Planning Statement

Former Sipson Garden Centre

Prepared by:

Savills

Prepared for:

VIRTUS Data Centres

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1. Introduction

1.1. This Application

1.1.1. This Planning Statement has been prepared on behalf of VIRTUS Data Centres (or 'VIRTUS') to support an outline planning application (with all matters reserved except for access) for the redevelopment of the former Sipson Garden Centre, West Drayton, UB7 0HP and surrounding land ('the site') to deliver a data centre facility.

1.1.2. The submission follows substantial engagement with London Borough of Hillingdon (LBH), the Greater London Authority (GLA), other key stakeholders, and members of the public.

1.1.3. The description of development is as follows:

"Outline planning application (with all matters reserved except for access) for the redevelopment of the former Sipson Garden Centre site to provide a data centre facility, including associated energy infrastructure, security measures, landscaping, and access arrangements."

1.1.4. The application is submitted in outline, with access included as a detailed matter for determination. This approach has been agreed with LBH through the pre-application process.

1.1.5. The proposed development would comprise the demolition of existing structures on site and the construction of a new data centre with an overall capacity of approximately 54MW. The development would provide up to approximately 54,000 sqm of gross internal floorspace, comprising data halls, an administration block, plant, and ancillary infrastructure associated with the development.

1.2. Role of Data Centres

1.2.1. The provision of additional data centre capacity aligns with the Government's broader support for the digital economy. This is reflected in the designation of data centres as critical national infrastructure, its Artificial Intelligence strategy, and its positive approach to plan-making and decision-taking for data centre development.

1.2.2. As well as providing the data storage capacity that is fundamental to the successful functioning of the economy, the redevelopment of the site will also deliver a significant uplift in jobs when operational, together with construction jobs throughout the entire construction phase. The key headlines are that the proposed development will:

- generate approximately 1,110 gross on-site construction jobs per annum during the anticipated two-year construction period;
- support approximately 1,520 net additional construction jobs per annum once multiplier effects are taken into account;
- create approximately 55 direct operational jobs on-site once operational;

- support around 75 net additional operational jobs in Hillingdon (85 nationally) through direct, indirect and induced employment effects;
- generate approximately £116 million in direct GVA annually;
- generate around £2.7 million in annual business rates revenue, supporting local and regional public services; and
- provide a range of highly skilled and entry-level employment opportunities, with many roles paying above local median earnings.

1.3. Overview of Applicant

1.3.1. The applicant is VIRTUS Data Centres, London's leading data centre developer operator. VIRTUS is part of ST Telemedia Global Data Centres and is dedicated to enabling the world's most innovative organisations to power and protect their critical digital infrastructure. With over 15 years of experience in designing and operating highly efficient data centres, VIRTUS has built a strong reputation for providing operational resilience and delivering robust, complex solutions for the most demanding global customers.

1.3.2. The main factor that influences when VIRTUS need to commence and complete the construction of any data centre building is when the power supply becomes available from the National Grid. Otherwise, VIRTUS will be in a position where it has an unusable data centre building because power is not available. This planning application is submitted in line with the power offer secured from the National Energy System Operator (NESO) and has been made in accordance with their programme requirements.

1.3.3. Data centre technology is evolving so quickly that performance is constantly improving and so it is essential for VIRTUS that, as much as possible, the latest technology is deployed to ensure that their data centres operate as efficiently and perform as strongly as possible.

1.4. Statement Structure

1.4.1. This is clearly an exciting and important project for VIRTUS and the project stakeholders. This Planning Statement provides an explanation of the justification for the project; notably its compliance with relevant planning policies and outlines the significant economic benefits that the scheme will bring to the LBH and London as a whole.

1.4.2. This Planning Statement is therefore structured as follows:

- **Section 2** describes the site, its context and summarises its planning history;
- **Section 3** outlines the various stages of consultation and engagement between the project team and members of the public and stakeholders, as well as the pre-application process with LBH and the GLA;
- **Section 4** describes the development proposal subject to this planning application;
- **Section 5** sets out the principle of development, including consideration of Green Belt matters, the Grey Belt assessment, and the Very Special Circumstances case for the proposed development;

- **Section 6** assesses the proposed development against the identified planning policy framework to establish the applications compliance, in respect of all material considerations, with the planning framework relevant to the application and the decision-making process; and

- **Section 7** provides a summary and conclusion.

1.4.3. The application comprises of a suite of technical information, the scope and content of which has been agreed with officers as part of the Planning Performance Agreement (PPA) process. Included at **Appendix A** is a schedule of plans and documents submitted in support of this planning application.

1.5. Environmental Impact Assessment

1.5.1. The proposals are accompanied by an Environmental Statement (ES) prepared by Savills, which covers air quality, archaeology, noise and vibration, climate change and landscape and visual impacts. The decision to submit an Environmental Statement as part of the application was taken by VIRTUS and the chapters (and their scope) have been agreed with LBH via the formal EIA Scoping Opinion process.

2. Site Overview

2.1. Introduction

2.1.1. This section considers the site's strategic location and its wider context, sets out the relevant planning history, and provides a detailed description of the application site itself.

2.2. Site Location

2.2.1. The site is broadly rectangular in shape and comprises the former Sipson Garden Centre in the northern part of the site with associated areas of hardstanding including a car park and areas understood to formerly be used for the external display and storage of goods associated with the former garden centre use. The southern part of the site comprises a field which is privately owned and does not constitute publicly accessible open space.

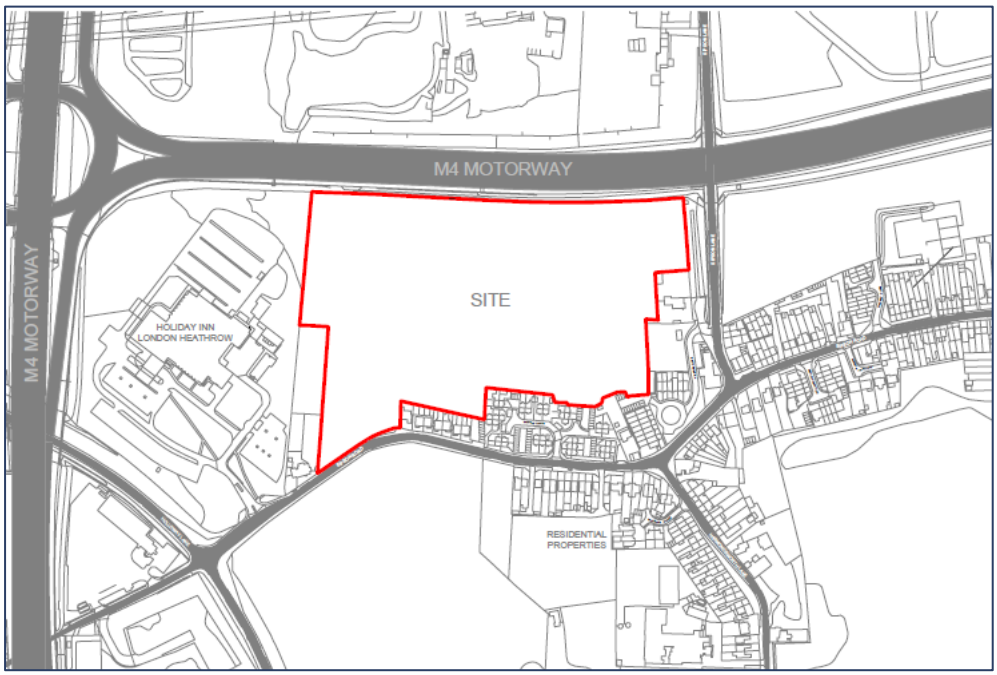


Figure 2.1: Site Location Plan

2.2.2. The site is bounded on its eastern boundary by part of the M4 motorway running between Heathrow Airport to the south and the M4 motorway (running west to east) is located to the north. The site's western boundary is formed by the A408 (Sipson Road), from which the site takes its access, and there are a small number of residential dwellings to the south west that also front the A408.

2.2.3. Located immediately to the north of the site is the Holiday Inn Hotel, which is currently being refurbished, and The Plough pub is located at the site's north western boundary. This pub is locally listed. To the south, the site adjoins the Lady Nafisa School. Beyond the site's southern boundary are a number of residential

dwellings forming part of the settlement of Sipson.

2.2.4. The site forms part of the Green Belt as designated in the development plan, albeit a significant proportion of the site comprises previously developed land following its former use as a garden centre.

2.2.5. There are no listed buildings on site, and the site is not within a Conservation Area. However, within 1km of the site boundary there are five listed buildings, as follows:

- Elder Farmhouse (Grade II), approximately 920m southeast of the application site;
- The King William IV Public House (Grade II), approximately 150m southwest;
- Lanz Farmhouse (Grade II), approximately 320m southwest;
- Sipson House (Grade II), approximately 750m southeast; and
- War Memorial Cherry Lane Cemetery (Grade II), approximately 650m northeast.

2.2.6. There are also a number of locally listed buildings within the vicinity of the site, as follows:

- The Plough Public House, located approximately 10m north of the site;
- No. 228 Sipson Lane (former Baptist Church), located approximately 45m south of the site; and
- the Sant Nirankari Bhawan (former Cottage Hospital), located approximately 390m southeast of the site.

2.2.7. There are no national or local statutorily designated sites on or within 2km of the site. There is one Internationally Designated Site within 10km of the site which is the South West London Waterbodies Special Protection Area and Ramsar, located approximately 4.7km to the southwest.

2.2.8. There are two nationally designated nature conservation sites within 5km of the site which are:

- Staines Moor Site of Special Scientific Interest (SSSI), approximately 4.5km southwest; and
- Wraybury Reservoir SSSI, approximately 4.8km southwest.

2.2.9. The EA Flood Map for Planning shows the site, in its entirety, is in Flood Zone 1 which means the site is at a lower than 0.1% Annual Exceedance Probability (AEP) of flooding from fluvial or tidal sources. The site is also not considered at risk of flooding due to Climate Change (2070 to 2125).

2.3. Planning History

2.3.1. A summary of the planning history associated with the site and relevant to the proposed development is provided below.

2.3.2. Full planning permission (LPA Ref. 67666/APP/2023/3721) was granted in March 2025 for the development

of a Centre of Excellence on the part of the site occupied by the former garden centre for the servicing and repair of Airside Support Vehicles (Use Class B2) consisting of a service building with 7no service bays and 1no storage bay, an ancillary two-storey office building and associated hardstanding, parking, a wash bay, plant, solar PVs, landscaping and drainage.

2.3.3. The permission remains extant and is capable of implementation, subject to commencement within three years of the date of permission.

2.3.4. Prior to this, an outline planning application (LPA Ref. 67666/APP/2015/2413) was refused in December 2015 for a mixed-use development comprising up to 53 residential units (Use Class C3/C2) and associated private and public open space, pedestrian and vehicular access and parking, including demolition of garden centre.

2.4. Planning Policy Context

2.4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications are made in accordance with the development plan unless material considerations indicate otherwise.

2.4.2. The development plan for LBH includes the following plans which this application will be assessed against:

- the London Plan (March 2021);
- the Local Plan: Part 1 Strategic Policies (LPP1) (November 2012) (LPP1);
- the Local Plan: Part 2 Development Management Policies and Site Allocations and Designations (January 2020) (LPP2); and
- the West London Waste Plan (July 2015).

2.4.3. All of the above plans are considered to be directly relevant except the West London Waste Plan.

2.4.4. The National Planning Policy Framework (2026) (NPPF) is a material consideration in the determination of planning applications, especially given that none of the above are up to date (i.e. less than five years' old).

3. Pre-Application Consultation

3.1. Introduction

3.1.1. The National Planning Policy Framework (NPPF) (2026) encourages pre-application discussions. NPPF Policy DM1 encourages early and proportionate pre-application engagement with local planning authorities, relevant stakeholders and, where appropriate, the local community to identify and address key planning matters before an application is submitted. London Plan Policy GG1 also supports strong and inclusive communities, and encourages early and inclusive engagement with stakeholders, including local communities, in the development of proposals

3.1.2. This section of the Planning Statement summarises the pre-application consultation that has been carried out and explains how this engagement has shaped the decisions made by the applicant and the design team at this stage of the project. It should be read alongside the Statement of Community Consultation prepared by Camargue to reflect the values set out in LBH's Statement of Community Involvement which was adopted in October 2021. There has been significant and meaningful consultation with the LBH, the GLA, the public and other key stakeholders prior to submission of the outline planning application. Engagement with LBH was coordinated through a Planning Performance Agreement (PPA). A summary of key consultation is provided below:

- initial pre-application meeting with LBH – 27 May 2025;
- follow-up pre-application meeting with LBH – 17 July 2026;
- Stage 2 pre-application meeting with GLA – 1 September 2026;
- public consultation event held near to the site – 7 September 2026;
- design workshop meeting with LBH – 9 September 2026; and
- final pre-submission design workshop meeting with LBH – 23 September 2026.

3.2. Consultation with the London Borough of Hillingdon

Pre-Application Meetings

3.2.1. Pre-application consultation with LBH commenced early in the design process, with the initial pre-application meeting held with officers in May 2025. This pre-application meeting was based on initial proposals involving the demolition of all existing buildings and the construction of a data centre facility and associated infrastructure. As the first pre-application meeting, discussions focused primarily on the principle of development, key planning considerations and the direction of travel for future design development.

3.2.2. Officers advised that the site's Green Belt designation and the potential loss of Best and Most Versatile Agricultural Land would represent key planning considerations. The Council highlighted the need for a robust planning and technical evidence base to support the proposals, including consideration of locational requirements, alternatives, landscape and visual impacts, transport, ecology and environmental matters.

Officers also encouraged continued engagement as the scheme evolved and recommended that future submissions demonstrate how impacts could be appropriately mitigated through design and landscaping.

3.2.3. A second pre-application meeting took place on 21 July 2026 following significant progression of the scheme design. Officers acknowledged the further work undertaken and advised that the site may be capable of being considered Grey Belt land, subject to robust supporting evidence. The Council emphasised the importance of demonstrating a clear need for the proposed data centre, supported by a comprehensive Alternative Sites Assessment and wider planning justification.

