Planning & Economic Benefits Statement

Block 4, Union Park, Land at Bulls Bridge Industrial Estate, Hayes, UB3 4QQ

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1. Introduction

1.1. This Application

1.1.1. Since 2021, Ark have been developing the Union Park data centre campus on the site of the former Bulls Bridge Industrial Estate. Once completed, the campus, as approved, will provide approximately 60,000sqm of data centre floorspace comprising of a data centre building split into three conjoined articulated blocks, three standalone energy centres, a substation, and two visitor reception centre.

1.1.2. The first data centre building (UP1), energy centre (EC1), and visitor reception centre (VRC1) have been completed and are already occupied by a hyperscale data centre operator whilst the further two data centres (UP3 and UP3), energy centres (EC2 and EC3), and visitor reception centre (VRC2) are at an advanced stage of construction, due to be completed later this year and also to be occupied by hyperscale operators.

1.1.3. The redevelopment represents one of the most significant economic development projects within the Borough. Once operational, the facility will provide much needed data centre capacity to respond to an evidenced and ever growing UK and global need. It will attract, and the first data centre building to be occupied already has attracted, globally known and instantly recognised technology companies to have a presence within the Borough, whilst also directly providing hundreds of high skilled jobs within the digital economy onsite. The construction effort associated with a project of this scale is vast – both in terms of the number of construction staff that are required and associated supply chain, but also its duration which is likely to be over a period of circa seven years in total.

1.2. The Planning Application

1.2.1. Ark has since acquired the former Addison Lee building within Bulls Bridge Industrial Estate, directly to the west of the already permitted Union Park data centre campus. Addison Lee has long vacated the site and, whilst currently used as part of the construction of the Union Park data centre campus, the site is an underutilised parcel of land that, by virtue of its shape, size, and boundaries, is challenging to redevelop and has no long term alternative future use.

1.2.2. Ark's proposal is to redevelop the site to deliver a fourth data centre block that is to be directly connected to the to the western edge of UP3. By virtue of the scale and quantum of floorspace that Ark is proposing, the development would result in the intensification of industrial uses (and data centres have been considered as Class B8 uses) within a Strategic Industrial Location, extending the construction period and its associated economic dividend by approximately three further years whilst also increasing the number of operational jobs.

1.2.3. Ark has undertaken extensive consultation prior to the submission of this application, engaging with the London Borough of Hillingdon (LBH) and the Greater London Authority (GLA) at pre-application stage, presenting the scheme design to a Design Review Panel and engaging the local community as part of a

pre-submission consultation process. This has led to the development of a scheme that responds positively to the site's constraints, incorporates feedback received at pre-application stage, and satisfies Ark's requirements.

1.2.4. Accordingly, the description of development, as stated on the planning application form, for the application is:

"Redevelopment of site to deliver extension to existing Union Park data centre campus consisting of (a) free standing data centre building (b) energy, power, and water infrastructure (c) site access and internal roads (d) site security arrangements (e) hard and soft, green landscaping and (f) other ancillary and auxiliary forms of development"

1.3. Statement Structure

1.3.1. This Statement provides an explanation of the justification for the project, notably its compliance with relevant planning policies, outlining the significant economic benefits that the scheme will bring to the LBH and London as a whole. This Statement is therefore structured as follows:

- **Section 2** describes the site, its context and summarises its planning history;
- **Section 3** outlines the various stages of consultation and engagement between the project team and members of the public and stakeholders, as well as the pre-application process with LBH and the GLA;
- **Section 4** describes the final development proposal subject to this planning application;
- **Section 5** sets out the significance of the data sector to the economy, and the economic benefits that the proposed scheme will deliver for Hayes and the wider area;
- **Section 6** summarises the key national, regional, and local planning policies (with a full overview of the relevant planning policies provided in **Appendix A**);
- **Section 7** 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 8** provides a summary and conclusion.

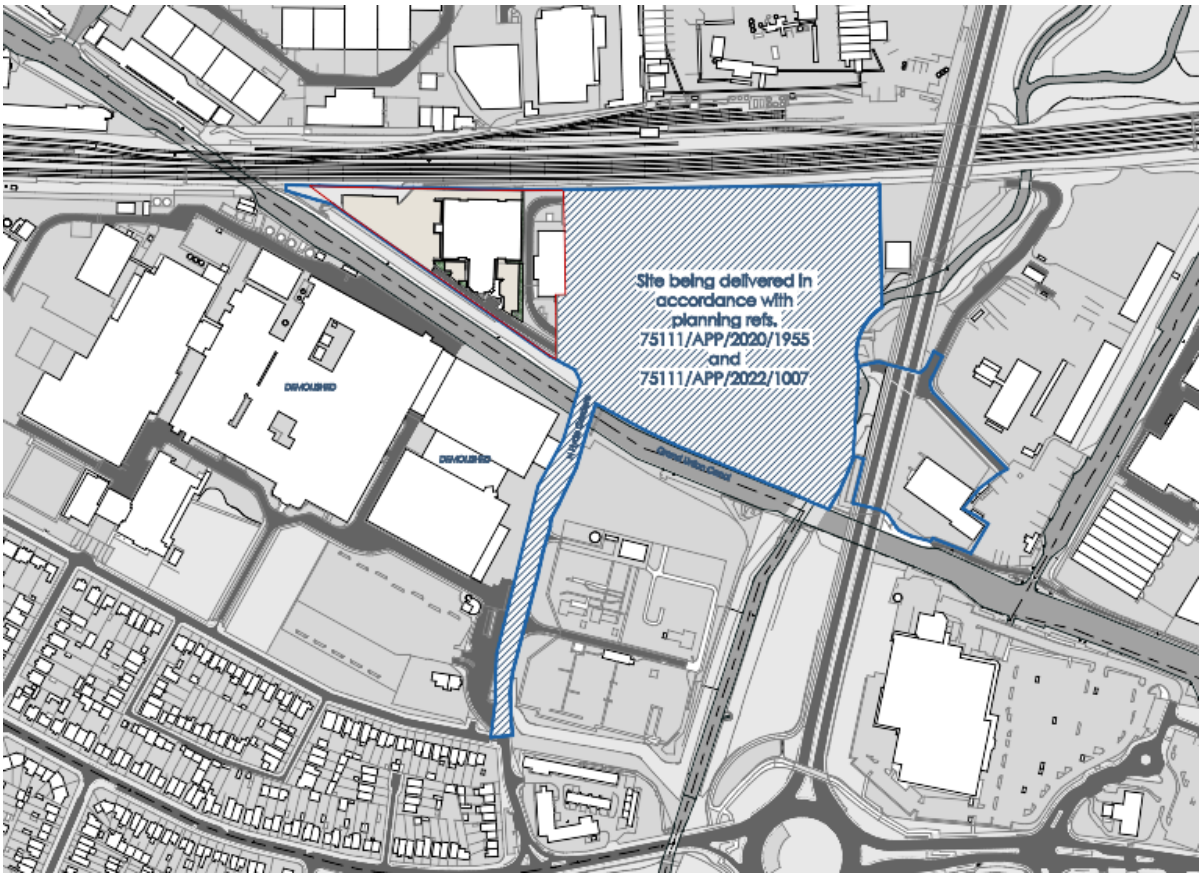
2. Site Overview

2.1. Introduction

2.1.1. This section of the Statement considers the Site's strategic location and its wider context, sets out the various existing land uses at the Site (and any relevant planning history) and provides a detailed description of the application site itself.

2.2. Site Location

2.2.1. The Site is triangular in shape, bound along its northern boundary by the Paddington to Swansea railway line, its southwestern boundary by the Grand Union Canal and associated towpath, and to the east by the wider Bulls Bridge Industrial Estate site which Ark is currently redeveloping. The location of the Site in the context of surrounding land uses is shown in Insert 2.1 below.

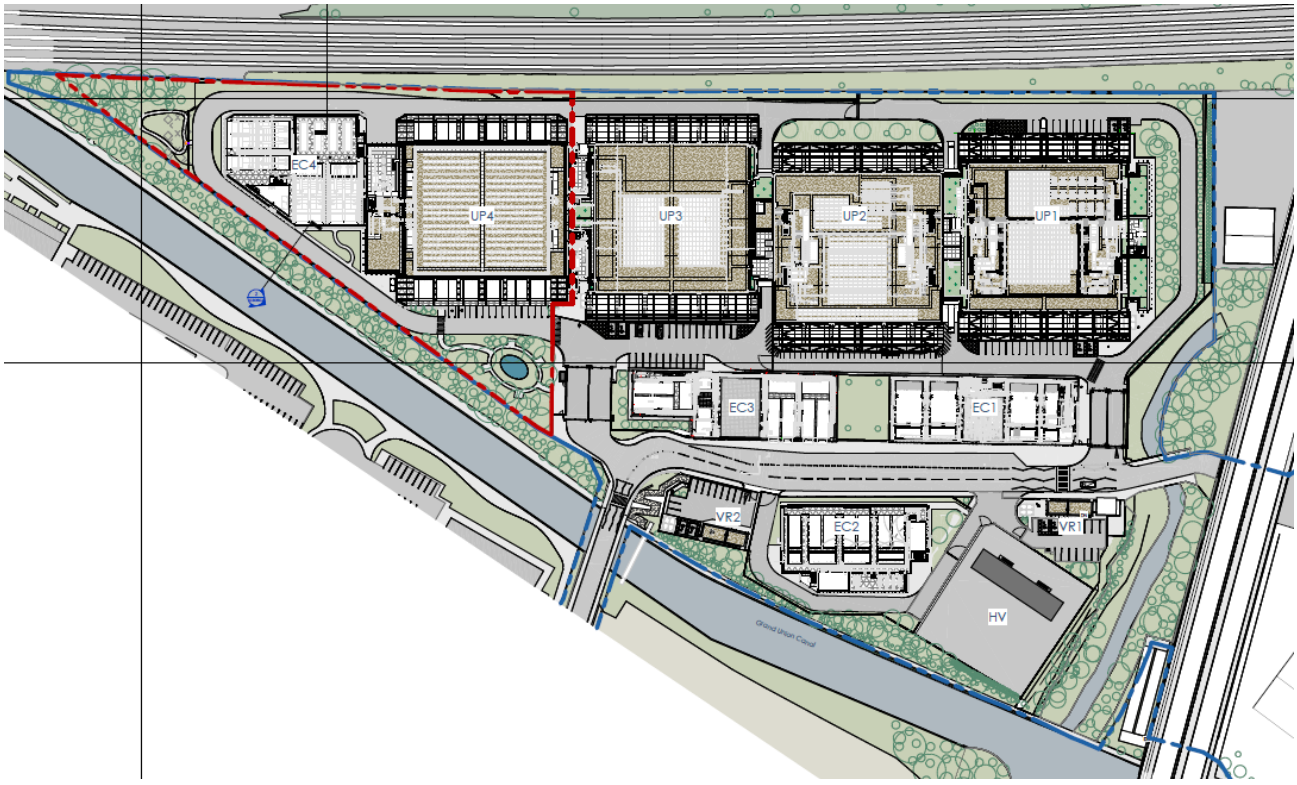


Insert 2.1: Site Location Plan (NWA, ref. NWA-0474-SW-ZZ-DR-A-010000-SW)

2.2.2. The northern boundary of the site is formed by the GWR London Paddington to Swansea main line, which is situated behind a galvanised steel palisade fence. Hayes and Harlington railway station is located approximately 500m to the west. Land uses on the northern side of the railway line are industrial in nature, with Tarmac operating a large asphalt plant, a cash and carry, and various small industrial and warehouse units.

