
Link Park Heathrow, Thorney Mill Road, West Drayton

Environmental Impact Assessment Screening Report

November 2020

Link Road Heathrow, Thorney Mill Road, West Drayton

Environmental Impact Assessment Screening Report

Prepared on behalf of Link Park Heathrow LLP

Job Number:	31810/A5/EIAScreening	
Status:	Draft	Final
Issue/Rev:	01	02
Date:	November 2020	November 2020
Prepared by:	MC	Client Team
Checked by:	MM	MM

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CONTENTS

1	INTRODUCTION	1
2	SITE AND PROPOSED DEVELOPMENT	3
3	SCREENING ASSESSMENT	6
4	CONCLUSION	18

APPENDICES

APPENDIX A: SITE LOCATION PLAN

1 INTRODUCTION

- 1.1 This report has been prepared by Barton Willmore¹ on behalf of Link Park Heathrow LLP ('the Applicant'). The report accompanies a request to Buckinghamshire Council (BC) and London Borough of Hillingdon (LBH) to adopt a screening opinion to determine whether the demolition of an existing warehouse and three smaller buildings within the site to facilitate the erection of two data centre buildings (a *Sui Generis* Use Class) with a gross internal area (GIA) of 55,000 square metres (sqm) in total and associated generators, sub-station, car parking, access and landscaping, located west of West Drayton, constitutes EIA development.
- 1.2 This report reflects the requirements of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended*² (the "EIA Regulations") and in accordance with Regulation 6 of the EIA Regulations, this report contains:
- *a plan sufficient to identify the land;*
 - *a description of the development, including in particular:*
 - (i) *a description of the physical characteristics of the development and, where relevant, of demolition works;*
 - (ii) *a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;*
 - *a description of the aspects of the environment likely to be significantly affected by the development;*
 - *to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:*
 - (i) *the expected residues and emissions and the production of waste, where relevant; and*
 - (ii) *the use of natural resources, in particular soil, land, water and biodiversity; and*
 - *such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.*

Requirement for EIA

- 1.3 To determine whether the development is 'EIA development', regard must be had for the EIA Regulations and supporting Planning Practice Guidance³.

¹ Institute of Environmental Management and Assessment (IEMA) qualified assessors and Environmental Impact Assessment (EIA) Quality Mark registrants

² SI 2017/571, as amended by SI 2018/695 and SI 2020/505

³ <https://www.gov.uk/guidance/environmental-impact-assessment/>

- 1.4 EIA development is defined by the EIA Regulations as development:

"likely to have significant effects on the environment by virtue of factors such as its nature, size or location".

- 1.5 EIA development falls into two Schedules of the EIA Regulations. EIA is mandatory for developments listed within Schedule 1. Schedule 2 developments require EIA if they would lead to likely significant effects on the environment.

- 1.6 In deciding whether a Schedule 2 development is EIA development, Regulation 5(4) states:

"Where a relevant planning authority ... has to decide under these Regulations whether Schedule 2 development is EIA development, the relevant planning authority ... must take into account in making that decision-

- (a) Any information provided by the applicant;*
- (b) The results of any relevant EU environmental assessment which are reasonably available to relevant planning authority...; and*
- (c) such of the selection criteria set out in Schedule 3 as are relevant to the development."*

- 1.7 In order to allow BC and LBH to determine the need for EIA, this report provides a description of the site and proposed development, a review of the EIA Screening Criteria based on the EIA Regulations and the Planning Practice Guide (PPG), a completed EIA Screening Checklist, and a site location plan at Appendix A.

2 SITE AND PROPOSED DEVELOPMENT

Site Context and Description

- 2.1 The site (see Appendix A) is irregular and elongated along a north-south alignment, approximately 4.57 ha in area and located to the west of West Drayton on the boundary between Buckinghamshire and the London Borough of Hillingdon. The national grid reference for the approximate centre of the site is TQ05207953. Set within the London Area Greenbelt, the site is bounded to the: west by a railway line between West Drayton and Poyle, which is partially disused; south by Thorney Mill Road and Thorney Pool beyond; east by a drain (Bigley Ditch) and a woodland copse; and north by the woodland copse and beyond the River Colne. The Site is approximately 1 km north of the M25/M4 junction and 2.7 km north of Heathrow Airport.
- 2.2 The site comprises a large area of hardstanding currently used for a combination of open storage, storage and distribution associated with the rail line/railhead that forms part of the site. In the centre of the site is a 16m tall warehouse building enclosed on three sides with a footprint of 4,400 sqm. Furthermore, there is also smaller former weighbridge office, bungalow and electricity substation in the south-east corner of the site close to Thorney Mill Road. There are several lighting columns approximately 5m tall spaced alongside the internal estate road. At the northern end of the site are rail sidings which are concealed by a shallow layer of road planings. The sidings have been historically used for importation of aggregates for the use in coated roadstone (see paragraph 2.4 below).
- 2.3 There are no historic or ecologically protected features on or adjacent to the site. The nearest Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA) is Wraysbury Reservoir SSSI within South West London Waterbodies SPA approximately 4.2km to the south-west. The closest heritage feature are Frays and Fray's Cottage Old Mill House which are both Grade II* Listed Buildings on the western edge of West Drayton Green Conservation Area, approximately 225m to the west of the site. The site is within Hillingdon and South Bucks District Council's Air Quality Management Areas. Most of the site, apart from the south-east corner is at low risk of flooding from rivers or seas. Bigley Ditch which connects to Frays Brook runs along the south-eastern boundary of the site and small areas of surface water flood risk are shown on mapping within lower areas of the site⁴.

