4 Consultation, Alternatives and Design Evolution

4.1 Consultation

EIA Consultation

4.1.1 In August 2026, Virtus Data Centres Limited submitted a request for the formal EIA Scoping Opinion of the London Borough of Hillingdon Council (LBH). LBH's formal EIA Scoping Opinion was issued on 12 October 2026. Further details of the formal EIA consultation process are set out within Chapter 5.

4.1.2 During the course of the EIA, the project team has consulted LBH to clarify elements of the scope where required. Details of technical consultation directly related to the EIA are provided in the methodology and baseline sections of each topic chapter.

Consultation

4.1.3 There have been various pre-application discussions with statutory and non-statutory consultees and the local community which have all had an influence over the evolution of the design of the EIA proposals and the scope of the EIA. This section summarises the consultation process undertaken by the Applicant with the London Borough of Hillingdon and Greater London Authority (GLA) and other key stakeholders and includes the key issues raised during these discussions.

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

Table 4.1 Schedule of Consultations

Consultation Event	Date
LBH Pre-Application No.1	27 May 2025
LBH Pre-Application No.2	17 July 2026
GLA Pre-Application	1 August 2026
LBH Design Workshop 1	9 September 2026
Public Consultation	7 September 2026
LBH Design Workshop 2	23 September 2026

Consultation with the London Borough of Hillingdon and the Greater London Authority

4.1.5 There has been an extensive programme of pre-application discussions between the Applicant, LBH and the GLA. The Applicant has sought to work positively together throughout the pre-application process. A summary of the discussions held are detailed below:

- Pre-application consultation with LBH commenced early in the design process with initial meetings held on 27 May 2025. Officers advised that the Site's Green Belt location and potential loss of Best and Most Versatile Agricultural Land represented key planning considerations. A need for a robust planning and technical evidence base was also highlighted.

- Further consultation was undertaken on 17 July 2026 following progression of the scheme design. Officers advised that the site may be capable of being considered Grey Belt land subject to robust supporting evidence. LBH emphasised the importance of demonstrating a clear need for the data centre supported by a comprehensive Alternative Sites Assessment and wider planning justification. Further advice from Officers stated that scale, massing and visual prominence of the development required careful consideration and design refinement and a landscaping strategy were encouraged.

- A design consultation workshop was held on 9 September 2026 and 23 September 2026 following the pre-application consultations. The purpose of these workshops was to review the emerging masterplan, landscape strategy, parameter plans and design approach. Discussion focused on proposed built form, landscape framework, treatment of Site boundaries and opportunities to reduce the perceived visual impact of the development. Officers welcomed the proposed reductions in car parking, the expansion of landscaping and green infrastructure, and the exploration of enhanced public amenity areas. Feedback was provided by officers on the approach to building envelopes, access and movement, building heights and distinction between public and private areas.

4.1.6 The Proposed Development has evolved since conception and work has been undertaken by the design team to address the comments made by officers, where possible. A detailed explanation of how the scheme has evolved to take account of the consultation process is provided in the DAS with a summary provided below.

Public Consultation

4.1.7 The Applicant has sought to involve the local community and stakeholders extensively to help shape the proposals.

4.1.8 A website, https://virtussipson.co.uk/, was commissioned to publicly promote the plans and associated consultation. Flyers were also distributed to site neighbours and politicians and letters were sent to site neighbours.

4.1.9 The consultation website offered a range of questions. Two local residents responded to at least one question. Concerns were raised over the attractiveness and massing of the development.

4.1.10 A public exhibition was held at the Harlington Scout Hut on Monday 7 September 2026, in which members of the public were invited to read and inquire about the development plans and provide feedback.

4.1.11 The Leader of Hillingdon Council, relevant cabinet members, chair of the planning committee Ward members, the Site's MP (John McDonnell) and local assembly member Bassam Mahfouz were also invited to attend the exhibition.

4.1.12 To inform local residents of this event, in the week commencing 24 August 2026, A4 double-sided fliers were distributed to all homes across the village of Sipson. This number was determined to include all the households in the immediate area. This is a total of 639 residential and business properties.

4.1.13 Representatives from the Applicant and the project team attended the consultation.

4.1.14 This team welcomed residents to the consultation, responded to their queries, listened to their comments and requested that they record their opinions on paper feedback forms or provide feedback using provided iPads. The paper feedback forms included identical questions as the online form. Links to the consultation website, project email address and project phone number were provided on the exhibition boards and feedback forms for visitors to view and share the proposals in their own time and leisure.

4.1.15 Concerns were raised in the drop-in consultation over noise impact, proximity to properties and impact on the local community. Further comments by online form / email contact made reference to massing and amenity.