2.2.3. The west of the application site is bound by mature trees and shrubbery. Beyond that is the Western View Railway Bridge.

2.2.4. The southern and southwestern boundary of the site is formed by the Grand Union Canal. The Grand Union Canal is connected to the Paddington Arm Canal approximately 400m to the east and is maintained by the Canal & River Trust. There is a band of trees and vegetation located between the towpath and the site which is outside of the site boundaries and is not under Ark's ownership. Further south is National Grid's North Hyde substation and the Former Nestlé site where planning permission for a major redevelopment scheme has been granted. This scheme includes 1,386 new homes focused on a cluster of apartment blocks, a local centre and commercial floorspace (which includes a data centre) (Ref. 1331/APP/2017/1883). This development, referred to as Hayes Village, adjoins the existing suburb of Cranford Park to the south and is currently under construction.



Insert 2.2: Overall Site Plan (NWA, ref. NWA-0474-SW-ZZ-DR-A-900000-SW)

2.2.5. To the east of the site is the Union Park data centre, approved under 75111/APP/2020/1955 and 75111/APP/2022/1007. 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). The description of development was as follows:

> *"Site clearance and preparation, including the demolition of remaining buildings, and the redevelopment of the site to provide: a new data centre (Use Class B8), two MV Energy Centres (including stand-by generation plant and gas storage), a HV Sub-Station, a visitor reception centre, plant, the creation of a new footpath and cycleway link to the canal towpath, works to the highway, car parking, cycle parking, associated infrastructure, enclosures and necessary physical security systems, hard and soft landscaping (including works to the River Crane) and ancillary uses, as well as associated external works"*

2.2.6. 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.

2.2.7. To ensure compatibility between the Original Permission and the Slot-In permission, a Non-Material Amendment application (ref. 75111/APP/2022/3012) under Section 96A of The Town and Country Planning Act 1990 was submitted to amend the Original Permission to ensure compatibility with the Slot-In permission. The effect of this application was to amend certain plans so that they made no reference to the Slot-In permission, remove plans that were permitted as part of the Slot-In application, alter and remove certain planning conditions to make reference to the Slot-In permission, and amend the description of development to the following:

> *"Site clearance and preparation, including the demolition of remaining buildings, and the redevelopment of the site to provide: a new data centre (Use Class B8), a HV Sub-Station, works to the highway, car parking, cycle parking, associated infrastructure, enclosures and necessary physical security systems, hard and soft landscaping (including works to the River Crane) and ancillary uses, as well as associated external works."*

2.2.8. 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.

2.3. Existing Land Use and Site Description

2.3.1. There is an existing building on site, which has a total area of circa 3,500sqm of floorspace and was formerly occupied by Addison Lee for the repair, maintenance, and replacement of private hire vehicles, sits centrally within the Site. Addison Lee has vacated the site and the building is currently used by Ark and their

contractors as a construction base whilst the adjacent permitted scheme is being delivered. Prior approval has been granted for the demolition of this building under ref. 56402/APP/2025/235 and it is anticipated that this building will be demolished whilst the application is being considered.

2.4. Existing Trees and Landscaping

2.4.1. The majority of the Site currently consists of hardstanding, with areas of overgrown shrubs and trees around the northern, western, and southern boundaries. There are small areas of ornamental planting in the south-east of the site.

2.4.2. On the northern side of the canal towpath and outside of the application site boundary is a band of mixed trees and shrubs.

2.4.3. At the time of writing, none of the trees mentioned above are covered by a tree preservation order (TPO). Most individuals within the site are of low landscape value due to being of small-size, whereas the off-site belt of trees and scrub adjacent to site contains larger individuals of greater age.

2.4.4. An Arboricultural Implications Report has been carried out by SJA Trees which assesses the trees within and around the site boundaries, and has been submitted as part of this Application.

2.5. Existing Highways and Accessibility

2.5.1. A Transport Assessment has been prepared by HDR and is submitted with this Application. As well as considering the quantum of trips that the development will generate and reviewing relevant transport policy, the assessment provides an overview of the existing situation. The existing access arrangements are summarised below.

Local Highways Network

2.5.2. North Hyde Gardens is situated to the south-east of the site, and bisects the campus which is currently being redeveloped (under application refs. 75111/APP/2020/1955 and 75111/APP/2022/1007), separating Energy Centre 2 and the HV Substation from the remainder of the development. Access to the current Addison Lee site is available from this road, just before it turns eastwards into the main body of the campus.

2.5.3. It is a two-way single carriageway road and is accessed via the north of the signalised crossroads with North Hyde Road and Watersplash Lane to the south. North Hyde Gardens is a no through way road, however, it also provides access to the other nearby employment units. To the south it joins North Hyde Road and, via the A312 immediately to the east, connects to the Great South-West Road to the south and the A40 to the north.

Pedestrian and Cycling Access

2.5.4. There is an existing footway located along the western side of North Hyde Gardens, which provides continuous link from the signalised crossroad at North Hyde Road towards the site access. The footway

along the eastern side of the road is provided in some sections until the bridge portion of North Hyde Gardens, which stops prior to the Grand Union Canal access.

2.5.5. The western footways along North Hyde Gardens provide direct access for pedestrians to the existing footways along Nestlé Avenue, which provides access to Hayes and Harlington railway station.

2.5.6. The Grand Union Canal path provides pedestrian access to the east side of North Hyde Garden bridge abutment. This has been classified as part of the 'Blue Ribbon' route and shares access with cyclists. There is no formal footway linking this access to other portions of footway along North Hyde Gardens. The London Loop and Grand Union Canal walkway both run along this towpath and the Hillingdon Trail long distance route also joins the towpath just east of the site via a pedestrian cycle ramp from The Parkway. This section of towpath is also included as part of the Quietway/Cycleway improvements initiative being undertaken by LBH in association with the Canal & River Trust.

2.5.7. There are no on-site public rights of way (PRoW) or rights of access to the Site. A PRoW follows the towpath. A canal access ramp from the towpath to North Hyde Gardens has been created as part of the re-development scheme. The canal towpath forms part of the London Loop, a circular walk around the capital and the Grand Union Canal Trail. To the east of the Parkway the canal splits with towpaths following both the northern and southern branches of the canal. The Hillingdon Trail follows the line of the River Yeading. There is more extensive open access the land within Minet Country Park to the north east.

Public Transport

2.5.8. The Public Transport Accessibility Level (PTAL) is a measurement tool grading accessibility to the surrounding public transport network, taking into account walk access time and service availability and so measures the density of the public transport network at a chosen point. The Webcat online planning tool from the Transport for London (TfL) website indicates the site currently has a PTAL level of 3, which is moderate.

2.5.9. The nearest bus stops to the development are located along North Hyde Road, approximately 500m to the south of the site, which equates to approximately six minutes walking time. The eastbound stop is located 30m west of the North Hyde Gardens and North Hyde Road junction.

2.5.10. The westbound bus stop is located along the southern site of North Hyde Road, approximately 550m to the south of the development. A puffin crossing is located along North Hyde Road, allowing pedestrians to access this bus stop.

2.6. Heritage Context

2.6.1. A Heritage Assessment has been prepared by Savills in support of the application and provides a comprehensive description of the site and its surrounding area with regard to heritage considerations.

2.6.2. In summary, this assessment confirms that there are no designated heritage assets within the site (such as listed buildings or scheduled monuments) and it does not fall within a conservation area. There are however five statutory and locally listed buildings outside the Site, and three conservation areas in the vicinity, whose settings and significance could potentially be changed by the development. The impact of the development on the above heritage assets is considered further in the accompanying Heritage Assessment (Savills, March 2025).

2.7. Ecological Conditions

2.7.1. The Ecological Assessment, prepared by Ecology Solutions, provides detailed background information with regards to the baseline ecological conditions on site.

2.7.2. There are no statutory designations of nature conservation value within the site, with the nearest statutory designation being Yeading Meadows Local Nature Reserve, approximately 2.5km to the north.

2.7.3. The Grand Union Canal and associated towpath along the southern site boundary is within the London Canals Site of Metropolitan Importance (SMI), a local non-statutory ecological designation that covers an area of 188ha.

2.7.4. In regards to habitats, overall the site is of low ecological value given it mainly comprises buildings and hardstanding. Of greatest importance is the woodland located in the northwest of the site, extending southwards to the Grand Union Canal. The off-site woodland and canal are designate a SINC. The on-site and of-site woodland will be retained as part of the development and mitigation measures put in place during construction to avoid adverse impact occurring to these adjacent habitats.

2.8. Townscape and Landscape Character

2.8.1. The Site is assessed as of low susceptibility to the proposed change of use. It comprises previously developed land with no associated landscape or green infrastructure. The Site and the immediate surrounding area do not reflect natural characteristics associated with the Northern Thames Basin NCA. The character of the Site is strongly influenced by the current on site and neighbouring industrial uses. The one remaining natural landscape corridor is associated with the River Yeading to the east of the Site. The Grand Union Canal also forms an important corridor cutting across this predominantly industrial and residential area.

2.9. Hydrology and Flood Risk

2.9.1. The Environment Agency's indicative flood maps show that the site is located within Flood Zone 1, which is deemed to have less than a 1 in 1000 (0.1%) chance of river or tidal flooding in any one year.

2.9.2. The accompanying Flood Risk and Drainage Strategy, prepared by HDR, notes that flood risk from surface water, groundwater and artificial sources have been reviewed and are low risk.

2.10. Existing Drainage

Foul Water

2.10.1. There is an existing 2134mm diameter foul sewer main line, known as the Crane Valley Sewer, which runs through the site from north to south which benefits from a build over agreement. There are no other public sewer assets within the site. All parts of the site currently discharges foul sewerage into this sewer.

Surface Water

2.10.2. The River Crane, which is adjacent the site's main campus to the east, is the current discharge location for existing surface water from the site, and is maintained by the Environment Agency.

2.11. Ground Conditions

2.11.1. Phase 1 and 2 Ground Investigation (GI) Reports have been produced by Colliers Building Consultancy Limited ('Colliers'), and submitted as part of this Application. In summary, the British Geological Survey (BGS) online mapping information indicated that the site is underlain directly by the Lynch Hill Gravel Member, which is classified by the Environment Agency (EA) as a Principal Aquifer. This is further underlain by the London Clay Formation, which is classified by the EA as an unproductive stratum.

2.11.2. The ground conditions found during the investigation comprised:

- Made Ground to 5.50mbgl;
- Lynch Hill Gravel Member of variable cohesive and granular proportions to 7.00mbgl, underlain by;
- London Clay Formation (35m+/depth unproven).

2.11.3. This broadly consistent with the historical uses of the site and BGS mapping.

2.11.4. Groundwater was identified between 2.30mbgl and 3.35mbgl (29.04 – 29.74 mAOD).

2.11.5. The results of the chemical analysis found concentrations (in soil) below the guidance values for a commercial land use. Therefore, the risk associated with contaminated soil is considered to be low. Furthermore, no asbestos fibres were identifies within tested samples during the investigation.