⁴ <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

Site Planning History

- 2.4 In 1981, Buckinghamshire County Council granted two planning permissions at the site (SBD/1111/79) and SBD/1112/79). The first permission was for the reception and storage under cover of railborne aggregates for use in the creation of coated roadstone. The second permission was for the retention of buildings in use for the processing of those aggregates to form coated roadstone. The first permission extended over most of the site and the second related to an area in the south west corner of the site.
- 2.5 In September 2019 South Buckinghamshire District Council resolved to grant retrospective planning permission for use as open storage of that part of the site which fell within their jurisdiction (ref 17/02353/FUL). The resolution is subject to the completion of a S106 Agreement.
- 2.6 In May 2020, the London Borough of Hillingdon granted certificates of lawfulness for the small part of the site on the east side which lies within their area. The certificates relate to use of the land as storage and the retention of a security fence along the boundary of the site (ref. 73420/APP/2020/1076 and 1042 respectively).

Description of the Proposed Development

- 2.7 The proposed development comprises the demolition of the existing warehouse and three smaller buildings to facilitate the erection of two data centre buildings (a *Sui Generis* Use Class) with a gross internal area (GIA) of 55,000 sqm in total and associated generators, sub-station, car parking, access and landscaping, located west of West Drayton. Each building would be approximately 25m high. To facilitate the works the rail tracks/rail head would be realigned which will also improve their useability.
- 2.8 If the proposed development is granted planning permission, which is then implemented, it would replace the current land uses and provide an alternative development option to the retrospective planning application 17/02353/FUL and certificates of lawfulness 73420/APP/2020/1076 and 1042 described above.
- 2.9 The data centres would operate 24 hours a day, 365 days a year.

Mitigation

- 2.10 Standard and embedded mitigation measures have been considered to be part of the proposed development. This includes adherence to best practice measures during the construction phase, such as through a Construction Environmental Management Plan (CEMP). The CEMP will be secured through planning conditions.
- 2.11 Tree and scrub removal will be undertaken outside of the bird nesting season (1st March to 31st August) to avoid the potential of damaging bird nests. If this is not possible, vegetation will be checked for the presence of nesting birds by an experienced ecologist no more than 48 hours prior to removal. If active bird nests are found, work will stop in a 5m no work zone around the nest, until chicks have fledged. If during any work on site bats or evidence of roosting bats are found, then work will stop immediately, and a Natural England licensed bat worker will be contacted.
- 2.12 Trees to be retained in proximity to areas of development activity, including areas for new surfacing, services, work site compounds and storage will be protected to ensure they are not damaged. This will be achieved with the use of temporary tree protection fencing in accordance with BS 5837: 2012 'Trees in Relation to Design, Demolition and Construction', to prevent access within the Root Protection Zone (RPZ) or canopy spread of trees. Where access is unavoidable, alternative protection arrangements such as ground protection (sufficient to protect the structure of the soil from compaction), and /or access facilitation pruning (to ensure a reasonable clearance for operations is provided) will be required.

3 SCREENING ASSESSMENT

Determining the Screening Approach

- 3.1 In determining whether a proposed development constitutes EIA development, consideration should be had to the following:
- If the proposed development is of a type listed in Schedule 1;
 - If not, whether it is listed in Schedule 2;
 - Is it located within a sensitive area;
 - It meets any of the relevant thresholds and criteria set out in Schedule 2; and/or
 - Would it lead to likely significant effects on the environment.
- 3.2 These points are explored further in this section with reference to the EIA Regulations and supporting Planning Practice Guidance (PPG).

Schedule 1 Projects

- 3.3 EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations. Schedule 1 developments are large scale projects for which significant effects would be expected and comprise developments such as new airports and power stations. The proposed development is not of a type listed in Schedule 1.

