

Planning Statement

**UNIT 1 HEATHROW INTERCHANGE,
BULLSBROOK ROAD, HAYES
UB4 0SL**

Prepared by:

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Prepared for:

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1. Introduction

1.1. This Application

1.1.1. This Planning Statement has been prepared by Savills in support of a full planning application submitted to the London Borough of Hillingdon ('LBH') ('the Council') by Colt Data Centres ('Colt') ('the applicant') for the redevelopment of Unit 1 of Heathrow Interchange ('the site') to deliver a substation to support Hayes Data Centre Campus.

1.1.2. Accordingly, the proposed description of development is as follows:

"Redevelopment of the site to deliver a substation in connection with the permitted and emerging Data Centre Campus".

1.2. Background

1.2.1. The Applicant, Colt Data Centres (Colt), has secured planning permission for the redevelopment of the former Trinity Data Centre, Veetec Building, and Tudor Works sites at Beaconsfield Road to deliver two data centre buildings, fuel tanks, and a substation (ref. 38421/APP/2021/4045). Pre-application discussions are with LBH are at an advanced stage in connection to proposals to redevelop Hayes Bridge Retail Park and Heathrow Interchange to deliver an extension to the data centre comprising of a further three data centre buildings and a technology start-up. The intention is that an application will be submitted in January 2025.

1.2.2. To provide power on a temporary (and short term) basis to the already permitted two data centre buildings at Beaconsfield Road and to provide the permanent power solution to the data centre campus that is proposed as part of the redevelopment Hayes Bridge Retail Park and Heathrow Interchange, an additional substation is required.

1.2.3. The fact that it is required to provide a temporary power solution to the already permitted data centre buildings means that it needs to come forward separately and in advance of the Hayes Bridge Retail Park and Heathrow Interchange planning application.

1.2.4. A Power Position Statement prepared by Arup is submitted alongside this application which provides additional detail around this.

1.2.5. This planning application therefore relates to a proposal for the redevelopment of Unit 1 of Heathrow Interchange to deliver a substation that would serve the additional data centre buildings that would be brought forward through the redevelopment of Hayes Bridge Retail Park and Heathrow Interchange.

1.2.6. A Prior Notification Application was submitted under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) (England) Order (2015) (as amended) for the demolition of the existing buildings at the site on 16th September 2024. LBH gave notice on 18th October 2024, that Prior Approval is not required (ref. 71554/APP/2024/2490). Demolition is anticipated to take place at the back end of Q1 2025 / early Q2 2025.

1.3. Submission Documents and Statement Structure

1.3.1. This Statement should be read in conjunction with the accompanying plans and drawings submitted as part of the application, as well as the following documents which have been prepared to address the full range of material planning considerations:

- Cover Letter;
- Site Location Plan;
- Existing and Proposed floorplans, elevations and sections;
- Landscape Masterplan and Sections;
- Design & Access Statement (including Landscape details);
- Archaeology Assessment;
- Arboricultural Impact Assessment;
- Contamination Preliminary Risk Assessment;
- Drainage Strategy;
- Ecology Appraisal;
- Biodiversity Net Gain Assessment;
- Fire Strategy & Fire Safety Statement;
- Flood Risk Assessment;
- Heritage Statement;
- Infrastructure Power Position Statement
- Lighting Strategy;
- Noise impact Assessment;

- Transport Assessment; and
- Utilities Statement.

1.3.2. This Statement provides an explanation of the justification for the proposed development, notably its compliance with relevant planning policies, outlining the significance of the substation in delivering the wider data centre campus, and the associated economic benefits that it will bring to the LBH and London as a whole.

1.3.3. This structure of this Statement is as follows:

- **Section 2** describes the site and its context within the surrounding area;
- **Section 3** sets out an overview of the pre-application engagement process undertaken to date;
- **Section 4** provides a summary of the proposed development subject to this planning application;
- **Section 5** 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 6** provides a summary and conclusion.