2.12. Air Quality Designation

2.12.1. The site is within an Air Quality Management Area (AQMA), which was declared in 2003, and covers the southern two thirds of LBH, therefore including the site. The AQMA is designated based on the levels of Nitrogen Dioxide (NO2).

2.12.2. Data from the UK-AIR and the London Atmospheric Emissions Inventory suggests that background concentrations in the vicinity of the site are generally below the key air quality standards and are predicted to decline each year.

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. NPPG also sets out how local communities can be effectively engaged in design, and how engagement activities offer an opportunity to work collaboratively with communities to shape better places for local people.

3.1.3. 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. It should be read alongside the DAS and the Statement of Community Involvement prepared by Connect Public Affairs ('Connect PA') to reflect the values set out in LBH's Statement of Community Involvement which was adopted in October 2021. There has been significant and meaningful consultation with the LBH, the GLA, the public and other key stakeholders. The DAS, alongside the Statement of Community Involvement, describe the consultation process and outcomes in detail. However, the discussions and design responses resulting from the consultation is summarised in this section of the Statement.

3.2. Consultation with the Greater London Authority

3.2.1. A pre-application meeting was held with the Greater London Authority ('GLA') on 26th September 2023. As the development is a continuation of the established Union Park data centre campus there was a good level of understanding of the proposal. The following comments were received:

- Recognition that this was an entirely appropriate location for a data centre by virtue of site's location within Strategic Industrial Land (SIL) and as reflected by planning history at Union Park;
- Welcoming of Ark's sustainability measures and keen to see these incorporated into scheme. Energy Memo provided and to be completed and returned by project team;
- Concerns around fire safety of green walls although position is subject to ongoing review and expectation that this may change within next 12 months. To be monitored depending on project timelines;
- Increased site sensitivity given proximity to Grand Union Canal and Hayes Village;
- Boundary treatment and relationship between site security and public realm;
- Urban design response if green walls to be removed; and
- Ability to break up massing of development by disaggregating development into standalone parts.

3.3. Consultation with the London Borough of Hillingdon

3.3.1. Following the consultation with the GLA, an initial pre-application meeting was held with LBH on 10th October 2023. Concerns were raised over the cumulative length of the data centre development when viewed in conjunction with the previously consented data centres adjacent. The main comments are as follows:

- Continued use of VuCity as an analysis tool was agreed;
- The logic of treating the façade of UP4 in a similar manner to UP2 was supported, however the introduction of a curved motif to the façade of UP4 was considered a negative move;
- The proximity of UP4 to the site boundary in a particularly sensitive location, opposite the Hayes Village development was a concern; and
- The importance of the southwest boundary treatment and relationship with the canal was emphasised.

3.3.2. A further pre-application meeting took place on 21st November 2024. Between the first and second pre-application meetings with LBH, the scheme was amended as below:

- The design of the data centre element was reduced in width (north-south) by 6m and moved north to increase the distance to the southwest boundary and no longer cantilever over the roadway;
- The Ancillary Building AB5 was designed with increased articulation at the upper level to reduce apparent massing;
- Energy centre redesigned and reduced in size to incorporate a design approach to seek to distinguish it further from UP4;
- The façade of UP4 was simplified, removing the curve motif; and
- Green walls were omitted from the energy centre EC4.

3.3.3. The meeting was attended by a number of LBH Officers, including specialists relating to urban design and the updated proposed designs were presented. The changes to the façade of UP4 were supported but the resolution of the design of the energy centre EC4 was not considered to be wholly successful. The proposed access route was considered to result in doubling-up of roadways at the expensive of a landscaping opportunity.

3.3.4. A follow-up workshop took place on 19th December 2024. At this meeting a more resolved approach to the energy centre was proposed, with dark aluminium cladding and a proposal to use lighting to add interest to the energy centre, which is was acknowledged would form a critical element of the built composition. In combination with this a simplified ancillary building was proposed. These changes were largely well received but concerns remained over the dark cladding of the energy centre.

3.3.5. A further workshop took place on 10th February 2025 with LBH to follow up on the comments on the previous workshop and Design Review Panel ('DRP') (which is discussed further below). Updates which were presented include changes to the entrance sequence, which had been successfully combined to a single route, increasing the area of landscaping and the façade treatment of the energy centre had been simplified and developed. The workshop was considered positive, and the design refinements well received. LBH requested details of cladding material and colours to be sent subsequently. A number of sustainability queries raised at the DRP were clarified during this session.

3.4. Design Review Panel

3.4.1. A site visit and meeting with the DRP took place on 20th January 2025. The key feedback received was as follows:

- General support for site layout and design of UP4;
- Suggestion that design approach to EC4 and AB4 needed to be simplified further and more expressive of function;
- Welcoming of approach to removal of second access limb to create larger amenity garden. Questions around whether this could be made publicly accessible;
- No real concerns around location and height of security fencing given strength of landscaping along southern boundary; and
- Queries around approach to sustainability.

3.5. Engagement with Other Bodies

Canal & River Trust

3.5.1. Ark has engaged with the Canal & River Trust throughout the design process about the proposals. A response from the Canal & River Trust was received on 21st November 2024. Feedback related to visual impact, biodiversity and ecology, lighting, drainage, and accessibility.

Network Rail

3.5.2. A meeting with Network Rail took place on 20th November 2024, which confirmed that they do not require a detailed method statement for the construction of Block 4 to be submitted for planning approval.

Metropolitan Police Service

3.5.3. A meeting with Richard Barnes GCGI, Counter Terrorism Security Advisor at Metropolitan Police Service took place on 28th January 2025. Mr Barnes noted that on 12th September 2024, the UK Government Technology Secretary, Peter Kyle, announced that the government was classing all UK data centres as Critical National Infrastructure to afford them more robust security measures. Whilst Union Park has not yet been classified as CNI, that may change in the future, especially given the very real and current threat from foreign, hostile states.

3.5.4. Mr Barnes' view raised over the proposed public 'pocket park' at this particular development from a counter terrorism perspective due to the increased potential for:

- Hostile reconnaissance to be carried out; and
- Criminal damage to (potentially), critical infrastructure.

3.6. Community Consultation

3.6.1. In accordance with Ark's commitment to community consultation, and to fully understanding the views of residents and local stakeholders, Public Relations consultants, Connect PA, has undertaken a programme of community consultation. This has included stakeholder mapping exercise identifying the relevant and key stakeholders, meetings with local elected representatives and community bodies, distribution of a leaflet to 2,100 householders (with accompanying contact information), the launching of a publicly accessible website, and engaging the local community in a public exhibition of the proposals

3.6.2. The Statement of Community Involvement, prepared by Connect, provides further information about the programme of engagement undertaken to date.

3.6.3. A public exhibition was held on 27th November 2024 at the Crane Youth and Community Association Community Centre on Fuller Way, Hayes, UB3 4LW. The exhibition was attended by two members of the public in addition to representatives from Savills, Ark, and NWA. A series of display boards were presented to the public, which included details about the proposed design of the development, and how key considerations had been addressed. Feedback from the consultation event included concerns around the potential impact of the height of the buildings and their impact on the view from residential properties in the immediate area, however the creation of jobs for the locality was seen as a positive.

3.6.4. Other feedback from Councillors and through the written feedback forms included welcoming the investment into the borough, appreciating the existing grid connection, and understanding the potential impact on the nearby residential estate. Additionally, massing and the design of the development were highlighted as points to discuss with case officers.

3.7. Environmental Impact Assessment

3.7.1. The Proposed Development falls within Schedule 2 Section 10(a) of the EIA Regulations as an "Industrial estate development projects". The criterion to be considered for Part 10 (a) Industrial Estate Development Projects is given in column 2 as "the area of the development exceeds 5 hectares."

3.7.2. The Proposed Development may also be considered to fall under Part 13(b) of Schedule 2 (changes and extensions to Schedule 2 developments) if the LPA considers this project to be an extension of the already consented data centre development, however the criteria for Part 13(b) would be the same as Part 10(a).

3.7.3. The area of this development proposal is on a site of around 1.26ha which is below the 5ha threshold. However, when considered in combination with the adjacent site to the east, the total area of both

developments exceeds this. Whilst the development to the east does not form part of the Proposed Development and benefits from planning consent data centres under applications 75111/APP/2020/1955 and 75111/APP/2022/1007, given the Applicant is the same and the potential for cumulative impacts, although no formal screening was undertaken, it was agreed with the LPA that the proposed development would qualify as EIA development and as such Environment Statement will be prepared to accompany the planning application with this to focus on climate change and air quality.

3.7.4. A formal scoping exercise has not been undertaken, however through discussions with the LPA, a clear steer has been provided on the required scope. Notwithstanding this, separate technical discussions have been held as part of the pre-application consultation to confirm the assessment scope for the topics scoped into the EIA.

3.7.5. An Environmental Statement (ES) accompanies the application for planning permission, providing environmental information about the scheme, including a description of the development, its predicted environmental impacts and the measures intended to mitigate any adverse impacts. It is provided to allow a wider public understanding of the environmental effects of the project.

4. Proposed Development

4.1. Overview

4.1.1. Data has become an indispensable part of modern life, driving innovation, economic growth, and social advancement. In the UK, the significance of data and data centres cannot be overstated. These facilities are the backbone of the digital economy, enabling the storage, management, and security of vast amounts of information.

4.1.2. Using Ark's significant experience of the data centre sector, and in line with the need for additional data capacity in the UK (particularly within the M25), Ark is planning to expand its existing data centre campus by adding a fourth data centre block. This new block will provide additional floorspace, enhancing the overall capacity of the campus. The proposed expansion is part of Ark's ongoing commitment to developing its data centre facilities to meet growing demand. Accordingly, the description of development is as follows:

> *"Redevelopment of site to deliver extension to existing Union Park data centre campus consisting of (a) free standing data centre building (b) energy, power, and water infrastructure (c) site access and internal roads (d) site security arrangements (e) hard and soft, green landscaping and (f) other ancillary and auxiliary forms of development"*

4.1.3. The site is a challenging one to develop for a data centre three primary reasons. Firstly, it is triangular in shape when generally data centres and their various components most comfortably sit as rectangles or squares. Secondly, it is the closest part of the former Bulls Bridge Industrial Estate to sensitive residential receptors. Thirdly, being the last part of the former Bulls Bridge Industrial Estate to be developed, it needs to be able to be constructed with the already permitted data centre in place