Schedule 2 Projects

- 3.4 EIA is discretionary for projects listed in Schedule 2. If the development proposed is of a type listed in Schedule 2 then it may be classified as EIA development depending on the location of the development (i.e. if it is within a sensitive area) and/or whether it meets any of the relevant thresholds or criteria in Column 2.
- 3.5 Sensitive Areas are defined in the EIA Regulations as:
- Sites of Special Scientific Interest and European Sites;
 - National Parks, the Broads, and Areas of Outstanding Natural Beauty; and
 - World Heritage Sites and Scheduled Monuments.
- 3.6 In certain cases, local designations which are not included in the definition of sensitive areas, but which are nonetheless environmentally sensitive, may also be relevant in determining whether an assessment is required. Furthermore, in considering the sensitivity

of a particular location, regard should also be had to whether any national or internationally agreed environmental standards (e.g. air quality) are already being approached or exceeded.

- 3.7 The proposed development falls within category 10 of Schedule 2, 'Infrastructure Projects', sub-section (a) 'Industrial estate development projects'. The site is not located within a sensitive area and therefore the thresholds should be applied. The thresholds for industrial estate developments as set out in Schedule 2 relate to developments where "*the area of the development exceeds 5 hectares*". The proposed development almost meets the threshold at 4.57 ha. Accordingly, this screening assessment has been prepared to determine whether the proposed development would be likely to result in significant environmental effects. To achieve this, Schedule 3 of the EIA Regulations and PPG need to be considered. Information on these are set out below.

Schedule 3

- 3.8 Schedule 3 of the EIA Regulations sets out selection criteria which relate to specific matters including: the characteristics of the development; the location of the development; and the characteristics of the potential impact. These factors should be taken into account as part of the screening process and are set out below:

Characteristics:

- the size and design of the whole development;
- cumulation with other existing development and/or approved development;
- the use of natural resources, in particular land, soil, water and biodiversity;
- the production of waste;
- pollution and nuisances;
- the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;
- the risks to human health (for example, due to water contamination or air pollution).

Location:

- the existing and approved land use;
- the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground; and
- the absorption capacity of the natural environment.

Potential Impact:

- the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- the nature of the impact;
- the transboundary nature of the impact;
- the intensity and complexity of the impact;
- the probability of the impact;
- the expected onset, duration, frequency and reversibility of the impact;
- the cumulation of the impact with the impact of other existing and/or approved development;
- the possibility of effectively reducing the impact.

Consideration of Cumulative Effects

- 3.9 Schedule 4 of the EIA Regulations requires consideration of a proposed development cumulatively with other existing and/or approved development. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG, which echoes the requirements of the EIA Regulations:

"each application (or request for a screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a Proposed Development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."

- 3.10 No permitted development has been identified in the surrounding area from a search of the Buckinghamshire⁵ and London Borough of Hillingdon⁶ Planning Registers as potentially resulting in a cumulative effect when considered with this proposed development.

National Planning Practice Guidance

- 3.11 Paragraphs 057 and 058 of the PPG provide guidance to help determine whether significant effects are likely. In general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely. Table 1 below sets out the indicative criteria, thresholds and key issues to be considered in determining whether a development is likely to be EIA developed identified in the PPG.

⁵ <https://pa.chilternandsouthbucks.gov.uk/online-applications>

⁶ <https://planning.hillingdon.gov.uk/OcellaWeb/planningSearch>

Table 1: Planning Practice Guidance Indicative Screening Criteria

Development type	Indicative criteria and threshold	Key issues consider
10 (a) Industrial estate development projects	Site area of the new development is more than 20 hectares	Potential increase in traffic, emissions and noise

Screening Assessment

- 3.12 This section assesses the proposed development against the EIA screening criteria outlined above and presents the assessment of the environmental effects likely to occur as a result of the proposed development. Table 2 sets out a review of all off the above criteria and requirements and specifically addresses the proposed development at the site.

Table 2: Screening Assessment for Development at Link Park

SCREENING CRITERIA	PROPOSED DEVELOPMENT
1. CHARACTERISTICS OF THE DEVELOPMENT	
(a) Size of the development	
Will the development as a whole be out of scale with the existing environment?	The redevelopment of the site would comprise the demolition of a 16m tall warehouse and three small one-storey high buildings and change of land use from open storage, storage and distribution to erection of two 25m high data centre buildings with car parking, access, and landscaping. The new buildings would be in keeping with the urban mixed-use location of the site. The proposed development would be slightly taller than surrounding buildings but not out of context due to screening from the surrounding woodland and the presence of the railway to the west.
Will the design of the development as a whole fit in with the existing environment?	As an urban redevelopment project on a slightly larger scale than the surrounding area, it is considered that the proposed development would be notable in the townscape. The design of the scheme would be informed by a thorough analysis of surrounding context and architectural styles.
Will it lead to further consequential development or works?	No. The proposed development is a discrete proposal and includes all necessary works, including access.
(b) Accumulation with other development	
Are there potential cumulative impacts with other existing development or development not yet begun but for which planning permission exists?	No permitted development has been identified as potentially resulting in a cumulative effect when considered with this proposed development.
Should the application for this development be regarded as an integral part of a more substantial project? If so, can related developments which are subject to separate applications proceed independently?	The proposed development is a discrete project and would proceed independently.
(c) Use of natural resources	
Will construction or operation of the development use natural resources such as land, water, material or energy, especially any resources which are non-renewable or in short supply?	The construction and operational phases of the proposed development would use resources in terms of land, water and energy as would be expected with the construction of a data centre development. The Applicant would include measures in the CEMP to