2. Site Overview

2.1. Site Description

- 2.1.1. Since the granting of planning permissions for Buildings 1 and 2, Colt has acquired Heathrow Interchange and Hayes Bridge Retail Park.
- 2.1.2. Heathrow Interchange sits as part of a wider commercial area which is broadly bound to the north by Uxbridge Road, the west by Springfield Road (and Minet Country Park), to the east by the Yeading Brook, and to the south by Beaconsfield Road. The broader area comprises of a mix of commercial operations with retail uses located predominantly in the northern part and industrial, storage, and manufacturing operations across much of the central and southern areas. The Heathrow Interchange site is bound by Bullsbrook Road to the north, Brook Industrial estate to the east, the site that Colt is redeveloping to deliver the two data centres to the south (ref. 38421/APP/2021/4045), and a business park to the west.
- 2.1.3. Heathrow Interchange consists of four industrial units arranged into two parallel terraces which are orientated north-south and separated from each other by an open yard with parking and vehicle turning which is served by Bullsbrook Road. Each terrace is split into two units so that there are four units within Heathrow Interchange.
- 2.1.4. Unit 1 is the northern unit of the eastern terrace. It is a fairly traditional industrial building, comprising of an internal area (with a roller shutter door) used for storage alongside ancillary office space. It is constructed from a mix of brickwork (its lower half and pillars) with both grey and green cladding at its uppers. The site also includes a yard in front of the roller shutter door, surface car parking for 48 cars, and planting fronting onto Bullsbrook Road and the main vehicular access into Heathrow Interchange from Bullsbrook Road. It is currently occupied on a rolling and short term lease to a removals company. The removals company's business model relies upon taking very short term and rolling leases on premises for storage purposes for short periods of time.
- 2.1.5. Unit 2, which is the southern half of the eastern terrace and adjoins Unit 1, is outside of Colt's ownership whilst Units 3 and 4 (which form the western terrace) are under Colt's control.

3. Pre-Application Consultation

3.1. Introduction

3.1.1. As recognised in National Planning Policy Guidance (NPPG), pre-application discussions are an opportunity for prospective applicants and the local planning authority to discuss the intended approach to a site and how design policies and guidance needs to be applied (paragraph: 009; reference ID 26-009-20191001). The guidance indicates how giving authorities the opportunity to inform and influence the design of a proposed development early in the design process is more efficient than trying to implement suggested revisions at a later stage, particularly if this relates to a major proposal.

3.1.2. This section of the Statement summarises the pre-application consultation that has been carried out and explains how they have directed the decisions made by the Applicant, and its design team, at this stage of the project. Given that the substation is required to facilitate the delivery of the wider data centre campus, this section relates to the substation-specific consultation rather than the extensive ongoing consultation on the emerging wider scheme.

3.2. Consultation with the London Borough of Hillingdon

3.2.1. Colt initially engaged LBH in pre-application discussions in September 2023 in connection to the wider data centre campus proposal for Hayes Bridge Retail Park and Heathrow Interchange. As part of this, Colt sought feedback from LBH around the principle of bringing forward the application for the substation independently and in advance of the wider emerging proposals. The logic behind this approach was understood by LBH and the approach agreed.

3.2.2. An initial substation specific pre-application meeting took place on 16th August 2024, with written feedback received 9th September 2024. The pre-application meeting was based on initial proposals for the demolition of 50% of the existing warehouse building and the erection of a new substation. The meeting was attended by LBH Officers, including specialists relating to urban design, highways and flood risk.

3.2.3. During the meeting, LBH considered the principle of a substation to be generally acceptable, however concerns were raised with the current approach to the built form and building identity. Officers also requested further information on the wider site context and how the substation ties into the wider masterplan.

3.2.4. A summary of the key comments received from LBH is provided below.

- A different approach needs to be developed which considers the emerging context. The substation will be part of the wider data centre campus and architectural expression must relate to this. The design should not take inspiration from a soon to be demolished building.
- Integrated green climbing walls and green roofs should be explored.
- The access route needs to serve the new substation as well as the remaining warehouse.

- Consider pedestrian movement and indicate road markings.
- Control room and transformers should be aligned. Consider combining transformer and control areas. A clear design concept needs to be established how the building fits into the wider family of blocks.
- The control room should have windows to provide natural surveillance towards the Bullsbrook Road. The extensive provision of fencing creates an unnecessary hostile appearance.
- The three functions, transformer, parking and the substation should be arranged in a more compact built form.

3.2.5. A further design workshop took place on 14th November 2024, to present the revised design in response to urban design comments. The development was broadly accepted on technical and policy grounds, subject to providing a full suite of technical documents with the submission, therefore the scope of matters discussed related primarily to urban design and landscape matters.

3.2.6. The revised proposal was well received, with LBH supportive of the revised approach responding to their concerns with regards to the architectural expression of the substation and how this complements the wider data centre campus. LBH were supportive of the transformative modern design, and how this responds to the emerging context.

3.2.7. Concerns were raised with the proposed car parking, and Officers requested justification as to why car parking spaces were being brought forward with the substation, as this goes against policy requirements and would not align with LBH ambitions on sustainable transport. Any proposed car parking has now been omitted from the proposal, and will come forward with the wider data centre campus development.