3.2.4. Officers advised that the scale, massing and visual prominence of the proposed development would require careful consideration, particularly given the site's edge-of-settlement location and proximity to residential properties. The Council encouraged further design refinement, high-quality architecture and a comprehensive landscape strategy to reduce visual impacts and improve integration with the surrounding area.

3.2.5. The Council also advised that a detailed suite of technical assessments would be required to accompany any planning application, including transport, ecology, noise, drainage, landscape, utilities and agricultural land assessments. The list of supporting documents has been agreed with officers as part of the PPA process.

Design Workshops

3.2.6. A series of design workshops were held with officers to review the emerging illustrative masterplan, landscape strategy, parameter plans and design approach. Discussion focused on the proposed built form, landscape framework, treatment of site boundaries and opportunities to reduce the perceived scale and visual impact of the development.

3.2.7. Officers welcomed a number of design amendments to the emerging proposals, including a reduction in car parking provision, the expansion of landscaping and green infrastructure around the site perimeter, and the exploration of enhanced public amenity areas.

3.2.8. Discussions also focused on the extent and function of the proposed green buffer, public accessibility, boundary treatments, attenuation pond design and opportunities to deliver meaningful public realm enhancements. Officers supported the principle of a strong landscape framework and recommended further work to clearly define the role of publicly accessible spaces and their relationship with the wider settlement.

3.2.9. The Council provided feedback on the emerging parameter plan strategy, including the proposed approach to building envelopes, access and movement, landscape, building heights and the distinction between public and private areas of the site. Officers also discussed the proposed security strategy.

3.2.10. Overall, the design workshops have provided a useful and collaborative forum in which constructive feedback on the developing proposals has been secured. This has helped inform further refinement of the illustrative masterplan, landscape strategy, public realm offer and parameter plans ahead of the submission of the outline planning application.

3.3. Greater London Authority

3.3.1. Pre-Application engagement was undertaken with the GLA in advance of submission, including a Stage two meeting held on 1 September 2026 with representatives of the GLA, LBH and the applicant team in attendance. This engagement has informed the evolution of the scheme and the preparation of the application submission pack.

3.3.2. Discussions with the GLA focused on the principle of development, Green Belt considerations, land use, design and layout, transport, sustainability, biodiversity and flood risk matters. The pre-application feedback provided a clear framework for progressing the proposal and identifying the technical information required to support the application.

3.4. Community Consultation

3.4.1. In accordance with VIRTUS's commitment to community engagement, and to fully understand the views of nearby residents and local stakeholders, Camargue have undertaken a programme of consultation in advance of the submission of the planning application.

3.4.2. An in-person public exhibition was held at The Scout Hut, in Harlington on 7 September between 3:00pm and 8:00pm to present the emerging proposals to local residents and neighbouring businesses. Attendees included neighbouring residents, representatives of community groups and local stakeholders. Visitors had the opportunity to review the exhibition materials, discuss the proposals with members of the project team and provide feedback on the emerging scheme.

3.4.3. A dedicated project website was launched on 11 August 2026 in advance of the public exhibition. The website provided information on the proposed development, details of the consultation process and opportunities to submit feedback electronically. The website also publicised the public exhibition and encouraged participation from local residents and businesses.

3.4.4. Consultation leaflets were distributed to residential and commercial properties within the agreed consultation catchment area surrounding the site. In total, 639 properties received notification of the consultation. The leaflet provided an overview of the proposals, details of the consultation programme and information on how feedback could be submitted.

3.4.5. Further details of the consultation process, stakeholder engagement and feedback received are set out within the Statement of Community Consultation, prepared by Camargue which accompanies this planning application.

4. Proposed Development

4.1. Overview

4.1.1. Using VIRTUS's significant experience of delivering data centres both internationally and within the UK, and in line with the need for additional data capacity in the UK (particularly within the M25), the proposed development seeks the redevelopment of the site to deliver a data centre facility.

4.1.2. Accordingly, the description of development is as follows:

"Outline planning application (with all matters reserved except for access) for the redevelopment of the former Sipson Garden Centre site to provide a data centre facility, including associated energy infrastructure, security measures, landscaping, and access arrangements."

4.1.3. The proposed development comprises the demolition of existing structures and the construction of a new data centre facility with an anticipated operational capacity of approximately 54MW. The development would provide up to 54,000 sqm of gross internal floorspace, including data halls, administration block, plant, and associated ancillary infrastructure.

4.1.4. Whilst the application is submitted in outline, an illustrative scheme has been progressed. Figure 4.1 below shows the illustrative masterplan for the site:

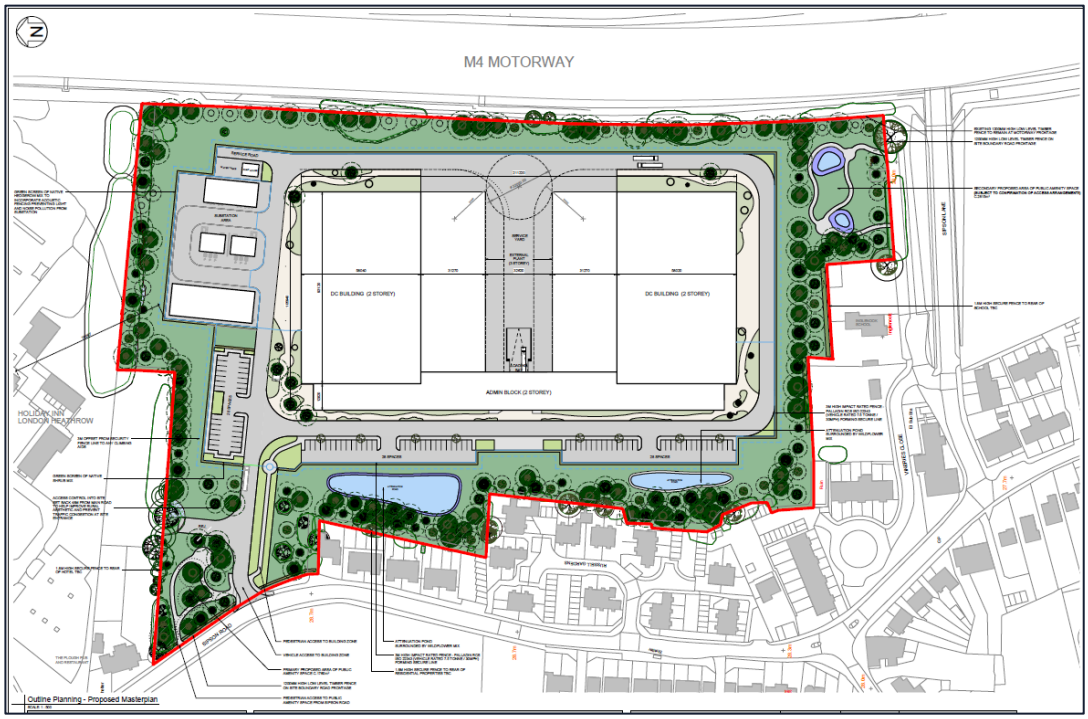


Figure 4.1: Illustrative Masterplan

4.1.5. The illustrative masterplan shows the principal data centre facility comprising two data hall buildings linked by a central ancillary administration and office building. The data halls provide the primary operational

floorspace, whilst the administration block accommodates ancillary office, welfare and operational support functions.

4.1.6. The data centre is proposed to be supported by a range of associated infrastructure, including external plant compounds, backup power generation equipment, water tanks, pumping infrastructure, service yards, internal circulation routes, security infrastructure, and other plant and equipment required for the operation of the facility.

4.1.7. In addition to the principal buildings, outline planning permission is sought for a series of ancillary and auxiliary buildings and structures necessary to support the operation and maintenance of the wider data centre campus.

4.1.8. A separate electricity substation and associated electrical infrastructure is proposed within the eastern part of the site. The substation will facilitate connection to the electricity network and provide the power required to support the operation of the data centre campus.

4.2. Outline Planning Approach

4.2.1. The application is submitted in outline form, with all matters except for access reserved. This approach has been agreed with LBH during pre-application discussions.

4.2.2. The maximum floorspace and maximum heights of each building is set out in the table below:

	Data Halls	Administration Block	External Plant	Ancillary Buildings (Substation)
Maximum Height (m)	20	10	20	20
Maximum Footprint (sqm)	12,905	3,130	5,780	3,990
Maximum Floorspace (sqm)	26,000	6,500	17,500	4,000

Table 4.1: Building Parameters

4.3. Parameter Plans and Design Code

4.3.1. Submitted as part of the outline planning application are a series of parameter plans which set parameters for the elements for which outline planning permission is sought. The parameter plans, their title, and their purpose is summarised in Table 4.2 below:

Parameter Plan and Drawing Number	Description
Land Use (Ref. PGF-ACM-00-XX-DR-AR-051503)	The Land Use Parameter Plan identifies the proposed uses across the site. The development comprises data centre floorspace, which is considered to fall within Use Class B8, together with office, plant, servicing and supporting infrastructure required for the operation of the facility. These uses are all ancillary to the principal data centre (Use Class B8) use.
Development Parcels (Ref. PGF-ACM-00-XX-DR-AR-051501)	The Development Parcels Parameter Plan establishes the maximum building footprints and development zones within which future buildings and associated infrastructure will be delivered. This denotes zones of deviation from principal building lines which reserved matters proposals will need to conform with.
Building Heights (Ref. PGF-ACM-00-XX-DR-AR-051502)	The Building Heights Parameter Plan identifies the maximum building heights for which outline planning permission is sought, providing certainty on the scale and massing of the proposed development.
Demolition (Ref. PGF-ACM-00-XX-DR-AR-051500)	The Demolition Parameter Plan identifies the existing buildings and structures to be removed to facilitate the comprehensive redevelopment of the site.
Public and Private Realm (Ref. PGF-ACM-00-XX-DR-AR-051506)	The Public and Private Realm Parameter Plan establishes the site's public realm framework, identifying secure operational areas, publicly accessible pedestrian routes and amenity spaces, and privately owned roads that remain accessible to the public. The plan ensures the operational needs of the development are accommodated whilst providing attractive and legible spaces for users and visitors.
Landscape and Green Infrastructure (Ref. PGF-ACM-00-XX-DR-AR-051505)	The Landscape and Green Infrastructure Parameter Plan establishes a comprehensive landscape framework across the site, including a minimum 12.5m-wide green buffer around the site boundary comprising dense tree planting, species-rich grassland, wildflowers and attenuation features. A 3m offset is maintained between the security fence and areas of high-level planting to facilitate security and maintenance requirements.
Access and Movement (Ref. PGF-ACM-00-XX-DR-AR-051504)	The Access and Movement Parameter Plan identifies the primary vehicular, servicing, pedestrian and cycle routes throughout the site, ensuring safe and efficient access whilst promoting sustainable travel and connectivity.

Table 4.2: Parameter Plans

4.3.2. It is anticipated that these parameter plans will be listed as approved plans on the Decision Notice and that any future reserved matters submissions will need to be made in accordance with them.

4.3.3. Alongside the parameter plans, a Design Code is submitted. This establishes the design principles which will guide the future detailed design of the proposals and should be read alongside the submitted parameter plans. The Design Code is structured to include images (illustrative) with principles that reserved matters applications should follow. It is anticipated that compliance of reserved matters submissions with the Design Code would be controlled via planning conditions.

4.4. Environmental Impact Assessment

4.4.1. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the 'EIA Regulations') set out the types of development that must always be subject to an EIA (defined as Schedule 1 development) and other development that will only require assessment if it is likely to give rise to significant environmental effects (defined as Schedule 2 development). The process to establish whether an EIA is required is known as Screening.

4.4.2. Given the nature and scale of the proposed development, the applicant's EIA advisors (Savills) concluded that significant environmental effects could arise. Therefore, it was considered that the proposed development qualifies as EIA development as defined within the EIA Regulations. As such, a formal Screening Opinion was not requested prior to beginning the EIA process.

4.4.3. A Scoping Opinion request was, however, submitted on behalf of the applicant in August 2026. The Council issued its formal Scoping Opinion on 12 October 2026 and the application has addressed this scoping opinion within the submitted Environmental Statement.

4.4.4. The submitted Environmental Statement covers Air Quality, Archaeology, Climate Change, Landscape and Visual Impact and Noise and Vibration.

4.5. Site Security

4.5.1. Key to the successful operation of a data centre campus is a robust security strategy; a consideration that has become increasingly important following the designation of data centres by the Government as Critical National Infrastructure. The proposed development has therefore been designed around a layered security approach, incorporating a hierarchy of security zones which transition from publicly accessible areas through to highly secure operational infrastructure.

4.5.2. The security strategy includes a continuous secure perimeter comprising a 3m high impact rated fence surrounding operational areas, controlled pedestrian and vehicular access points, dedicated secure compounds for critical infrastructure, and integrated security measures throughout the site. These measures have been carefully incorporated within the architectural and landscape design to ensure operational functionality whilst maintaining a high-quality environment.

4.5.3. In accordance with Crime Prevention Through Environmental Design (CPTED) principles, the landscape strategy has been designed to maintain clear sightlines, support natural surveillance and minimise opportunities for anti-social behaviour. A minimum 3m offset is maintained between the security fence line and surrounding features to prevent climbing and ensure the continuous effectiveness of the site's security measures.

4.6. Landscaping Strategy

4.6.1. Whilst landscape matters are reserved for subsequent approval, the outline planning application is supported by an Illustrative Masterplan and a Landscape and Green Infrastructure Parameter Plan, which together establish the landscape framework and key parameters that will guide the future detailed design of the development.

4.6.2. The landscape proposals are intended to create a strong green setting for the data centre facility, soften the appearance of the built form, enhance biodiversity and provide a high-quality environment throughout the

site.

4.6.3. The Landscape and Green Infrastructure Parameter Plan establishes a minimum 12.5m-wide green buffer around the site boundaries. This buffer will comprise extensive tree, shrub and hedgerow planting, species-rich grassland and areas of wildflower planting to provide effective screening, strengthen local landscape character and deliver ecological enhancements. The most substantial areas of landscape planting are focused along the site's boundary adjoining Sipson Road, Sipson Lane and neighbouring residential areas, intended to create a robust landscape edge to the development.