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	minimise the consumption of natural resources, particularly those non-renewable, where possible.
(d) Production of waste	
Will the development produce wastes during construction or operation or decommissioning?	As with nearly all construction, the proposed development would result in some waste materials from the preparation and undertaking of works. Construction waste, such as concrete from the existing hardstanding areas and the existing structure, would be reused and recycled where possible. Significant quantities of construction waste are not anticipated as a result of the proposed development and any waste arisings would be managed in accordance with all applicable legislation and disposed of in line with best practice. Operational waste would be disposed of in line with BC and LBH requirements and managed in accordance with all applicable legislation.
(e) Pollution and nuisances	
Will the development release any pollutants or any hazardous, toxic or noxious substances to air?	During the construction phase of the proposed development, dust would be generated. Dust generation would be managed in accordance with standard best practice measures, enforced through a CEMP and is not anticipated to generate significant adverse effects. There would be emissions associated with machinery and vehicles during the construction phase. The construction works would be managed to control the arrival and departure of Heavy Good Vehicles (HGV) where possible to ensure any effects are dispersed across the working day. There would also be emissions associated with the operational phase of the proposed development, primarily from employees and deliveries. To mitigate these effects, a Travel Plan would be submitted with the planning application which would provide advice on alternative travel methods including cycling, walking and use of public transport. The proposed development would comprise a data centre which is not associated with hazardous substances or toxic or noxious emissions to air. There is not anticipated to be a requirement to store large volumes of hazardous materials. Any such materials would be stored and handled in accordance with relevant legislation.
Is there a potential risk from leachates or escape of wastes of other products/by-products that may constitute a contaminant in the environment?	The existing and historical land uses have the potential to have resulted in localised contamination. Prior to construction, a Remediation Strategy would be produced and agreed through planning conditions with BC and LBH which would be implemented during construction as required. The land uses proposed are not highly contaminative and it is not expected that there would be a high risk of contaminants released into the environment. Appropriate measures, in accordance with all relevant legislation, would be used to prevent accidental spillages of contaminants during the construction and operational phases of the proposed development.

SCREENING CRITERIA	PROPOSED DEVELOPMENT
Will the development cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	The potential exists for noise effects to result from the construction processes associated with the proposed development. These effects would be managed in accordance with best practice measures, implemented through the CEMP and are not anticipated to generate significant adverse effects. No significant adverse noise effects are anticipated during operation. During construction, the potential also exists for light pollution associated with construction activities. External safety lighting would also be required during operation. Lighting during construction and operation would be designed carefully in accordance with relevant British Standards and Institute of Lighting Professionals (ILP)⁷ guidance. No electromagnetic radiation, heat or energy releases are expected other than those associated with normal data centre development.
Will the development lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	The site is not located in a groundwater source protection zone (SPZ). During construction, any residual contamination from existing and previous land uses would be remediated through the implementation of a Remediation Strategy. Furthermore, hydrocarbons would be used as part of the construction phases of the proposed development. This would involve plant and vehicle fuel and lubricants. Their use would be controlled through the implementation of the CEMP and would not result in any significant adverse effects to land or water.
(f) Risk of major accidents and/or disasters, including those caused by climate change and also having regard in particular to substances or technologies used	
Will there be a risk of accidents during construction or operation of the development which would have effects on people or the environment?	During construction, the contractor(s) would implement measures in accordance with Health and Safety legislation/requirements, and best practice to minimise the risks of accidents that could have adverse effects on people or the environment. All such measures would form part of the CEMP. There are no anticipated significant risks of accidents during operation as the proposed development would not involve users dealing with hazardous substances.
Will the development involve use, storage, transport, handling or production of substances or materials which could be harmful to people or the environment (flora, fauna, water supplies)?	During construction, certain materials may be present on the site which may be harmful to the environment. However, through the implementation of appropriate environmental control measures within the CEMP and Remediation Strategy in line with relevant legislation there would be no significant environmental effects. As a data centre development, storage, transport or handling of harmful substances is not anticipated during its operation.
(g) Risks to human health	