3.2.8. Officers requested further information on the purpose of the substation, and the source of power it will provide. This information is provided within the Infrastructure Power Position Statement prepared by Arup, submitted in support of the application.

4. Proposed Development

4.1. Overview

- 4.1.1. The substation will be powered entirely using power that Colt has already secured for both the permitted scheme at Beaconsfield Road and their emerging proposals for Hayes Bridge Retail Park and Heathrow Interchange. Development of this substation will have no additional impact on power availability locally beyond that already known, anticipated, and planned for.
- 4.1.2. On plan view, the substation comprises of two elements – a series of control rooms which run in the eastern part of the site and, running parallel to this to the west but separated by a servicing road, two transformers set in transformer housing.
- 4.1.3. The tallest of these two elements is the control rooms which has a maximum height of 12.41 metres whilst the transformers are lower with a maximum height of 9.1 metres.
- 4.1.4. Given the sensitivity of the equipment, the enclosure must be secure and environmentally controlled. A 2.4-metre-high mesh fence, with gates on the western and northern boundaries, will be installed to secure the compound. The fencing will be softened by landscaping, which aims to screen it from view.
- 4.1.5. As the site is located within Flood Zone 2, measures have been taken to mitigate flood risk. The building will be elevated approximately 1 metre above ground level, with ramp and gantry access provided to reach both the ground and upper levels. This elevation results in the inclusion of a cable basement beneath the dedicated rooms.
- 4.1.6. An urban greening approach has been adopted to unify the campus, incorporating trees, hedging in front of the fence, and low-maintenance meadow grass throughout the site.

4.2. Design

- 4.2.1. The design approach has evolved following pre-application engagement with LBH, and reflects their feedback to respond to the emerging site context, and compliment the wider data centre campus.
- 4.2.2. The building's design is straightforward, driven by functional requirements, including the space necessary for switch rooms and associated electrical and fire suppression systems. The building has been designed with a simple urban form, featuring a solid base and a translucent or illuminated upper level.
- 4.2.3. Materials have been carefully selected to suit the industrial nature of the building, prioritising fire performance, low maintenance, and efficient construction. Locally used architectural languages, such as shuttered concrete with a visual finish and anodised or polyester powder-coated expanded mesh, have been incorporated to link the design to the site's emerging context.

- 4.2.4. This approach draws on the design of nearby developments, such as the permitted data centres on Beaconsfield Road, which feature mesh cladding, and aligns with the masterplan's grey palette and concrete textures.
- 4.2.5. The design incorporates a geometric form with emphasis on massing and a solid façade complemented by a mesh front. The mesh cladding not only highlights the building's infrastructural character but also provides ample ventilation for the equipment based on the mesh's free area.
- 4.2.6. The building will be constructed using a lightweight steel frame clad with composite insulated panels capable of achieving the desired fire rating with the mesh installed over this, with a traditional blue back brickwork base. The weldmesh fencing on the western side will be streamlined to match the colour of the mesh cladding of the transformer building.
- 4.2.7. Further detail on the design of the development can be found within the accompanying Design and Access Statement prepared by NWA Architects.
- 4.2.8. Colt recognise the importance of ensuring that the non-data centre buildings within the campus read together as a family of building and therefore the intention is for this building to establish principles for the other ancillary buildings that are to come forward across the wider data centre campus.

4.3. Landscaping

- 4.3.1. The design includes new planting to provide visual screening for the built structures and boundary fences at a human scale, while promoting urban greening and enhancing biodiversity.
- 4.3.2. A new mixed-species, native hedge is proposed along the north, east, and south sides of the substation compound security fence. To the east, a wildflower grassland area is planned between the hedge and the existing carriageway. To the south, low-growing shrub planting is proposed between the hedge and the retained section of Unit 1.
- 4.3.3. Within the substation compound, areas of low-maintenance, low-growing shrubs and wildflower grassland are proposed to enhance site greening. This reflects that the a substation inherently needs to be a low access and low maintenance building.
- 4.3.4. To the west of the substation compound, a new native hedge will be planted behind the existing parking area, with a section of grasscrete, seeded with a species-rich lawn mix, placed between the hedge and the transformer enclosures. This will enhance site greening while also permitting future maintenance access to the transformers from the west.
- 4.3.5. The landscape proposals enhance greening and biodiversity, with key elements contributing to the Urban Greening Factor including the planting of native hedges, species-rich perennial shrubs, and wildflower grasslands.