4.2. Site Layout

4.2.1. The proposed Site Layout Plan is shown below in Insert 4.1.

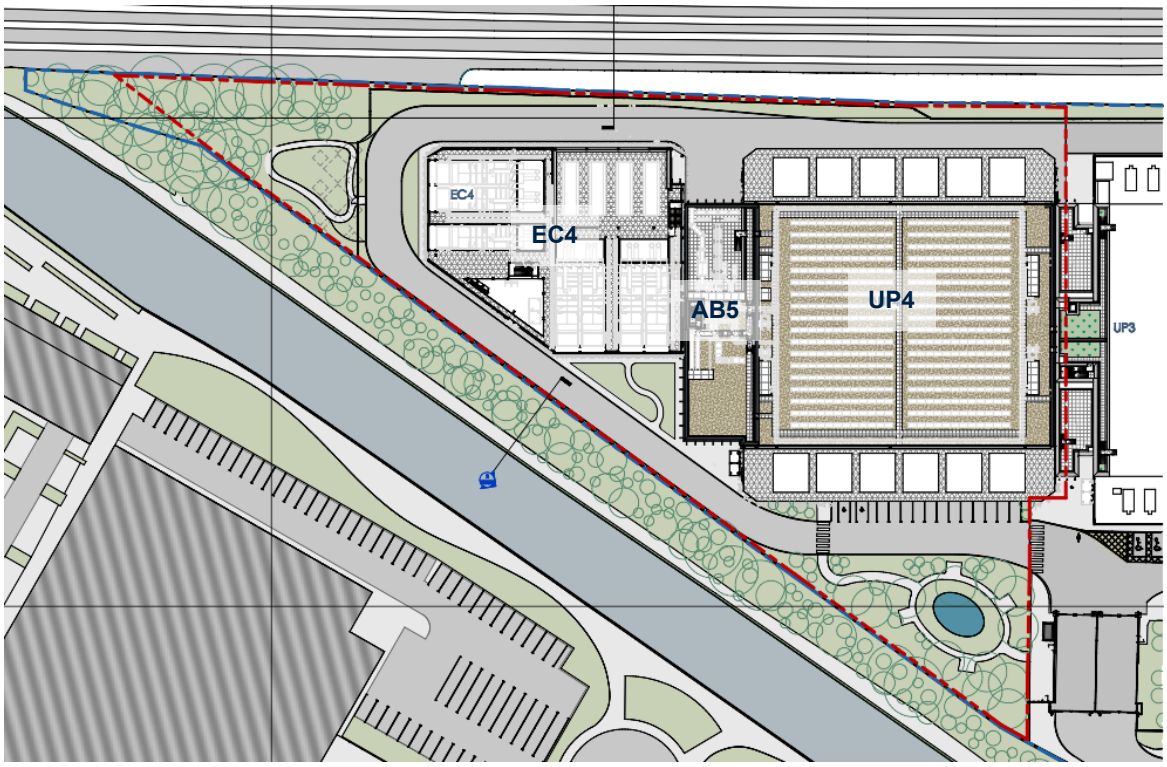


Figure 4.1 Enlarged Site Plan (ref.NWA-0474-SW-ZZ-DR-A-900001-B4)

4.2.2. The data centre element of UP4 is proposed to connect to the Ancillary Building (AB4) of the adjacent consented UP3 project. This allows flexibility of use if the two data centres are taken on by the same occupier but can also be used if UP3 and UP4 are occupied by independent tenants. The data centre is the largest element of the proposal and locating it adjacent to AB4 maximises the distance from the residential Hayes Village development whilst the triangular nature of the site also precludes locating the data hall to the west.

4.2.3. The ancillary building (AB5) for UP4 is proposed to run north south and adjoin the west elevation of the data centre block. This follows the pattern of the Union Park campus, using set-back ancillary buildings to break up the elevation of the neighbouring data centres. AB5 is the building with the most active façade in the proposal, using it to add interest and separate the more introverted data centre and energy centre has good compositional advantages.

4.2.4. The energy centre (EC4) is proposed to be located immediately to the west of, and conjoining with, AB5. This minimises the overall footprint and keeps the building as far from the residential Hayes Village development as possible. This arrangement also minimises the extent of façade and limits cable run distances.

4.2.5. Arranging the buildings in this order means that they step down in height moving west towards the residential development.

4.2.6. A link road is designed to run from the southeast corner of the site, connecting to the primary entrance of the Union Park Campus at the north side of North Hyde Gardens Bridge, and run clockwise around the proposed buildings, before turning east and connecting with the access route to the rear of the adjoining UP3 development. Running the access round around the outside of the buildings maximises the distance between the buildings and the site boundaries. This has advantages for construction, plant replacement and in protecting trees beyond the site boundary.

4.3. Data Centre Building

4.3.1. A data centre is a highly controlled environment designed for the continuous operation of computer servers.

4.3.2. The overall height of UP4 is 32.25m. This is the same height as for UP1, UP2, and UP3 and is compliant with Aviation threshold.

4.3.3. The gantries of UP1 and UP3 express the structure of the gantry supporting frame with large scale perforated panels recessed within this framing. In contrast UP2 has been designed with tapering vertical fins that sit in front of the gantry framing. UP4 belongs to this family of buildings in form and arrangement so has been designed in a similar design language. To establish an ‘A,B,A,B’ pattern UP4 follows the expression of UP2, using vertical fins as screening rather than expressing the frame.

4.3.4. The fins on UP2 are vertical and taper, being wider at the top and narrower at the bottom. As UP4 will be viewed form a variety of angles the fins were designed to be three dimensional, consisting of two flat vertical aluminium panels meeting to form a triangle. The southern elevation of the building is shown in Figure 4.2 below.

Figure 4.2 South Façade 3D View (ref. studioNWA)

4.3.5. PV panels and brown roofing are proposed at roof level.

4.4. Energy Centre

4.4.1. The Energy Centre provides back up power and consists of 14 generator sets as well as control rooms to host switchgear and other electrical equipment were required. There are certain requirements around adjacencies, stacking, plant replacement, and CFD modelling that defines the relationship between all of these elements and, of all elements of the site, this is arguable the element where form and design must follow function.

4.4.2. The façade is conceived as a series of triangular fins with a similar design to UP4. In contrast to UP4, these fins will be in dark grey powder coated aluminium (RAL 7016) whilst a waved approach is incorporated into the façade to add variety and allow visibility through the façade and into the building from various views.

4.4.3. To further soften EC4, in addition to the functional lighting required, it is proposed to include feature lighting to this building. This is discussed further below in the lighting section.

4.5. Ancillary Block

4.5.1. The ancillary building ('AB5'), which sits between UP4 and EC4, contains the office space for the development, as such it has the most transparent façade. This office accommodation overlooks the canal, providing views out for the occupants and a more human-scale, active façade for those looking at the building from across the canal.

4.5.2. The external fins provide practical solar shading and draw on the design of AB1 which book ends the Union Park development at the east end. The colour of AB5 is dark grey powder coated aluminium to match EC4 and provide a contrast to UP4.

4.6. Highways

4.6.1. The access into the site is to be located immediately off the bend in North Hyde Gardens, which is to have controlled access gate and pedestrian access. The access point is proposed to be designed as private secure entrance and exit and based on observed vehicular speeds along North Hyde Gardens, appropriate visibility splays of 2.4m x 43m are achieved as demonstrated within the submitted Transport Assessment (ref. HDR-0474-XX-XX-REP-C-00003).

4.6.2. The proposed amount of car parking spaces to align with BREEAM recommendations for the targeted 'Excellent' rating of the UP4 is 14 number spaces. 20% of these spaces will be provided with active electric vehicle charging points and 20% passive provision for electric vehicles in the future. Furthermore, based upon consultation with LBH, two of the car parking spaces will be for blue badge holders and additional spaces for motorcycles, mopeds and scooters will be provided at the rate of 5% of car parking spaces.

4.6.3. A total of eight cycle spaces will be provided for the development and located close to the pedestrian access to the data centre building.

4.7. Landscaping and Trees

4.7.1. The Landscape Masterplan integrates planting within the large-scale urban development to enhance species diversity and ecological biodiversity. It has been designed in coordination with the Townscape and Visual Impact Assessment.

4.7.2. Detailed landscaping plans have been prepared by Murdock Wickham, and have been submitted as part of this application. The plans detail the comprehensive landscaping measures that are incorporated into the proposals. The key features of the proposed landscaping scheme are as follows:

- The existing woodland on the western side of the site has been preserved with appropriate management and additional scrub planting. To the east of the woodland, a turning area for heavy vehicles has been incorporated using species-rich reinforced grass. This space is framed by a gravel recreational path, scattered tree planting, and timber benches, creating a space that is not publicly accessible but is usable for staff.

- A well-being garden has been created for staff to the south of the site. The garden features picnic tables, vibrant planting, and ecological pond. Planting is strategically positioned to provide a natural screen from the nearby buildings and car park to the north, with trees and hedges lining the northern and eastern boundaries. Seating areas and pathways are oriented to provide views over the adjacent Grand Union Canal. This is not to be publicly accessible.

- Green and brown roofs with sedum planting are proposed, providing a landscape treatment to the roofscape, to be designed in conjunction with services and facilities, enhancing the biodiversity of the roofs.

- A stylised, south-facing 'Parairie' garden designed with an ecological focus provides seasonal interest and vibrant colour, featuring a variety of pollinator-friendly plants to boost biodiversity. It includes integrated seating areas to provide a tranquil space.

4.7.3. The Urban Greening Factor (UGF) calculations follows the Mayor of London, London Plan Guidance for Urban Greening Factor 2023. The landscape design has maximised the areas for landscaping and ecological enhancements achieving a UGF of 0.39.

4.7.4. To accommodate the proposed development, as shown on the proposed layout plan submitted as part pf this application, seven individual trees (nos.1-7) and one group of trees (G1) are to be removed because they are situated within the footprints of proposed structures or surfaces.

4.8. Security

4.8.1. Given the nature and operations of a data centre, site security forms an essential element of the proposed design and the proposal is designed to highest security standards and is to comply with Government Protection of National Infrastructure. The scheme will maintain a high level of discrete surveillance with good lighting within the development, security cameras and 24 hour guard patrols. The site will be active throughout day and night due to shift work and deliveries to the premises

4.8.2. There is existing fencing to the north and western corner of the site along the railway track, which is to be retained. A 4m high fence (3100mm weld mesh with 900mm barbed wire) is proposed to sit in front of this. This is consistent with the fencing that has already been approved across the wider Union Park campus.

4.8.3. The existing barbed wire-topped fencing to the southwest boundary will be removed and replaced with 3.5m high weld mesh fencing with an anti-climb topping. This fencing will run north along the south west boundary.

4.9. Lighting

4.9.1. An External Lighting Strategy (HDR, ref. HDR-0474-SWS-XX-REP-E-610006) has been submitted as part of this application, and provides details about the various means of lighting that are incorporated into the design of the scheme.

Lighting levels across Block 4 have been determined based on specific client requirements, ensuring adequate illumination for pedestrian and vehicular access while considering security needs, particularly for CCTV and perimeter security.

4.9.2. The proposed external lighting strategy is designed to achieve a balance between safety, functionality, and the environmental constraints. Under normal operation, which is expected to be the dusk-dawn period, light spill will not exceed 5 lux across the site boundary. Foliage along the site boundary with the canal helps prevent light spill to the bat foraging corridor, and light spill along the site boundary with Network Rail is limited to less than 2 lux.

4.9.3. In addition to the functional lighting required for the operation of UP4, AB5 and EC4, it is proposed to include feature lighting to the energy centre EC4. The intention is to install lighting to the access gantries that sit between the perforated aluminium façade and the generators, as well to the circulation zone in the southwest of the energy centre. The aspiration is to produce a warm glow, adding interest to the form of the building in the evenings; this needs to be balanced with the need to avoid excess light spillage to either the tree line along the canal banking or to the Network Rail line to the north. To achieve this the lighting is designed to be indirect and rely of diffuse reflection rather than direct lighting shining out through the façade.

