

5th March 2025

Michael Briginshaw
London Borough of Hillingdon
Environment and Community Services
3 North
Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

Nick Heard
E: nheard@savills.com
DL: +44 (0) 2920 368912
F: +44 (0) 2920 368999

2 Kingsway
Cardiff
CF10 3FD
T: +44 (0) 2920 368 920
savills.com

Dear Michael,

FULL PLANNING PERMISSION ON A TEMPORARY BASIS FOR THE CONSTRUCTION AND RETENTION OF A FLANK WALL TO FORM THE WESTERN FAÇADE OF ANCILLARY BLOCK 4 FOR A PERIOD OF THREE YEARS

ANCILLARY BLOCK 4, UNION PARK, HAYES

Savills is instructed by Ark Data Centres Ltd (Ark) to submit an application for a development with the following description of development:

'Full planning permission on a temporary basis for the construction and retention of a flank wall to form the western façade of Ancillary Block 4 for a period of three years'

The remainder of this covering letter summarises the site's planning history, the need for this planning application, and the requirement for the temporary permission to be for a three year period.

In support of this application the following plans are submitted:

- Site Location Plan (ref. NWA-0473-B3-ZZ-DR-A-90950 P01);
- Enlarged Site Location Plan (ref. NWA-0473-B3-ZZ-DR-A-90959 P01); and
- West Elevation (ref. NWA-0473-UP3-ZZ-DR-A-03705P P01).

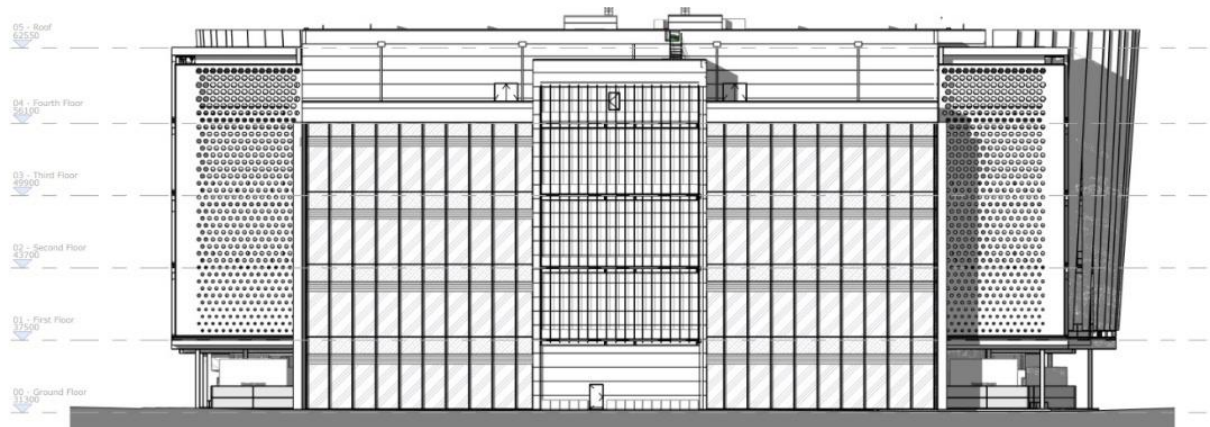
Payment of the application fee has been made via the Planning Portal.

Planning Background

The London Borough of Hillingdon (LBH) granted planning permission on 15 April 2021 for the redevelopment of Bulls Bridge Industrial Estate to deliver a data centre development (ref. 75111/APP/2020/1955). A separate application, known as the "Slot-In" application, was submitted in March 2022 (ref. 75111/APP/2022/1007) seeking full planning permission for a revised scheme for the three energy centres, two visitor reception centres, and the canal access ramp. To ensure compatibility between the two permissions a regularisation S96A application was permitted under ref. 75111/APP/2022/3012 to amend the Original Permission.