- 4.3.6. On structure landscaping, whether that be green walls or climbers, have been considered but dismissed, both as a result of the associated fire risk and the need to ensure that the substation is a low access and low maintenance building.
- 4.3.7. Further detail on the landscaping strategy can be found within the Design and Access Statement prepared by NWA Architects and the Landscape Masterplan prepared by Murdoch Wickham.

4.4. Vehicle Access and Movement

- 4.4.1. The car parking to the north of the site will remain as existing. This car parking will be used for servicing of the substation itself and for car parking associated with Colt's emerging proposals for the redevelopment of Hayes Bridge Retail Park and Heathrow Interchange. The 2.4m secure fence line surrounding the substation compound will extend to enclose this area.
- 4.4.2. Running to the west of the substation and the area of surface car parking is a service road which is required to be approximately 10.8m wide. The area of car parking to the west of the transformers will be retained as existing, and is required for construction purposes.

4.5. Drainage Strategy

- 4.5.1. The proposed drainage strategy intends to utilise the existing Thames Water storm water sewer which outfalls into the Yeading Brook to the east of the site – and discussion have taken place with Thames Water which have confirmed that there is existing sufficient capacity.
- 4.5.2. Sustainable Drainage features have been incorporated into the development where possible. A permeable surface has been provided to the rear of the transformers. The surface will be concrete/grass, with a permeable sub-base. Permeable surfaces were considered for other trafficked areas but discounted due to anticipated heavy vehicle loading.
- 4.5.3. The wider site benefits from a light liquid separator prior to the outfall to Yeading Brook. Details of the separator are unknown, and as such an additional full retention separator has been provided prior to the drainage connecting into the existing network. The separator will be installed and alarmed in accordance with current regulations

5. Planning Assessment

5.1 Planning Policy Context

5.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan alongside a range of material considerations.

5.1.2. 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).

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

5.1.4. The National Planning Policy Framework (December 2023) (NPPF) is a material consideration in the determination of planning applications. A consultation on amendments to the NPPF was launched on the 30th July 2024, running until the 24th September 2024. The consultation proposes a wide range of changes to the planning system, with targeted changes impacting Data Centres. The general message is an elevated recognition of the significance of data centres to the digital economy and their importance to the national economy, both as investments and employers in themselves but also in facilitating the wider digital economy. There was also clear recognition of the requirement for essential infrastructure to support the successful functioning of data centres. This aligns with the recent designation of data centres as critical national infrastructure.

5.2 Planning Considerations

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

- Principle of development;
- Design;
- Landscaping;
- Access and Parking;
- Ecology and Biodiversity;
- Lighting;
- Noise;
- Flood risk and drainage;
- Heritage and Archaeology;

- Ground Conditions; and
- Fire Safety.

5.2.2. Each of these are considered in turn below.

5.3. Principle of Development

5.3.1. The site is located within the Springfield Road section of the wider Hayes Industrial Area Strategic Industrial Location (SIL), a specific area where substantial new economic development is anticipated and the intensification of existing operations is specifically supported and where the London Plan encourages the redevelopment of existing employment facilities to deliver additional industrial floorspace.

5.3.2. Planning policy at a local, regional, and national level recognises the importance of data centres to the economy with decisions undertaken by LBH and the Greater London Authority subsequently considering data centre to be Class B8 uses that are inherently suitable for SILs as demonstrated by the granting of planning permission for Buildings 1 and 2. Secure and efficient data storage is essential to store, process, and manage the ever-growing amount of data that is fundamental to our daily life, whether that be the increasingly digital nature of the economy or our individual day to day usage.

5.3.3. Whilst the substation itself would not result in any direct employment, it is a key piece of critical infrastructure that is required for the operation of the data centre campus for which planning permission is going to be sought across Hayes Bridge Retail Park and Heathrow Interchange and to facilitate the operation of the two data centre buildings that Colt already has permission for.

5.3.4. This approach has been accepted by the LBH in the determination of other planning applications for data centres (whether at Bulls Bridge Industrial Estate or Colt's site at Beaconsfield Road) whereby a substation has been included and permitted as part of a wider data centre campus proposal on a Strategic Industrial Location. The only difference here is that it is subject to its own standalone application because of the need for it to come forward earlier to ensure the powering of the permitted data centre scheme and positive pre-application discussions have taken place about the emerging scheme for Hayes Bridge Retail Park and Heathrow Interchange.