4.10. Drainage

Surface Water

4.10.1. It is proposed to discharge surface water from the development via two separate connections to the surface water drainage system serving the rest of the campus. The surface water run-off from the entire campus is discharged into the River Crane, utilising the existing 675mm diameter outfall.

Foul Water

4.10.2. Foul water is proposed to be a separate network to the surface water, with foul water discharging into the existing drainage network serving the rest of the campus. There is an existing 2134mm diameter foul sewer main line, known as the Crane Valley Sewer, which runs through the site from north to south which benefits from a build over agreement.

4.11. Sustainability and Energy Use

4.11.1. The proposals have been developed with sustainable design principles at its core, through adopting a considered holistic and integrated design approach. Indeed, Ark considers itself as a leader in delivering and operating sustainable developments within its industry, and this is particularly true of the proposals for Union Park. From the inception of the project Ark and its design team have strived for the highest environmental performance possible for the proposed data centre use.

4.11.2. As reported in detail in the Sustainability Statement and Energy Statement submitted with this application, Ark has strived to harness cutting edge technologies and design to minimise on-site energy consumption

and emissions, through regulated and un-regulated demand. As reported in the Sustainability Statement, a Whole Life Cycle Analysis of the proposed development has been undertaken, which embraces Best Available Technology (BAT).

BREEAM Strategy

4.11.3. As set out in the BREEAM Pre-Assessment Report which accompanies this application, the target BREEAM rating for the project is Excellent which requires a score of at least 70%. This pre-assessment shows that at this stage a score of 72.16% should be achievable.

Low Carbon Technologies

4.11.4. Low carbon technologies have been utilised in the proposed development in the form of heat pumps, electric vehicle charging bays, and photovoltaic panels (PVs). Wherever possible, the technologies employed seek to reduce carbon emissions and atmospheric pollution.

Minimising Carbon Dioxide Emissions

4.11.5. An Energy Statement is submitted with this planning application which confirms how the proposed development aspires to deliver a minimum on-site carbon dioxide emission reduction of over 35% beyond the baseline Part L Vol2 2021 building. The strategy has been prepared in accordance with the GLA's 'Be Lean, Be Clean, Be Green, Be Seen' hierarchy.

Materials & Construction

4.11.6. Materials have been chosen that have a minimal environmental impact, are from sustainable or recycled sources and where feasible, will be locally sourced to avoid transportation impacts. The design team recognises and will encourage measures to optimise construction product consumption efficiency and the selection of products with a low environmental impact, including embodied carbon, over the life cycle of the building. The specification of recycled and reused materials will be a main design consideration, wherever feasible.

Waste

4.11.7. Ark is committed to becoming a zero-waste landfill business by thinking of waste as a resource, with the aim of achieving increased efficiency, cost savings, lower environmental impact and carbon reductions. Ark has a commitment to follow the waste hierarchy and implement initiatives that encourage waste producers to reduce their overall waste and prevent waste production wherever possible.

Water Use

4.11.8. Water efficiency measures will be included where possible in order to reduce mains water consumption on the site, reusing water on site where possible and specify water efficient internal sanitary ware and appliances.

5. Benefits and Need for Data Centres

5.1. Introduction

5.1.1. This section of the Planning Statement outlines the importance of data and data facilities to overall economic performance, creativity, innovation and economic resilience. It also explains the number of jobs to be generated directly by the proposed development.

5.2. Strategic Economic Benefits

5.2.1. Given the historical and ongoing growth in the data sector, the economic impact of the data centre, and data centres as a whole, is substantial. Data centres are poised for unprecedented growth, with the potential to contribute an additional £44 billion to the UK economy by 2035[1].

5.2.2. The 'Foundations for the Future' Report, produced by TechUK (November 2024) found that data centres contribute approximately £4.7 billion in Gross Value Added (GVA) annually to the UK economy and support around 43,500 jobs, whilst contributing £640 million in tax revenue[2]. TechUK's analysis emphasises that if the UK can increase data centre supply above its recent growth rate of 10% to 15% a year, this could have a transformative impact on the sector and wider UK economy by 2035, unlocking:

- A GVA boost: £44 billion additional GVA between 2025-35 from the construction and operation of data centres
- An employment boost: 40,200 additional jobs directly employed in (often high-paid) data centre operational roles by the year 2035; 18,200 additional jobs directly employed in data centre construction roles over the period 2025-35
- A tax boost: an additional £9.7 billion in tax revenue generated by the industry.

5.2.3. The Economic Estimates: Employment in the Digital Sector publication[3] found that during the 2023 calendar year, there were a total of approximately 1.9 million filled jobs in the Digital Sector, representing an increase of approximately 5,200 filled jobs compared to 2022. In both 2022 and 2023, the Digital Sector made up 5.6% of filled jobs in the UK overall.

[1]TechUK (November 2024) https://www.techuk.org/resource/techuk-report-foundations-for-the-future-how-data-centres-can-supercharge-uk-economic-growth.html

[2] TechUK (November 2024) https://www.techuk.org/resource/techuk-report-foundations-for-the-future-how-data-centres-can-supercharge-uk-economic-growth.html

[3] Department for Science, Innovation & Technology (January 2023 to December 2023) https://www.gov.uk/government/statistics/economic-estimates-employment-and-earnings-in-the-digital-sector-january-2023-to-december-2023/economic-estimates-employment-in-the-digital-sector-january-2023-to-december-2023#references

5.2.4. The UK tech sector overall reached a record combined market valuation of $1.08 trillion in 2023. That's an 8x increase in value over the past decade, up from $133b in 2014, and an almost 2x increase compared with five years ago. London alone has a combined market valuation of $648.6b in 2023[4].

5.2.5. Additionally, the UK has attracted significant foreign investment in data centres, with recent commitments totalling £6.3 billion from major tech firms. This brings the total investment in UK data centres to over £25 billion since the current government took office[5]

5.3. Job Creation

5.3.1. The Homes & Communities Agency's (HCA) Employment Density Guide 2015 crudely quantifies what quantum of floorspace is required to support a single job and therefore can be used to calculate the number of jobs a development of a certain size and balance of uses can realistically be expected to generate.

5.3.2. The Guide notes that data centres have a completely different employment impact than other storage facilities and therefore require their own classification with the matrix. It also notes that there are different types of data centre, which generate different employment levels. The proposed development is best defined as a 'co-location facility' (where a customer leases a space within a data centre with the site managed on site by a service provider). Noting that the size of data centres can vary significantly, there is considered to be little difference in employment generation based on data centre size. It is the operational model that is the key driver. The employment density of a co-location facility is considered in the HCA Guidance to vary from one FTE job per 180 to 540sqm.

5.3.3. Ark has analysed site occupancy at their existing data centre campuses. For the purposes of the analysis Ark considers the two main user groups as:

- Technical Support Staff: These are the site managers, engineers, technicians, security officers employed by Ark and their supply chain to support the day to day operations of the campus. For most of these occupants the campus is their main place of work.
- Client Staff: these are the site managers, engineers, technicians, security officers employed by Ark's customers to support their specific requirements within their rented space. Some 50% of these occupants are visitors to the campus.

[4] Tech Nation (2024) live.ff.co/l/800123/2024-07 08/36l4gp/800123/17204293508I8Y8tzr/The_Tech_Nation_Report_2024___UK_Tech_in_the_Age_of_AI.pdf

[5] Department for Science, Innovation and Technology (October 2024) https://www.gov.uk/government/news/tech-secretary-welcomes-foreign-investment-in-uk-data-centres-which-will-spur-economic-growth-and-ai-innovation-in-britain

5.3.4. Based on the above split (And as accepted as an appropriate metric for the Original Planning Permission),and the capacity of deployed data centre space (MW (of IT)), each MW of data space generates, on average, the following number of jobs:

- 2.29 Technical Support Staff/MW(IT); and
- 3.45 Client Staff/MW(IT).

5.3.5. The IT capacity of the proposed development is 28MW(IT), and so based on this average density, this translates into:

- 64 Site Based Technical Support Staff; and
- 97 Site Based Client Staff.

5.3.6. This equates to 161 jobs. Instinctively, this feels high and there will inevitably be a degree of efficiencies in job creation given that the proposal is effectively for an extension to the existing and permitted data centre campus rather than a new standalone facility. Nevertheless, it is clear that the development will provide a number of jobs, more likely between 50 and 100. Crucially, jobs in data centres tend to be highly skilled and therefore command higher salaries compared to more traditional sites and industries[6].

5.4. Skills and Training

5.4.1. Ark is committed to work with the LBH to ensure that the benefits of the employment opportunities that are brought to an area are felt within the surrounding community. Certain commitments were required as part of the Section 106 for the Original Planning Permission and Ark expect similar obligations to be applied to any permission for this site.

5.4.2. Ark run apprenticeship programs at other data centres that they operate and would hope to extend this to Union Park when operational. This would support the UK has ambitious plans for apprenticeships, which include seeking to reform the apprenticeship system to better support young people and address skills gaps in critical sectors.

5.4.3. Aligned to this, Ark work alongside UTC Heathrow as part of their 'Digital Futures Program', which aims to provide young people with the skills to work in the digital economy in the future.

[6] TechUK (November 2024) https://www.techuk.org/resource/techuk-report-foundations-for-the-future-how-data-centres-can-supercharge-uk-economic-growth.html

6. Planning Policy

6.1. Introduction

6.1.1. This section of the Planning Statement summarises the key messages contained within the national, regional, and local planning policies relevant to the determination of this application, either as part of the development plan, or as material considerations. A full overview of all planning policies considered pertinent to the site and the proposed form of development are contained in **Appendix A**, which includes reference to all technical and environmental planning policies.

6.2. Legislative Context and Development Plan

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

6.2.2. The development plan for LBH includes the following plans:

- 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).

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

6.2.4. Whilst not having development plan status, the National Planning Policy Framework (December 2024) (NPPF) is evidently a material consideration in the determination of planning applications.

6.2.5. LPP1 is of some age, having been adopted in November 2012. The Plan Period for LPP1 runs until 2026. LPP1 was examined, and adopted, subsequent to the NPPF in 2012 so to a large degree reflects an, albeit, previous version of the NPPF. The NPPF sets a presumption in favour of sustainable development, indicating in Paragraph 11 what this means for decision-taking depending on whether there is either an up to date development plan (Paragraph 11c) or an out of date development plan (Paragraph 11d). As, overall, the policies of LPP1 remain up to date, including with NPPF 2024, it is not considered at the time of writing that there is any need to engage part d of Paragraph 11. Therefore, as there is considered to be an up-to-date development plan, the decision maker is expected to approve development proposals that accord with the development plan without delay.

The London Plan (March 2021)

6.2.6. The London Plan, revised in March 2021, provides the Spatial Development Strategy for Greater London. It outlines a framework for the city's development over the next 20-25 years, aligned with the Mayor's vision for Good Growth.

6.2.7. Paragraph 6.4.1 of the London Plan recognises that London depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners, including emerging activities such as data centres.

6.2.8. Policy GG5 is concerned with conserving and enhancing London's global economic competitiveness. The policy encourages the promotion of the strength and potential of the wider city region, and seeks to ensure that London's economy diversifies. The policy also notes that those involved in planning and development must plan for sufficient employment and industrial space in the right locations to support economic development and regeneration. Supporting text notes that the right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working.