4.6.4. The landscape framework has been designed carefully to integrate effectively with the site's security requirements. A continuous security fence line will define the operational areas of the campus, with a minimum 3m stand-off maintained between the fence and areas of high-level planting. This approach ensures that landscape planting can provide visual screening and ecological benefits whilst maintaining clear sightlines and supporting the overall security strategy of the development. Within the limited areas where the 12.5m landscape buffer and 3m security offset overlap, only low-level planting will be provided.

4.6.5. Alongside the Design Code and the Landscape and Green Infrastructure Parameter Plan, the Illustrative Masterplan demonstrates how hard and soft landscaping could be integrated throughout the site. Soft landscaping is proposed around the building plots and within key amenity areas, incorporating native hedgerows, ornamental shrub planting, bulbs and other planting that will contribute to the visual quality of the development. These landscaped areas will help to create an attractive setting for the buildings and define routes and arrival spaces for staff and visitors.

4.6.6. A series of attenuation ponds are proposed within the green infrastructure network and will be integrated into the wider landscape design. These features will provide sustainable drainage functions whilst also creating habitat opportunities through the incorporation of wetland and wildflower planting. The landscape strategy therefore delivers multiple benefits, contributing to surface water management, biodiversity enhancement and visual amenity.

4.6.7. Existing trees within the site will be retained where feasible and incorporated into the landscape framework. The Landscape and Green Infrastructure Parameter Plan identifies retained trees and associated root protection areas, ensuring that established vegetation continues to contribute to the character of the site and supports the creation of a mature landscape setting.

4.6.8. The landscape strategy has been developed to balance the operational and security requirements of a critical national infrastructure facility with the delivery of high-quality green infrastructure. Through a combination of substantial boundary planting, internal amenity landscaping, ecological enhancements and sustainable drainage features, the proposals will establish a strong landscape structure that will evolve over time and provide an attractive and biodiverse setting for the development.

4.7. Highways and Accessibility Improvements and Parking

4.7.1. Access forms part of the detailed component of the application and approval is sought for the proposed means of access to the site from Sipson Road. The proposals utilise the existing site access previously used by the former garden centre.

4.7.2. Visibility splay drawings and swept path analysis have been undertaken and demonstrate that safe and suitable access can be provided for all users, including maximum legal articulated HGV and a fire tender accessing the site, turning around and exiting the site in a forward gear.

4.7.3. The development will continue to be accessed from Sipson Road via a secure, controlled entrance incorporating gates and on-site security. The proposed site access has been designed to provide a high-quality point of arrival whilst minimising impacts on the surrounding rural area, whilst maintaining the operational and security requirements associated with a critical national infrastructure facility.

4.7.4. Access controls will be provided within the site, and the access road has been set back approximately 48 metres from the main road. This arrangement allows vehicles to queue clear of the public highway, helping to prevent congestion at the site entrance, while also creating space for landscaping that softens the appearance of the development and enhances the site's rural setting.

4.7.5. The Access and Movement Parameter Plan establishes the framework for movement throughout the site and identifies the principal vehicular, pedestrian and cycle routes. Internal roads provide access to the data centre buildings, servicing areas, ancillary infrastructure and the proposed substation, whilst ensuring efficient circulation throughout the site. The Illustrative Masterplan demonstrates how these routes can be accommodated within the development framework established by the parameter plans.

4.7.6. Separate pedestrian access is proposed from Sipson Road to the south of the main vehicular entrance, providing a direct route to the principal building entrance. Internal pedestrian and cycle routes will connect key destinations within the site and facilitate safe movement between building entrances, parking areas and ancillary facilities.

Parking

4.7.7. The proposed development incorporates parking provision to meet the operational requirements of the data centre whilst seeking to avoid an overprovision that could encourage unnecessary private vehicle use. A total of 84 car parking spaces are proposed, comprising 72 standard spaces, 8 accessible parking spaces and four active electric vehicle charging spaces, with passive provision incorporated to support future expansion of electric vehicle infrastructure.

4.7.8. Secure cycle parking facilities will be provided for both staff and visitors. The proposals include 24 long-stay cycle parking spaces for staff and 16 short-stay spaces for visitors located close to the building entrance, encouraging active travel and supporting the objectives of the accompanying Travel Plan.

Servicing and Emergency Access

4.7.9. Dedicated servicing areas are incorporated within the development, including a central service yard and loading area capable of accommodating servicing vehicles and plant replacement activities. A turning head is provided adjacent to the site entrance, allowing vehicles unable to gain access through security controls to turn within the site and exit in a safe manner. Vehicle tracking has demonstrated that the site can accommodate the movement of servicing vehicles, including maximum legal articulated HGVs and fire appliances.

4.8. Sustainability and Energy Use

4.8.1. The proposed development has been designed in accordance with sustainable development principles, incorporating an holistic approach to energy efficiency, carbon reduction, climate resilience and resource efficiency. From the outset, VIRTUS and the wider design team have sought to minimise the environmental impact of the development whilst delivering the operational requirements of a modern data centre.

BREEAM Strategy

4.8.2. The application is supported by a BREEAM Data Centres 2010 pre-assessment which demonstrates that the proposed development is capable of achieving a BREEAM 'Excellent' rating. The assessment identifies an anticipated score of approximately 73%, exceeding the 70% threshold required for an 'Excellent' rating and reflecting strong performance across a broad range of sustainability categories including energy, water, materials, transport, ecology and pollution.

Low Carbon Technologies and Minimising Carbon Dioxide Emissions

4.8.3. An Energy and Sustainability Statement accompanies the application and demonstrates that the proposed development exceeds the London Plan requirement for a minimum 35% reduction in regulated carbon emissions. The submitted strategy achieves an estimated 41% reduction in regulated carbon emissions compared with a Part L 2021 compliant baseline development.

4.8.4. In accordance with the 'Be Lean' stage of the energy hierarchy, the development incorporates a range of energy efficiency measures to minimise energy demand, including:

- high-efficiency cooling systems serving the data halls;
- mechanical ventilation systems with heat recovery;
- air source heat pump technology serving the administration and ancillary areas;
- high-efficiency LED lighting throughout the development;
- occupancy and daylight-responsive lighting controls;
- high-performance building fabric and glazing;
- free-cooling technology incorporated within the data hall cooling strategy; and
- comprehensive metering and energy monitoring systems to support ongoing performance optimisation.

4.8.5. The proposals have also been designed to enable future heat recovery opportunities. Whilst the development has relatively limited on-site heat demand, the data centre will generate significant quantities of recoverable waste heat. The building design will therefore facilitate the future export of waste heat to potential off-site users or future district heat networks, should suitable opportunities emerge.

4.8.6. Renewable energy generation forms part of the proposed strategy through the incorporation of roof-mounted photovoltaic panels on the administration building. These will generate low-carbon electricity on-site and contribute towards meeting the operational energy requirements of the development.

Materials and Construction

4.8.7. Sustainable construction principles will be embedded throughout the development process. Materials will be selected with regard to embodied carbon, durability, lifecycle performance and responsible sourcing. Opportunities to utilise recycled and reused materials will be maximised where practicable, whilst construction waste generation will be minimised through the implementation of Circular Economy principles and sustainable construction methodologies.

Water Use

4.8.8. The proposed development incorporates a range of water efficiency measures designed to minimise potable water consumption. Water-efficient sanitary fittings, metering systems and management controls will be specified throughout the development. Rainwater harvesting infrastructure will also be incorporated to facilitate water reuse for non-potable purposes where feasible, reducing demand on the mains water network.

4.9. Drainage Strategy

4.9.1. A Flood Risk Assessment and Drainage Strategy has been prepared by AECOM and accompanies the application. The proposed drainage strategy adopts a sustainable drainage-led approach and has been designed to manage surface water runoff generated by the development.

4.9.2. Sustainable Drainage Systems (SuDS) have been incorporated into the development where feasible. The proposals include rainwater recovery and re-use for toilet flushing and landscape irrigation. External surfaces will be drained through a combination of permeable paving and green roofs where rooftop plant arrangements allow.

4.9.3. The proposed drainage strategy comprises a range of SuDS features including attenuation ponds, below-ground attenuation tanks, rainwater harvesting infrastructure, filter drains, permeable drainage features, oil separators, carrier drains and associated management infrastructure.

4.9.4. The drainage system has been designed to accommodate rainfall events up to and including the 1 in 100-year storm event, including an allowance for climate change. Surface water runoff will be managed through the proposed attenuation and drainage infrastructure prior to discharge from the site.

5. Consideration of Green Belt Matters

5.1. Introduction

5.1.1. This section of the Planning Statement considers the acceptability of the principle of development with regards to the site's location within the Green Belt.

5.1.2. The national decision-making policies relating to Green Belt land are set out in Chapter 13 of the new NPPF from Policy GB6 onwards. Policy GB6 (1) states that development in the Green Belt is inappropriate unless it falls within one of the categories in Policy GB7.

5.1.3. Of relevance to the development proposals is that the former Sipson Garden Centre building and its associated hardstanding remain in situ on the site. Part of the site is therefore previously developed land, where Policy GB7 (e) states that development would not be inappropriate as follows:

"The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential), which would not cause substantial harm to the openness of the Green Belt;"

5.1.4. However, the entirety of the site is considered to meet the requirements of Policy GB7 (g) which is as follows:

"Development where all of the following apply:

i. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
ii. There is an evidenced unmet need for the type of development proposed[41];
iii. The development would be in a sustainable location, with particular reference to policy TR3 of this Framework[42]; and
iv. In the case of major development involving the provision of housing, the development proposed complies with policy GB8."

5.1.5. Footnotes 41 and 42 are set out for completeness as follows:

"41 Which, in the case of applications involving the provision of housing, means the lack of a five year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Test result was below 75% of the housing requirement over the previous three years; and in the case of traveller sites means the relevant local planning authority cannot demonstrate a five year supply of deliverable traveller sites.

42 In the case of development proposals involving the provision of traveller sites, particular reference should instead be made to policy HO12."

5.1.6. For the avoidance of doubt, footnotes 41 and 42 are not of relevance to the outline planning application proposals.

5.1.7. NPPF Annex B (Glossary) defines Grey Belt land as follows:

"For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2".

5.1.8. The NPPF sets out what may constitute a 'strong,' 'moderate,' or 'weak' contribution to the identified Green Belt purposes at Annex E.

5.1.9. Rather than progressing a partial Green Belt Assessment on the basis of compliance of part of the site with Policy GB7 (e), the applicant has progressed the Green Belt Assessment on the basis of the whole site's compliance with Policy GB7 (g). To be able to ascertain whether the development proposals can be considered to not be inappropriate development in the Green Belt and compliant with Policy GB7 (g), it is therefore incumbent on the applicant to demonstrate firstly that the site can be defined as Grey Belt as per the Annex B definition, and secondly that the development would comply with Policy GB7 (g) (i-iv).

5.2. Grey Belt Assessment: Annex B Definition

5.2.1. It is the applicant's assertion that the site meets this definition and can be considered to be Grey Belt land. An assessment of the site against the Annex B is undertaken below, and which demonstrates that the site could be considered to meet the definition of Grey Belt land.

Purpose (a): To check the unrestricted sprawl of large built-up areas

5.2.2. Annex E of the NPPF states that sites that demonstrate the following illustrative features provide a 'Weak or None' contribution towards checking the unrestricted sprawl of large built-up areas:

- *"Are not adjacent to or near to a large built-up area; or*
- *Are adjacent to or near to a large built-up area, but containing or being largely enclosed by significant existing development"*

5.2.3. Annex E states that sites that the following illustrative features provide a 'Moderate' contribution:

"Assessment areas that contribute moderately are likely to be adjacent or near to a large built-up area, but include one or more features that weaken the land's contribution to purpose A, such as (but not limited to):

- *Having physical feature(s) in reasonable proximity that could restrict and contain development;*
- *Be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development;*
- *Contain existing development; and/or*

- *Being subject to other urbanising influences."*

5.2.4. The site itself is well contained by existing development or major infrastructure (i.e. the M4 motorway) on all sides.

5.2.5. To the north the site boundary is well defined and contained by the former Holiday Inn hotel and The Plough pub, both accessed from the A408 road. The site's eastern boundary is well defined by the M4 motorway, and to the south by the Lady Nafisa School and by a number of houses with gardens and a hedgerow at the site boundary fronting Sipson Lane. The containment is also defined to the west where the boundary is formed by the rear gardens of residential properties fronting onto Sipson Road.

5.2.6. The site is generally well contained with defensible boundaries. Its north, east, south and west boundaries are formed by boundary vegetation beyond which is development and / or road infrastructure including the M4 and existing development. It is considered that the defensible boundaries provide a clear limit to the extent of the future development.

5.2.7. The Hillingdon Townscape and Character Study (2023) (Character Study) acknowledges that the Green Belt in the South of the borough is "more fragmented" but that it provides a useful buffer between the main residential areas and Heathrow Airport. That buffer is primarily to the south of the M4 but should be noted that part of the site is previously developed land, having formerly been used as the Sipson Garden Centre. An extract of the Character Study is shown below in Figure 5.1 for context:



Figure 5.1: The Hillingdon Townscape and Character Study (2023)

5.2.8. Overall, it is considered that the site does not strongly contribute to purpose (a) and meets the definition within Annex E of the NPPF of sites that have moderate or weak contribution.

5.2.9. Furthermore, pre-application engagement with the Council has informed the assessment of the site's contribution to Green Belt purposes. Officers have concluded during pre-application discussions that the site is likely to make a moderate contribution to purpose (a). On this basis, the Council has indicated that the site may be capable of being considered Grey Belt, subject to a full and robust assessment being undertaken as part of the planning application.