5.3.5. Whilst, in itself, a substation is not particularly significant or interesting proposal, it is a key piece of critical infrastructure that is required to deliver Colt's wider proposals for the data centre campus that will have a transformative economic impact. Put another way, the data centre campus cannot operate without the substation.

5.3.6. At all levels of planning policy is a recognition that planning policy should support economic growth and productivity. Support for economic development on a general basis is set out throughout Chapter 6 of the NPPF, Policies E2, E4, and E5 of the London Plan, and Policies E1 and E2 of the LPP1, whilst there is specific support for emerging sectors (and particularly the digital economy) in Paragraph 83 of the NPPF, and Policy E7 of the London Plan.

- 5.3.7. There are clear (and largely quantifiable) economic benefits associated with data centre. As well as directly supporting a greater number of jobs onsite than the current operations and providing jobs at construction stage, indirect jobs will be supported for manufacturers of equipment for the data centre campus and for Colt DCS's customers that rent space. Data centres should be seen as essential infrastructure that is required for the continued functioning of many aspects of the wider economy and therefore the development can be seen as supporting jobs across the wider economy.
- 5.3.8. The substation is required to power the permitted data centre buildings approved under planning application re.38421/APP/2021/4045 on a temporary (and short term) basis and to provide permanent power to a number of future data centres (which will be subject to future planning applications) at the Heathrow Interchange Business Park which will have a significant economic impact. The principle of development should therefore be considered acceptable.
- 5.3.9. Further detail on the power demand can be found in the accompanying Infrastructure Power Position Statement prepared by Arup.

5.4. Design

- 5.4.1. The NPPF attaches notable weight to the design of the built environment. High quality design is considered to be a fundamental aspect of sustainable development as defined within Paragraph 131 of the NPPF. Paragraph 135 also encourages planning decisions to, through scrutiny of the subject proposals, ensure that development proposed is sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change, including increased densities and built form.
- 5.4.2. At a regional level, London Plan Policy D3 encourages development proposals to enhance local context through the delivery of buildings and spaces that positively respond to local distinctiveness through their layout, scale, shape and general appearance, having due regard to existing and emerging street hierarchy, building types, forms and proportions. Policy D6 and Table 3.2 also identify that the built form, massing and height of development should be appropriate for the surrounding context.
- 5.4.3. Planning policy, and most explicitly in the London Plan, indicates change is to be considered as a fundamental characteristic of London, and respecting character and accommodating change should not be seen as mutually exclusive. This is particularly the case in SILs where the London Plan strongly encourages the intensification of uses which can only be delivered through the expansion of existing operations and site wide redevelopment.

- 5.4.4. 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 play a positive urban design role in the built form, that is enduring and successful, has been a fundamental aim of this proposal.
- 5.4.5. As set out in section 3 of this Statement, there has been comprehensive pre-application discussions with LBH, which has informed the design evolution. The proposed design reflects Urban Desing Officer's feedback, to provide a cohesive typology, tying into the wider masterplan. In line with this approach, the design draws on the aesthetic of the permitted data centre on Beaconsfield Road which features mesh classing, and aligns with the masterplan's grey palette and concrete textures.

5.4.6. The result is that the proposed development will make a positive contribution to improving and transforming the standard of design of an industrial area currently characterised by buildings of a utilitarian nature through the addition of a high quality piece of urban industrial architecture.

5.5. **Landscaping**

5.5.1. Paragraph 135 of the NPPF notes that planning policies and decisions should seek to ensure that developments will function well and add to the overall quality of an area, being visually attractive as a result of several factors including landscaping. NPPF Paragraph 136 furthers this statement, noting that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change

5.5.2. 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.

5.5.3. Local Plan Policy DMHB 14 states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

5.5.4. The proposed development seeks to enhance greening and biodiversity where possible. Proposed landscaping is primarily confined to the footprint of the existing Unit 1 building, which is to be demolished (in part) to enable the proposed development. The remaining areas of the site are to be retained as existing.

5.5.5. A new mixed-species, native hedge is proposed along the north, east, and south sides of the substation compound security fence. To the east, a wildflower grassland area is planned between the hedge and the existing carriageway. To the south, low-growing shrub planting is proposed between the hedge and the retained section of Unit 1.

5.5.6. Within the substation compound, areas of low-maintenance, low-growing shrubs and wildflower grassland are proposed to enhance site greening. To the west of the substation compound, a new native hedge will be planted behind the existing parking area, with a section of grasscrete, seeded with a species-rich lawn mix, placed between the hedge and the transformer enclosures.

5.5.7. On structure landscaping has been considered but dismissed on grounds relating to fire safety and maintenance challenges.