6.2.9. Policy SI6 is concerned with digital connectivity infrastructure and outlines criteria to ensure London's global competitiveness now and in the future. It is recognised that for some types of developments specific requirements regarding communications access and security may apply, and that data centres, in particular, depend on reliable connectivity and electricity infrastructure.

6.2.10. Fundamental to this application, is the fact that the London Plan designates the Hayes Industrial Area, in which the site falls within, as a SIL and thus the site is part of one of London's main reservoirs of industrial and related capacity. Policy E5 states that these locations should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy. It also notes that development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function, which includes *'storage and logistics/distribution (Use Class B8)'.*

6.2.11. The London Plan includes a number of policies which underpin London's response to climate change, notably Policy SI 2, which sets out targets for minimising greenhouse gas emissions for development. Other policies relating to sustainable design, renewable energy, overheating and cooling, urban greening, flood risk and water are outlined in **Appendix A**. This also includes a summary of the relevant transport and accessibility policies.

6.2.12. Policy D1 is concerned with London's form, character and capacity for growth, and sets out that high design quality is a priority, with developments expected to be attractive, functional, and sustainable. Development must also the best use of available land by optimising site capacity.

6.2.13. Policy D9 is specific to the location and design of 'tall buildings' which are defined generally as those that are substantially taller than their surroundings and cause a significant change to the skyline. It's noted that tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can also help people navigate through the city by providing reference points and emphasising the hierarchy of a place, and can make a positive contribution to London's cityscape.

6.2.14. Also of note and relevance in the London Plan, are the policies relating to the Blue Ribbon Network which broadly, offer support for improved accessibility it, the protection and improvement of it and proposals which restore and enhance it, through a number of options including naturalising river channels and increasing habitat values.

Local Planning Policy

6.2.15. As noted above, local planning policy comprises two parts, LPP1: Strategic Policies and LPP2: Development Management Policies and Site Allocations and Designations. The adopted Proposals Map confirms that the site is located within a SIL, and that land surrounding the site is subject to there are other designations (see **Appendix A** which includes an extract of the Proposals Map).

6.2.16. The Local Plan, comprising of LPP1 and LPP2, in consistent with the NPPF and the London Plan in respect of its policies for economic growth and the protection of SILs (which is also considered a Preferred Industrial Location, or PIL, in the Local Plan).

6.2.17. Likewise, the Local Plan seeks to ensure that all new development is of high quality, responds to local character, improves environmental quality and includes a safe network of routes. With regard to 'tall' buildings specific guidance is provided in Policies BE1 and DMHB10 that they should not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views.

6.2.18. The Local Plan includes a suite of other policies relating to climate change, the Blue Ribbon Network, flood risk and drainage, transport, heritage, design considerations and biodiversity – which are summarised in **Appendix A.**

6.3. Other Policy and Guidance

The National Planning Policy Framework (NPPF) (December 2024)

6.3.1. The NPPF sets a presumption in favour of sustainable development in paragraph 11 which states that, where there is an up-to-date development plan, local planning authorities (LPAs) should approve development proposals that accord with the development plan without delay.

6.3.2. The NPPF seeks to promote building a strong and competitive economy and encourages the support for proposals that foster economic growth, particularly where it responds to future changes and drives innovation. Indeed, paragraph 85 expects that significant weight should be placed on the need to support economic growth and productivity, and that this should address the challenges of the future. This means that planning decisions should recognise and address the specific locational requirements of different sectors, including networks of knowledge and data driven or high technology industries (paragraph 87). This is important context to this application on the basis that data centre development, especially of this size which attracts hyper-scale users, has specific locational requirements which means that findings sites which are suitable, available and viable for the use is not a simple task. The suitability of the sites will often depend on the availability of sufficient energy infrastructure and connection to the national grid, as well as more general environmental factors and local considerations.

6.3.3. The NPPF also recognises the significance of the digital sector, and high quality internet and telecommunications services to cater for this. This explicitly references the need for the planning system to set out how high quality digital infrastructure should be delivered. This reflects the broader economic strategy identified in section 5 of this Statement.

6.3.4. Paragraph 124 of the NPPF, as does regional and local planning policy, requires that planning decisions promote the effective use of land, and therefore making as much use of brownfield land.

6.3.5. The NPPF provides a criteria based policy, in paragraph 135, for considering the design of proposed development. This includes consideration of the effects on the overall quality of the area and being sympathetic to local character and history, but is clear that this assessment needs to ensure that that it does not prevent or discourage appropriate innovation or change and requires design to optimise the potential of the site. It should also be noted that the NPPF expects that 'significant weight' should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they 'fit' with overall form and layout of their surroundings (paragraph 139).

6.3.6. The NPPF also includes a number of other policies relating to transport, climate change and flooding, the natural environment and heritage which are summarised in **Appendix A.**

7. Planning Assessment

7.1. Introduction

7.1.1. Having described the site, outlined the proposals, and presented the relevant national, regional, and local planning policy, this section of the Statement will assess the proposals as per the identified key considerations and matters pertinent to this application.

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

- Principle of Development;
- Design;
- Visual and Townscape Impact;
- Daylight and Sunlight;
- Impact on Heritage Assets;
- Sustainability and Energy Use;
- Infrastructure and Utilities;
- Transport and Parking;
- Air Quality Impacts;
- Trees;
- Landscaping;
- Lighting;
- Ecology;
- Noise;
- Flood Risk; and
- Ground Conditions.

7.1.3. Taking each of the above considerations in turn, each section, if necessary provides an overview of the response to the consideration is provided (including a summary of any other technical reports and assessments). Then, the assessment considers the compliance of the proposals with the relevant development plan policies and then identifies any other material considerations, as relevant to each of the matters in support of the proposal, including compliance with the policies and guidance contained in the NPPF (2024) and the London Plan (2021).

7.2. Principle of Development

The acceptability of a B8 use in the SIL

7.2.1. The application site is located within a Strategic Industrial Location. The London Plan describes SILs as the capital's main reservoir of land for industrial, logistics and related uses. SILs are given strategic protection because they are critical to the effective functioning of London's economy. Policy E4 of the London Plan states that a sufficient supply of land and premises in different parts of London to meet current

and future demands for industrial and related functions should be provided and maintained whilst Policies E5 and E7 of the London Plan encourages the intensification of industrial uses within SILs

7.2.2. The proposal is for a fourth data centre block as an extension to the data centre campus as already permitted. The determination of applications for data centres both by LBH specifically and across London more broadly have confirmed data centres to be Class B8 uses that are suitable for SILs. This is best demonstrated by the granting of planning permission for the redevelopment of the remainder of the former Bulls Bridge Industrial Estate to deliver the data centre campus buildings adjacent to the site.

7.2.3. At present, the applciation site is used for construction purposes associated with the wider data centre campus that Ark is constructing but this application proposes a long term use for the site, delivering a significant intensification of industrial floorspace within a SIL.

7.2.4. Therefore, the proposed development complies with Policies E4, E5, and E7 of the London Plan. At a local level, the proposed use also compliant with LPP1 Policy E1 and Policy E2, LPP2 Policy SEA1 and Policy DME1.

Re-use of brownfield land and the intensification of industrial land

7.2.5. The site is previously developed (or brownfield) land and the proposals are also therefore in accordance with NPPF Paragraph 124 which promotes the efficient use of land and the need to give substantial weight to the value of using suitable brownfield land for identified needs.

7.2.6. Paragraph 129 of the NPPF also reminds LPAs that decisions should support development that makes efficient use of land, and take into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement. This is relevant to this application because there is a technical requirement to ensure that the data centre building, and its supporting infrastructure, is as efficient as possible to ensure maximum storage and processing capacity. Furthermore, as described below, data centre development does have specific locational requirements which means that the availability of other sites, which would be suitable of accommodating the proposed use, are limited (especially with regard to sites within SILs where this type of development is directed to by planning policy).

7.2.7. Policies D1, D2, and D3 of the London Plan identify clear encouragement of industrial intensification, requiring that development plans should assess the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth. As considered below in detail, the proposed development is proportionate to its infrastructure requirements and the capacity of existing infrastructure to support it, and is an outcome of an involved design process which has resulted in a proposal that recognises and responds appropriately to the site's attributes and its context.

7.2.8. Therefore, it is clear that the proposed development accords with policies to make the most efficient use of land, and particularly the encouragement for proposals that result in the intensification of industrial uses.

Delivering Economic Growth

7.2.9. In addition to the acceptability of the proposed land use and its alignment with relevant policies, the economic benefits that the proposed development will bring to the local, regional, and UK economy are also significant considerations in the determination of this application.

7.2.10. Section 5 of this Statement highlights the increasing demand for data centre capacity and the economic advantages generated by a strong data sector but, broadly speaking, the economic benefits associated with this development are as follows:

- The extension of the construction period of Union Park for a further three years. This is significant given that, during peak construction periods, approximately 800 construction staff can be onsite;
- The provision of additional operational jobs. It is anticipated that a total of between 50 and 100 jobs will be provided at operational stage with these being high skilled and high paid;
- Additional data centre storage capacity is provided, responding to a well-known and documented national and global need;
- Increased business rates;
- Further planning obligations, both in the form of Section 106 contributions and Community Infrastructure Levy.

7.2.11. The proposed development therefore complies with London Plan policies GG5, E4, E8, LLP1 Policy E7, and Paragraphs 85 - 87 of the NPPF.

Tall Building Considerations

7.2.12. The London Plan defines tall buildings as *'generally those that are substantially taller than their surroundings and cause a significant change to the skyline'.* Boroughs should define what is a 'tall building' for specific localities, however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. Given that there is no local definition, the proposed building is therefore a tall building by definition.

7.2.13. Paragraph 7.13 of the LLP1 recognises that tall may be acceptable in a limited number of suitable locations where the Council considers that they will not seriously harm the surrounding area and its heritage assets, with parts of Uxbridge and Hayes being appropriate. This was successfully demonstrated on the adjoining site and, given that the proposal is for a building of the same height, it follows that the same conclusion can be reached here.

7.2.14. As outlined in the TVIA (which is summarised below), it is considered that the expansion of the data centre at Union Park would be a marginal increase in the extent and scale of built form as a consequence of the

proposals, but this would not impact to any significant degree on the character and appearance of the more sensitive landscape receptors, in particular the Grand Union Canal. The reason for this being that the Site comprises previously developed land within an area historically associated with industrial and commercial development. The character and appearance of the area has changed in recent years with a gradual transition from more traditional industries to modern business and science parks and residential apartments. As expected in a SIL, the development is therefore in keeping with the traditional large scale of these existing elements and so will have a familiar visual relationship with its surroundings.

7.3. Visual and Townscape Impact

7.3.1. A Landscape, Townscape, Visual Impact Assessment (ref. MWL-0474-SEW-XX-REP-L-100006) ('LTVIA') has been prepared by Murdoch Wickham. The TVIA sets out the landscape and townscape policy context, describes the townscape and landscape character of the existing site and surrounding area, assesses the visual amenity of the surrounding area from agreed representative viewpoints towards the Site from the surrounding area, describes the proposed development and associated mitigation measures, and assesses the anticipated impacts and effects of the proposed development on townscape and landscape character and visual amenity.