Purpose (b): To prevent neighbouring towns merging into one another

5.2.10. Purpose (b) is concerned with maintaining separation between neighbouring towns and preventing their coalescence. The site is not located within a strategic gap between towns and does not function to maintain the separation of any neighbouring urban settlements. In accordance with the Annex E definition, such sites provide a 'Weak or None' contribution to this purpose.

5.2.11. The site is located between existing areas of built development and does not function as an important area of open land maintaining separation between settlements.

5.2.12. The relationship between Sipson, West Drayton and Heathrow Airport demonstrates that settlement separation is principally maintained by substantial physical infrastructure, most notably the M4 motorway. The motorway creates a clear and enduring distinction between these areas and represents the defining feature preventing coalescence.

5.2.13. Whilst development of the site would marginally reduce the extent of undeveloped land between Sipson and settlements to the east and north-east, including Harlington and Hayes, these areas remain physically separated by the M4 corridor. Consequently, the proposed development would not materially diminish the role of the Green Belt in preventing settlement coalescence.

5.2.14. Furthermore, the site is situated between existing built form, including residential development within Sipson and established commercial development to the north. In this context, the site does not perform a significant role in maintaining the separation of neighbouring towns.

5.2.15. The proposed development also provides an opportunity to establish a stronger and more enduring Green Belt edge through substantial landscaping, sustainable drainage features and a clearly defined site boundary. Taken together, these factors indicate that the site makes a negligible contribution to Green Belt purpose (b).

Purpose (d): To preserve the setting and special character of historic towns

5.2.16. The site does not form part of the setting of an historic town, and its development would not erode or undermine the special character of any historic settlement. As such, the site has no contribution when considered against purpose (d) of the Green Belt purposes.

Summary

5.2.17. In light of the above, it is considered that the site meets the definition of Grey Belt land. Therefore, in order to demonstrate that the site can be considered appropriate development in the Green Belt, an assessment against the criteria in GB7 (g) needs to be undertaken. This is set out below.

5.3. Green Belt Assessment: Policy GB7(g)

5.3.1. As set out above the site is considered to constitute Grey Belt Land, therefore an assessment against criteria (i) – (iv) of Policy GB7 (g) is then required.

i. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan

5.3.2. The redevelopment of the site would not fundamentally undermine the function of the Green Belt across the borough as a whole due to its limited size and highly contained nature. With regards to its contribution towards the remaining Green Belt purposes (c) and (e), we comment as follows:

- Purpose (c) relates to safeguarding the countryside from encroachment. The site features existing buildings and associated areas of hardstanding, and many of the views of the site are characterised by the presence of buildings in the background or in the peripheries of the views. While the development of the site would physically require the encroachment into land classified as countryside not already featuring built development, this land doesn't perform any function as countryside land and is not characterised as rural. This conclusion is reinforced by the LTVIA, prepared by Savills Urban Design Team, which identifies the site as forming part of a heavily modified urban-fringe landscape. The LTVIA further concludes that the relevant landscape character areas are generally of low value and low to medium susceptibility to change, reflecting the fragmented and developed nature of the surrounding landscape. Overall, the site makes a 'low' contribution to purpose (c).

- Purpose (e) relates to urban regeneration, by encouraging the recycling of derelict and other urban land. The site is partially made up of previously developed land and is the preferable site due to its location within an existing Availability Zone and close (typically within up to 5km) to a Grid Supply Point ('GSP'). The unique need and locational requirements do not conflict with the overall aspirations of purpose (e).

5.3.3. In summary, the development would utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt.

ii. There is an evidenced unmet need for the type of development proposed

5.3.4. The accompanying Data Centre Needs Assessment and Economic Benefits Statement, prepared by Savills Economics demonstrates a clear and substantial unmet need for additional hyperscale data centre capacity within the Hayes Availability Zone ('AZ'), within which the site is located. The assessment concludes that the proposed development would deliver critical digital infrastructure in a location where demand for capacity significantly exceeds available and planned supply.

5.3.5. The Hayes AZ is one of the principal data centre clusters within the London Availability Region and has become a strategically important location for hyperscale facilities due to its proximity to London, access to high-voltage power infrastructure, dense fibre connectivity and the presence of an established ecosystem of operational data centres. The site is located within this established cluster and is therefore capable of serving the operational requirements of cloud service providers and hyperscale operators.

5.3.6. Based on analysis of historical delivery rates, planning activity and live capacity data, Savills Economics estimates that demand within the Hayes AZ will amount to approximately 3,851MW between 2026 and 2031. By comparison, the identified supply pipeline, including approved schemes and applications currently progressing through the planning system, is estimated to provide up to 2,000MW of capacity. This results in an identified shortfall of approximately 1,851MW by 2031, even before account is taken of delivery risks

associated with planning, power availability and construction programmes.

5.3.7. The assessment further demonstrates that this need is immediate. Historical analysis identifies average annual demand of approximately 167MW per annum within the Hayes AZ and a compound annual growth rate of 40.3% over the period 2015-2025, reflecting the rapid expansion of cloud computing, artificial intelligence and data-intensive technologies. The forecast unmet need is reinforced by a range of sensitivity testing using alternative methodologies, each of which also identifies a significant shortfall in data centre capacity within the Hayes AZ.

5.3.8. Importantly, the identified need is not footloose and cannot simply be accommodated elsewhere. The submitted Data Centre Needs Assessment and Economic Benefits Statement explains that data centre operators require facilities to be located within established Availability Zones in order to facilitate low-latency connectivity, load balancing, data replication and operational resilience. Consequently, capacity delivered in other availability zones would not meet the identified need within the Hayes AZ.

5.3.9. The conclusions of the Needs Assessment are reinforced by the accompanying Alternative Sites Assessment, which demonstrates that there are no suitable alternative sites capable of meeting the operational requirements of the proposed development within the relevant search area. The site therefore represents a rare opportunity to deliver additional hyperscale data centre capacity in a location where there is both a significant unmet need and a shortage of suitable development opportunities.

iii. The development would be in a sustainable location, with particular reference to policy TR3 of this Framework

5.3.10. An assessment of the scheme against the specific criteria of Policy TR3 is set out below:

a) The site occupies a highly sustainable edge-of-settlement location adjoining Sipson, with direct access to existing services, employment opportunities and public transport infrastructure. There is a bus stop outside The Plough pub which is served by the 222 bus route that runs between Uxbridge and Hounslow. The bus services provide connections to the London Underground network and Elizabeth Line, making the site accessible across London. There are several facilities and amenities within walking and / or cycling distance of the site. The site therefore aligns directly with the objective of limiting the need to travel by private car whilst offering a genuine choice of transport modes.

b) The scheme makes effective use of existing transport infrastructure, benefiting from direct access to the 222 bus stop. The scheme seeks to enhance the existing site access and will include cycle parking in line with required standards. By combining existing transport assets with new and improved active travel infrastructure, the scheme maximises opportunities for walking, cycling and public transport use, improving accessibility for both existing and future residents.

c) The development adopts a vision-led approach to movement and will not result in any significant adverse impacts on the transport network in terms of capacity and congestion.

d) The scheme has been designed to minimise the environmental impacts associated with traffic and transport by promoting sustainable modes of travel and reducing reliance on the private car.

e) The site is adjacent to, and takes its access from, the village of Sipson so is not considered a rural location. Criterion e) is therefore not relevant.

5.3.11. Despite having a PTAL rating of 1b, the site is well connected in terms of public transport and the proposed development accords with the requirements of NPPF Policy TR3. The site is considered to be sustainable having particular regard to the locationally specific elements and operational characteristics. The proposal therefore complies with Policy GB7 (g) (iii).

iv. In the case of major development involving the provision of housing, the development proposed complies with policy GB8.

5.3.12. This criterion is not relevant.

Summary

5.3.13. For the reasons set out above, the proposed development complies with all relevant requirements of Policy GB7(g). The site constitutes Grey Belt land that does not strongly contribute to the relevant Green Belt purposes (or the other purposes when taken as a whole); there is a clear and evidenced need for data centre capacity; and the site occupies a sustainable location. It is therefore considered that the proposal is supported in principle by Policy GB7 (g) and the proposals should be considered to be appropriate development in the Green Belt.

5.4. Development in the Green Belt: Very Special Circumstances

5.4.1. NPPF Policy GB6 states that development within the Green Belt is inappropriate unless it falls within one of the categories of development identified in Policy GB7. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (VSC).

5.4.2. As set out above, it is considered that the site meets the definition of Grey Belt land and that the proposed development complies with the requirements of Policy GB7(g). It is not, therefore inappropriate development within the Green Belt. However, should the Council reach an alternative conclusion and determine that the site does not constitute Grey Belt land, or that it does not comply with the requirements of Policy GB7(g), the applicant contends that there are also VSC which apply to the proposals.

5.4.3. Since the Labour Government took office in July 2024, the Secretary of State for Housing, Communities and Local Government has recovered three appeals for data centres within the London Green Belt: one at Court Lane Industrial Estate in Iver (Ref. APP/P1940/W/24/3346061); a second at Bedmond Road in Abbots Langley (Ref. APP/N0410/W/24/3337981); and a third at the Woodlands Park Landfill site (Ref. APP/N0410/W/24/3347353).

5.4.4. The Land off Bedmond Road, Abbots Langley and Court Lane Industrial Estate appeals were allowed on the basis of VSC outweighing the substantial weight given to Green Belt harm. Whilst the Woodlands Park Landfill site was allowed by the Secretary of State on the basis that development satisfied all the tests set out in paragraph 153 of the NPPF (2024), the Planning Inspector did not reach the same conclusion that the site should be considered to be Grey Belt and undertook a VSC exercise that the Secretary of State agreed with.

5.4.5. The below table provides an overview of how weight was afforded to key VSC presented in the three appeal decisions listed above. In the case of Bedmond Road and Court Lane Industrial Estate, this is the weight given by the Secretary of State, whilst in the case of Woodlands Park Landfill Site, it is the weight given by the Planning Inspector as the Secretary of State considered the development not to be inappropriate based on a Grey Belt case and did not consider the weight that could be given to Very Special Circumstances.

Very Special Circumstances	Court Lane	Bedmond Road	Woodlands Park
Need for additional data centre capacity within the Availability Zone	Significant	Significant	Substantial
Economic benefits associated with the level of investment	Significant	Significant	Substantial
Social benefits associated with data centres	N/A	N/A	Significant
Lack of alternative sites within Availability Zone	Significant	Significant	Substantial
Lack of plan-led solution to deliver required capacity	N/A	No Weight	Significant
Damage to UK digital economy if appeal dismissed	N/A	N/A	Significant
Site is previously developed land	Significant	N/A	N/A
Transport improvements	N/A	N/A	N/A
Green space improvements	N/A	N/A	N/A
District heating opportunities	N/A	N/A	N/A
Biodiversity Net Gain	N/A	N/A	N/A

Table 5.1: Very Special Circumstances Weight

5.4.6. It is worth noting that the Inspector in the Woodlands Park decision used the term 'substantial' instead of 'significant' but there appears to be no difference between these two terms in terms of the weight afforded and both appear to be at the top of the hierarchy of weight afforded to VSC.

5.4.7. On the basis of the above, VIRTUS put forward the below as the VSC case in favour of the development:

- need for additional data centre capacity within the Availability Zone;
- lack of alternative sites within Availability Zone;
- economic and social benefits associated with the level of investment to be delivered from the proposals;
- damage for the UK's digital economy if permission not granted;
- the site contains previously developed land, and has a positive planning history; and
- district heating opportunities.

5.4.8. Each is considered in turn below:

<u>Need for Additional Data Centre Capacity within the Availability Zone</u>

5.4.9. The need for additional data centre capacity is a significant material consideration which weighs in favour of the proposed development. The needs case is set out in detail in the submitted Data Centre Needs

Assessment and Economic Benefits Statement prepared by Savills Economics. The key conclusions of this report are summarised above at paragraphs 5.34-5.39.

5.4.10. The proposed development would deliver infrastructure that responds directly to a demonstrable market need and supports the Government's wider objectives for economic growth, productivity and digital connectivity. The identified need is particularly important given the role of data centres as critical enabling infrastructure, supporting cloud services, artificial intelligence technologies, digital communications, public services and business operations across the wider economy.

5.4.11. The identified need is a matter of more than local importance, reflecting the role of the proposed development in supporting nationally significant digital infrastructure. As such, the demonstrated requirement for additional data centre capacity within the Availability Zone forms an important component of the Applicant's VSC case and should be afforded substantial weight in the planning balance.

Lack of Alternative Sites within Availability Zone

5.4.12. An Alternative Sites Assessment (ASA) has been undertaken to establish whether there are any suitable and available alternative sites capable of accommodating the proposed data centre development within the Hayes Availability Zone (AZ). The assessment applied a robust, staged methodology, reflecting the specific operational requirements of hyperscale data centres, including proximity to power infrastructure, location within the Hayes AZ, site size, access arrangements, environmental constraints and site availability.

5.4.13. The assessment considered a wide range of potential sites across West London and the surrounding authorities within an appropriate search area defined by data centre locational requirements. Following a detailed review, 22 sites were identified for further assessment; however, all were discounted due to constraints relating to availability, existing permissions, competing allocations, environmental or heritage designations, operational requirements, access limitations, or because they were already being brought forward for data centre development.

5.4.14. A significant number of the assessed sites either benefit from extant permissions or live proposals for data centre development, demonstrating the substantial market demand for suitable development opportunities within the Hayes AZ. Other sites were unavailable due to existing employment uses, residential-led regeneration proposals, mineral extraction operations, or policy allocations for alternative forms of development. Several Green Belt sites were also found to perform more strongly against Green Belt purposes or were subject to constraints that would prevent delivery of a comparable scheme.

5.4.15. The ASA concludes that there are no suitable and available alternative sites, either individually or in combination, capable of accommodating the proposed development or meeting the identified need for additional data centre capacity within the Hayes AZ within the required timeframe. The application site therefore represents a unique opportunity to deliver urgently required data centre capacity, supported by an available power connection and a location within the established availability zone. As such, the conclusions of the ASA should be afforded significant to substantial weight in the planning balance.