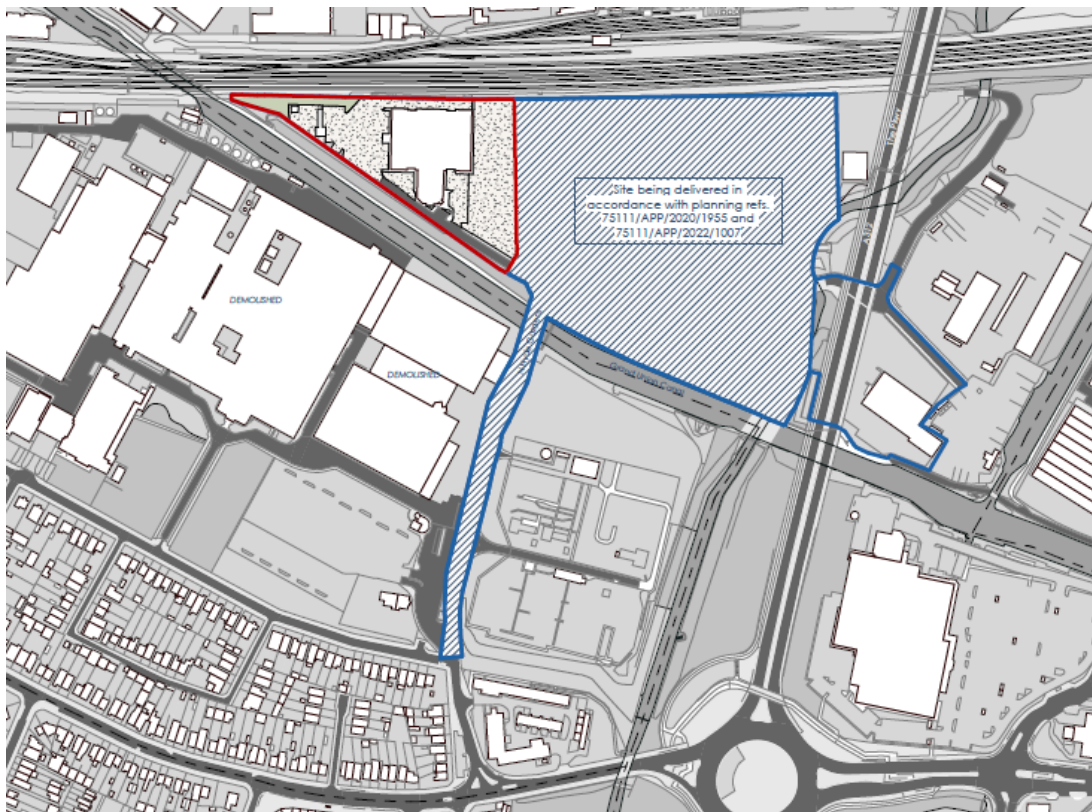
Ark is in the process of delivering the Union Park data centre campus. The HV substation as well as the first data centre building, visitor reception centre, and energy centre are all completed and occupied with construction works ongoing for the remaining two data centre blocks, energy centre, and visitor reception centre. The scheme also includes extensive areas of soft and hard landscaping as well as a new ramp connecting the site to the towpath on the northern side of the Grand Union Canal to the east of the North Hyde Gardens road bridge.

The designs for AB4, the office and administration core which sits to the west of UP3 and would form the western elevation of the permitted development, show an integrated administrative building containing offices and other ancillary functions located on the west flank of the data centre, which has been designed with a glazed façade and a green wall, shown below:



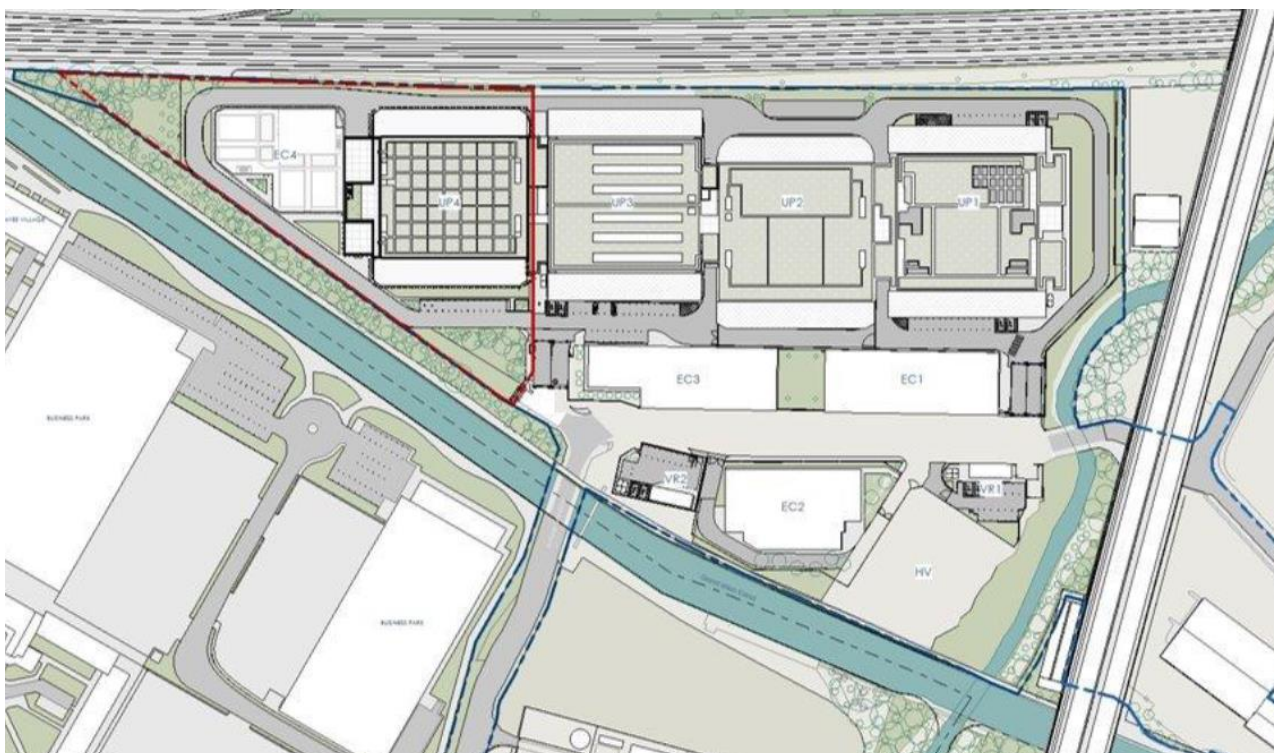
3 West Elevation
1:200

Ark has acquired the freehold ownership of the adjacent parcel of land to the west, comprising a building and yard formerly occupied by Addison Lee (the Addison Lee land). The intention is to submit a planning application for a fourth data centre building (to be known as UP4) together with a further energy centre to support the data centre in the coming months. This is shown outlined in red in the plan below:



The development of a data centre on the Addison Lee land would comply with development plan policy, and would be consistent with the approach that LBH have taken to the consideration of planning applications at Union Park. We have had a series of pre-application meetings with LBH and the scheme has been presented to the Design Review Panel such that there has been a significant focus on the design quality of the proposals and their environmental and technical performance.

Ark's proposals for The Former Addison Lee Site will require the UP4 building to be built against the side of UP3, with AB4 effectively acting as an interconnecting extension to the building. This is indicated in the plan below:



The intention is for development of UP4 (if permitted) to commence after the completion of both UP2 and UP3 with construction likely to last for three years.

The Need for this Application

UP3 (and the associated AB4 admin building) will be occupied in October 2025. Whilst there would be a live application for the UP4 development, permission may not have been granted and construction works would not commence for some months after that, particularly as demolition of the Addison Lee building is to be undertaken in accordance with a separate application for prior notification for demolition to be submitted in early 2025. There will therefore be a short period of time between the occupation of UP3/AB4 and the construction of UP4. There would be little point in installing the glazing and the green wall to the flank of the AB4 admin building as UP3 is constructed as these elements would shortly need to be demolished when UP4 is built. This would be wasteful, unsustainable and costly for Ark.

In order to allow the safe occupation of UP3 and AB4, the proposal is to install a temporary flank wall as the construction is paused which will make the 'unfinished' building weather tight and capable of occupation. This has already been undertaken and is shown in the photograph below:



It is proposed that Ark continues with the construction of UP3/AB4 so that the buildings can be occupied in October 2025, but that it pauses the construction before the installation of the elements that will need to be removed when UP4 is constructed, i.e. the green wall and the glazing to the flank of AB4. There is of course no requirement to complete a development once it is started.

It is anticipated that construction of UP4 will take three years and therefore planning permission is sought for the flank wall for a three year period. This is because the occupier of UP3 needs the guarantee that there would be no planning breach (and associated risk of enforcement action) in the period where they are occupying a building permitted and the UP4 development is completed. Given that this construction period would be three years, a temporary planning permission for one year does not provide this beyond the period permitted in the temporary planning permission that is in place when they occupy UP3.

If a temporary permission is not granted for a period of three years, Ark's operator for UP3 will not take occupation as they do not have sufficient certainty around there being no planning risk associated with their occupation whilst UP4 is being constructed. In reality, this would result in one of two outcomes:

1. Ark has to complete UP3 in accordance with the approved plans including the installation of the glazing and green wall on the western edge of AB3. This would mean that Ark would not commence the development of UP4 as the removal of those elements of AB4 could not realistically take place whilst UP3 is occupied. This would mean that the economic benefits both at construction and operational stages of UP4 are not realised; or
2. UP3 remains unoccupied until UP4 is completed. Not only would it not be contributing to the supply of much needed data storage and processing capacities within the UK, it would not deliver the economic benefits associated with its occupation. It would leave the former Addison Lee Site as an incredibly challenging site to redevelop and not represent good use of land within a Strategic Industrial Location.

Either result clearly is a bad result for both Ark and the LBH.

This application therefore seeks full planning permission for the installation of a flank wall on the western elevation of AB4 for a temporary and fixed period of time. When UP4 comes forward, this temporary enclosure can easily be removed to allow interconnection between the buildings with no breach so long as the temporary flank wall and other temporary works are removed by the time that its temporary planning permission expires. If UP4 were not to come forward for any reason, Ark would then continue with the construction of UP3/AB4. This is because, in a scenario where UP4 is not built within the length of the temporary planning permission, the temporary permission for the flank wall would lapse and its retention would become liable to enforcement action.

Yours sincerely

A handwritten signature in blue ink, appearing to read "N. Heard".

Nick Heard
Associate Director