7.3.2. The LVIA has inherently informed and driven the design approach. Between the October 2023 and November 2024 meeting the massing of the proposed building was significantly altered with the building moved northwards by 6m, the massing of EC4 simplified, and AB5 articulated. Further design development since then has sought to simplify the massing of EC4 and develop the façade treatment and approach to materiality.

7.3.3. As previously discussed, the whole of the Site comprises previously developed land within an area historically associated with industrial and commercial development now used as a construction hub for the wider construction project. The character and appearance of the area has changed in recent years as a result of the introduction of residential typologies at the Hayes Village site and more modern employment buildings as Ark's Union Park campus has been delivered as already permitted. UP4 would be of a similar scale and appearance to the previously consented data blocks, forming an extension to the Union Park campus. It would not, therefore, markedly alter the character and appearance of the canal corridor in this location. Policy from the London Plan relating to SILs supports the intensification of use on such land and therefore anticipates change.

7.3.4. The proposed building would be perceived in near views from the canal corridor and vantage points on the surrounding road network, such as the elevated sections of the parkway and in longer distance views from Minet Country Park. In all cases it would be perceived in the context of the existing data centre buildings and other neighbouring residential and business developments. The proposed building would not impact on local townscape and landscape pattern and would not impact on the setting to listed buildings in the surrounding area.

7.3.5. Overall the Site itself, as previously developed land with no associated landscape infrastructure, is assessed as of low sensitivity to the proposed change of use, in particular bearing in mind the approved

data storage development on the neighbouring land. There would be a marginal increase in the extent and scale of built form as a consequence of the proposals, but this would not impact to any significant degree on the character and appearance of the more sensitive landscape receptors, in particular the Grand Union Canal. The assessment concludes, however, that as planting matures it is anticipated the anticipated effects would reduce to negligible or a minor adverse effect.

7.3.6. The proposals are therefore considered to be compliant with Policies E5, HC1, G1, G5, G6, and SI17 of the London Plan, and Policies EM3, EM7, HE1, and EM2 of LPP1, and Policies DMHB4, DMHB14, DMEI7, and DMEI8 of LPP2.

7.4. Daylight and Sunlight

7.4.1. This Application is accompanied by a Daylight and Sunlight report (ref. 6803-250218-JP), prepared by eb7, which assess the potential impacts of the proposed development on the level of daylight and sunlight that the nearest residents at the Hayes Village development on the southern side of the Grand Union Canal enjoy .

7.4.2. The results of the daylight and sunlight assessments have shown that all of the habitable rooms within the Hayes Village complex will retain very good levels of daylight and sunlight with the development in place, and continue to meet the BRE guidelines.

7.4.3. The proposals are therefore in line with Policy DMHB 11 of the LPP2, which states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space, and paragraph 130 of the NPPF.

7.5. Impact on Heritage Assets

7.5.1. A Heritage Assessment has been prepared by Savills in support of the application to assess the impact of the proposals on the identified heritage assets. It is produced within the context and requirements of relevant national and local planning policy and guidance, including the NPPF and Historic England guidance on significance and setting.

7.5.2. The application Site does not include any listed buildings or conservation areas and only forms a part of the wider industrial setting of the identified assets. Therefore no additional consent is required as the scheme will not physically impact upon the identified listed buildings or conservation areas and potential change to the setting of heritage assets is dealt with under the planning process. This also means that there is no conflict with Paragraphs 212 - 222 because the proposals will cause no harm to the heritage significance of any designated heritage asset.

7.5.3. The Heritage Assessment confirms that the existing Site is not considered to meaningfully contribute to the setting of these heritage assets, and the proposed development is designed to be in keeping with the existing wider setting of these assets, representing the latest phase in a series of contextual and sensitively designed industrial developments here. The proposed landscaping within the Site is also

considered to preserve and enhance the canal's existing character, celebrating this as a key feature of the area's industrial heritage. Overall the proposed development will therefore result in no harm to any of the identified heritage assets, by way of a change in their setting.

7.5.4. This confirms that the proposed development complies with Policy HC1 of the London Plan. At a local level, the proposals do not conflict with LPP1 Policy HE1 and LLP2 Policies DMHB 1 and DMHB 4. This is because there is no harm on any designated heritage assets as part of the proposals and no adverse change to their setting, with the significance of the two groups of assets being sustained.

7.5.5. It is material the proposals are considered to enhance the wider industrial area by way of high quality design and recognised public benefits, as well as extensive landscaping, as explained previously.

7.6. Sustainability and Energy Use

7.6.1. Section 4 of this Statement summarises various sustainable design principles and the numerous ways Ark has endeavoured to utilise cutting-edge technologies and design. Detailed explanations are provided in the accompanying Sustainability Statement, Energy Statement, Circular Economy Statement, and Whole Life Carbon Assessment. These documents highlight the inherent sustainability of the site, given its brownfield status and accessibility by multiple modes of transport.

7.6.2. The design process has sought to deliver new buildings which avoid increased vulnerability to the impacts arising from climate change (for example through adaption measure and green infrastructure) and can help reduce greenhouse gas emissions.

7.6.3. A number of low carbon technologies have been utilised in the proposed development in the form of heat pumps, electric vehicle charging bays, and photovoltaic panels (PVs). Wherever possible, the technologies employed seek to reduce carbon emissions and atmospheric pollution. An Energy Statement is submitted with this planning application which confirms how the proposed development aspires to deliver a minimum on-site carbon dioxide emission reduction of over 35% beyond the baseline Part L Vol2 2021 building. The strategy has been prepared in accordance with the GLA's 'Be Lean, Be Clean, Be Green' hierarchy.

7.6.4. The proposals are therefore considered to be compliant with Policy SI2 of the London Plan, which requires the reduction of greenhouse gas in operation and minimising both annual and peak energy demand. The proposals also comply with LPP1 Policy EM1 and LLP2 Policy DMEI 2.

7.7. Infrastructure and Utilities

7.7.1. London Plan Policy D2 requires that consideration must be given to how infrastructure requirements and the capacity of existing infrastructure can be balanced and proportionate to the scale of the development. These matters are considered in the Utility Statement (ref. HDR-0474-ZZ-XX-RP-C000005) and Infrastructure Statement Report (ref. HDR-0474-ZZ-XX-RP-C-000006) submitted as part of this application.

7.7.2. The Utilities Statement confirms that the site can be connected to all services that a data centre is required to and that there is capacity for the scale of development that is proposed.

7.7.3. The Infrastructure Statement Report (ref. HDR-0474-ZZ-XX-RP-C000006) provides information on power demand and procurement power delivery and distribution, and the impact on the surrounding area. The document confirms that Ark has already paid for and secured the amount of power required for the operation of the data centre. The power was originally secured around the time that Ark progressed the application for Original Planning Permission with this proposal seeking to make the most efficient use of the remainder.

7.8. Transport and Parking

7.8.1. A Transport Assessment ('TA'), prepared by HDR, has been submitted as part of this application.

7.8.2. Following an appraisal of the existing active travel and public transport network, the Transport Assessment concludes that the site is a sustainable location for the type of development that is proposed. This is reflected by its PTAL rating of 3 and ability to connect onto the wider active travel network via the towpath on the Grand Union Canal and the access ramp that Ark has installed. Improvements to North Hyde Gardens, financial contributions for transportation improvements, and the funding of the re-surfacing of the towpath all further boost the site's sustainability. This is an expected conclusion given that the proposal is for the same use as previously permitted on land adjacent to the application site.

7.8.3. A Healthy Streets assessment has been undertaken for North Hyde Gardens against the 10 Indicators and there is a net improvement as a result of the proposed development. The development is therefore compliant against London Plan Policy T2.

7.8.4. The Transport Assessment includes analysis of the trips anticipated to be generated by the proposed development and compares this against the number of vehicle movements associated with the former Addison Lee operations. The traffic impact will be reduced for the proposed use and a net decrease in trip generation against the development. As such the development will not have significant impact on the transport network, and is therefore compliant with Paragraph 115(d) of the NPPF.

7.8.5. The proposed amount of car parking spaces to align with BREEAM recommendations for the targeted 'Excellent' rating of the UP4 is 14 number spaces. 20% of these spaces will be provided with active electric vehicle charging points and 20% passive provision for electric vehicles in the future. Furthermore, based upon consultation with LBH, two of the car parking spaces will be for blue badge holders and additional spaces for motorcycles, mopeds and scooters will be provided at the rate of 5% of car parking spaces. In accordance with the London Plan parking for B2/B8 land uses which state a maximum of 1

space per 500 m^2 of gross internal floorspace (GIA) for sites within Outer London. In accordance with the proposed development this equates up to 12 car parking spaces based upon 5855 m^2.

7.8.6. A total of eight cycle spaces will be provided for the development and located close to the pedestrian access to the data centre building. The London Local Plan sets out the minimum cycle parking standards for new B2-B8 developments as 1 space per 500 m^2 for long stay, and thereafter; 1 space per 1000 m^2 for short stay. With reference to the proposed development based upon a total GIA of office space the number of long stay parking would equate to 3 number long stay spaces.

7.8.7. Based on the office occupation and following the BREEAM guidelines for transport credits to achieve "Excellent" rating, a minimum of four cycle parking spaces will be required within the secure compound and near the pedestrian access. The number of cycle parking will be monitored through the Travel Plan and should occupationally demand increase then additional spaces may be required, and these should be provided in the future.

7.8.8. These improvements are considered to comply with London Plan Policies T1, T2, T3, T4, T5, T6, T7, T9, Policies DMT1, DMT2, DMT5 and DMT6 of LPP2, and Paragraphs 115 – 118 of the NPPF.

7.9. Air Quality Impacts

7.9.1. The proposed development is considered to be EIA development and, following engagement with LBH, air quality is a matter that is to be scoped within the Environmental Statement. Pre-application dialogue has taken place with LBH around the scope for the air quality Environmental Statement.

7.9.2. In terms of baseline, the main pollution sources are from vehicle emissions travelling on the local road network, primarily the A312, as well as Heathrow Airport. Whilst, LBH has declared one Air Quality Management Area (AQMA) that covers the southern two thirds of the Borough, data from the UK-AIR and the London Atmospheric Emissions Inventory suggests that background concentrations in the vicinity of the Site are generally below the key air quality standards.

7.9.3. This AQMA was declared in 2003 due to exceedances of the UK Air Quality Standard (AQS) for annual mean concentrations of nitrogen dioxide (NO2).

7.9.4. An Air Quality Assessment has been prepared by Phlorum (ref. 13528A(AQ)V2) to consider the effects of air quality during the construction phase and when operational, on the existing baseline environment.

7.9.5. Although the proposed development is located in an Air Quality Management Area and within an Air Quality Focus Area, local monitoring and background concentration mapping suggest that exceedances of UK air quality objectives at, and in the vicinity of, the Site are unlikely.

Construction Phase

7.9.6. The construction phase of the proposed development will involve activities that could potentially produce polluting emissions to air. Predominantly, these will be emissions of dust. However, they could also include releases of odours and/or more harmful gases and particles.

7.9.7. Various mitigation measures are to be implemented during construction which are set out in the AQA and the Construction Management Plan. As best practical means will be employed to control air quality emissions during construction and bearing in mind that these works will be for a limited time period, it is considered that they would be unlikely to have a significant impact on nearby sensitive receptors.