Economic and Social Benefits

5.4.16. The economic and social benefits associated with the proposed development are a material consideration in the determination of this application and are set out within the submitted Data Centre Needs Assessment

and Economic Benefits Statement prepared by Savills Economics.

5.4.17. At all levels of planning policy there is a recognition that policy should support economic growth and productivity. Support for economic development on a general basis is set out throughout Chapter 7 of the NPPF, Policies E2, E4, E5 and E7 of the London Plan, and Policies E1 and E2 of the LPP1. Furthermore, there is specific support for knowledge-based, data-driven and high-technology industries, including data centres, within Policy E2 of the NPPF, which states that substantial weight should be given to proposals that support business growth and the Government's Industrial Strategy, including AI and digital technologies.

5.4.18. The proposed development would deliver significant economic benefits at the local, regional and national level, as set out in the accompanying Data Centre Needs Assessment and Economic Benefits Statement, prepared by Savills Economics. In addition to providing critical digital infrastructure and contributing towards the UK's growing demand for data storage capacity, the development would generate substantial employment opportunities during both the construction and operational phases. The proposal would also support wider economic activity through its supply chains and by enabling the continued operation and growth of businesses that rely on secure and resilient data centre capacity.

5.4.19. Whilst not repeated verbatim here, the key economic benefits in this regard are that the proposed development would:

- make a meaningful contribution towards the forecast requirement for 4,180MW of additional data centre capacity in the UK by 2030;
- create approximately 251 net additional operational jobs, comprising 232 direct jobs and 186 indirect and induced jobs, after accounting for displacement;
- generate an average of 483 construction jobs during the nine-year construction period, equating to approximately 652 net additional construction jobs once multiplier effects are taken into account;
- deliver an estimated £18 million increase in Gross Value Added (GVA) per annum; and
- generate approximately £4.1 million per annum in business rates revenue.

5.4.20. These significant economic benefits, together with the provision of nationally important digital infrastructure, attract substantial weight in favour of the proposed development.

5.4.21. Beyond its economic benefits, the proposed development would support a range of social benefits. There include:

- a new publicly accessible landscaped amenity area adjacent to the site entrance, providing opportunities for informal recreation and dog walking;
- a secondary landscaped area in the southeast corner of the site capable of providing either additional publicly accessible open space or ecological enhancement;
- improvements to site access and connectivity, together with contributions towards highway

improvements where required; significant landscaping and green infrastructure enhancements;

- biodiversity enhancements and habitat creation; and
- sustainable drainage measures that contribute to improved surface water management and flood resilience.

5.4.22. These benefits are additional to the significant economic and digital infrastructure benefits arising from the proposed development and taken together, weigh materially in favour of the proposed development in the planning balance.

Damage to the UK's Digital Economy

5.4.23. The digital sector has become a large part of the UK economy, generating £117 billion in GVA in 2024 accounting for around 6.8% of total UK GVA. In addition, another vital component of the digital sector is the indirect GVA. Indirect GVA captures the impact the digital sector has on other segments of the economy. The indirect GVA in 2024 equated to £101 billion. Therefore, the total GVA (both direct and indirect) attributable to the digital sector equated to around £278 billion in 2024. These figures underline the critical role of data infrastructure in driving productivity, innovation, and economic growth.

5.4.24. In the Woodlands Park Landfill Site appeal decision, the appellant put forward a case that weight should be given to the harm that would be caused to the UK's digital economy if the appeal were to be dismissed. Whilst contested by the Local Planning Authority, Significant Weight was given to this as a Very Special Circumstance by the Inspector who distinguished this from the economic and social benefits of the scheme.

5.4.25. The Planning Inspector found that, given the need for additional data centre capacity is so significant across the whole of Europe and that data centre developers, to an extent, can be footloose in which markets they target across Europe, the effect of dismissing the appeal would be to deter future investments in the sector as developers pivot to alternative locations outside of the UK which are seen as having a more favourable and certain permitting regime. This would mean that both the unmet need for data centre capacity within the UK would not be met (or would be harder to meet) and that the economic and social benefits associated with data centres would not be delivered. The Inspector was clear that this should not be considered to be double counting and differs to the separate weight that should be given to the economic and social benefits associated with the proposed development.

5.4.26. The reasoning adopted by the Inspector in the Woodlands Park Landfill Site appeal is also relevant to the proposed development. The proposals would make a meaningful contribution towards addressing the identified shortfall in capacity within the Hayes AZ and support the continued growth of the UK digital economy. In circumstances where there is a recognised shortage of data centre capacity and significant competition for investment across European markets, the refusal of schemes capable of delivering strategically important digital infrastructure risks undermining confidence in the UK as a destination for future investment. This consideration attracts significant weight in the planning balance as a distinct matter from the direct economic and social benefits associated with the development.

5.4.27. If not given weight as its own VSC, it strengthens the weight that can be given to the need for additional data centre capacity and the economic benefits of data centres as VSC.

Previously Developed Land and Positive Planning History

5.4.28. The former Sipson Garden Centre building and its associated hardstanding remain in situ on the site. Part of the site is therefore previously developed land. This element of the site is also subject to an extant planning permission (LPA Ref. 67666/APP/2023/3721) for the development of a Centre of Excellence for the servicing and repair of Airside Support Vehicles (Use Class B2) consisting of a service building with 7no service bays and 1no storage bay, an ancillary two-storey office building and associated hardstanding, parking, a wash bay, plant, solar PVs, landscaping and drainage.

5.4.29. The presence of previously developed land is an important material consideration which weighs in favour of the proposed development. The extant planning permission further demonstrates that the principle of built development on part of the site has already been accepted, with planning permission capable of being implemented.

5.4.30. Whilst the current proposals would differ in form and use from the permitted scheme, the existence of previously developed land and a lawful fallback position are material considerations which reduce the weight that can reasonably be attributed to the loss of openness arising from development of this part of the site. Taken together, these factors attract moderate weight in favour of the proposed development, reflecting both the previously developed nature of part of the site and the fact that an implementable planning permission already exists for built development on that land. These considerations therefore form a meaningful component of the Applicant's VSC case.

District Heating Opportunities

5.4.31. VIRTUS has made various commitments to waste heat export at other data centre campuses that they are developing. They would look to do the same here either by future proofing their development through the incorporation of onsite waste heat export capabilities when constructed, or through building in the ability to incorporate such features in the future should a district heating network become available.

5.4.32. VIRTUS's experience is that for such a mechanism to work effectively there is a requirement for a network to be in place, there to be recipients coming online at an appropriate time, for these recipients to want heat at the level that the data centres provides, and for the recipients to be close enough so that heat loss is minimal. VIRTUS therefore suggests that a planning condition is used setting out these requirements.

5.4.33. On that basis, it is suggested that moderate weight is given to the future ability to export heat into a district heating network.

5.5. Green Belt Assessment: Summary

5.5.1. This section of the Planning Statement has confirmed that the proposed data centre constitutes appropriate development within the Green Belt because the site qualifies as Grey Belt land under the NPPF and meets all relevant tests of Policy GB7 (g). It contends that the site makes only a weak to moderate contribution to the relevant Green Belt purposes and would not undermine the function of the wider Green Belt as a whole.

5.5.2. It has been further demonstrated that there is a significant unmet need for hyperscale data centre capacity within the Hayes AZ, a lack of suitable alternative sites, and the proposals have been demonstrated to be in compliance with NPPF Policy TR3.

5.5.3. Consequently, the proposal is considered policy-compliant and acceptable in principle with regards to Green Belt matters. In the alternative, should the Council disagree with the Grey Belt Assessment, the applicant has set out a VSC case based on the pressing need for data centre infrastructure, the absence of alternative sites, substantial economic and social benefits, support for the UK's digital economy, the presence of previously developed land, and potential future district heating opportunities.

6. Planning Assessment

6.1. Introduction

6.1.1. Having described the site and summarised the development proposals above, this section assesses the application against the principal planning considerations and material considerations relevant to the determination of the application. These matters are considered in turn below.

6.2. Principle of Development and Land Use

6.2.1. Data centres are a critical component of national digital infrastructure, providing the computing capacity required to support cloud services, artificial intelligence, communications networks, public services and wider business operations. As such, they represent essential infrastructure required to support the operation and growth of the modern economy.

6.2.2. National planning policy is supportive of economic growth and investment in digital infrastructure. The NPPF recognises the importance of advanced technologies and innovation in supporting productivity and competitiveness and requires significant weight to be afforded to proposals which support economic growth, business investment and the Government's wider objectives for digital technologies and artificial intelligence.

6.2.3. The application site is particularly well suited to data centre development owing to its location within the Hayes AZ, one of the UK's most established data centre clusters. The site benefits from proximity to strategic power infrastructure, high-capacity fibre networks and the wider ecosystem of existing and planned data centre facilities which are necessary to support hyperscale data centre operations.

6.2.4. Data centre development is a highly specialised form of development with specific locational requirements that cannot be readily met across the wider market. The submitted Data Centre Needs Assessment and Economic Benefits Statement demonstrates a significant shortfall in available data centre capacity within the Hayes AZ, whilst the Alternative Sites Assessment confirms that there are no suitable and available alternative sites capable of accommodating the proposed development. The application site therefore represents a rare opportunity to deliver nationally important digital infrastructure within an established and operationally suitable location.

6.2.5. Having regard to the site's suitability, the strategic need for additional data centre capacity and the policy support for digital infrastructure and economic growth, the principle of the proposed development is considered acceptable, subject to consideration of the detailed planning matters assessed below.

6.3. Design

6.3.1. The NPPF places significant emphasis on the importance of good design and the creation of well-designed places. It requires planning decisions to ensure developments are visually attractive, sympathetic to local character and history, establish a strong sense of place and provide a high standard of amenity for existing and future users. The NPPF also promotes the use of design codes and a design-led approach to secure high-quality and sustainable development (Policy L1).

6.3.2. NPPF Policy DP3 sets out that development proposals should respond positively to their context, including the history, character and defining features of the site and its surroundings, so that development integrates with and enhances its setting. The policy supports innovation and change where appropriate, and recognises that increased scale or density may be acceptable where justified in accordance with Policies L2 and L3.

6.3.3. Policy D3 of the London Plan states all development must make the best use of land by following a design-led approach that optimises the capacity of sites. The design-led concept requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth. Planning policy, and most explicitly in the London Plan, indicates that change is to be considered as a fundamental characteristic of London, and respecting character and accommodating change should not be seen as mutually exclusive.

6.3.4. In accordance with the prevailing planning policy context, securing an understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place's distinctive character, recognising that not all elements of a place are special and valued. As such good design is central to planning policy at all levels, and as expected, a need to design a new building that can be play a positive urban design role in the built form, that is enduring and successful, has been a fundamental aim of this project.

6.3.5. Throughout this process, the design team have been clear on design expectations and the technical requirements which are integral to the proposed data centre use. To a significant extent, the function of the data centre defines the necessary building envelope, its mass, its layout and its overall form with data centre design having to respond to three guiding principles:

- the provision of technical and controlled space which can store and process very large amounts of data;
- to build in exemplary levels of security (against cyber and physical threats) and resilience; and
- to deploy very efficient forms of technology to reduce power and water use for day to day operations.

6.3.6. For example, data halls need to be of a certain shape (and are only feasible at a certain size) whilst the spatial configuration of mechanical and electrical requirements are determined by the data hall capacity.

6.3.7. These requirements drive the form of modern data centres and what they require to operate effectively and efficiently. They do not, however, mean that data centres should be hidden or that performance needs to be at odds with appearance.

6.3.8. The proposed development is the product of a comprehensive and iterative design process which has sought to balance the operational requirements of a modern data centre with the constraints and opportunities presented by the site and its surroundings. The scheme will deliver a high-quality piece of digital infrastructure across the site, supported by a landscape-led masterplan, carefully considered building design and significant areas of green infrastructure.

6.3.9. The parameter plans and Design Code submitted as part of the application establish a robust framework

for the future development of the site and will guide the preparation and determination of subsequent reserved matters applications. Together, they ensure that the design principles, development parameters and quality standards established through this application are secured and carried forward through the detailed design stages.

6.3.10. As set out in Section 3 of this Planning Statement, the proposals have been informed by extensive pre-application engagement with officers at LBH, including design workshops and ongoing discussions with officers and key stakeholders. This collaborative process has helped shape the evolution of the masterplan, building form, landscape strategy and access arrangements.

6.3.11. The design has evolved through a series of iterative site test-fits and design reviews, resulting in a layout, scale and massing strategy that responds positively to the site's context. The proposals incorporate substantial landscape buffers, break down the massing of the built form through articulation and varied building elements, and carefully locate infrastructure and operational areas to minimise visual impacts and create an attractive and coherent development.

6.3.12. Further detail regarding the evolution of the proposals, the design rationale, and the parameters that will govern future reserved matters submissions is provided within the accompanying Design and Access Statement and Design Code prepared by AECOM.

6.4. Landscape, Townscape and Visual Impact

6.4.1. A Landscape, Townscape and Visual Impact Assessment (LTVIA) has been prepared by Savills and is included within the Environmental Statement (Chapter 9), which provides an assessment of the baseline and likely effects of the proposed development on the landscape character, landscape features and visual amenity of the site. The LTVIA concludes that the site is located within a relatively low-value urban fringe landscape characterised by the former Sipson Garden Centre, areas of hardstanding, modified grassland, the adjacent M4 Heathrow Spur Road, the vacant Holiday Inn hotel, and surrounding transport infrastructure. The relevant landscape character areas are assessed as having low value and low-medium susceptibility to change.

6.4.2. The site is not subject to any landscape designations or valued landscape designations, although it does lie within the Metropolitan Green Belt. The LTVIA has concluded that the surrounding landscape has already been substantially influenced by urbanising features, including Heathrow Airport, major road infrastructure, mineral workings and adjacent development. As a result, the relevant landscape character areas are generally assessed as having low value and low to medium susceptibility to change. The assessment notes that the landscape is fragmented and heavily influenced by existing urbanising features, limiting its sensitivity to development of the type proposed.