4.2 Alternatives and design iteration

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

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

4.2.2 A description of the reasonable alternatives considered is provided below.

Alternative development scenarios and design iterations

4.2.3 Given the nature and purpose of the Proposed Development, the assessment of reasonable alternatives to the development presented in the ES comprises options within the following categories.

- **Do Nothing:** Under this scenario no development is implemented at the Site, and baseline conditions continue in their current trends. This option would not result in the delivery of a key piece of infrastructure on an underutilised grey belt Site with excellent sustainability to the local motorway and wider transport network. The Site would remain in its current condition as an underutilised Site with a former garden centre converted into an airside vehicle repair and servicing centre. As such, under a 'do nothing' scenario, the substantial economic and supporting infrastructure benefits of the Proposed Development would not be realised. Furthermore, it is considered that the existing uses on the Site would continue and the Site is likely to remain underutilised.

- **A Different Design**: Under this scenario the Proposed Development is realised with alternative scales and layouts in the context of developmental constraints present at the Site. This option is discussed further below.

Design Evolution

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

4.2.5 The proposals have been driven by the need to deliver a high-performance data centre that responds sensitively to its context whilst meeting the Applicant's operational and capacity requirements.

4.2.6 The masterplan has been informed by a series of iterative site test-fits. Six options were developed and assessed by the design team:

- **Site Test-Fit Option 1:** Single 2 storey data hall building
- **Site Test-Fit Option 2:** Two 2 storey data hall buildings
- **Site Test-Fit Option 3:** Two 3 storey data hall buildings
- **Site Test-Fit Option 4:** Three 3 storey data hall buildings
- **Site Test-Fit Option 5:** Single 2 storey data hall building with ancillary office block
- **Site Test-Fit Option 6:** Two 2 storey data hall buildings with ancillary office block

4.2.7 The Site test-fit optioneering and assessment of the early constraints resulted in Option 6 being chosen as it delivered the client's capacity and accommodation requirements, whilst maximising urban greening.

4.2.8 Option 6 also broke down the overall building mass into data hall blocks which allowed all external plant to be positioned behind or between buildings, effectively screening it from surrounding receptors and directing noise away from residential properties and toward the M4 Spur Road.

4.2.9 The inclusion of the ancillary office block further enabled the building to be reduced in scale where the operational requirements of the data halls were not required.

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

Table 4.2 Key Design Changes/Influences

Environmental Topic	Change and influence on Environmental Impacts / Effects.
Air Quality	External plant and generator ventilation has been shielded by the horseshoe shape of the proposals such that the impacts on sensitive receptors are able to be mitigated.
Climate Change and Greenhouse Gases	For reducing GHG emissions, allowance has been made for measures such as implementing permeable paving areas to allow maximum absorption of surface water into the ground as well as designing in an allowance for retro-fit will be secured through the detailed design phase.
Landscape, Townscape and Visual Impact	Landscape and visual impacts on sensitive receptors are reduced with the scale of the proposals being stepped down to the two-storey office block accommodation. The retention of existing trees, a minimum 12.5m landscaped green buffer and minimum 21m separation between neighbouring residential properties from any Site

	infrastructure have also assisted in screening the proposals from any sensitive receptors.
Noise and Vibration	By orientating the proposals away from sensitive receptors, noise from generators and plant is shielded by the bulk of the building.
Other non-EIA Topics	
Ecology	Ecological buffers and enhancement zones are provided along the boundaries of the Site with wildflower planting, hedgerow mixes, shrub mixes and spring bulb mixes will provide mitigation for any affected habitats.
Transport and Access	The perimeter road and layout of the proposals will ensure any associated traffic is limited to the internal road network of the Proposed Development.
Water Environment	Surface water runoff will be managed through a network of Sustainable Drainage Systems (SuDS) including attenuation basins, swales and wetland features.

Summary

4.2.11 The proposed layout organises the development into a series of clearly defined functional zones, with data halls positioned to optimise operational efficiency and ancillary accommodation arranged to create a stepped-building form at the Site's edge.

4.2.12 The massing strategy focuses on breaking down the scale of the development, integrating generous landscape buffers, and orienting plant and service areas away from neighbouring residential properties. This approach ensures an architectural composition that balances technical performance with landscape led design, resulting in a development that is both operationally efficient and environmentally considerate.

4.2.13 Surface water mitigation via Sustainable Urban Drainage Systems is proposed along the southern and eastern boundaries of the Site. These mitigation measures follow the natural drainage patterns on Site.

4.2.14 As set out above, the Illustrative Masterplan and parameters have been adapted and updated to take into account the received comments received during extensive consultation.

4.2.15 The technical work undertaken as part of EIA process and wider planning application has identified key environmental constraints that have fed into the design seeking to avoid and reduce adverse environmental impacts.