5.5.8. Whilst the London Plan does not set a urban greening factor target for the proposed substation use, the landscape design incorporates urban greening elements as part of the overall development, and the proposals have clearly sought to maximise landscaping across the site (representing a significant improvement compared to the baseline position) and can therefore be seen as compliant with the aims of Policy G5 of the London Plan.

- 5.5.9. Aspect Arboriculture have carried out an Arboricultural Impact Assessment to establish any likely effects of the proposals, and provides any mitigation and enhancement measures to safeguard any significant arboricultural interest of the site.
- 5.5.10. The proposed development involves the necessary removal of six trees of individual distinction and three groups of trees/shrubs to make efficient use of the site, however they are entirely focused on low quality trees and ornamental shrubs which are not important to the amenity of the site or the wider area.
- 5.5.11. Subsequently, replacement planting of a comparable scale and assemblage is proposed to mitigate for their loss. The application is supported by a landscape masterplan prepared by Murdoch Wickham which demonstrates that new planting will provide an appropriate replacement canopy area, which will enhance the site's green infrastructure credentials and provide amenity benefits tangible to both the existing and proposed setting.
- 5.5.12. The assessment concludes that the arboricultural impact of the development will be acceptable and can be fully supported from the arboricultural perspective.

5.6. Access and Parking

- 5.6.1 The existing car parking to the north and west will be retained. No new parking is proposed as part of the development.
- 5.6.2 When operational, the substation would be unmanned and is expected to generate minimal trips related to the maintenance and servicing of the substation.
- 5.6.3 The proposed layout accommodates the anticipated movements of vehicles visiting the facility, including those required for plant replacement. A 3.5-metre access road has been incorporated to serve the facility, ensuring ease of access for any maintenance operations required in the control rooms.
- 5.6.4 Due to the infrequency of the servicing trips, it is likely that the proposed trip generation will be lower than that for existing operations which are fairly high given the nature of the existing use by a removals and packaging company. As such, no additional traffic impact analysis is required for the proposed development.
- 5.6.5 The transport impact of the construction phase of the development will be managed through the development of a Construction Management Plan developed by the contractors and agreed with the planning authority prior to works commencing. This will be controlled via a planning condition and will include matters relating to access to other units within Heathrow Interchange Park.
- 5.6.6 It is therefore concluded that the proposed development would have a negligible impact on the operation of the local area and is therefore considered to be appropriate and acceptable on transport grounds.
- 5.6.7 A Transport Statement has been prepared by Arup in support of the application and should be referred to for further detail.

5.7. Ecology and Biodiversity

- 5.7.1. NPPF Paragraph 8 seeks to secure net gains within the three underpinning objectives of sustainable development, including improvements to biodiversity and the quality of the natural environment. Paragraph 186 also explicitly states that opportunities to incorporate biodiversity improvements within development proposals should be strongly encouraged, especially where this can secure measurable net gains for biodiversity.
- 5.7.2. Local Plan Policy DMEI 7 requires development to retain and enhance features of biodiversity value.
- 5.7.3. Whilst the site itself is not subject to any ecological designations, the nearby Yeading Meadows Local Nature Reserve (LNR) and Yeading Brook are subject to local and non-statutory ecological designations.
- 5.7.4. An Ecology Appraisal has been prepared by Aspect Ecology to assess the likely impacts of the development on biodiversity. The appraisal confirms that no statutory or non-statutory nature conservation designations are present within the site and appropriate mitigation measures have been provided to safeguard the non-statutory designation within close proximity of the site, therefore, none of the designations within the surrounding area are likely to be adversely affected by the proposals.
- 5.7.5. The appraisal confirms that the site has low ecological value and thus there is no significant harm to biodiversity resulting from the development that cannot be adequately mitigated.
- 5.7.6. As demonstrated by the Biodiversity Net Gain Assessment, prepared by Aspect Ecology, the proposed development will result in net gains in habitat units and hedgerows units within the site boundary, which are substantially in excess of the relevant figure of 10%.
- 5.7.7. The conclusion can therefore be reached that the proposals comply with Local Plan policies LPP1 policy EM3 and policy EM7 and LLP2 Policy DMEI 7.

5.8. Lighting

- 5.8.1. An External Lighting Statement has been prepared by Arup in support of the planning application, which outlines the lighting principles for the proposed development, which the aim to balance the functional needs of the site with the environmental impacts on the surrounding habitats and communities.
- 5.8.2. The external lighting system will have safety and security as the two main functional objectives which will need to be balanced with the environmental impacts of polluting light (obtrusive light and ecologically light sensitive areas).
- 5.8.3. The design seeks to minimise the environmental impacts of light pollution by using shielding luminaires, low-blue-light emitters, and dimming controls. Further detail can be found within the accompanying External Lighting Statement.