6.4.3. The proposals incorporate significant embedded mitigation through a comprehensive landscape strategy, including retention and enhancement of existing boundary vegetation, provision of a substantial green buffer around the site perimeter, new native tree and shrub planting, species-rich grassland, SuDS features and publicly accessible open space. The proposed data centre building will be set back from the site boundaries to allow for extensive landscaping and visual screening. A minimum 12.5m landscape buffer would be secured around the site perimeter, as shown in Landscape and Green Infrastructure Parameters Plan (Drawing Ref. PGF-ACM-00-XX-DR-AR-051505), ensuring that substantial planting and green infrastructure are delivered through the subsequent reserved matters process.

6.4.4. The assessment concludes that the principal landscape effect would arise from the introduction of the data centre building within the site itself, resulting in a moderate adverse effect on the localised part of Landscape Character Area K2 (Harlington Open Gravel Terrace) during the early operational period. However, as landscape mitigation matures, this effect would reduce to minor adverse and would not be significant in summer conditions after 15 years. The assessment also identifies beneficial effects arising from enhanced green infrastructure, extensive tree planting, biodiversity enhancements, sustainable drainage features and the provision of new publicly accessible open space.

6.4.5. In visual terms, the proposed buildings would be visible from a limited number of locations, most notably the M4 Heathrow Spur Road immediately east of the site, a section of Public Footpath H68 south of Sipson Lane, and some nearby residential properties within Sipson. However, the assessment notes that visibility is constrained by existing vegetation, surrounding built development and the presence of the substantially taller Holiday Inn building, which already forms a prominent landmark within the local skyline. The proposed data centre buildings would have a maximum height of 20m, approximately half the height of the adjacent hotel.

6.4.6. Significant residual visual effects are limited to a small number of receptors, comprising users of Public Footpath H68 and residents on Sipson Lane, Sipson Road, Vineries Close and Russell Gardens, particularly during winter months when vegetation screening is reduced. For the majority of public viewpoints, visual effects are assessed as minor or negligible and therefore not significant. As proposed mitigation planting matures, visual effects reduce substantially. The extent of visual effects reduces over time as mitigation planting matures and becomes increasingly effective.

6.4.7. The assessment also concludes that there would be no cumulative landscape or visual effects arising from other consented or proposed data centre developments due to the lack of proximity and intervisibility between schemes. Overall, while the development would introduce a noticeable change within the site itself, the landscape and visual impacts are considered limited and appropriately mitigated through the embedded landscape strategy. The effects are largely localised and must be considered within the context of the surrounding urban-fringe environment, which is already strongly influenced by Heathrow Airport and associated infrastructure.

6.5. Agricultural Land

6.5.1. An Agricultural Land Classification (ALC) survey was undertaken in September 2026 to assess the quality of agricultural land within the site. While published mapping identifies much of the site as Grade 1 agricultural land, the detailed survey found that historical development, extensive areas of hardstanding and ground disturbance have significantly affected soil quality and agricultural potential. The site is therefore characterised by a mixture of land grades, including Grade 2 (Very Good), Subgrade 3a (Good), Grade 4 (Poor) and areas classified as Urban (derelict).

6.5.2. The survey identified that approximately 37% of the site comprises urban/derelict land associated with the former garden centre and vehicle storage uses, while a further 23% comprises Grade 4 agricultural land where shallow soils overlie hardstanding and other anthropogenic materials, limiting agricultural productivity. The remaining areas comprise approximately 1.96ha of Grade 2 land and 0.85ha of Subgrade 3a land, equating to around 2.81ha of Best and Most Versatile (BMV) agricultural land. However, even these areas exhibit evidence of previous disturbance, including the presence of hardcore, brick and other made ground material within the soil profile.

6.5.3. The ALC Report concludes that the site comprises substantial areas of derelict urban land and disturbed Grade 4 land, with only a relatively limited area of Grade 2 and Subgrade 3a land remaining within the central part of the site. The report notes that even these areas exhibit evidence of disturbance and are constrained by the site's enclosed location between the M4 motorway and surrounding commercial and residential development. Furthermore, the site is not currently in agricultural use.

6.5.4. The report concludes that the site does not comprise a significant area of BMV agricultural land and that the extent of disturbance across the site, together with its physical containment and lack of agricultural use, significantly limits its ability to function as productive agricultural land in the future. The proposed development would result in the loss of approximately 2.81ha of BMV land; however, this represents a limited area of BMV land and falls substantially below the 20ha consultation threshold identified in Natural England's guidance. Accordingly, the effects on agricultural land resources attract limited weight in the planning balance.

6.6. Sustainability and Energy Use

6.6.1. As described in Section 4 of this Planning Statement (as well as within the BREEAM Pre-Assessment and Sustainability and Energy Statement that accompany this application), the proposed development has been designed with sustainable design principles at its core. The proposals are accompanied by an Energy and Sustainability Statement, Whole Life Cycle Carbon Assessment and Circular Economy Statement.

6.6.2. Energy efficiency is central to the design, and several key energy measures are proposed, include a fabric-first approach, high-efficiency building services, heat recovery ventilation, free cooling within the data halls, air source heat pump technology, LED lighting and rooftop solar photovoltaics. The development has been designed in accordance with the London Plan energy hierarchy and is predicted to achieve a 41% reduction in regulated carbon emissions compared to a Part L 2021 compliant baseline, significantly exceeding the London Plan requirement for a minimum 35% on-site reduction.

6.6.3. Whilst the Energy Statement identifies that there are no viable existing or planned district heat networks in close proximity to the site, given the scale of waste heat generated by data centre operations, VIRTUS is committed to exploring opportunities for future heat export should suitable heat infrastructure come forward within the vicinity of the site during the operational life of the development. The proposed development has therefore been designed to maintain flexibility for future connection, supporting the transition towards a more efficient and sustainable use of energy resources.

6.6.4. The proposal will also incorporate smart metering and energy monitoring measures in line with the GLA's ‘Be Seen’ requirements.

6.6.5. Beyond energy performance, Sustainable Drainage Systems (SuDS) features (including green roofs, permeable paving, rain gardens and tree pits) are proposed to manage surface water runoff, while native landscaping and biodiversity enhancements will contribute to wider environmental objectives. Secure cycle parking, electric vehicle charging infrastructure and a Travel Plan are also proposed to encourage sustainable travel choices.

6.6.6. A BREEAM pre-assessment has been undertaken using the BREEAM Data Centres 2010 scheme. This indicates that the development is capable of achieving a BREEAM ‘Excellent’ rating, with a predicted score of approximately 73%, demonstrating a strong commitment to sustainable design and construction.

Circular Economy

6.6.7. A Circular Economy Statement has been prepared by Savills Earth and is submitted as part of the outline planning application, demonstrating how circular economy principles have been embedded into the design, construction and operation of the scheme. The development adopts a resource-efficient approach that seeks to minimise material consumption, maximise opportunities for reuse and recycling, and design out waste in accordance with London Plan Policy SI 7.

6.6.8. The proposals include the recovery and reuse of materials from the existing site where practicable, including the reuse of hardstanding materials and the deconstruction of remaining buildings to maximise material recovery. The scheme is designed to support long-term adaptability, durability and future disassembly, with a target design life of 60 years. Measures including the use of recycled-content materials, modular building components and sustainable waste management practices will further reduce resource consumption and waste generation.

6.6.9. The Circular Economy Statement concludes that the development will meet or exceed relevant London Plan targets, including diverting at least 95% of demolition, excavation and construction waste from landfill, achieving a minimum 65% municipal recycling rate and incorporating at least 20% recycled or reused content within building materials. A preliminary circularity score of 39% has been achieved at this stage, with further refinement proposed through the reserved matters process.

Whole Life Carbon

6.6.10. A Whole Life-Cycle Carbon Assessment has been undertaken by Savills Earth and is submitted as part of the outline planning application. This quantifies the carbon emissions associated with the construction, operation and eventual decommissioning of the proposed development over a 60-year assessment period. The assessment has informed the design process and identifies opportunities to reduce emissions as the scheme progresses through detailed design.

6.6.11. The assessment demonstrates that carbon reduction principles have been embedded throughout the development, including the use of lower-carbon construction materials, efficient building form, design for adaptability and disassembly, and measures to improve operational efficiency. The assessment also identifies opportunities for further reductions through the specification of recycled-content steel, cement replacement within concrete, low-global-warming-potential refrigerants and renewable energy generation.

6.6.12. Overall, the assessment concludes that the proposed development has adopted a robust whole-life carbon strategy appropriate to its outline design stage and provides a framework for further carbon reductions through the reserved matters process, ensuring compliance with London Plan Policy SI2 and wider sustainability objectives.

Climate Change and Greenhouse Gases

6.6.13. The likely effects of the proposed development in relation to climate change and greenhouse gas emissions have been assessed within the Environmental Statement (Chapter 8). The assessment considers both the contribution of the development to greenhouse gas emissions during construction, operation and decommissioning, and the resilience of the scheme to future climate change impacts.

6.6.14. The assessment identifies that greenhouse gas emissions associated with the construction phase would result in a minor adverse (not significant) effect, reflecting the implementation of embedded mitigation measures including efficient construction practices, material reuse, circular economy principles and sustainable waste management.

6.6.15. During operation, the assessment identifies greenhouse gas emissions associated with operational energy demand as the principal source of carbon emissions. Taking account of currently committed measures, operational emissions are assessed as resulting in a Moderate Adverse and Significant effect. The assessment recommends additional mitigation measures, including commitments relating to renewable energy procurement, power usage effectiveness, water efficiency, server material reuse and waste heat recovery, which could reduce the residual effect to Minor Adverse and Not Significant if secured and implemented at subsequent reserved matters stage.

6.6.16. The submitted Climate Change Risk Assessment identifies no significant climate risks during construction. During operation, potential significant risks are identified in relation to pluvial flooding and extreme heat; however, the assessment demonstrates that these risks can be effectively managed through a range of embedded and additional adaptation measures, including sustainable drainage infrastructure, climate-resilient building design, flood resilience measures, cooling infrastructure and water efficiency measures. Following implementation of these measures, residual climate risks are not anticipated to be significant.

6.6.17. Overall, the assessment concludes that the proposed development has incorporated a range of measures to address both climate change mitigation and adaptation. Construction phase greenhouse gas effects are assessed as Minor Adverse and Not Significant. Whilst operational greenhouse gas emissions are initially assessed as resulting in a Moderate Adverse and Significant effect, the assessment identifies a series of additional mitigation measures, including commitments relating to renewable energy procurement, power usage effectiveness, water efficiency, server material reuse and waste heat recovery, which are capable of reducing the residual effect to Minor Adverse and Not Significant once secured and implemented. The Climate Change Risk Assessment further concludes that, following implementation of the proposed adaptation measures, the development would be resilient to future climate conditions.

6.6.18. Subject to the implementation of the mitigation and adaptation measures identified within the assessment, the proposals can comply with Policy SI2 of the London Plan, and LPP1 Policy EM1 and LLP2 Policy DMEI 2.

6.7. Transport and Parking

6.7.1. The NPPF embodies a vision-led approach to transport planning at Policy TR1. It moves away from the traditional predict-and-provide model, instead directing planning towards a future pattern of development that actively supports sustainable, well-connected and people-focused places. Transport considerations are expected to be built into planning from the outset, with development directed towards locations and layouts that make walking, cycling and public transport the most convenient options (Policy TR3).

6.7.2. A Healthy Streets Transport Assessment (TA) and Framework Travel Plan (FTP) have been prepared by AECOM in support of the proposal. The assessments demonstrate that the site benefits from access to sustainable transport modes, whilst the scale and operational characteristics of the development will not give rise to severe impacts on the local or strategic highway network.

6.7.3. The site is served by existing footways along Sipson Road, local cycle route 89, nearby bus stops on route 222 located approximately 80m from the site, and rail services from West Drayton Station (2.2 km north of the site). Whilst the site has a PTAL of 1b, the assessment concludes that sustainable transport opportunities are available and will be actively promoted through the accompanying Travel Plan.

Trip Generation

6.7.4. The submitted Healthy Streets TA identifies that the proposed development will generate relatively low levels of operational traffic, reflecting the employment density typically associated with modern data centre developments. Based on TRICS data and accounting for the existing use of the site, the development is forecast to increase traffic flows by only 29 vehicle movements during the AM peak hour and 18 vehicle movements during the PM peak hour. This represents a maximum increase of approximately 3.6% on Sipson Road and is below the threshold at which material highway impacts would typically be expected.

6.7.5. The assessment also finds that HGV activity would reduce compared to the existing use, with HGVs expected to account for approximately 5% of operational trips compared with around 16% currently associated with the site.

Access

6.7.6. Access to the development will be taken from the existing site access on Sipson Road, with a separate pedestrian entrance also proposed. Visibility splays, vehicle tracking assessments and servicing arrangements demonstrate that all vehicles, including articulated HGVs and emergency vehicles, can safely access and manoeuvre within the site.

Parking

6.7.7. The level of car parking provision has been informed by the BREEAM Pre-Assessment and the aspiration to achieve a BREEAM 'Excellent' rating. A total of 84 car parking spaces are proposed, including eight accessible bays (10% of the total provision). All parking spaces will be future-proofed to enable the installation of electric vehicle charging infrastructure. The proposed parking provision accords with the maximum standards set out in the London Plan and supports the transition towards more sustainable modes of travel.

6.7.8. The quantum of parking has also been reduced following engagement with the GLA during the pre-application process, resulting in a level of provision that sits considerably below the applicable London Plan maximum standards. This reflects the operational characteristics of the proposed data centre, and the objective of encouraging travel by sustainable modes wherever practicable.

6.7.9. A total of 84 cycle parking spaces are proposed, comprising 28 short-stay spaces (provided as 14 Sheffield stands within external cycle shelters) for visitors in close proximity to the main building entrance, and 56 long-stay spaces for staff. The long-stay provision would be distributed across the site, ensuring convenient and secure access for employees.

