance any harm.

I hope the above is helpful, I will provide an update once HE replies.

Many thanks,
Emilie Bateman
Senior Planning Officer
Planning and Sustainable Growth
Residents Services
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