⁷ Institute of Lighting Engineers Guidance and Standards (<https://www.theilp.org.uk/home/>)

SCREENING CRITERIA	PROPOSED DEVELOPMENT
What are the risks to human health such as from water contamination or air pollution?	During the construction phase of the proposed development, dust would be generated. However, dust generation would be managed in accordance with standard best practice measures, enforced through the CEMP, and is not anticipated to generate adverse effects to human health. In addition, the CEMP would be conditioned as part of the planning permission to ensure construction contractors use best practice measures to prevent land and water contamination. The land uses proposed are not highly contaminative and it is not expected that there is a high risk of contaminants being released into the environment. Any residual contamination from previous and existing land uses would be dealt with through the implementation of the Remediation Strategy. Surface water run-off and foul water drainage would be managed on-site during the construction and operational phases, as detailed further in the FRA and Drainage Strategy that would be submitted with the planning application.
Other characteristics	
Potential physical changes (topography, land use, changes in water bodies etc) from construction, operation or decommissioning of the development?	The principal land use would change from open storage, storage and distribution to a data centre. There would be changes to the site during the construction phase as materials would be excavated for foundations, drainage and access. There would be no material changes to topography, other than localised regrading to achieve development platforms.
2. LOCATION OF THE DEVELOPMENT	
(a) Existing and approved land use	
Are there existing land uses on or around the location which could be affected by the development, e.g. residential, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying?	The brownfield site is currently used for open storage, storage and distribution. There is a large warehouse in the centre of the site and three smaller buildings in the south-east corner of the site. The site is surrounded to the east and north by a woodland copse and to the west by a railway. Residential dwellings are located to the east and the south however these are on the opposite side of woodland, roads and railway lines and are not anticipated to be significantly affected. During construction, potential adverse effects to the quality of surface and ground water, roads and air (including airborne noise) will be minimised through the effective implementation of the CEMP.
Is the development located in a previously undeveloped area where there will be loss of greenfield land?	The site is a brownfield site comprising hardstanding with a minimal number of ruderal species along the site boundaries, which surrounds a 16m tall structure with a footprint of 4,400 sqm. There would be no loss of greenfield land.
(b) Relative abundance, availability, quality and regenerative capacity of natural resources in the area and its underground*	
Are there any areas on or around the location which contain important, high quality or scarce resources which could be affected by the development? • Soil; • land; • groundwater resources;	The site is not located within or adjacent to any groundwater SPZ. Habitats at the site, are of limited intrinsic ecological importance. Survey work will be undertaken and submitted as part of the planning application process.

SCREENING CRITERIA	PROPOSED DEVELOPMENT
• surface waters; • biodiversity; • forestry; • agriculture; • fisheries; • tourism; and • minerals.	There is a drain (Bigley Ditch which connects to Frays Brook) along the south-eastern site boundary which could be affected by the proposed development. The River Colne is located approximately 85m at its closest location to the north and east. The watercourses will be protected by measures within the CEMP during construction and the surface water drainage strategy during operation. There are no soil, land, forestry, agriculture, fisheries, tourism or minerals resources that would be affected by the proposed development.
(c) Absorption capacity of the natural environment**	
Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the development?	The site is not located within or close to any sensitive areas, within the meaning of the EIA Regulations. In addition, there are no statutory designations within or adjacent to the site i.e. there are no Scheduled Monuments, Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI), National Parks, Registered Battlefields, Registered Historic Parks and Gardens, Special Areas of Conservation, Special Protection Areas, or Ramsar Sites⁸. The nearest ecological 'sensitive area', as defined by the EIA Regulations is Wraysbury Reservoir SSSI which forms part of the South West London Waterbodies SPA which is approximately 4.2km to the south-west. The site is also approximately 5.3km south-east of Yeading Meadows Local Nature Reserve. The nearest listed buildings are the Frays and Fray's Cottage Old Mill House which are both Grade II* Listed building approximately 290m and 300m to the east and south east respectively. There is also a cluster of listed buildings within the centre of West Drayton. All these listed buildings are within the West Drayton Green Conservation Area⁹ which is approximately 225m to the east of the site. Furthermore, the nearest scheduled monument is the two concentric ditches showing as crop marks at Thorney¹⁰ which is approximately 1.25 km to the west. No other sites have been identified. It is considered that the above designations are sufficiently distant and separated by intervening vegetation, urban development and watercourses from the site that the potentially significant effects upon them are not anticipated.
Are there any other areas on or around the location which are important or sensitive for reasons of: • Wetlands, riparian areas, river mouths; • coastal zones and the marine environment;	The site is within both the Hillingdon and South Bucks District Council's Air Quality Management Areas¹¹. There are no sensitive features on or adjacent to the site. No other areas have been identified, see row