5.9. Noise impacts

- 5.9.1. The Noise Impact Assessment (prepared by Arup) submitted with the application considers the impact of noise from the development on the nearest residential properties at Cherry Avenue as well as the Guru Nanak Sikh Academy and the Blair Peach Primary School.
- 5.9.2. The assessment of the substation indicates that the rating levels, without additional mitigation, are at least 15 dB lower than the background sound levels at the nearest residential receptors during the daytime and night-time periods. Accordingly, it is unlikely that the substation sound source will have an adverse impact.
- 5.9.3. Based on dialogue with the LBH and in light of the approach taken in the determination of similar planning applications, the rating level of noise emitted from the plant and/or machinery shall be at least 5dB below the existing background noise level.
- 5.9.4. The predicted rating levels therefore achieve London Borough of Hillingdon's preferred noise criteria of at least 5 dB below the background sound level.
- 5.9.5. On this basis the proposed development complies with NPPF Paragraph 185 (in so far as it related to noise pollution), London Plan Policy D13 and D14 and LLP1 Policy EM8.

5.10. Flood Risk and Drainage

- 5.10.1. At a national level, the NPPF encourages the direction of new development away from areas identified to be at high risk of flooding sources, instead situating development in those areas of lowest risk in the first instance. London Plan Policy SI12 states development proposals should ensure flood risk is minimised and mitigated through sufficient measures integrated within the development.
- 5.10.2. Following consultation with the Environment Agency, Thames water, and LBH as the Lead Local Flood Authority with regards to the wider data centre campus, a Flood Risk Assessment has been prepared by Arup in relation to the proposed substation.
- 5.10.3. The scope of the report is to provide an assessment of flood risk posed to the proposed development from all sources, including fluvial, tidal, pluvial (surface water), groundwater and artificial sources. Further, it will consider the nature of the proposed development, and identify mitigation measures where necessary.
- 5.10.4. Given the proposed development is required to support the wider data centre campus, it is considered to fall within the definition of the wider data centre development of the Heathrow Interchange Park and is considered to be an emerging activity that falls within this class of use (Use Class B8). Under flood risk assessment (Planning Practice Guidance on Flood Risk) guidance, the proposed development is therefore classified as being less vulnerable.
- 5.10.5. The assessment concludes that flood risk to the site is considered to be very low for coastal and surface water sources, to low for groundwater; reservoirs, canals and artificial sources; and drainage and off-site sources, while there remains a medium risk from fluvial flooding via the Yeading Brook.

- 5.10.6. The proposed drainage strategy (prepared by Arup) intends to utilise the existing surface Thames Water storm water sewer which outfalls into the Yeadng Brook to the east of the site – and discussion have taken place with Thames Water which have confirmed that there is existing sufficient capacity.
- 5.10.7. Sustainable Drainage features have been incorporated into the development where possible, however there is insufficient width and space to provide open water features such as basins, ponds and swales and green roofs were discounted due to safety risks.
- 5.10.8. A permeable surface has been provided to the rear of the transformers. The surface will be concrete/grass, with a permeable sub-base. Permeable surfaces were considered for other trafficked areas but discounted due to anticipated heavy vehicle loading.
- 5.10.9. The wider site benefits from a light liquid separator prior to the outfall to Yeadng Brook. Details of the separator are unknown, and as such an additional full retention separator has been provided prior to the drainage connecting into the existing network. The separator will be installed and alarmed in accordance with current regulations

5.11. Heritage and Archaeology

- 5.11.1. Paragraph 200 of the NPPF states clearly that in determining planning applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.
- 5.11.2. Paragraph 194 also clearly states that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment.
- 5.11.3. At a regional level, London Plan Policy HC1 states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.
- 5.11.4. A Heritage Impact Assessment has been prepared by Iceni in support of the application, which identifies and appraises the setting and significance of any heritage assets within proximity of the site. The heritage impact assessment focuses on the character, appearance and special interest of the Canalside Conservation Area, given the Grand Union Canal runs parallel to the east of the site.
- 5.11.5. Given the proposed height and scale of the substation, the proposed development is expected to have no impact upon the setting of the Conservation Area. If the proposed development is glimpsed in the background of one view from Bankside, it is highly unlikely to present a prominent feature within the view and would instead be experienced as a subtle addition to the emerging cluster of new development in this area, including the consented data centres (Ref:38421/APP/2021/404).