Operational Phase

7.9.8. Once the development is operational, the key sources of air emissions associated with this application are the 14 No. 3.2MWe Rolls Royce MTU DS4000 20V4000 G94LF standby diesel generators, which are required to meet the electrical demand for the data centre in the event of an emergency power outage. It is understood that these generators can operate using Hydrotreated Vegetable Oil (HVO), which gives rise to reduced emissions relative to the typical use of diesel. Given the reliability of the grid, extended operation is not anticipated and is considered to be a 1 in 10 year event, at a minimum.

7.9.9. A dispersion modelling assessment of the 14 No. standby generators will be undertaken. Concentrations of NO2/ NOX, PM10 and PM2.5 will be predicted at selected human receptors using a detailed dispersion model and compared with relevant long and short-term air quality standards. Cumulative impacts of these generators, alongside the 40 No. standby generators which will also operate on the wider Union Park facility, will be considered, as appropriate.

7.9.10. On the basis of the above, it is considered that the proposed development complies with relevant planning policy relating to air quality, including Paragraphs 198 and 199 of the NPPF, Policy SI1 and Policy SI2 of the London Plan, Policy EM8 of LPP1 and Policy DMEI 14 of LPP2.

7.9.11. Air Quality has been considered in Chapter 6 of the accompanying Environmental Statement. The assessment followed relevant methodologies prescribed for the assessment of air quality. The air quality consultants established the base levels of existing and future air quality and set the parameters against which any significant effects were assessed.

7.9.12. Without mitigation, construction dust posed a Medium Risk of dust soiling, Low Risk to PM10 health, and Negligible Risk to ecological sites. Mitigation measures will reduce dust effects to Negligible.

7.9.13. The operational phase will cause negligible increases in NO2, PM10, and PM2.5. Hourly NO2 impacts are also negligible, with no significant breaches of air quality standards.

7.9.14. The cumulative effects are considered insignificant.

7.9.15. With mitigation, there will be no significant residual air quality effects during construction and operation.

7.10. Trees

7.10.1. The Arboricultural Implications Report (ref. SJA air 23258-01) surveyed 30 individual trees and five groups of trees growing within or immediately adjacent to the Site. A total of seven of these trees are to be removed as part of the development with all having been assessed as category 'C': these are either of low quality, low value, or short-term potential. For this reasons, their removal will have no significant impact on the character or appearance of the area.

7.10.2. The proposals incorporate considerable new and replacement tree planting. This will result in a net increase of trees across the Site which will mitigate the proposed removals, improve the age class balance of the on-site trees, enhance the local landscape, and re-establish a framework for the ongoing and long-term character of the Site.

7.10.3. In the light of these considerations, and taking account of the numbers, sizes and locations of the trees to be retained, including those that are off-site, the felling of the trees and group identified for removal will represent no alteration to the main arboricultural features of the Site, and the proposals are therefore compliant with Policy G7 of the London Plan, Policy DMHB 14 of LPP2 and Paragraph 136 of the NPPF.

7.11. Landscaping

7.11.1. The landscape design has been an iterative process, evolving alongside the layout and proposed buildings and consultation with the LBH.

7.11.2. The existing woodland on the western side of the Site has been preserved with appropriate management and additional scrub planting, while the boundary vegetation remains intact to maintain the Site's perimeter structure. To the east of the woodland, a turning area for heavy vehicles has been incorporated using species-rich reinforced grass. This space is framed by a gravel recreational path, scattered tree planting, and timber benches, creating a relaxing area for staff.

7.11.3. A series of further landscaped spaces have been incorporated into the scheme along the southern side of the Site, including a stylised, south-facing 'Prairie' garden designed with an ecological focus to provide seasonal interest and vibrant colour, featuring a variety of pollinator-friendly plants to boost biodiversity. Additionally a Wellbeing Garden has been created for staff, offering a peaceful retreat for staff breaks. The garden features picnic tables, vibrant planting, and an ecological pond. Planting is strategically positioned to provide a natural screen from the nearby buildings and car parking to the north, with trees and hedges lining the northern and eastern boundaries. Seating areas and pathways are orientated to provide tranquil seating areas overlooking the pond.

7.11.4. The Urban Greening Factor (UGF) calculations follows the Mayor of London, London Plan Guidance for Urban Greening Factor 2023. The landscape design has maximised the areas for landscaping and ecological enhancements achieving a UGF of 0.39. The key features which have contributed to the UGF includes biodiverse brown roofs, wildflower grassland, native scrub planting, retained trees and proposed tree planting.

7.11.5. The proposed development is therefore considered to be compliant with Policy G1 and G5 of the London Plan, Policy EM1 and EM7 of LPP1, Policy DMHB 14, DMEI 1, DMEI 7, Paragraph 135, 187, 193 of the NPPF.

7.12. Ecology

7.12.1. An Ecology Assessment, prepared by Ecology Solutions (February 2025), accompanies this application and, as well as establishing the ecological baselines, assesses the likely impacts of the development.

7.12.2. In terms of the ecological baseline, the Ecology Assessment confirms that the site is not subject to any statutory or non-statutory ecological designations with the nearest statutory site being the Yeading Meadows LNR, located approximately 2.5km north of the Site and the nearest non-statutory site being the London Canals Site of Importance for Nature Conservation (SINC) located immediately adjacent to the Site's southern boundary and comprising of the woodland between the security fence and towpath. Overall, the Site is of low ecological value, comprising in the main of buildings and hardstanding. Of greatest importance is the woodland located in the northwest of the Site, extending southwards to the Grand Union Canal.

7.12.3. With regards to designated sites, the Assessment concludes that development of the site will have no adverse direct or indirect impact as a result of its distance (in the case of the Yeading Meadows LNR) or as a result of the landscaping proposed on site and the mitigation measures that the Assessment recommends are controlled via planning condition (in the case of the London Canals SINC).

7.12.4. The on-site and off-site woodland will be retained as part of the development and mitigation measures put in place during construction, to avoid adverse impact occurring to these adjacent habitats. Aside from the woodland, all habitats will be lost from the Site but given their overall limited ecological value and small area, this is not considered to be any real detriment to local wildlife.

7.12.5. Instead, the landscape strategy will diversify the habitats present on-site and include flower-rich and amenity grassland, pond, tree planting, hedgerow planting and brown roofs. This means that, the proposals will result in a net gain of +83.92% from pre-development to post development. Additionally, a net gain of 0.24 hedgerow units is to occur.

7.12.6. The proposals therefore comply with London Plan Policies G6, LPP1 Policy EM3 and Policy EM7 and LPP2 Policy DMEI 7,and paragraphs 187, 192 and 193 of the NPPF.

7.13. Lighting

7.13.1. The proposed external lighting strategy has been designed to achieve a balance between safety, functionality, and the environmental constraints.

7.13.2. The canal foraging corridor will be unaffected by light spillage from the Site. Light spill along the boundary with the canal is limited to less than 5 lux. This limited light spill will not reach the canal foraging corridor due to the vegetation between the Site boundary and canal towpath acting as a natural barrier. This is confirmed in the Ecological Assessment and the lighting strategy has evolved to be informed by the site's ecological constraints.

7.13.3. Pre-application engagement has taken place with Network Rail with the level of lightspill from the development onto the railway liens reviewed and confirmed as acceptable.

7.13.4. The proposals are therefore considered to be compliant with the ecology policies, as set out below, and Policy DMHB 10 of LPP2.

7.14. Noise

7.14.1. The Plant Noise Assessment Report (ref. R/NS/1/241125) submitted with the application considers the impact of the development on the nearest noise sensitive properties which are located at the north-eastern corner of the Hayes Village development.

7.14.2. The main generator of noise on the Site will be associated with plant equipment required for the operation of the data centre. This is to operate continuously without pause. The assessment found that the noise experienced at these residential receptors from the operational plant will be 5dB below the background noise level during both day and night time. This factors in the noise associated with the operational plant for the permitted data centre campus whilst using the background noise levels from before construction of the data centre campus commenced (to exclude construction noise).

7.14.3. For the rare, short-term operation of emergency plant (such as standby power generators) during an emergency and testing, noise emissions will not exceed a 'significant adverse impact' when assessed in accordance with BS 4142: 2014. This approach has been agreed previously with London Borough of Hillingdon for Blocks 1-3.

7.14.4. The development proposals are therefore considered to comply with London Plan Policy D14, LPP1 Policy EM8, and Paragraph 187 of the NPPF.

7.15. Flood Risk and Drainage

7.15.1. A Flood Risk Assessment and Drainage Strategy (ref. HDR-0474-XX-XX-REP-C-00002) has been submitted as part of this application, and concludes that the site has low risk of flooding from fluvial, pluvial, artificial watercourses, canals, groundwater, public sewers, or public sewers

7.15.2. Additionally, multiple SuDS techniques are proposed to be incorporated as part of the proposed surface water drainage strategy which include brown roofs, swales, filtration trenches, porous surfacing as well as the required pollution prevention measures.

7.15.3. The proposed development is therefore considered to accord with London Plan Policies SI7, SI12, and SI13, LPP2 Policy DMEI 9 and paragraphs 164, 166, and 170 – 182 of the NPPF. Additionally, the proposals incorporate, as far as possible, sustainable drainage systems, as per the expectations of LPP1 Policy EM6 and LPP2 Policy DMEI 10.

7.16. Ground Conditions

7.16.1. The supporting documentation which has been submitted as part of this planning application shows that the Site is suitable for its proposed use, taking into account ground conditions and any risks arising from land instability and conditions.

7.16.2. This is to be expected given that the application site is directly adjacent to a site where the same use has previously been permitted and where construction is at an advanced stage.

7.16.3. Conditions attached to both the Original Planning Permission and the Slot-In Planning Permission require the submission and approval of a site investigation and remediation strategy prior to the commencement of development and a remediation strategy prior to occupation. It follows, and Ark would accept, similar planning conditions for this application.

7.16.4. The proposals are therefore complaint with Policy DMEI 12 of LPP2 and Paragraph 196 of the NPPF.

8. Conclusion

8.1.1. Ark has already secured planning permission for a data centre campus on the majority of the former Bulls Bridge Industrial Estate. That development is under construction and the socio-economic benefits associated with both its construction and the first phase of its occupation are being realised.

8.1.2. This application proposes an extension to the permitted and under construction scheme on adjacent land. The application site forms part of a SIL but, whilst currently being used to support the ongoing construction efforts on the adjacent site, has no future long term use once construction ends.

8.1.3. Ark's proposal therefore seeks its redevelopment to deliver a fourth data centre block (UP4), fourth energy centre (EC4), and associated ancillary space (AB5), as well as associated landscaping, access arrangements, and security infrastructure.

8.1.4. From a planning policy perspective, the proposals deliver an intensification of industrial uses on a site within a SIL whilst the economic benefits of the proposed data centre use both during construction and operation stage are well understood by LBH.

8.1.5. The proposed development has evolved both drawing upon lessons learnt from the already permitted and under construction data centre campus, and follow extensive pre-application engagement with LBH as well as consideration of a Design Review Panel and consultation with the local community.

8.1.6. The application is accompanied by a package of supporting technical documentation with the matters that these should cover agreed with LBH through pre-application discussions. These documentation demonstrate the technical and environmental acceptability and performance of the proposed scheme.