⁸ <https://magic.defra.gov.uk/MagicMap.aspx>

⁹ <https://archive.hillingdon.gov.uk/article/22670/Conservation-areas-in-Hillingdon>

¹⁰ <https://historicengland.org.uk/listing/the-list/list-entry/1006944>

¹¹ <https://uk-air.defra.gov.uk/aqma/list>

SCREENING CRITERIA	PROPOSED DEVELOPMENT
• mountains and forest areas; • nature reserves and parks; • European sites and other areas classified or protected under national legislation; • Areas in which there has already been a failure to meet the environmental quality standards laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; • Densely populated areas; • Landscapes and sites of historical, cultural or archaeological significance.	above.
Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected?	The site is not located within a designated site for nature conservation and the habitats at the site are of limited intrinsic ecological importance. Bats are likely to use the tree lines bordering the eastern and northern boundaries of the site for commuting and foraging. They would be protected from adverse effects through the provision of 'bat friendly' outdoor lighting. Lights would be low level and angled down or have baffles to prevent unnecessary light spill into the surrounding area which could disturb bats, especially along tree lines in accordance with the Bat Conservation Trust guidelines¹². Further information will be included in the ecological reporting submitted with the planning application.
Are there any inland, coastal, marine or underground waters on or around the location which could be affected?	Bigley Ditch which connects to Frays Brook flows along the south-eastern boundary of the site and beyond flows the River Colne. The site is not located within or close to a groundwater SPZ. No other water bodies would be expected to be significantly affected by the proposed development.
Are there any groundwater source protection zones or areas that contribute to the recharge of groundwater resources?	The site is not located within or adjacent to a groundwater SPZ.
Are there any areas or features of high landscape or scenic value on or around the location which could be affected?	None identified.
Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected?	Thorney Mill Road is located immediately to the south of the site. The nearest public rights of way are south of Thorney Mill Road and north of the site along the banks of the River Colne ^{13,14} . There are no public rights of way within or adjacent to the site.
Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected?	The construction phase of the proposed development would involve changes to traffic movements (e.g. use of HGVs). There is likely to be a slight decrease in number of vehicles using the local road network especially Thorney Mill Road compared to the existing situation once the proposed development is operational due to the change in land use.

¹² Bat Conservation Trust (2011) Statement on the impact and design of artificial light on bats.

¹³ <https://archive.hillingdon.gov.uk/29826?q=public+rights+of+way+map&go=Search>

¹⁴ <https://prow.buckscc.gov.uk/standardmap.aspx>

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	Assessment work will be carried out and a Transport Assessment submitted with the planning application which will review these data however significant effects are not anticipated. A Travel Plan will be included with the planning application which will identify alternatives to car use including cycling, walking and rail; West Drayton train station is approximately 1.2 km to the north-east of the site.
Is the development in a location where it is likely to be highly visible to many people?	The site is not covered by any statutory designations for landscape character or quality. The potential for glimpsed local views of the site exist from adjacent and nearby roads, footpaths, residential dwellings and caravans south of Thorney Mill Road.
Are there any areas or features of historic or cultural importance on or around the location which could be affected?	The site is not located in or adjacent to any areas protected for heritage conservation purposes. It is approximately 225m west of West Drayton Green Conservation Area and associated Grade II and Grade II* Listed Buildings.
Are there any areas on or around the location which are densely populated or built up, which could be affected?	The site is located on the western urban edge of West Drayton and has the potential for dust and other typical construction effects such as noise however these would be managed using a CEMP and appropriate traffic management. As set out above, on completion of the proposed development the main source of noise would be from traffic generated by employees of the proposed development. However, this will be small scale and where necessary will be addressed at the detailed design stage to mitigate any potential effects.
Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected?	The proposed development is split between the Hillingdon and Buckinghamshire Council Air Quality Management Areas. During construction, effects would be managed by a CEMP which will include standard, best practice measures such as ensuring bulk cement and other fine powder materials are delivered to the site in enclosed tankers. Dust generation would be managed in accordance with standard best practice measures, enforced through a CEMP and is not anticipated to generate significant adverse effects. During operation of the proposed development, the proposed data centre is unlikely to generate dust and the numbers of vehicles accessing the site are predicted to reduce slightly compared to the existing situation. A travel plan will be submitted alongside the planning application.
Is the location of the development susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the development to present environmental problems?	According to the Gov.UK website¹⁵ the majority of the site is located within Flood Zone 1 and is at low risk of flooding from rivers or seas. The south-eastern corner of the site is within Flood Zone 3 along the banks of Bigley Ditch and Frays Brook. The built development will be located within the Flood Zone 1 areas of the site. With regard to surface water flood risk, the site is located in an area of 'Very Low' with localised areas of 'Low' and 'Medium' risk¹⁶. An Flood Risk