- 5.11.6. The proposed development would replace an industrial warehouse of no architectural merit and introduce a high-quality design to the site, with accompanying landscape proposals that complement the natural environment of the canal.
- 5.11.7. Overall, the proposed development is sympathetic to the surrounding historic context of the canal and would preserve the character and appearance of the Conservation Area.
- 5.11.8. An Archaeological Desk Based Assessment has been prepared by Mola in support of the application, which assesses the impact of the scheme on archaeological remains (buried heritage assets).
- 5.11.9. The assessment identifies the presence of any known or potential buried heritage assets that may be affected by the proposals; describes the significance of such assets, as required by national planning policy, assess the likely impacts upon the significance of the assets arising from the proposals; and where considered necessary, provide recommendations for further assessment of the historic assets affected, and/or mitigation aimed at reducing or removing completely any adverse impacts upon buried heritage assets and/or their setting.
- 5.11.10. Further detail of the assessment and findings can be found within the submitted assessment.
- 5.11.11. The proposals are considered to be in line with the requirements of Section 72(1) of the 1990 Act; NPPF Chapter 16; London Plan Policies, and Local Plan Heritage Policies, in that the significance of all identified heritage assets would be preserved and/or enhanced, and that the standard of design is exceptionally high-quality and contextually appropriate.

5.12. **Ground Conditions**

- 5.12.1. 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.
- 5.12.2. A Contaminated Land Desk Study and Preliminary Risk Assessment has been prepared by Arup in support of the application.
- 5.12.3. The supporting documentation shows that the site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and conditions. A series of recommendations relating to further site investigations, site remediation, tank decommissioning, and verification reporting are identified which can be controlled via planning condition.
- 5.12.4. The proposed development complies with LLP2 Policy DMEI12 as it has been clearly demonstrated that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.

5.13. Fire Safety

- 5.13.1. London Plan Policy D12 states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety.
- 5.13.2. A Fire Planning statement has been prepared by Arup in support of the application, which demonstrates that the proposed development complies with the functional requirements of Part B of the Building Regulations 2010 (as amended). The Fire Statement sets out the proposed fire safety approach for the proposed substation and should be referred to for further detail.

6. Conclusion

- 6.1.1. Full planning permission is sought for the redevelopment of Unit 1 of Heathrow Interchange to deliver a substation in connection with the permitted and emerging Data Centre Campus at Hayes Digital Park.
- 6.1.2. The Applicant, Colt Data Centres (Colt), has secured planning permission for the redevelopment of the former Trinity Data Centre, Veetec Building, and Tudor Works sites at Beaconsfield Road to deliver two data centre buildings, fuel tanks, and a substation (ref. 38421/APP/2021/4045). Pre-application discussions are ongoing with LBH in connection to proposals to redevelop Hayes Bridge Retail Park and Heathrow Interchange to deliver an extension to the data centre comprising of a further three data centre buildings and a technology start-up.
- 6.1.3. To provide power on a temporary (and short term) basis to the already permitted two data centre buildings at Beaconsfield Road and to provide the permanent power solution to the data centre campus that is proposed as part of the redevelopment Hayes Bridge Retail Park and Heathrow Interchange, an additional substation is required.
- 6.1.4. Colt and its project team have carried out comprehensive pre-application discussions with LBH, in advance of making this application. This has resulted in very helpful and productive feedback and input into the evolution of the design and has informed the final proposal which forms part of this planning application.
- 6.1.5. As explained in the Design and Access Statement, a high quality design is proposed that has regard to the permitted data centres on Beaconsfield Road and the emerging site context. The resulting design integrates seamlessly into the local and emerging context, and it is considered that the proposed development will make a positive contribution to the character of the industrial area.
- 6.1.6. Furthermore, the redevelopment of the site will deliver a key piece of critical infrastructure that is required for the operation of the data centre campus for which planning permission is going to be sought across Hayes Bridge Retail Park and Heathrow Interchange and to facilitate the operation of the two data centre buildings that Colt already has permission for. The substation is key to the delivery of the data centre, which will have a transformative economic impact.
- 6.1.7. The application is supported by a suite of environmental and technical documents to justify its acceptability with regard to a number of considerations.
- 6.1.8. In summary, this Statement has assessed the proposed development against the Development Plan and has demonstrated that the proposals broadly comply with the Development Plan taking into account material considerations. It is therefore respectfully requested that the proposed development be approved at the earliest opportunity.