Deliveries and Servicing

6.7.10. Servicing and delivery arrangements will broadly reflect the previous operational characteristics of the site when functioning as a garden centre. The proposed layout has been designed to accommodate servicing

vehicles safely and efficiently, ensuring that all vehicles can enter, manoeuvre within, and exit the site in a forward gear. A dedicated servicing area and loading dock will be provided centrally within the site to accommodate deliveries, servicing activities and occasional plant replacement operations. The layout has been designed to ensure that servicing can be undertaken safely and efficiently, with larger vehicles operating under appropriate supervision where required.

6.7.11. Vehicle tracking assessments demonstrate that a maximum legal articulated HGV and emergency service vehicles can safely enter, manoeuvre within and exit the site in a forward gear. All internal roads will be accessible to emergency vehicles, ensuring appropriate access is maintained throughout the development.

Travel Plan

6.7.12. A Framework Travel Plan has been prepared and will be secured and implemented to encourage sustainable travel choices among staff and visitors. Measures include cycle parking and changing facilities, personalised travel planning, promotion of public transport use and car sharing initiatives, appointment of a Travel Plan Coordinator, and monitoring of travel patterns over a five-year period. Targets include reductions in single-occupancy vehicle trips and increase in walking, cycling, car sharing and public transport use.

Outline Construction Management Plan

6.7.13. An Outline Construction Management Plan has been prepared to demonstrate how construction activities associated with the proposed development can be appropriately managed. The OCMP sets out the framework for mitigating potential construction effects, including arrangements for site access, construction traffic management, workforce travel, noise and dust control, community liaison, and environmental management measures.

6.7.14. The document confirms that construction can be undertaken in a coordinated and responsible manner, with detailed measures to be secured and developed through subsequent reserved matters approvals as the scheme progresses.

Summary

6.7.15. The submitted Healthy Streets TA demonstrates that the proposed development would not result in an unacceptable impact on highway safety and that the residual cumulative impacts on the local and strategic highway network would not be severe. The development is forecast to generate only limited levels of additional traffic, reflecting the low operational trip generation associated with data centre uses. The proposals also support the Healthy Streets Approach through the provision of pedestrian and cycling infrastructure and measures that promote sustainable travel. Accordingly, the proposals comply with LPP2 Policy DMT2 and are considered acceptable in transport.

6.8. Air Quality

6.8.1. NPPF Policy P3 requires development to be appropriate for its location by ensuring that impacts from pollution (including air quality) do not give rise to unacceptable effects on health, living conditions or the natural environment. It expects proposals to provide healthy living conditions by avoiding exposure to harmful levels of air pollution, and to ensure that development does not contribute to unacceptable levels

of air pollution affecting neighbouring occupiers or the wider area. Within this framework, proposals must mitigate existing pollution where necessary and, where possible, reduce wider pollution such as traffic-related emissions. The policy also requires cumulative impacts to be considered and emphasises particular regard for vulnerable groups such as children and older people.

6.8.2. London Plan Policy SI1 requires that new developments do not lead to a deterioration in air quality or delay compliance for areas that currently exceed any legal limits. Thus, development proposals must be at least air quality neutral.

6.8.3. The likely effects of the proposed development on air quality have been assessed within Chapter 6 of the Environmental Statement. The assessment considers potential impacts arising during both the construction and operational phases, including construction dust, traffic emissions and emissions associated with the testing, maintenance and emergency operation of backup generators.

6.8.4. The assessment identifies that the site lies within an Air Quality Management Area; however, monitoring data indicates that pollutant concentrations in the vicinity of the site are generally below the relevant air quality objectives, with no recent exceedances identified at monitoring locations closest to the site. Whilst historic exceedances of annual mean NO_2 concentrations have occurred at isolated locations on Bath Road, baseline air quality conditions are generally considered to be good

6.8.5. During construction, potential effects associated with dust and vehicle movements can be effectively managed through standard best practice mitigation measures secured through the Construction Environmental Management Plan. As a result, residual construction effects are assessed as negligible to slight adverse and not significant.

6.8.6. Detailed dispersion modelling was undertaken to assess emissions from the proposed backup generators during routine testing and maintenance, together with emergency operating scenarios. The assessment concludes that impacts on human health receptors would be negligible to slight adverse at worst and not significant. Annual mean pollutant concentrations remain comfortably within the relevant air quality objectives, whilst impacts on nearby ecological receptors are assessed as negligible. Operational traffic impacts are also predicted to be negligible to slight adverse and not significant.

6.8.7. Overall, the assessment concludes that, following the implementation of standard construction mitigation measures, the proposed development would not give rise to any significant adverse effects on air quality during either construction or operation. The effects of construction dust and vehicle movements would be negligible to slight adverse, whilst operational effects associated with backup generators and traffic movements would also be negligible to slight adverse and not significant.

6.8.8. Accordingly, the development accords with relevant planning policy relating to air quality, including Policy P3 of the NPPF, SI1 of the London Plan, Policy EM8 of LLP1 and Policy DMEI 14 of LPP2.

6.9. Landscaping

6.9.1. The NPPF places significant emphasis on the delivery of well-designed development that responds positively to local character and integrates successfully with its surroundings through the provision of high-quality landscaping and multifunctional green infrastructure. The Framework expects development to conserve and enhance landscape character, retain and incorporate important natural features such as trees

and hedgerows where possible, and deliver environmental improvements that support biodiversity, climate resilience, health and wellbeing.

6.9.2. London Plan Policy D7 deals with public realm and states that opportunities to create new public realm should be encouraged. It goes on to state that such space should be well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.

6.9.3. London Plan Policy G5 states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. London Plan Policy G7 states that within London, existing trees of value should be protected and maintained where achievable, along with the planting of new trees.

6.9.4. Local Plan Policy DMHB14 states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit whilst Policy G5 of the London Plan sets expect around the Urban Greening factor.

6.9.5. Whilst landscaping is reserved for future approval through the reserved matters process, illustrative landscape proposals have been submitted to demonstrate how the site can be successfully integrated into its surroundings and deliver substantial urban greening, biodiversity and visual amenity benefits.

6.9.6. The indicative landscape scheme includes extensive tree planting, native hedgerows, semi-natural vegetation, species-rich grassland, flower-rich perennial planting, sustainable drainage features, rain gardens and both extensive and intensive green roofs. Existing vegetation would be retained wherever practicable and supplemented by substantial new planting to strengthen the site's landscape structure, enhance ecological connectivity, improve visual containment and deliver biodiversity enhancements.

6.9.7. The landscape strategy has also been developed to maximise urban greening across the site and achieves an Urban Greening Factor (UGF) score of 0.397, exceeding the London Plan benchmark of 0.3 for predominantly commercial developments. The UGF score is achieved through the provision of semi-natural vegetation, hedgerows, vegetated sustainable drainage features, and intensive and extensive green roofs, along with extensive areas of tree and ornamental planting throughout the site.

6.9.8. In addition to the wider landscaping and ecological enhancements proposed across the site, the landscape strategy incorporates a primary area of public amenity space adjacent to the main site access. This area is intended to provide an attractive and accessible green space for employees, visitors and the wider community, with opportunities for informal recreation, walking and dog walking within a landscaped setting. A secondary landscaped area is also proposed within the south-eastern part of the site. Subject to detailed design and operational considerations at the reserved matters stage, this area could either provide additional publicly accessible open space or be managed primarily for ecological enhancement purposes, delivering habitat creation and biodiversity benefits.

6.9.9. Importantly, both areas are identified on the Public and Private Realm Parameter Plan (Drawing Ref. PGF-ACM-00-XX-DR-AR-051506) submitted as part of the outline application, thereby securing their delivery through the development framework and ensuring that these spaces are brought forward and appropriately detailed through the reserved matters process. Together, these spaces would contribute to the quality of

the public realm, increase opportunities for access to green space, strengthen the site's landscape setting and provide wider social and environmental benefits in accordance with national, regional and local planning policy objectives.

6.9.10. A Landscape Management and Maintenance Plan has been prepared to demonstrate that all proposed landscaping can be appropriately established, managed and maintained over the long term, including a five-year establishment period, replacement planting provisions and regular maintenance visits to ensure successful implementation.

6.10. Trees

6.10.1. NPPF Policy N3 seeks to secure the retention, protection and integration of trees within new development. Proposals should seek to retain existing trees and hedgerows where practicable, deliver new tree planting, and ensure that species selection and placement are compatible with surrounding infrastructure and public spaces. The policy recognises the contribution of trees towards biodiversity enhancement, climate change adaptation, green infrastructure and place-making.

6.10.2. London Plan Policy G7 prescribes that wherever possible, existing trees of value are retained. In instances where planning permission is granted to those that necessitate the removal of trees there should be an adequate replacement based on the existing value benefits of those approved.

6.10.3. An Arboricultural Impact Assessment has been prepared by AECOM and demonstrates that the proposed development can be accommodated whilst retaining the vast majority of existing tree cover and protecting the site's most valuable arboricultural assets. The assessment confirms that no ancient woodland, veteran trees, conservation areas, Sites of Special Scientific Interest or other significant arboricultural designations affect the site. A single Area Tree Preservation Order was identified relating to a tree outside the main development area.

6.10.4. A total of 62 tree features were surveyed, comprising 29 individual trees, 31 groups and two hedgerows. The survey identified one high-quality Category A tree, 20 Category B trees, 31 Category C trees and 10 Category U trees considered unsuitable for long-term retention.

6.10.5. To facilitate the proposed development, the removal of one Category B tree (T19) and three Category C tree groups (G10, G46 and G49) is required. In addition, six Category U trees would be removed due to their poor condition and limited life expectancy. Overall tree loss equates to approximately 317.5m² of canopy cover, representing only 4.32% of the surveyed canopy area, with 95.68% of existing canopy cover retained.

6.10.6. The most significant retained tree is T16, a mature Category A lime tree located along the northern boundary. The proposed development has been designed to retain and protect this tree, with only minor crown lifting required to facilitate construction access and the removal of existing hardstanding within its Root Protection Area. These works will be undertaken under arboricultural supervision and are expected to improve long-term growing conditions.

6.10.7. The proposal delivers substantial compensatory planting and a significant net gain in arboricultural value. The landscape strategy includes the planting of 187 new trees.

6.10.8. The assessment concludes that the development accords with national and local planning policy relating to trees and landscaping, retains the site's most important arboricultural features, and secures significant long-term enhancements to canopy cover, biodiversity and landscape quality through a robust programme of tree protection and replacement planting.

6.11. Ecology

6.11.1. Chapter 19 of the NPPF, titled Conserving and enhancing the natural environment, provides guidance on biodiversity matters. NPPF Policy N2 seeks to ensure that development proposals conserve and enhance the natural environment by protecting and improving habitats, biodiversity and ecological networks. Development should respond positively to the environmental characteristics of a site, retain and enhance existing natural features where possible, and deliver measurable improvements for nature.

6.11.2. London Plan Policy G6 states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Local Plan Policy DMEI 7 requires development to retain and enhance features of biodiversity value.

6.11.3. A Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment Report have been prepared by AECOM in support of the proposed development. The assessments identify the site as comprising predominantly modified grassland, areas of hardstanding associated with the former garden centre and subsequent airside vehicle use, tree belts, individual trees and small areas of young woodland planting.

6.11.4. The ecological appraisal concludes that the site is not subject to any statutory ecological designations and that the nearest site of Borough Importance for Nature Conservation is located approximately 800m away. No significant ecological constraints have been identified that would preclude development of the site.

6.11.5. Surveys identified habitats suitable for bats, breeding birds, reptiles and other species; however, the majority of boundary vegetation and tree belts will be retained as part of the proposals. Additional surveys for bats have been completed, with no bat roosts recorded within the building identified as having potential suitability. Appropriate mitigation measures, including sensitive lighting design, protection of retained habitats and ecological supervision during vegetation clearance works, are proposed where necessary.

6.11.6. The landscape-led design incorporates significant ecological enhancements, including species-rich grassland, native tree and hedgerow planting, biodiverse green roofs and sustainable drainage features. These measures will strengthen ecological connectivity, enhance habitat diversity and deliver long-term biodiversity benefits across the site. Additional enhancements include bird and bat boxes, native planting and habitat management measures.

6.11.7. The Biodiversity Net Gain Assessment (BNG) demonstrates that the development will deliver measurable biodiversity enhancements, including a substantial increase in hedgerow units through the creation of new native hedgerows and the retention and enhancement of existing tree features. Whilst the current on-site design achieves a biodiversity net gain of 1.91% for area habitats and 821.67% for hedgerows, the remaining biodiversity units required to achieve the statutory 10% Biodiversity Net Gain requirement will be secured through an appropriate off-site solution, with the precise details to be agreed through the Biodiversity Gain Plan and secured by planning condition.

6.12. Noise and Vibration

6.12.1. NPPF Policy P3 addresses noise considerations and requires noise impacts to be minimised and mitigated. It expects proposals to avoid significant adverse noise effects and to ensure new development is not adversely affected by existing noise sources, forming part of the wider aim to create healthy, safe and inclusive places.

6.12.2. London Plan Policy D14 states that development noise related issues can be reduced by mitigating existing adverse impacts, improving the acoustic environment and separating noise-sensitive development from main roads, rail and air transport through methods such as screening, orientation and layout.

6.12.3. The likely effects of the proposed development in relation to noise and vibration have been assessed within Chapter 10 of the Environmental Statement. The assessment considers potential impacts arising during both the construction and operational phases on nearby residential properties and other sensitive receptors, including the Holiday Inn Hotel, Heathrow Primary School and St Mary's Church.

6.12.4. Baseline surveys indicate that the existing acoustic environment is already influenced by road traffic associated with the M4, with measured daytime ambient noise levels of approximately 59dB LAeq and background noise levels of 55-56dB LA90.

6.12.5. During construction, vibration levels are predicted to remain at or below the Lowest Observed Adverse Effect Level (LOAEL) and are therefore not significant. Construction noise impacts at certain sensitive receptors, including the nearby school and place of worship, have the potential to exceed the Significant Observed Adverse Effect Level (SOAEL). However, through the implementation of best practicable measures and temporary acoustic screening, residual construction noise effects are reduced to a level that is not significant.