¹⁵ <https://flood-map-for-planning.service.gov.uk/>

¹⁶ <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastings=505207&northings=179270&map=SurfaceWater>

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	Assessment will be undertaken for the site and submitted in support of the planning application. The site is not located within a groundwater SPZ. The site is not susceptible to earthquakes, subsidence, landslides, erosion, or extreme or adverse climatic conditions.
CHARACTERISTICS OF THE POTENTIAL IMPACT	
(a) Extent and nature of the impact	
Will the effect extend over a large area?	No. This is confined to the site (approximately 4.57 ha) and the land immediately adjacent.
Will many people be affected?	Users of the surrounding road network and nearby footpaths and residents/occupiers of surrounding properties and buildings have the potential to be affected by the development during construction and operation.
What will be the nature of the impact?	Visual impacts during construction and operation; potential decrease HGV traffic movements from the current baseline; increase in noise, particularly during site construction; and minor impacts upon air quality from traffic movements during operation.
(b) Transboundary nature of the impact	
Will there be any potential for transboundary impact? (n.b. Development which has a significant effect on the environment in another Member State is likely to be very rare. It is for the Secretary of State to check Environmental Statements to decide whether there is likely to be such an effect in each case).	No.
(c) Magnitude and complexity of the impact	
Will there be a large change in environmental conditions?	No.
Will the effect be unusual in the area or particularly complex?	No.
Will many receptors other than people (fauna and flora, businesses, facilities) be affected?	This is considered to be unlikely. A suite of appropriate ecological species surveys and an ecological appraisal will be submitted in support of the planning application.
Will valuable or scarce features or resources be affected?	No.
Is there a risk that environmental standards will be breached?	No.
Is there a risk that protected sites, areas, and features will be affected?	No.
(d) Probability of the impact	
Is there a high probability of the effect occurring?	The effects of the proposed development can be clearly established, and the probability of any effects determined with reasonable confidence.
Is there a low probability of a potentially highly significant effect?	As above.
(e) Expected onset, duration, frequency and reversibility of the impact	
What will result in the onset of the impact?	Development will commence following the discharge of pre-commencement conditions attached to the planning permission and the issue of any environmental permitting.
Will the effect continue for a long time?	Construction effects would be short term in duration and the operational effects would be long term.
Will the effect be permanent rather than temporary?	Construction effects would be temporary, and the operational effects would be permanent.
Will the impact be continuous rather than intermittent?	Construction – intermittent Operation – continuous

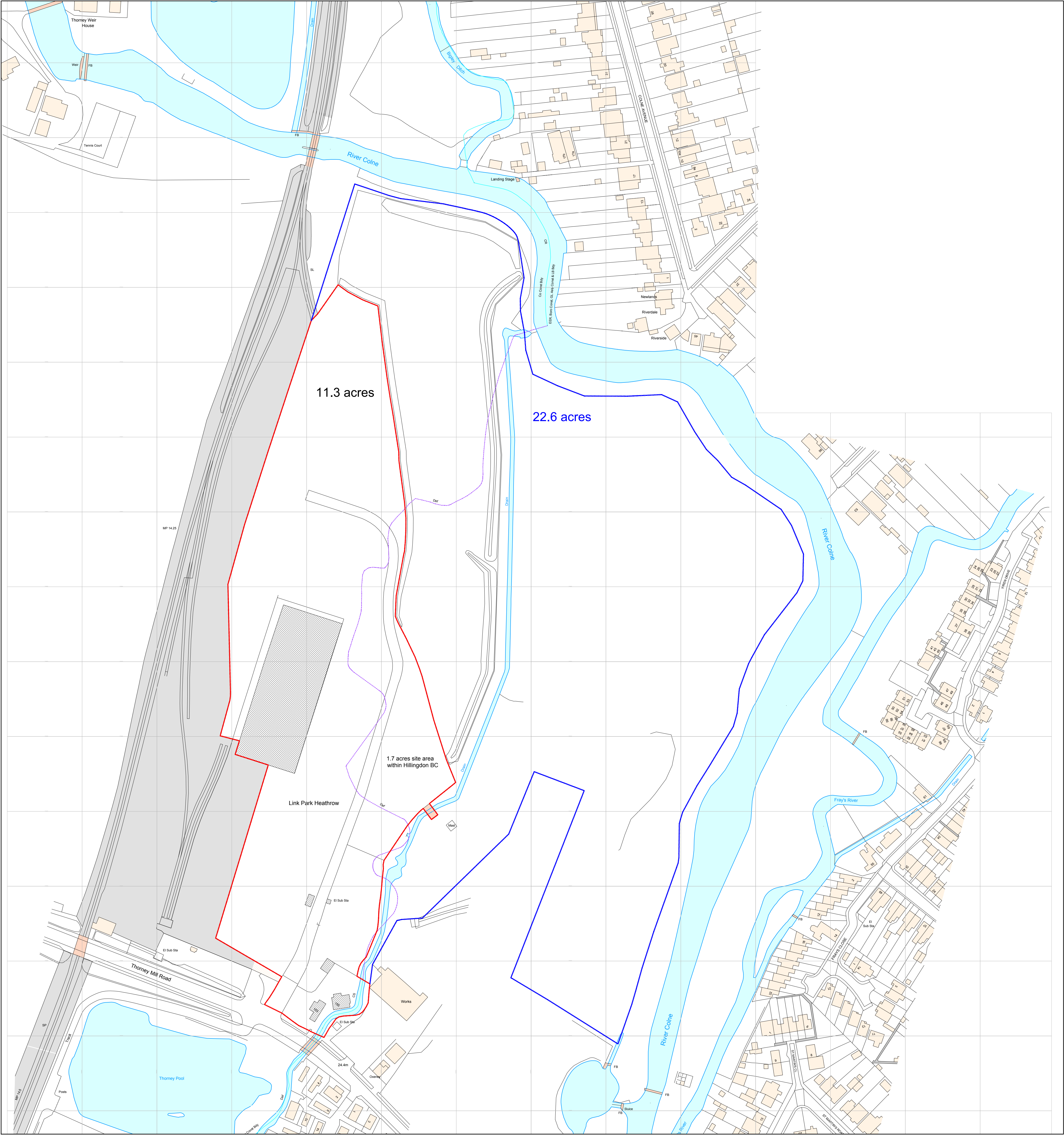
SCREENING CRITERIA	PROPOSED DEVELOPMENT
If intermittent, will it be frequent rather than rare?	Frequent.
Will the impact be irreversible?	Some effects would be permanent, such as change in land use. Some effects will be temporary and reversible such as noise during construction.
Will it be difficult to avoid or reduce or repair or compensate for the effect?	No.
(f) Possibility of effectively reducing the impact	
What is the possibility of the likely impacts arising from the Proposed development being effectively reduced?	Well understood, standard mitigation measures would be incorporated into the proposed development and a high level of confidence can be placed in the mitigation measures proposed.

4 CONCLUSION

- 4.1 The screening assessment has considered whether the demolition of an existing warehouse and three smaller buildings to facilitate the erection of two data centre buildings (a *Sui Generis* Use Class) with a gross internal area (GIA) of 55,000 sqm in total and associated generators, sub-station, car parking, access and landscaping, located west of West Drayton, is likely to give rise to significant effects on the environment.
- 4.2 The proposed development falls within Schedule 2, 10 (a) of the EIA Regulations, as an industrial estate development project. The site is not located within a sensitive area as defined by the EIA Regulations, and falls just below the indicative threshold of 5 ha. With regard to the indicative criteria and thresholds identified in the PPG (set out in Table 2 above), the proposals fall well below the 20 ha threshold at which EIA is more likely to be required.
- 4.3 The proposed development would not lead to effects that are different in nature or complex. It is considered that the principal construction environmental effects would relate to traffic movements and associated noise and air quality emissions, although as set out above, these effects could be managed in accordance with standard methods, implemented through the CEMP. The main residual effects on completion of the development would relate to the changed townscape of the site, however the design of the development would be informed by a thorough analysis of surrounding context and residual effects are not considered to be significant.
- 4.4 The screening assessment has identified that significant effects on the environment are not considered likely either alone or in combination with other development. The proposals would be of a sufficiently limited scale that effects could be managed in accordance with standard methods. The proposed development is therefore not considered to be formal EIA development as defined by the EIA Regulations.

APPENDIX A

SITE LOCATION PLAN

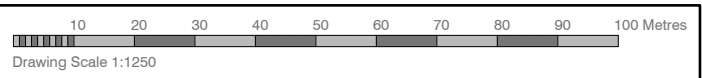


KEY:

Site Boundary

Other land in the same ownership

Council boundary



Revision	Notes	Date	Checked by	Project	Client
P01	Draft issue	22.10.2020	AN	Link Park Heathrow - Iver	LINK PARK LLP
P02	Drawing generally revised.	05.11.2020	AN	Date: 07.04.2020	Title: OS Site Plan - Red Line Boundary
				Drawn: AN	Status: OUTLINE PLANNING
				Checked: NW	Drawing: 0485-A02-100 Rev: P02
				Scale: 1:1250 (@ A1)	

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