6.12.6. During operation, detailed noise modelling demonstrates that unmitigated noise from chillers and emergency generators has the potential to exceed relevant assessment thresholds at nearby receptors. However, the incorporation of attenuators to chiller units, generator exhaust silencers and acoustic enclosures reduces operational noise levels to at or below the relevant assessment criteria. Following mitigation, residual operational noise effects are assessed as not significant.

6.12.7. Operational traffic associated with the development is predicted to increase road traffic noise levels by approximately 1.9 dB, resulting in a minor adverse effect that is not significant

6.12.8. The assessment therefore concludes that no significant residual noise or vibration effects would arise during either the construction or operational phases of the development. On this basis, the proposed development complies with NPPF Policy P3, London Plan Policy D14 and LLP1 Policy EM8.

6.13. Flood Risk and Drainage

6.13.1. At a national level, the NPPF encourages the direction of new development away from areas identified to be at high risk of flooding sources, instead situating development in those areas of lowest risk in the first instance. Chapter 18 of the NPPF states that development should be directed away from areas at highest risk of flooding. It continues to require that flood risk from all sources (including rivers, the sea, surface water, groundwater and drainage) is considered and that development must not increase flood risk

elsewhere.

6.13.2. Policy F8 of the NPPF states that development proposals which could affect drainage should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, in ways which are proportionate to the nature and scale of the proposal. SuDS should be designed in accordance with the National Standards for Sustainable Drainage Systems.

6.13.3. London Plan Policy SI12 states development proposals should ensure flood risk is minimised and mitigated through sufficient measures integrated within the development.

6.13.4. A Flood Risk Assessment and Preliminary Drainage Strategy has been prepared in support of the proposed development. The assessment confirms that the site is located entirely within Flood Zone 1 and is therefore at a low risk of flooding from rivers and the sea. The proposed development is classified as essential infrastructure and is considered appropriate development within Flood Zone 1.

6.13.5. The assessment considers flooding from all sources, including fluvial, tidal, surface water, groundwater, sewers and artificial sources. It concludes that the risk from fluvial flooding is very low, the risk from tidal flooding is negligible, and the risks from groundwater, sewer and artificial sources are low. Surface water flooding represents the principal flood risk constraint, with parts of the site susceptible to ponding during intense rainfall events due to local topography and underlying low permeability soils.

6.13.6. A preliminary drainage strategy demonstrates that surface water can be managed appropriately through the incorporation of sustainable drainage systems (SuDS), including attenuation ponds, buried attenuation storage, rainwater harvesting and controlled discharge measures.

6.13.7. The drainage strategy incorporates appropriate climate change allowances and demonstrates that the proposed drainage infrastructure can accommodate extreme rainfall events, including future climate change scenarios. The assessment also confirms that foul drainage can be accommodated through connection to the existing Thames Water network.

6.13.8. Subject to the implementation of the proposed drainage strategy and ongoing maintenance of the drainage infrastructure, the assessment concludes that flood risk can be appropriately managed throughout the lifetime of the development and that the proposed development would not increase flood risk elsewhere. Accordingly, the proposed development complies with the requirements of the NPPF, London Plan Policies SI12 and SI13, and Local Plan Policies EM6 and DMEI 9.

6.14. Ground Conditions

6.14.1. Local Plan Policy DMEI 12 provides guidance on what documentation is expected to be submitted for sites on contaminated land and how planning conditions can should be used in this regard.

6.14.2. A Preliminary Land Contamination Risk Assessment has been undertaken to identify potential sources of contamination and assess any risks to human health, controlled waters, future site users and the built environment arising from the historical and current uses of the site. The assessment has considered the site's former agricultural use, the former Sipson Garden Centre, the existing vehicle storage yard, adjacent quarrying and landfill activities, and the wider environmental setting.

6.14.3. The assessment identifies a number of potential contaminant sources associated with made ground,

historical agricultural activities, the existing vehicle storage yard and nearby historical landfill sites. However, the site is not recorded on LBH's contaminated land register and no significant contamination incidents have been identified that would prevent redevelopment of the site.

6.14.4. The assessment concludes that the site presents an overall Very Low to Moderate contamination risk. The principal risks relate to potential contamination within made ground and the potential migration of ground gases from nearby historical landfill sites. These matters are common to sites with a similar land use history and can be appropriately addressed through further site investigation and, where necessary, remediation measures.

6.14.5. The assessment recommends a geo-environmental ground investigation to confirm ground conditions, including soil, groundwater and ground gas monitoring, prior to the commencement of development. This will inform any remediation or mitigation measures required and ensure the site is suitable for its proposed use.

6.14.6. Subject to the implementation of any recommendations arising from the ground investigation, the assessment concludes that the site can be safely developed for the proposed development and that any land contamination risks can be appropriately managed. Accordingly, the proposed development complies with the requirements of the NPPF, London Plan Policy SI 12 and Local Plan Policies EM8 and DMEI 11.

6.15. Archaeology

6.15.1. Archaeology has been addressed as part of the Environmental Statement (Chapter 7), by the Savills Heritage and Townscape team. A Historic Environment Desk-Based Assessment has been prepared to assess the potential effects of the proposed development on known and potential archaeological remains.

6.15.2. The assessment identifies evidence of multi-period archaeological activity within the wider area, with the site lying within the Heathrow Archaeological Priority Zone, an area recognised for its archaeological potential. Previous investigations on part of the site identified archaeological features dating to the Prehistoric, Roman and Post-Medieval periods, although the significance of these remains is considered to be local in nature.

6.15.3. The assessment concludes that construction activities, particularly ground disturbance associated with the proposed development, have the potential to directly affect both known and previously unidentified buried archaeological remains. Without mitigation, these effects could be significant. However, appropriate archaeological mitigation, including further investigation, recording and preservation by record where necessary, can be secured through planning conditions and agreed with the Council's archaeological advisor.

6.15.4. Following implementation of these mitigation measures, including archaeological investigation and preservation by record, the residual effects on archaeological remains are assessed as negligible and not significant. No operational effects on archaeology are anticipated, as impacts would arise solely during ground disturbance associated with construction. The assessment also concludes that no significant cumulative effects would arise in combination with other committed developments. Accordingly, no likely significant adverse effects on archaeological assets have been identified.

6.15.5. The proposals therefore accord with the requirements of the NPPF, London Plan and Local Plan policies

relating to the conservation and management of archaeological heritage assets.

6.16. Fire Safety

6.16.1. In accordance with Policy D12 of the London Plan, a Fire Statement has been prepared by AECOM and is submitted in support of the application. The Statement confirms that fire safety considerations have been embedded into the design from the outset and that the proposed development has been designed in accordance with the principles of BS 9999:2017.

6.16.2. The Fire Statement confirms that the development incorporates a comprehensive package of passive and active fire safety measures, including compartmentation, structural fire protection, a Category L1 fire detection and alarm system, emergency lighting, fire suppression systems, clear means of escape and appropriate provisions for firefighting access. The building has been designed to facilitate safe evacuation for all occupiers through a simultaneous evacuation strategy, multiple protected stair cores, refuges and evacuation lifts serving the administration block.

6.16.3. The proposals also provide dedicated fire appliance access around the site, fire hydrants, emergency power supplies and water mist suppression systems that exceed the minimum life-safety requirements ordinarily applicable to a development of this scale. Fire safety management and maintenance procedures will be secured through the building's ongoing operational management arrangements.

6.16.4. Whilst the technical blocks do not include evacuation lifts within every stair core, the Fire Statement demonstrates that these areas will be transiently occupied, wheelchair users are not anticipated within the technical areas, and alternative provisions including refuges, protected routes and access to evacuation lifts within the administration building ensure that the intent of London Plan Policy D5 is achieved.

6.16.5. Overall, the Fire Statement concludes that the proposed development achieves the objectives of London Plan Policy D12 and satisfies the intent of the relevant fire safety requirements, subject to detailed design development through subsequent reserved matters stages.

7. Conclusion

7.1.1. Outline planning permission (with all matters reserved except for access) is sought for the redevelopment of the former Sipson Garden Centre, to provide a data facility, including associated energy infrastructure, security measures, landscaping, and access arrangements.

7.1.2. The application site comprises the former Sipson Garden Centre and associated land. The northern part of the site accommodates the former garden centre buildings, areas of hardstanding, customer parking and external areas previously used for the display, storage and sale of goods associated with the garden centre use. The southern part of the site comprises an undeveloped field. The site is within a highly accessible location adjoining Heathrow Airport and is within the established Hayes Availability Zone. The site represents a rare opportunity to deliver strategically important digital infrastructure within an area that is capable of meeting the operational requirements of data centre development and where there is a recognised shortage of suitable sites.

7.1.3. VIRTUS and its project team have undertaken extensive pre-application engagement with LBH, the GLA and other key stakeholders, alongside consultation with the local community. The feedback received through this process has informed the evolution of the proposals and has helped shape a carefully considered scheme which responds positively to both the opportunities and constraints of the site.

7.1.4. The application is supported by a comprehensive suite of technical and environmental assessments which demonstrate that the proposed development can be delivered without giving rise to unacceptable environmental effects. These include assessments of landscape and visual impacts, heritage, ecology, transport, drainage, noise, air quality, sustainability and socio-economic effects.

7.1.5. As explained within the Design and Access Statement, the scheme is the product of an iterative design process which has sought to balance the operational requirements of a modern data centre with the sensitivities of the site and its surroundings. The proposals incorporate a landscape-led approach, substantial green infrastructure, ecological enhancements and a robust design framework that will guide future reserved matters submissions.

7.1.6. The proposed development would deliver nationally significant digital infrastructure in support of the continued growth of the digital economy. The evidence accompanying the application demonstrates a substantial unmet need for additional data centre capacity within the Hayes Availability Zone and confirms that opportunities to meet this need elsewhere are limited.

7.1.7. The development would also generate significant economic benefits. These include the creation of substantial employment during both the construction and operational phases, significant GVA contributions, business rates revenue, and wider economic benefits arising from increased digital capacity and resilience. The development would therefore support economic growth at the local, regional and national level.

7.1.8. Whilst the application site lies within the Green Belt, the proposal has been assessed against the revised national Green Belt policy framework and is considered to comprise Grey Belt development that satisfies the requirements of paragraph GB7(g) of the NPPF. Accordingly, the proposed development does not constitute inappropriate development in the Green Belt. Without prejudice to that primary conclusion, the application also demonstrates substantial planning benefits (which would constitute Very Special Circumstances), including the delivery of critical digital infrastructure, a clear and evidenced need for additional data centre capacity within the Hayes Availability Zone, significant economic benefits, biodiversity enhancements and the absence of suitable alternative sites.

7.1.9. Having regard to the development plan as a whole and all other material considerations, it is concluded that the benefits of the proposal significantly outweigh any identified harms. The proposed development accords with the strategic objectives of national, regional and local planning policy and planning permission should therefore be granted without delay.

Appendix A: Schedule of Application Plans and Documents

Drawing Pack (Prepared by AECOM)

- Site Location Plan (Ref. PGF-ACM-00-XX-DR-AR-051000)
- Illustrative Masterplan (Ref. PGF-ACM-00-XX-DR-AR-051100)
- Illustrative Site Sections (PGF-ACM-00-XX-DR-AR-051200)
- Outline Planning Parameter Plans:
    - Demolitions Parameters Plan (Ref. PGF-ACM-00-XX-DR-AR-051500)
    - Development Parcels Parameters Plan (Ref. PGF-ACM-00-XX-DR-AR-051501)
    - Building Heights Parameters Plan (Ref. PGF-ACM-00-XX-DR-AR-051502)
    - Land Use Parameters Plan (Ref. PGF-ACM-00-XX-DR-AR-051503)
    - Access and Movement Parameters Plan (Ref. PGF-ACM-00-XX-DR-AR-051504)
    - Landscape and Green Infrastructure Parameters Plan (Ref. PGF-ACM-00-XX-DR-AR-051505)
    - Public and Private Realm Parameters Plan (Ref. PGF-ACM-00-XX-DR-AR-051506)

Documents

- Design and Access Statement, prepared by AECOM;
- Design Code, prepared by AECOM;
- Planning Statement, prepared by Savills;
- Agricultural Land Assessment, prepared by Tetra Tech;
- Alternative Sites Assessment, prepared by Savills;
- BNG Assessment and Metric, prepared by AECOM;
- BREEAM Pre-Assessment, prepared by AECOM;
- Circular Economy Statement, prepared by Savills Earth;
- Construction and Demolition Logistics and Management Plan (Outline), prepared by AECOM;
- Data Centre Needs Assessment and Economic Benefits Statement, prepared by Savills Economics;
- Daylight, Sunlight and Overshadowing Assessment, prepared by AECOM;
- Ecological Impact Assessment, prepared by AECOM;
- Energy and Sustainability Statement, prepared by AECOM;
- Environmental Statement, prepared by Savills, comprising the following chapters:
    - Air Quality
    - Archaeology
    - Climate Change and Greenhouse Gases
    - Landscape, Townscape and Visual Impact Assessment (LTVIA)
    - Noise and Vibration
- Environmental Statement appendices, comprised of the following:
    - Agricultural Land Classification Report, prepared by Tetra Tech
    - Historic Environment Desk-Based Assessment, prepared by Savills Heritage, Townscape and Archaeology
- Flood Risk Assessment and Drainage Strategy, prepared by AECOM;
- Healthy Streets Transport Assessment, prepared by AECOM;
- Land Contamination Assessment, prepared by AECOM;
- Landscaping Plans and Details (including Urban Greening Factor), prepared by AECOM;
- External Lighting Assessment, prepared by AECOM;

- London Plan Fire Statement, prepared by AECOM;
- Microclimate and Wind Assessment, prepared by AECOM;
- Statement of Community Consultation, prepared by Camargue;
- Travel Plan (Draft), prepared by AECOM;
- Arboricultural Impact Assessment (including Tree Protection Plan and Tree Root Protection Areas), prepared by AECOM;
- Utilities Statement, prepared by AECOM;
- Water Cycle Strategy, prepared by AECOM; and
- Whole Life-Cycle Carbon Assessment, prepared by Savills Earth.